5. Comments and Responses

This chapter includes a reproduction of, and responses to, each comment letter received during the public review period on the February 2016 Draft EIR and Supplement to the Draft EIR. Comments are presented in their original format in Appendix J, along with annotations that identify each individual comment number.

Responses to individual comments are provided in this chapter alongside the text of each corresponding comment. Letters follow the same order as listed in Section 5.1 of this Final EIR and are categorized by:

- Governmental Agencies
- Non-Governmental Organizations and Private Companies
- Members of the Public
- Oral Comments

Letters are arranged by document and then by category and date received. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to the February 2016 Draft EIR or Supplement to the Draft EIR, these revisions are shown in Chapter 4 of this Final EIR. Responses to individual comments are presented in Table 5-4.

5.1 MASTER RESPONSES

The California Environmental Quality Act (CEQA) requires a Final EIR to provide written responses to comments received on the environmental analysis in the Draft EIR during the public review period. The City received several such letters from agencies and the general public, as noted above. However, some of the public comments related to the merits of the proposed Comp Plan Update, as opposed to comments on the environmental analysis contained in the Draft EIR. CEQA does not require the Final EIR to respond to comments on the merits of the proposed project and the City has prepared Master Response 1 to explain how these non-CEQA comments will be considered.

Several comments requested that the analysis in the EIR include recent development projects and planning efforts in nearby jurisdictions that have been proposed or approved since the Notice of Preparation (NOP) for the Comprehensive Plan EIR was issued. Master Response 2 describes these projects and addresses these comments.

The City received several letters regarding the analysis of impacts to schools in the February 2016 Draft EIR and Supplement to the Draft EIR. Master Response 3 addresses the issues raised in these comments.

5.1.1 MASTER RESPONSE 1: COMMENTS RELATED TO THE MERITS OF THE PROPOSED PROJECT

During the review period for the February 2016 Draft EIR and Supplement to the Draft EIR, members of the public submitted several comments that related to the details of the proposed Comp Plan Update, conveyed the commenter's opinion on the proposed Comp Plan and/or the Comp Plan scenarios, or addressed the relative consequences or benefits of the proposed Comp Plan and/or the Comp Plan scenarios (referred to here as "merits of the proposed Plan"), rather than the adequacy of the EIR or the environmental issues, impacts, and mitigation measures addressed in the EIR. For example, the City received a number of comments from concerned citizens for or against specific scenarios; however, these comments did not cite specific issues with the analysis of the scenarios contained in the February 2016 Draft EIR or the Supplement to the Draft EIR. Similarly, many commenters addressed traffic conditions in the city and housing issues, but did not comment on the EIR's analysis of traffic or housing impacts.

It is important for the City in its decision-making process to consider both the adequacy of the EIR and the merits of the proposed project. However, the City as Lead Agency is only required by CEQA to respond in its Final EIR to comments on pertinent environmental issues related to the adequacy of the EIR.

Section 15204 of the CEQA Guidelines provides direction for parties reviewing and providing comment on a Draft EIR, as follows:

> In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

Section 15204 continues in relation to the role of the Lead Agency in responding to comments on the Draft EIR:

> When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Where comments in Table 5-4 refer to the merits of the project, the response indicates that the comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR and cross references this Master Response. The comments are nonetheless available for decision makers to consider during their deliberations on the Comprehensive Plan Update.

In addition to the comment letters included in Table 5-4, the City received several letters that pertain only to the merits of the proposed project or the merits of the Comp Plan scenarios evaluated in the EIR. Comment letters that only address the merits of the project or the scenarios were not included in this Final EIR but are included in the administrative record, and are available for review at City Hall during normal

business hours. These letters are listed in Chapter 5 of this Final EIR and are included in Appendix J. The majority of these comments on the merits of the proposed plan pertain to the scenarios considered in the EIR. The City notes that in some cases, the preferred scenario reflects suggestions contained in the public comments on the merits that the City received.

Although comments related to the merits of the proposed project do not require responses in the Final EIR, they do provide important input to the decision-making process. All letters received during the public comment period will be forwarded to decision makers.

5.1.2 MASTER RESPONSE 2: RECENT CUMULATIVE DEVELOPMENT PROJECTS

Several comments requested that the EIR be revised to take into account recent development projects and planning efforts in nearby jurisdictions that have been proposed or approved since the NOP for the Comprehensive Plan EIR was issued.

Section 15125(a) of the State CEQA Guidelines provides guidance on how to determine what to include the environmental setting of an EIR:

> "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published… from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

This section of the statute reflects the fact that, because conditions on the ground are constantly in flux, it would be impossible to complete the required CEQA analysis if the analysis had to re-start each time existing conditions inside or outside the community change.

Chapters 4.1 through 4.14 of the February 2016 Draft EIR and Supplement to the Draft EIR provide a detailed explanation of the Environmental Setting against which environmental impacts are evaluated by first explaining the "Regulatory Setting," which explains a general summary of the primary federal, State, regional, and local regulations for the study area, and then explaining the "Existing Conditions," which are the conditions on the ground at the time of the release of the NOP on May 30, 2014.

Chapter 4, Environmental Analysis, of the February 2016 Draft EIR also describes the cumulative setting used for the evaluation of cumulative impacts of each environmental topic area in the Plan's horizon year of 2030. The context within which environmental impacts are measured varies by environmental topic. For example, air quality impacts are considered in a regional context and greenhouse gas (GHG) emissions are considered in a global context. As described on page 4-3 of the February 2016 Draft EIR, the EIR uses a projections-based approach for its analysis of future conditions and uses the forecasts in the Association of

Bay Area Governments' *Projections 2013* to evaluate the proposed Plan's impacts when considered in the context of future development in surrounding jurisdictions in the year 2030.

This master response provides information about some of the larger projects that have been proposed or approved in surrounding communities since the NOP was issued in May 2014:

- Stanford University:
  - Escondido Village: an additional 1,450 beds beyond existing 2000 General Use Permit (GUP). Amendment to the GUP authorized by Santa Clara County in May 2016.[1]
  - 2018 General Use Permit update, initiated in late 2016. Would include: 3,150 net new housing units and 2.275 million net new square feet of academic and academic support space.[2]
- City of Menlo Park:
  - Housing Element Update, adopted April 2015 (655 housing units).[3]
  - Connect Menlo General Plan and M-2 Zoning Area Update, adopted November 2016 (4,500 housing units, 5,500 jobs and 2.3 million square feet of non-residential development)[4], which includes the upcoming Facebook Willow Campus project.
  - Facebook Campus Expansion project, approved November 2016 (6,550 jobs in approximately 127,000 feet of non-residential development).[5]
  - Greenheart project at 777 Hamilton Avenue (195 housing units).[6]
  - Greenheart project at 1300 El Camino Real (183 housing units and 220,000 square feet of non-residential development).[7]
- City of Mountain View:
  - Housing Element Update, adopted October 2014 (1,315 housing units).[8]

[1] The County of Santa Clara reviewed prior CEQA documents and determined that the Escondido Village project would not result in new significant impacts. Traffic analysis completed for the project evaluated the reallocation of housing units and construction of additional housing units beyond the amount authorized by the 2000 GUP. The analysis found that the Escondido Village project would reduce vehicle trips to and from the campus in the peak hour/peak direction. However, the project would increase trips leaving campus in the morning peak hour. The analysis of the project's effects on the two external intersections that would be most affected by the project found that the project would not result in significant level of service impacts. More information on the Escondido Village analysis conducted by the County is available at the following address: https://www.sccgov.org/sites/dpd/DocsForms/Documents/7165_EVGradResid_04_CEQA_Checklist.pdf.

[2] The 2018 General Use Permit Update EIR is currently in development. Project updates are available at the following address: https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/GUP2018_CEQA.aspx.

[3] The City of Menlo Park Housing Element Update Initial Study/Negative Declaration is available online at the following address: https://www.menlopark.org/584/Environmental-Review.

[4] The ConnectMenlo EIR is available online at the following address: https://www.menlopark.org/1013/Environmental-Impact-Report.

[5] The Facebook Campus Expansion project EIR is available online at the following address: https://www.menlopark.org/1012/Environmental-Impact-Report.

[6] The Greenheart project at 777 Hamilton Avenue required no discretionary approvals and is currently leasing.

[7] The Greenheart project at 1300 El Camino Real EIR is available online at the following address: https://www.menlopark.org/833/CEQA.

[8] The General Plan EIR Addendum prepared for the City of Mountain View Housing Element Update is available online at the following address: http://mountainview.legistar.com/gateway.aspx?M=F&ID=53264c99-98a4-4eed-b174-2b246f126d70.pdf.

- Prometheus project, approved September 2016 (583 housing units and 11,171 square feet of non-residential development).[9]
- San Antonio Phase II/Merlone Geier Partners project, approved December 2014 (2,457 jobs in approximately 1 million square feet of non-residential development)[10]
- El Camino Real Precise Plan, adopted November 2014 (788 housing units).[11]
- North Bayshore Precise Plan, approved December 2014 (13,346 jobs and 3.4 million square feet of non-residential development).[12]
- San Antonio Precise Plan, approved December 2014 (1,770 housing units, 6,260 jobs, and 800,000 square feet of non-residential development).[13]

- City of Sunnyvale:
  - Housing Element Update, adopted December 2014 (5,452 housing units).[14]
  - Lawrence Station Area Plan, adopted December 2016 (2,323 housing units, 3,459 jobs in approximately 1.2 million square feet of non-residential development).[15]
- City of Redwood City:
  - Housing Element Update, adopted October 2014 (2,789 housing units).[16]
- City of East Palo Alto:
  - Housing Element Update, adopted May 2015 (467 housing units).[17]
  - VISTA 2035 General Plan Update, adopted October 2016 (2,519 housing units and 2.5 million square feet of non-residential development).[18]

Together, these projects and plans represent a buildout of approximately 25,200 housing units, 38,300 jobs, and approximately 11.7 million square feet of non-residential development in communities near Palo Alto. This list does not include relatively small and mid-sized development projects (e.g., projects under 100 housing units or under 100,000 non-residential square feet), and would be in addition to any background

[9] The Initial Study prepared for the Prometheus development project at 400 San Antonio Road is available online at the following address: http://mountainview.legistar.com/gateway.aspx?M=F&ID=1f8f4ed8-c2ad-4421-bdd6-68dadfadf49b.pdf.

[10] The San Antonio Phase II project Draft EIR is available online at the following address: http://www.losaltosca.gov/sites/default/files/fileattachments/Community%20Development/page/3777/san_antonio_phase_ii_draft_eir_march_2014.pdf.

[11] The El Camino Real Precise Plan is available online at the following address: http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15251.

[12] The North Bayshore Precise Plan Draft EIR is available online at the following address: http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=13791

[13] The San Antonio Precise Plan is available online at the following address: http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15178

[14] The City of Sunnyvale Housing Element Update Negative Declaration is available online at the following address: https://sunnyvaleca.legistar.com/View.ashx?M=F&ID=3414605&GUID=39179A65-7EE5-4F03-8D8B-A7B4768843BD.

[15] The Lawrence Station Area Plan EIR is available online at the following address: http://sunnyvale.ca.gov/Departments/CommunityDevelopment/CurrentProjectsandStudies/LawrenceStationAreaPlan.aspx.

[16] The City of Redwood City Housing Element Update is available online at the following address: http://www.redwoodcity.org/home/showdocument?id=4084.

[17] The City of East Palo Alto Housing Element Update is available online at the following address: http://www.ci.east-palo-alto.ca.us/DocumentCenter/View/437.

[18] The VISTA 2035 Draft EIR is available online at the following address: http://www.cityofepa.org/DocumentCenter/View/2633.

growth occurring elsewhere in these jurisdictions or in the region. The environmental impacts associated with each of these projects and plans have been or are being assessed by the applicable lead agencies and information about these environmental analyses is available online at the addresses provided in each project's respective footnote.

Table 5-1 shows the amount of development assumed in various jurisdictions for the quantitative analyses of transportation, air quality, greenhouse gas emissions, and noise impacts on the February 2016 Draft EIR and Supplement to the Draft EIR. The cumulative growth anticipated by 2030, as expressed by the total number of housing units and jobs included in the analysis, is higher than the total of the individual major projects listed above, although there may be some differences in the geographic location of future development. It should also be noted that many of the plans and some of the projects noted above are not expected to build out until after 2030, and thus only a portion of the planned or approved development would reasonably appear in the City's forecast and analysis of cumulative impacts in 2030.

TABLE 5-1 CUMULATIVE DEVELOPMENT IN SURROUNDING JURISDICTIONS PER PALO ALTO TRAVEL DEMAND FORECASTING MODEL (2014-2030)

	Housing Units		Jobs		Net Change	
Jurisdiction[a]	2014	2030	2014	2030	Housing Units	Jobs
East Palo Alto	7,477	8,310	6,173	7,270	833	1,097
Sunnyvale	56,576	66,349	81,237	97,470	9,773	16,233
Mountain View	30,417	35,061	53,063	68,373	4,644	15,310
Redwood City	28,510	34,175	60,596	72,430	5,665	11,834
Menlo Park	13,529	14,775	27,451	32,544	1,246	5,093
Stanford[b]	4,130	5,136	5,300	5,760	1,006	460
Total	**136,509**	**158,671**	**228,520**	**278,086**	**22,162**	**49,566**

a. Sum of land uses in TAZ's within City boundaries. Since TAZ boundaries do not necessarily follow City limits, these numbers are approximate.
b. Data from land use files provided by PlaceWorks: Sum of TAZ's outside of City jurisdiction but within SOI.

As noted above, the environmental setting is constantly changing, and our understanding of plans and projects that will affect conditions in the year 2030 is also changing. It would be impossible for the EIR to provide an updated quantified cumulative development setting throughout the entire preparation period of this EIR. For this reason, jurisdictions in the Bay Area typically inform their understanding of cumulative conditions in the future by referring to regional projections published by the Association of Bay Area Governments (ABAG). When the February 2016 Draft EIR was published, the available projections were in ABAG's *Projections 2013*. ABAG released new projections as part of its preparation of *Plan Bay Area 2040*. As

shown in Table 5-2, the new projections differ from the old projections in the amount of growth anticipated in Santa Clara County, San Mateo County, and the region.

TABLE 5-2 REGIONAL PROJECTIONS FOR THE YEAR 2040

	ABAG Projections 2013		Plan Bay Area 2017	
Jurisdiction[a]	Households	Jobs	Households	Jobs
San Mateo County	315,100	445,070	318,000	472,100
Santa Clara County	818,400	1,229,520	860,900	1,289,900
Bay Area as a Whole	3,308,090	4,505,230	3,426,700	4,698,400

Note: The horizon year of the proposed Plan is 2030, and this EIR uses 2030 projections for its analysis of future conditions. In order to provide a comparison between 2013 and 2017 projection data, this table presents projections for the year 2040, which is the year used for projections in *PlanBay Area 2040*.
Source: Association of Bay Area Governments, 2013, *Projections 2013*; Metropolitan Transportation Commission and Association of Bay Area Governments, 2017, *Plan Bay Area 2040 Land Use Modeling Report: Final Supplemental Report*.

The City has provided a good faith effort to carefully and fully describe the cumulative development context for each environmental topic area evaluated in the EIR and the February 2016 Draft EIR and Supplement to the Draft EIR. The projections used for the modeling of traffic, air quality and greenhouse gas emissions, and noise are sufficiently high to take into account the plans and projects proposed or approved since the City's EIR process started with publication of an NOP in May 2014. Further, the City has been in communication with Stanford University to ensure that the proposed Comp Plan update is accounted for in the EIR analysis of Stanford's 2018 General Use Permit application that is currently being prepared.

5.1.3 MASTER RESPONSE 3: ANALYSIS OF IMPACTS TO SCHOOLS

Several comments received on the February 2016 Draft EIR and Supplement to the Draft EIR related to the analysis of impacts to schools. This master response addresses the central concerns raised in these comments, including comments provided by PAUSD.

5.1.3.1 SUMMARY OF THE ANALYSIS IN THE FEBRUARY 2016 DRAFT EIR AND SUPPLEMENT TO THE DRAFT EIR

In preparing the impact analyses for the February 2016 Draft EIR and Supplement to the Draft EIR, the City consulted with the Palo Alto Unified School District (PAUSD) for determining existing school capacity, projected enrollment, and student generation rates. These impact analyses are briefly summarized below.

As explained on page 4.12-5 of the February 2016 Draft EIR, the PAUSD has produced both "moderate" (higher) and "conservative" (lower) enrollment projections. Moderate projections are based on student generation rates (students per housing unit) that are typical of students enrolled from existing

developments, and conservative generation rates, if different, are designed to anticipate a decrease in family size. As stated on page 4.12-11 of the February 2016 Draft EIR, the analysis in the EIR uses the moderate generation rates, in order to avoid under-representing potential impacts associated with increased enrollment.

The student generation rates provided by the PAUSD differ based on housing type (single-family detached, single-family attached, and multi-family), with single-family detached housing generating the most students. Because the proposed Plan emphasizes smaller housing units geared toward young professionals and empty-nesters, and due to the limited amount of vacant land available in the city, the EIR assumes that net new housing will be developed in the form of multi-family housing, and that single-family housing that is developed during the Plan horizon will primarily be in the form of redevelopment of existing housing, rather than a net increase in the city's single-family housing stock. Therefore, the February 2016 Draft EIR and Supplement to the Draft EIR use the PAUSD's student generation rates for multi-family housing when calculating the increased student enrollment expected from the net new housing anticipated under each scenario.

Based on this approach, the February 2016 Draft EIR calculates future enrollment under the proposed Plan scenarios using the following student generation rates (students per housing unit), which were provided by the PAUSD in 2015:

- Elementary: 0.10
- Middle: 0.04
- High: 0.04

Following the publication of the February 2016 Draft EIR, the PAUSD's demographer provided 2015 Enrollment Projections with updated generation rates that were substantially higher based on recent housing projects. The Supplement to the Draft EIR uses the updated moderate rates for multi-family housing as follows:

- Elementary: 0.23
- Middle: 0.12
- High: 0.15

Applying these rates to Scenarios 1 through 6, the Supplement to the Draft EIR assesses a range of 1,940 new students (Scenarios 1 and 2) to 3,583 new students (Scenario 6).

The increased generation rates used in the Supplement to the Draft EIR did not change the impact finding of less than significant. As described on pages 4.12-6 to 4.12-7 of the Supplement to the Draft EIR, under CEQA, impacts to schools are based on two components: the need for additional school facilities in order to maintain acceptable performance levels, and the adverse physical impacts associated with the construction of additional facilities. Regarding the need for additional school facilities, subdivision (h) of California Government Code Section 65995 declares that impacts are fully mitigated with the payment of school fees, regardless of the number of students generated. In terms of the adverse environmental effects associated

with school construction, it is unknown where or how school facilities would be expanded to accommodate future students. Therefore, it would be speculative to analyze the impacts of potential future school construction projects in this EIR. The traffic model does, however, account for an increase in school-related vehicle trips and therefore potential associated impacts, such as those related to increased air pollutant, GHG emission, and noise levels, are accounted for in this EIR. However, because it is unknown where future school facility expansions may occur, the allocation of those trips within the EIR study area may not match future plans for school improvements. There will be future opportunities to assess the environmental impacts of school expansion or construction projects. The environmental impact of specific school expansion or construction projects would be undertaken by PAUSD as the lead agency when they are proposed. In addition, the Land Use Element includes a policy that the City will assess the reasonably foreseeable environmental impacts of proposed development projects that result in new school construction or enrollment. This analysis would include the increased school-related vehicle trips of the proposed development project. Comments regarding the need for additional school facilities are addressed below following responses to comments on the school projections described above.

5.1.3.2 COMMENTS REGARDING ENROLLMENT PROJECTIONS

Some comments received questioned the use of PAUSD's multi-family generation rates, rather than the higher single-family attached and detached rates. As described above, while the City notes that future single-family development will occur in the city, it will generally be in the form of redevelopment and will not result in a net increase in the city's housing stock. The City anticipates that the net increase in housing will largely occur through multi-family housing development.

Conversely, some comments stated that birth rates are decreasing and that student enrollment should therefore be expected to decline over the horizon of the proposed Plan. These comments asserted that lower student generation rates should be used, to reflect demographic projections of smaller family sizes. The City believes that the PAUSD's own rates, which are based on recent development projects within the city, provide the best indicator of future student enrollment. While family sizes may be declining in existing housing stock, for the purposes of CEQA, the City is appropriately overstating rather than under-representing potential impacts.

In its comment letter on the Supplement to the Draft EIR (Letter #SUPP-GOV4), the PAUSD observes that its projections are based on past projects and are therefore not precise predictors of future student enrollment. In addition, the multi-family generation rates in particular are based on a small number of development projects that generated a wide range in students. For these reasons, the PAUSD recommends calculating a range of student generation numbers. To provide a range of anticipated enrollment under the preferred scenario, Table 5-3 below applies the PAUSD's moderate 2015 rates for the low and high end of the housing range for the preferred scenario using the PAUSD's lowest (i.e., multi-family) and highest (i.e., single-family detached) generation rates.[19] As shown in Table 5-2, this results in a range of 1,773 new

[19] These 2015 rates are consistent with rates used in the report titled *Residential Research Summary* that was prepared for the PAUSD by Decision Insite in November 2016.

students (low end of the preferred scenario, using multi-family rates) to 3,624 new students (high end of the preferred scenario, using single-family detached rates). The low end of this range is 168 students less than the range considered in the Supplement to the Draft EIR (1,940 new students) and the high end of this range is 41 students more than the upper end of the range considered in the Supplement to the Draft EIR (3,583 new students).

TABLE 5-3 ESTIMATED ENROLLMENT IN PAUSD UNDER THE PREFERRED SCENARIO USING PAUSD 2015 ENROLLMENT PROJECTIONS RATES

		Elementary		Middle		High		
	Housing Units	Generation Rate	Students	Generation Rate	Students	Generation Rate	Students	Total Students
Preferred Scenario - Low								
Multi-Family	3,545	0.23	815	0.12	425	0.15	532	**1,773**
Single-Family Detached	3,545	0.38	1,347	0.19	674	0.25	886	**2,907**
Preferred Scenario - High								
Multi-Family	4,420	0.23	1,017	0.12	530	0.15	663	**2,210**
Single-Family Detached	4,420	0.38	1,680	0.19	840	0.25	1,105	**3,624**

Note: These calculations use PAUSD's "moderate" (i.e., higher) generation rates. Totals may not sum due to rounding.
Source: PlaceWorks, City of Palo Alto, 2017.

Although the highest end of the enrollment range calculated in Table 5-3 slightly exceeds the range considered in the Supplement to the Draft EIR (by just over 1 percent), this increase does not change the finding in the Supplement to the Draft EIR for the reasons described above.

Some comments stated that enrollment over the horizon of the Plan will occur with a "bubble effect," with rapid housing occurring during some years and disproportionate amounts of younger students entering the district when new housing is built. The City acknowledges these concerns. However, since the proposed Comp Plan is a citywide, program-level document, it is unknown precisely when and where future development under the Plan will occur, and what the scale of future development projects will be. Therefore, it would be speculative to attempt to provide a quantitative enrollment projection that takes this bubble effect into account. Nevertheless, the City is committed to working collaboratively with PAUSD to ensure that the District is informed on an ongoing basis regarding pipeline development and the following policy is included in the Comprehensive Plan Update:

> Policy L-2.11: Ensure regular coordination between the City and PAUSD on land development activities and trends in Palo Alto, as well as planning for school facilities and programs. Under State law, impacts on school facilities cannot be the basis for requiring mitigation beyond the payment of school fees or for denying development projects or legislative changes that could result in additional housing units. The

City will, however, assess the reasonably foreseeable environmental impacts of development projects that result in new school construction or enrollment." (Revision of previous Policy C-6 and related programs)

Lastly, PAUSD's letter on the Supplement to the Draft EIR expresses concerns regarding Stanford University's expansion plans. Please see Master Response 2, which discusses recent cumulative development projects, including Stanford University's expansion.

If Stanford's proposal to add 3,150 or more additional housing units/beds is ultimately approved by the County of Santa Clara, it would enable the university to add a mix of housing types, some percentage of which could accommodate families with school-aged children. In addition, as a condition of approval, the university would likely continue to contribute funds to the production of affordable housing elsewhere in the region, which would likely accommodate families with children. As the PAUSD comments point out, the location of any new housing with school-aged children is likely to be as important as the number of children in assessing the need for new school facilities. As noted above, the City's traffic model accounts for an increase in school-related vehicle trips and includes assumptions about future growth in the region. Therefore, potential associated impacts, such as those related to increased air pollutant, GHG emission, and noise levels, are accounted for in this EIR. However, because it is unknown where future school facility expansions may occur, the allocation of those trips within the EIR Study Area may not match future plans for school improvements. The City acknowledges this challenge and looks forward to working with the school district, the University, and the County on this issue as future school facility locations or expansions become known.

5.1.3.3 COMMENTS REGARDING SCHOOL CAPACITY

Some comments stated that the capacity levels reported in the February 2016 Draft EIR reflect contractual maximum capacities but do not reflect realistic operational capacities. That is, a school operating at maximum capacity based on the numerical capacity would have every classroom fully loaded, which does not allow for PAUSD schools to operate at their desired functionalities. As stated in its comment letter, the PAUSD reserves space in its schools for wellness services, project-based learning, music and arts activities, special education, maker spaces, and other purposes. Such programs and activities would be more difficult to accommodate in schools operating at their maximum contractual capacities.

Should additional capacity be needed to increase the school facility space in the District, PAUSD has identified five sites that are not currently in use by its schools that could be used as future school sites. The District notes in its comment letter that the sites available to the District are limited, and that, while additional sites beyond these five could be acquired in the future, suitable sites are not readily available and are very costly to acquire.

The City appreciates the District's input to better understand the function of PAUSD schools, capacity analysis, and potential expansion plans. The Supplement to the Draft EIR identifies that PAUSD elementary and middle school capacity would be exceeded under all six scenarios, and that high school capacity would

be exceeded under two scenarios. The preferred scenario includes residential growth in the middle of the range of the scenarios. According to Comment SUPP-PUB2-06, operational capacity is 90 to 95 percent of maximum capacity. If the capacity is determined based on lower operational capacities, then the exceedances would be greater than identified in the Supplement to the Draft EIR. For example, the Supplement to the Draft EIR reports that the current remaining capacity for Palo Alto's elementary schools is 550 students (based on a maximum capacity of 6,227 students and an enrollment of 5,677 students). An operational capacity of 90 percent would allow for 5,604 students (6,227 maximum capacity x 0.90), which would mean that elementary schools are currently over capacity by 73 students [5,604 student capacity – existing 5,677 students). Therefore, any increase in enrollment in elementary schools would exceed operational capacity, if capacity were calculated as 90 percent of maximum. As it is unknown precisely where future students will live and how increases in student population will be paced over time, it cannot be determined precisely which schools will be most affected by future population growth in the city. Even though maximum capacity may not be exceeded, a school's operational capacity may be exceeded at a given time.

As noted above, even if the EIR were to assume reduced school capacities to reflect the operational capacities of schools, such a change would not affect the impact finding in the EIR, which is required by State statute to conclude that the payment of school fees would offset potential impacts. The City is, as previously mentioned, committed to coordinating with the PAUSD on development activity and planning for school expansions to help the PAUSD address these concerns.

5.2 RESPONSE TO COMMENTS

Table 5-4 presents comments received on the February 2016 Draft EIR and responses to each of those comments.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
Letters on the February 2016 Draft EIR		
A. Governmental Agencies		
GOV1	Hannah Cha, Park Associate Planner, County of Santa Clara Parks & Recreation Department, April 11, 2016	
GOV1-01	The County of Santa Clara Parks and Recreation Department ("County Parks Department") is in receipt of a Notice of Availability & Completion of a Draft Environmental Impact Report (DEIR) for the Palo Alto Comprehensive Plan Update. The County Parks Department's comments are primarily focused on potential impacts to countywide trail routes as outlined in the Santa Clara County Countywide Trails Master Plan Update, a component of the Parks and Recreation element of the County General Plan that the Board of Supervisors adopted on November 14, 1995. Additional comments pertain generally to public access to recreational facilities and regional parks. **Relationship to the Santa Clara County Countywide Trails Master Plan Update** The following are trail routes found within the Project's Sphere of Influence. The DEIR should describe these countywide trail routes and evaluate the potential impacts to these trails as a result of the project. • *Juan Bautísta de Anza NHT* (Route R1-A) - designated as an off-road cycling route; trail route within other public lands. • *Juan Bautísta de Anza NHT* (Route R1-B) - designated as a hiking and off-road cycling route; trail route within other public lands. • *Bay Area Rídge Traíl: Santa Cruz Mountain* (Route R5-A) - designated as a trail route within other public lands for hiking, off-road cycling and equestrian use. • *Stevens Creek Sub-regional Trail* (Route S2)-designated as a hiking, off-road cycling and partially equestrian route; trail route within other public lands. • *Adobe Creek Connecting Trail* (Route C2) - designated as a hiking and off-road cycling route; route within road right-of-way East of Miranda Ave.; route within other public lands. • *Matadero Creek-Page Mill Sub-regional Trail* (Route S 1) - designated as an onstreet bicycle route with parallel trail; route within road right-of-way.	Page 4.12-16 of the Supplement to the Draft EIR includes revisions to reflect that these trails are within the SOI.
GOV1-02	**Section 4.12: Public Services and Recreation** The County Parks Department, in partnership with other public agencies, is charged with furthering the implementation of a number of national, regional and local trails in Santa Clara County. Section 4.12 of the DEIR discusses the Santa Clara County Countywide Trails Master Plan Update under Local Regulations. Upper Stevens Creek County Park was not	Page 4.12-16 of the Supplement to the Draft EIR includes revisions to reflect that Upper Stevens Creek County Park is a regional park in Palo Alto's vicinity.

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	mentioned as one of the regional parks on pg. 4.12-43, so we request that the Upper Stevens Creek County Park be included in the Regional and State Parks list.	
GOV1-03	**Impact 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. The DEIR states that "future development under the proposed Plan would be subject to existing regulations and procedures, including requirements to dedicate or provide funding for new/improved parkland. However, the location of new parkland has not been identified; therefore the impact from new park construction would be potentially significant, requiring mitigation under all four scenarios." (pg. 4.12-46) The County Parks Department agrees with this impact statement. In addition to the policies and programs suggested in Mitigation Measure PS-7, we recommend policies promoting alternative recreation spaces, such as linear parks and urban trails, and partnering with park and open space agencies to maintain parks and recreation facilities.	The comment is noted. Pursuant to CEQA, the discussion of Impact PS-7 in the Supplement to the Draft EIR focuses on the potential physical impacts of the construction of new park and recreation facilities. Therefore, Mitigation Measure PS-7 has been revised in the Supplement to the Draft EIR to focus on construction impacts. Please refer to Policy N-1.13 in the June 30, 2017 draft Comp Plan. In addition, Policy C-3.3 encourages maintenance and enhancement of existing park and recreation facilities consistent with the Parks, Trails, Open Space and Recreation Master Plan and UFMP; Policies N-1.10 and N-1.11 propose to work with other agencies to create multi-use trail connections and habitat linkages.
GOV1-04	**Cumulative Impact PS-8:** Implementation of the proposed Plan would 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. The County Parks Department makes similar comments as Impact PS-7, since the Mitigation Measure is the same as above.	Please see Response GOV1-03.
GOV1-05	**Section 4.13: Transportation and Traffic** Section 4.13 does not discuss the Santa Clara County Countywide Trails Master Plan Update; the Regional Agencies, Plans, and Policies Section (pg. 4.13-5) should be edited to include it. The County Parks Department also strongly encourages that proposed local and regional trails be constructed concurrently with the Project's planned road improvements.	Page 4.13-1 of the Supplement to the Draft EIR includes revisions to incorporate the *Santa Clara County Countywide Trails Master Plan* as part of the regulatory framework.
GOV1-06	In addition, the DEIR should include an analysis of potential traffic and circulation conflicts and opportunities in relation to the regional trail routes and Upper Stevens Creek County Park, and mitigations incorporated where appropriate. Thank you for the opportunity to comment on the Notice of Availability & Completion of a DEIR for the Palo Alto Comprehensive Plan Update. Please add our agency to your distribution list for the Final EIR when the document is available for public review. We look	All of the planning scenarios analyzed in the February 2016 Draft EIR and Supplement to the Draft EIR include implementation of the City of Palo Alto's *Bicycle + Pedestrian Transportation Plan*, which is consistent with the *Countywide Trails Master Plan Update*. Stevens Creek County Park is located in Cupertino and the nearby unincorporated area, and is in not located in Palo Alto or its sphere of influence (SOI). Accordingly, the Palo Alto

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	forward to reviewing the EIR when it becomes available. If you have any questions regarding these comments, please feel free to contact me at (408) 355-2228 or via email at Hannah. Cha@prk.sccgov.org	Comprehensive Plan Update process did not include analysis of that county park.
GOV2	Martin Alkire, Principal Planner, City of Mountain View Community Development Department, Planning Division, May 3, 2016	
GOV2-01	Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) to the Comprehensive Plan Update. The City of Mountain View has the following comments on the February 5, 2016 letter we received from your office regarding the DEIR. *Mandatory* San Antonio Housing Site. The 2015-2023 Housing Element Site identified along San Antonio, and proposed in Scenarios 1 and 2, borders industrial land uses in Mountain View that are potentially incompatible with the proposed residential use. Please study mitigation measures to limit the impacts of the industrial and residential uses between each other.	The comment is noted. The preferred scenario is described in Chapter 2 of this Final EIR and would include removing the housing sites along San Antonio Road and replacing them with higher densities and new sites in more transit accessible areas.
GOV2-02	**Page 21 (App G - TIA).** Please include the following roadway segments to be studied: • El Camino Real (San Antonio Road (SAR) to Grant/HWY 237) • Middlefield Road (SAR to HWY 101) • Charleston Road (SAR to HWY 101)	The roadway segments listed by the commenter are located in Mountain View and were analyzed by the City of Mountain View in its own recent General Plan update. All six planning scenarios evaluated in the February 2016 Draft EIR and Supplement to the Draft EIR are consistent with ABAG's regional growth projections, and are therefore also consistent with Mountain View's own analysis of those segments, since Mountain View's General Plan is also based on ABAG's growth projections. The analysis in the EIR uses multiple metrics to evaluate traffic impacts, including intersection level of service (LOS), link (roadway) LOS, vehicle miles traveled (VMT), and freeway segment/ramp capacity. For this reason, it was not possible to analyze more than a representative list of intersections and roadways, focusing on those most likely to see significant impacts, and those deemed to be representative of future conditions. Palo Alto's Comprehensive Plan Update takes an aggressive approach to mitigating traffic impacts on roadway segments and intersections through a TDM program with quantitative targets, monitoring, and penalties for non-compliance. This approach to mitigation would also reduce vehicle trips on roadway segments and at intersections in Mountain View.
GOV2-03	**Page 22 (App G - TIA).** Please revise Figure 1 to include a list of all intersections. Include all CMP intersections on ECR within the City of Mountain View as well as the intersection of Charleston Road/Independence Avenue and Middlefield Road/Old Middlefield Way.	In response to comments received on the February 2016 Draft EIR, four intersections were added to the traffic analysis of the Supplement to the Draft EIR. However, the intersections located

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		in the City of Mountain View and proposed for inclusion by the City of Mountain View were not among the four intersections added to the analysis. The intersections mentioned in this comment were also not included in the City of Mountain View's General Plan EIR. The City of Palo Alto included the CMP intersection of El Camino Real and San Antonio Road in the analysis, but not the intersections on El Camino Real that are more distant from Palo Alto and would thus experience less traffic going to or from Palo Alto. Also, the City of Palo Alto included only key intersections of major arterials in the traffic analysis, and the intersection of Charleston Road and Independence Avenue is not such an intersection. Please see Response GOV2-02 for additional information.
GOV2-04	**Page 3-34, Figure 3-8 Scenario 3 Concept, Page 3-40, Figure 3-9 Scenario 4 Concept.** The proposed Caltrain trench will affect our utilities (water, sewer, and storm). How will Palo Alto mitigate the impact to our system/ customers? How will any impacts to Adobe Creek be mitigated?	The preferred scenario calls for grade separation of the Charleston Road and Meadow Drive Caltrain crossings by depressing the tracks in a cut and cover trench. This configuration was analyzed in a preliminary study presented to the City Council in October 2014 and available online at the following address: https://www.cityofpaloalto.org/civicax/filebank/documents/44211. Additional engineering and analysis would be necessary to determine the feasibility and potential impacts/mitigation related to this approach. While the Draft EIR assumes the proposed Caltrain trench for purposes of analyzing traffic impacts, it also envisions additional environmental review once a more fully developed grade separation design is developed – that would be the time to identify potential utility impacts and appropriate mitigation measures.
GOV2-05	**Section 4.8 Hydrology and Surface Water Drainage (p.24).** Please correct statement to include a portion of Mountain View also discharges into Adobe Creek.	Page 4.8-8 of the Supplement to the Draft EIR includes revisions to include this information regarding the Adobe Creek watershed.
GOV2-06	**Section 4.14 Impact Discussion (p.38, 39, 41).** Please confirm how at 34 MGD, where the treatment capacity is at 87%, is compliant with the Basic Agreement where the partnering agencies agree to conduct an engineering study when their respective service area reaches 80% of their contractual obligations.	The 87 percent treatment capacity cited by the commenter is a hypothetical number (based on 34 ÷ 39 = 87 percent). Page 4.14-11 of the Supplement to the Draft EIR states, "… based on the LRFP [*Long Range Facility Plan*], projected dry weather flows are anticipated to be between 28 and 34 MGD in the year 2062, which is below the dry weather flow design capacity of the plant (39 MGD)." Current treatment capacity is not at 87 percent;

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		average dry weather flow is 21 MGD, which is 54 percent of 39 MGD. The 34 MGD figure cited by the commenter is the dry weather flow projection contained in the LRFP for 2062, which is 32 years beyond the proposed Plan's 2030 horizon year. The LRFP anticipates that, based on existing planning documents, the existing Regional Water Quality Control Plant facilities will provide adequate capacity to meet dry weather and maximum month flows through at least 2035. The discussions under Impacts UTIL-5, UTIL-6, and UTIL-7 in the February 2016 EIR and Supplement to the Draft EIR show the proposed Plan's estimated worst-case increase in wastewater flow (a maximum of approximately 0.631 MGD) at buildout represents less than 4 percent of the existing excess dry flow capacity available at the Regional Water Quality Control Plant of 18 MGD. Thus, the estimated worst-case increase in wastewater treatment demand under the Plan would result in far less than 80% of the City's "contractual obligations." Therefore, there is no need to take any action to address an exceedance of 80 percent of the contractual obligation at present or in anticipation of 2030 levels under the proposed Plan.
GOV2-07	**Section 4.14 Impact Discussion (p. 40).** Please confirm whether the treatment capacity is 40 MGD (Long Range Facilities Plan for the Regional Water Quality Control Plant (Carollo, May 2012)) versus 39 MGD.	Operation of the City's Regional Water Quality Control Plant and wastewater collection system is regulated by NPDES No. CA0037834, as prescribed in Regional Water Quality Control Board (RWQCB) Order No. R2-2014-0024. The Regional Water Quality Control Plant is designed -- and permitted -- to have an average dry weather flow capacity of 39 MGD.
GOV2-08	**Section 4.14 Impact Discussion (p. 43).** There is an existing portion of Palo Alto (west of Del Medio between El Camino Real and Alma) that discharges into the City of Mountain View. While the flow is negligible (about 100 homes), it does contribute to the City's meter flow discharge into a Los Altos main. There is a contractual limitation, and if this area was to redevelop it would change the flow dynamics and could require amendment to an agreement.	The comment is noted. The area referred to by the commenter consists of approximately 130 parcels in the R-1 zoning district. No land use changes are proposed in this area under the proposed Plan and therefore no agreement amendments are anticipated to be necessary as a result of development allowed under the proposed Plan.
GOV2-09	**Page 4.14 Impact Discussion (p.56).** Please include a table showing total square footage of additional building/ structure footprint (estimated) for all 4 scenarios.	This EIR is a program-level document that evaluates a citywide policy plan. The City anticipates that up to 3 million square feet of new office and R&D space, and up to 4,420 housing units, would be developed citywide under the preferred scenario (see Table 3-1 of this Final EIR). However, the locations and types of

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		development that will be proposed for each future development project. Therefore, evaluating the actual building footprint of future, unknown development would be speculative and beyond the scope of this EIR.
GOV2-10	*Discretionary* **Section 4.8 Sea Level Rise (p.35).** Please consider whether Regional Water Quality Control Plant (RWQCP) protection is needed from sea level rise.	The proposed project would not, in and of itself, increase sea level rise as sea level rise is occurring independent of whether is project is implemented. Therefore, evaluating whether specific buildings would need protection from sea level is outside the scope of the EIR. However, the June 30, 2017 draft Comp Plan contains programs to address this issue. Program N4.15.2 calls for the City to develop a plan to address the ongoing operations of the RWQCP, taking potential sea level rise into account. Program N8.3.1 calls for the protection of the RWQCP, as well as other critical facilities, from the impacts of sea level rise. In addition, outside of the Comp Plan Update process, the City is working on a Sea Level Rise Policy and the RWQCP is working in conjunction with the SAFER Bay (Strategy to Advance Flood Protection, Ecosystems and Recreation along San Francisco Bay) Project to ensure that that the plant will be protected in the future.
GOV2-11	*Editorial* **Section 4.14 Existing Conditions (p.9).** Mountain View would like to consider opportunities to install another intertie at Nita Avenue, Middlefield Road or Charleston Road.	The comment is noted. The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR.
GOV2-12	**Section 4.14 General.** While the Comprehensive Plan Update does not appear to impact the overall treatment plant capacity, the narrative could clarify the proportional flows of the City of Palo Alto along with the total treatment plant partner capacity. This document appears to mix the two and should not consider these flows as interchangeable. Palo Alto flows are a subset of the overall treatment capacity.	Page 4.14-11 of the Supplement to the Draft EIR notes that, if and when the dry weather flows reaches 80 percent of capacity, an engineering study would be conducted, as called for by the Basic Agreement among RWQCP partnering agencies. The current average dry weather flow into the RWQCP is 21 MGD. The current percentage of flow from partner agencies is as follows: ▪ Mountain View – 38 percent ▪ Palo Alto – 36 percent ▪ Los Altos – 10 percent ▪ Stanford University – 7 percent ▪ East Palo Alto Sanitary District – 6.7 percent

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		▪ Los Altos Hills – 1.5 percent
GOV2-13	**Section 4.14 General.** Please include a clarifying statement that the projections are compliant with the partners per the Basic Agreement. The partnering agencies agree to conduct an engineering study when their respective service area reaches 80% of their contractual capacity rights. Thank you for the opportunity to provide comments. Please let me know if you have any questions.	Please see Response GOV2-13.
GOV3	Aruna Bodduna, Associate Transportation Planner, County of Santa Clara Roads & Airports Department, May 5, 2016	
GOV3-01	The County of Santa Clara Roads and Airports Department appreciates the opportunity to review Draft Environmental Impact Report (DEIR) and is submitting the following comment(s). 1. The County commends the City for focusing on aggressive transportation demand management (TDM) goals to handle future growth. However, the report identifies that the ultimate finding is "Significant Unavoidable", meaning it is anticipated that these aggressive TDM measures may not fully mitigate the transportation impacts. The County operates two major expressway arterials providing access to and for circulation within the City: Page Mill-Oregon Expressway and Foothill Expressway. The County requests that the proposed improvements for these expressways identified in Expressway Plan 2040 be listed as potential mitigation measures to receive traffic impact fee (TIF) or fair-share contributions for traffic impacts from new developments, should the reduction targets and/or the goal of no net increase in peak period motor vehicle trips proves unattainable.	Thank you for this comment. In lieu of including *Expressway Plan 2040* improvements as mitigation, the proposed Comprehensive Plan Update (Transportation Element) references these as likely projects during the life of the plan, and includes Program T1.25.1, which calls for an update Transportation Impact Fee (TIF) program to fund needed capital improvements. The City can include the improvements identified in *Expressway Plan 2040* in its list of projects for partial funding through a transportation impact fee.
GOV3-02	2. Scenario 2 incorporates grade separations at Page Mill Road/Junipero Serra Boulevard-Foothill Expressway and Foothill Expressway/Arastradero Road, widening of Page Mill Road between I-280 interchange and Peter Coutts Road, and intersection improvements at Page Mill Road/El Camino Real. County's Expressway Plan 2040 also lists intersection improvements at Page Mill Road/Hanover Street. All of these improvements should be included in the City's TIF.	Some of the projects included in the County's *Draft Expressway Plan 2040* are included in the preferred scenario and the Comprehensive Plan Update Transportation Element as noted above. The City of Palo Alto is currently in the process of conducting a nexus study and all of the projects mentioned in the County's comment will be considered for inclusion in the project list to be funded by the updated Transportation Impact Fee (TIF) program.
GOV3-03	3. Page 4.13-43 of the DEIR notes that two expressway intersections, Foothill Expressway/Junipero Serra Boulevard and Page Mill Road (#9) and Foothill Expressway and Arastradero Road (#10), would need about 96% and 75% reduction of trips respectively, to operate at acceptable level of service (LOS). The report further states such a large	Scenario 2 of the Comprehensive Plan Update analysis included grade separation at both of the expressway intersections identified in this comment: Foothill Expressway/Junipero Serra and Page Mill Road (#9) and Foothill Expressway and Arastradero

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	reduction would not be feasible even with an extremely aggressive TDM program. Should the City decide not to support Expressway Plan 2040 grade separation projects at these locations, the County requests that the City identify alternative routes or plans for the overflow traffic from these intersections.	Road (#10). The other scenarios did not include these grade separations. The travel demand forecasting model output for all scenarios includes projections of which routes traffic would take if those segments and intersections are overloaded. The City of Palo Alto's Comprehensive Plan Update takes an aggressive approach to mitigating traffic impacts on roadway segments and intersections through a TDM program with quantitative targets, monitoring, and penalties for non-compliance, as well as other measures. This approach to mitigation would reduce vehicle trips at those expressway intersections. In response to this comment, Scenario 5 in the Supplement to the Draft EIR included an analysis of widening Page Mill Road at the intersection of Foothill Expressway-Junipero Serra Boulevard and Page Mill Road to include HOV lanes but no grade separation. Under Scenario 5, the LOS would remain at LOS F, but the average delay would be greatly decreased from Existing Conditions, so there would not be a significant impact. Thus, the analysis of Scenario 2 in the Draft EIR discloses that inclusion of grade separation at this intersection would result in an acceptable level of service and no significant impact. The analysis of Scenario 5 in the Supplement to the Draft EIR also discloses that construction of HOV lanes without grade separation would result in no significant impact, even though the level of service would remain unacceptable. All other scenarios result in a significant and unavoidable impact at this intersection based on their assumptions of no change to this intersection, but either of the approaches used in Scenario 2 or 5 would adequately mitigate the impact. At the intersection of Foothill Expressway and Arastradero Road, the EIR discloses that there would be a significant and unavoidable impact if the proposed grade separation would not occur. The only scenario under which there was no significant impact is Scenario 2, which included the grade separation. The analysis of post-mitigation conditions for Scenarios 5 and 6 in the

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		Supplement to the Draft EIR, conducted in response to this comment, indicate that there would still be a significant impact at this intersection, even with implementation of the TDM program. This impact is largely due to anticipated growth in the region and would also occur under Scenario 1 (the Business as Usual scenario). Based on the analysis of post-mitigation conditions for Scenarios 5 and 6, It is fair to assume that there would still be a significant impact at Foothill Expressway and Arastradero Road under the preferred scenario's growth assumptions, even with implementation of the TDM program, unless grade separation were also included. Faced with increasing congestion at these intersections, drivers will likely use several strategies, including seeking alternate routes, traveling outside the peak period, and shifting modes. The HOV lanes on Page Mill Road would incentivize ridesharing for drivers who use that roadway segment.
GOV3-04	4. Page 4.13-72 of the DEIR, Mitigation Measure TRANS-8 states *"Develop a proactive neighborhood traffic calming program with a tool box of specific improvements that can be used to discourage non-local drivers from using local, neighborhood streets to bypass traffic congestion on arterials"* This mitigation measure is consistent with the stated mission of the expressways to relieve local streets of through traffic. However, if Page Mill Road-Oregon Expressway and/or intersections of Page Mill Road/Junipero Serra Boulevard-Foothill Expressway and Foothill Expressway/Arastradero Road are operating at severe congestion levels, it will be difficult to keep the cars on the expressways. If the City does not prefer to implement the improvements identified in the Expressway Plan 2040, the County recommends that the City identify parallel City arterials for overflow expressway traffic.	The travel demand forecasting model used in the traffic analysis has assigned traffic to parallel City arterials if the expressways are projected to be overloaded. Alternative routes for Foothill Expressway include Interstate 280, El Camino Real, and Alma Street. Alternate routes for Page Mill Road between Foothill Expressway and El Camino Real include Arastradero Road and Stanford Avenue. Alternative routes for Page Mill Road (to and from Interstate 280) include El Monte Avenue, Alpine Road, and Sand Hill Road. All of these parallel arterials would also be congested. Drivers would choose alternate routes such that travel times between them are equalized. Drivers may also choose to alter the times at which they drive or use an alternate mode. Impacts at these intersections are largely due to anticipated growth in the region and would also occur under Scenario 1 (the Business as Usual scenario). The City's aggressive approach to mitigation through a TDM program with quantitative targets, monitoring, and penalties for non-compliance is designed to reduce the vehicle trips on the expressways.

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		Please also see Response GOV3-02, which explains that some of the projects included in the County's *Draft Expressway Plan 2040* are included in the preferred scenario and the Comprehensive Plan Update Transportation Element. The City of Palo Alto is also currently in the process of conducting a nexus study and projects will be considered for inclusion in the project list to be funded by the updated Transportation Impact Fee program.
GOV3-05	5. The traffic impact analysis in the DEIR fails to include the interchanges of I-280/Page Mill Road and US 101/Oregon Expressway. Please provide the analysis for these locations. If the analysis results in significant impacts, appropriate mitigation measures should be identified.	The interchange of Interstate 280 and Page Mill Road was the subject of extensive analysis in the County's *Draft Expressway Plan 2040* and the Page Mill Expressway Corridor Study Report. Five of the six scenarios evaluated in this EIR are within ABAG's growth estimates and are therefore consistent with the County's analysis of this interchange. Under the preferred scenario, within the city, the population, housing, and jobs projections would all be less than ABAG's projections, even at the high end of the preferred scenario's range. When looking at the city plus the SOI, the high end of the preferred scenario's housing and population ranges would be higher than ABAG's projections by 850 units and 1,765 people, respectively. But, for the city plus the SOI, the high end of the preferred scenario's jobs projection would be 3,980 less than ABAG's projections. Also, the County has identified mitigation measures for this interchange in the *Draft Expressway Plan 2040*, and the City did not consider it necessary to repeat that process as part of the Comprehensive Plan Update EIR. All of the ramps at the Highway 101/Oregon Expressway interchange were analyzed as part of the freeway ramp evaluation (see Table 4.13-19 on pages 4.13-39 to 4.13-40 of the Supplement to the Draft EIR).
GOV3-06	6. When individual development projects are to move forward, please provide a Transportation Impact Analysis (TIA) for these projects. The TIAs should be prepared following the latest adopted Congestion Management Program (CMP) TIA Guidelines to identify significant impacts. The preliminary Expressway Plan 2040 should be consulted for a list of mitigation measures for significant impacts to the County roadways. Should the Expressway Plan 2040 list not include an improvement that would mitigate a significant	The comment is noted and the City looks forward to working with the County and VTA on guidelines to govern preparation of Transportation Impact Analyses (TIAs) and development of mitigation strategies consistent with forthcoming updates to the CEQA Guidelines in response to SB 743.

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	impact, the TIA should identify mitigation measures that would address the significant impact. Mitigation measures listed in the TIA should be incorporated into the EIR document. If proposed projects plan to use TDM and goal of no new peak period trips to avoid significant impacts, County recommends to include Expressway Plan 2040 improvements as mitigation measures in case these TDM goals prove unattainable.If you have any questions or concerns about these comments, please contact me at (408) 573-2462 or aruna.boddun a@rda.sccgov.org.	
GOV4	Sean Charpentier, Assistant City Manager, City of East Palo Alto Community & Economic Development Department, Planning Division, May 5, 2016	
GOV4-01	Thank you for the opportunity to review and comment on the Draft EIR for the City of Palo Alto Comprehensive Plan Update. The City of East Palo Alto recognizes the many years of hard work that went into the production of the Draft Comprehensive Plan and DEIR. <u>Traffic and Transportation- Comment #1</u> The traffic mode shares in Table 4.13-15 used for the four scenarios have highly optimistic assumptions about the use of modes of transportation other than driving, especially transit use. Currently, transit, bike, and walking trips account for 16% of all current trips. Depending on the Scenario, the transit, bike, and walking trips account for between 34% and 43% of all new trips. The traffic model projects that, depending on the scenario, the percentage change from existing conditions will range between 8% and 11% for drive alone trips; 41% and 76% for transit trips, 23% to 35% for biking trips, and 13% to 26% for waking *[sic]* trips. The Santa Clara Valley Transportation Authority recent "Transit Choices Report" noted that between 2000 and 2015, transit ridership declined by 23%. Assuming such a high portion of new trips are transit, biking or walking trips understates the traffic impacts at the study intersections and the greenhouse gas analyses based on the traffic study. This is a highly optimistic assumption about mode share that is not supported with corresponding policy provisions within the document. What is the basis and documentation supporting this assumption of major increases in transit, bike, and walking mode shares? What is the basis and documentation supporting an assumption of a 41% to 76% increase in transit trips from existing conditions?	The mode share percentages presented in Table 4.13-15 are not assumptions. They are the results obtained from the travel demand forecasting model used throughout the traffic analysis in the February 2016 Draft EIR and Supplement to the Draft EIR. In other words, the mode shares are model output, not input assumptions. The travel demand forecasting model used for the City of Palo Alto's Comprehensive Plan Update is based upon and is consistent with MTC's model for the Bay Area region and VTA's model for Santa Clara County. The increased use of alternative mode shares that is projected by the travel demand forecasting model are partly due to the projection of increased traffic volumes and congestion on freeway segments, some roadway segments, and at some bottleneck locations. As traffic congestion and travel delays increase throughout the Bay Area, modes other than driving will become relatively more attractive. The increased mode shares for alternative modes also reflect the increased investment in transit facilities by 2030 (e.g., Caltrain electrification) and bicycle and pedestrian facilities (e.g. implementation of numerous new bikeways in the City's Bicycle and Pedestrian Transportation Plan).
GOV4-02	The use of optimistic mode share numbers call into question the adequacy of the analyses and impacts on all the traffic analyses and the greenhouse gas analyses. To adequately analyze and disclose the potential impacts, the study should prepare traffic and greenhouse gas analyses with more realistic assumptions about mode share.	Please see Response GOV4-01.
GOV4-03	<u>Traffic and Transportation - Comment #2</u>The traffic study did not analyze the critical intersection at University Ave. and Woodland Ave. The traffic analysis analyzed the US 101/University highway ramps, but not the intersection at Woodland Ave. and University	The EIR assessed traffic impacts through analysis of intersections, roadway segments, freeways and freeway ramps, mode split, and VMT. Not all intersections suggested by commenters were

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	Ave. This intersection is a key gateway to the City of Palo Alto and is shared with East Palo Alto. To adequately review the potential impacts, this intersection would have to be included in the analysis. Please analyze this intersection within the traffic study.	included. As described in Response PUB14-03, four intersections were added to the EIR analysis based on comments received; however, the intersection of University Avenue and Woodland Avenue was not added. Representative intersections were selected if there was no other recent data or analysis available. The City of East Palo Alto's analysis of its recently updated General Plan includes the intersection of University Avenue and Woodland Avenue, and the City of Palo Alto did not consider it necessary to include it since it had been so recently addressed in East Palo Alto's own General Plan. The TIA for the East Palo Alto General Plan indicates that under Cumulative with Project conditions, there would not be a significant impact at this intersection. Five of the six of the City of Palo Alto's Comprehensive Plan Update planning scenarios are consistent with ABAG's growth projections, and are therefore also consistent with East Palo Alto's own analysis of this intersection, since it is also based on ABAG's growth projections. The buildout of the preferred scenario is similar to ABAG projections, with the low end of the buildout range below ABAG projections, and the high end (when the SOI is included) slightly above in terms of housing and population, but below ABAG projections in terms of jobs. This EIR makes a broad finding of significant and unavoidable traffic impacts to intersections and the mitigation measure is also a broad approach to trip reduction through TDM. Palo Alto's Comprehensive Plan Update takes an aggressive approach to mitigating traffic impacts on roadway segments and intersections through a TDM program with quantitative targets, monitoring, and penalties for non-compliance, as well as other measures. This approach to mitigation would also reduce vehicle trips on roadway segments and at intersections in East Palo Alto.
GOV4-04	Traffic and Transportation/ Air Quality - Comment #3 The Tables 4.13-13 and 4.13-14 have different VMT amounts from the Table 4.2-7. For example, Table 4.2.7 has 2,937,470 in Existing Daily VMT while the Table 4.13-14 has 5,320,931 in Daily Existing VMT. Please explain this difference.	Table 4.2-7, Comparison of the Change in Population, Service Population, and VMT in Palo Alto, was updated in the Supplement to the Draft EIR. The air quality and greenhouse gas analysis adjusts the VMT based on the recommendations of the California Air Resources Board's Regional Targets Advisory Committee (RTAC, a committee formed per SB 375). RTAC recommends that

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		50 percent of interjurisdictional trips are the responsibility of the jurisdiction. This is consistent with the methodology used in the City's Earth Day Report. The VMT in the tables in Chapter 4.13, Transportation and Traffic, include the full trip length for interjurisdictional trips. In addition, the analysis in Chapter 4.2, Air Quality, of the February 2016 Draft EIR and Supplement to the Draft EIR includes VMT from commercial trucks in addition to passenger vehicles. The tables in Chapter 4.13, Transportation and Traffic, referenced by the commenter do not include any commercial truck traffic and only include passenger vehicle traffic (i.e., light duty autos/trucks).
GOV4-05	Air Quality - Comment #4 The VMT numbers derive from assumptions for extremely large increases in transit use. The VMT numbers should be calculated again using more realistic assumptions. Without assuming that transit trips increase 41%- 76% over existing conditions, the impacts in the VMT section might be significantly different and the VMT impact might change from LTS to Significant and Unavoidable.	Please see Response GOV4-01. As explained in that response, the transit use numbers used in the EIR are model outcomes based on analysis of the scenarios and future cumulative roadway conditions, not assumptions.
GOV4-06	The BAAQMD standard is that projected VMT increase is less than or equal to projected population increase. The DEIR analysis instead uses the service population, which includes population plus the number of new jobs. Section 2.7.1 of the BAAQMD CEQA Air Quality Guidelines, Updated May 2011 states that the calculation is based on "population," rather than the "service population" standard used by the DEIR. This calculation should be based on the BAAQMD "population" standard.	Chapter 4.2 of the February 2016 Draft EIR and Supplement to the Draft EIR evaluates consistency of the proposed Plan with the BAAQMD's *Clean Air Plan*. One of the metrics considered during this consistency analysis is an evaluation of the project's efficiency with regard to transportation, measured in VMT. The commenter is correct that BAAQMD's CEQA Air Quality Guidelines establish a threshold for compliance with the adopted 2010 Clean Air Plan based on whether the project VMT increase is less than or equal to the population increase. The Draft EIR explains BAAQMD air quality thresholds on pages 4.2-22 and 4.2-23, and the Draft EIR presents VMT per population in Table 4.2-7 on page 4.2-32. Table 4.2-7 also presents VMT per service population, and shows that a reduction in VMT per capita would occur using both metrics. The Draft EIR explains, on pages 4.2-31 through 33, the City's reasons for using VMT per service population as part of the analysis of consistency with the *2010*

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		Clean Air Plan. A VMT efficiency target based on a city's population alone does not fully capture the jobs-housing relationship in the city, particularly in a city like Palo Alto where there are substantially more jobs than residents. The Comprehensive Plan is intended to address both jobs and housing in Palo Alto as part of a complete and integrated approach to land use and transportation planning that reduces both air pollutant and GHG emissions in the greater Bay Area. Therefore, the City evaluates consistency with the *Clean Air Plan* based on the VMT/service population. The Association of Bay Area Government's (ABAG)/Metropolitan Transportation Commissions' (MTC) *Plan Bay Area* considers both where people live and where people work to improve the overall mobility of the Bay Area to reduce trips and vehicle miles traveled. Trips in the regional model are based on an origin-destination approach and consider trip by trip purpose. For employment-generating land uses, the regional model disaggregates trips into specific industry sectors (i.e., type of commercial, office, warehouse, retail) in order to determine trip lengths by trip purpose and the origin and end of a trip. The regional emissions forecasts conducted by BAAQMD as part of the *Clean Air Plan* and BAAQMD's Climate Protection Program consider on-road mobile source emissions based on data provided by these regional agencies. Consequently, both the population and employment generating land uses are critical to determining the transportation efficiency of the Bay Area in BAAQMD's regional plans.Furthermore, the consistency analysis for criteria air pollutants should be internally consistent with the approach taken for the proposed Plan's GHG emissions analysis. BAAQMD's CEQA Guidelines GHG efficiency metric is based on service population, rather than just per capita emissions, for similar reasons as identified above—VMT is not just based on where someone lives but also where they work or where services are provided (e.g., retail stores, schools, day care, etc.).

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		Lastly, the Governor's Office of Planning and Research (OPR) is considering alternative metrics to the transportation LOS under Senate Bill 743. One of the metrics being considered is VMT efficiency. OPR proposed to define transportation efficiency as follows. "A transportation analysis for a land use project should measure transportation efficiency, rather than the total amount of VMT generated. Therefore, a VMT metric used for trip- or tour-based assessments should include a denominator. Typical denominators include per capita for residential, per employee for office, and per trip for other uses. Per person-trip is another option that could be used for all land use types" (see Appendix C of OPR's SB 743 Guidelines Discussion Draft). Consequently, OPR's current recommendation includes evaluating both population and employment when considering transportation efficiency, which is consistent with the City's approach.
GOV4-07	Population and Housing Comment #5The proposed General Plan continues the existing jobs housing imbalance. The Jobs to Employed residents ratio remains steady at above 3. (Table 4.11.20) This means that the growth projections are imbalanced because they preserve the existing condition of imbalanced job growth of 3 jobs per employed resident. This is a significant impact. The burden placed on the region by cities that have imbalanced land uses is significant. The threshold is not the existing imbalance, but whether the growth brings the city closer to a balanced growth pattern. The growth projections for all scenarios identify significant imbalances that remain unchanged. The DEIR identifies this as a Less than Significant Impact. This is a significant impact due to the imbalanced growth included in the growth projections for all scenarios, and the resulting regional housing and traffic impacts.Thank you again for the opportunity to comment on the Draft Comprehensive Plan EIR. The City of East Palo Alto appreciates the years of effort that went into producing these documents. The City of East Palo Alto looks forward to continuing our collaborative relationship with the City of Palo Alto. If you have questions, please feel free to contact me.	As noted on page 4.11-16 of the February 2016 Draft EIR, the EIR uses Appendix G of the CEQA Guidelines and the City of Palo Alto's *Environmental Criteria Used by the City of Palo Alto* in 2007. The threshold as worded in the City's published environmental criteria is: "Create a substantial imbalance between employed residents and jobs." In evaluating the proposed Comp Plan against this threshold, the EIR considers whether the proposed Plan would worsen the existing jobs to employed resident ratio. As shown in Tables 4.11-20 and 4.11-21 of the Supplement to the Draft EIR, with the exception of Scenario 1 (the Business as Usual scenario), the scenarios considered in the EIR would improve the current jobs/housing balance. Therefore, the impact is less than significant. This EIR evaluates the impacts associated with adopting the proposed Plan and is not required to identify impacts resulting from existing conditions.
GOV5	Roy Molseed, Senior Environmental Planner, Santa Clara Valley Transportation Authority, May 5, 2016	
GOV5-01	Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for the Comprehensive Plan Update. We have the following comments. Land Use Alternatives The DEIR analyzes the impacts of four land use/transportation scenarios that grew out of a	The comment focuses on the merits of the scenarios considered in the February 2016 Draft EIR. The comment is noted. Please see Master Response 1. The City has chosen a preferred scenario, which is described in Chapter 2 of this Final EIR. The preferred scenario is anticipated to result in 3,545 new housing units (same

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	series of public workshops in mid-2014 (pg. 3-10). VT A's understanding is that the Preferred Alternative will be developed at a later date and will include elements of one or more of the analysis scenarios, but is not expected to be identical in every respect to any single scenario. VTA recommends that the City include the land uses, land use policies, and transportation framework of Scenario 4 as described in the DEIR, which would ''concentrate growth in transit-rich areas of the city where there are ample neighborhood services, and seek to address the impacts of employment growth rather than slowing or controlling the rate of growth" (pg. 3-38). This scenario was shown in the transportation analysis to result in the lowest vehicle miles traveled per capita, the lowest "Drive Alone" mode share and the greatest increase in transit ridership among the scenarios studied (pgs. 4.13-49 - 4.13-50). VTA notes that this scenario also includes the greatest increase in housing units compared to new square footage of employment uses, which would increase the mix of land uses in the City and likely lead to further reductions m automobile trips and vehicle miles traveled.	as Scenario 3) to 4,420 new housing units (same as Scenario 4) and seeks to concentrate new growth near transit.
GOV5-02	Transportation Analysis VTA commends the City for including an analysis of multimodal performance measures such as vehicle miles traveled, mode share, pedestrian and bicycle facilities, and congestion impacts on transit travel times in the DEIR. Inclusion of such measures provides for a more balanced approach to transportation analysis and mitigation than a more traditional approach focused solely on automobile level of service and other measures of vehicle delay.	The City thanks VTA for its comment. The comment does not address the adequacy of the February 2016 Draft EIR. Therefore, no response is required.
GOV5-03	Congestion Impacts on Transit Travel Times VTA commends the City for including an analysis of congestion impacts on transit operations in the DEIR. The DEIR identified a significant impact to transit operations as a result of increased vehicle congestion, and included a Mitigation Measure for the City to "Provide traffic signal prioritization for buses at Palo Alto intersections, focusing first on regional transit routes. Also, provide queue jump lanes and curbside platforms for buses on El Camino Real." (p. 4.13-68) VTA supports the proposed mitigation measure and looks forward to working with the City to implement transit improvements in Palo Alto.	The City thanks VTA for its comment. The comment does not address the adequacy of the February 2016 Draft EIR. Therefore, no response is required.
GOV5-04	Transportation Demand Management - General Mitigation Measure Trans-la would require new development projects to prepare and implement Transportation Demand Management (TDM) Plans to achieve vehicle trip reductions of 20% - 45%, depending on location within the City. The DEIR notes that "TDM Plans must be approved by the City and monitored by the property owner on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets	Please note that the wording of Mitigation Measure TRANS-1b as quoted in this comment was revised in the Supplement to the Draft EIR and is addressed in Response SUPP-GOV3-06. The City of Palo Alto agrees that TDM monitoring should be performed by the City or a third party in order to provide more reliable monitoring results. The requirement that TDM Plans be monitored by the

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	are not met" (pg. 4.13-51). In addition, Mitigation Measure Trans- I b requires the City to establish and implement a policy that eliminates ("unbundles") free or subsidized parking in new commercial and residential development (pg. 4.13-52), and additional parking management measures, such as parking charges at existing workplaces with over 50 employees and paid parking in Downtown and California Avenue Areas, are included in Scenario 4 (Table 3-3, pg. 3-16). VTA commends the City for including these forward-thinking TDM measures and goals in the DEIR. However, VTA recommends that the City require that TDM monitoring be performed by the City or a third party, to provide more reliable monitoring results.	project proponent or "by the property owner" means that the property owner will have financial responsibility for the monitoring. The City will ensure that each TDM Plan includes a section that addresses the monitoring process and may require that the actual monitoring is to be conducted by an independent third party at a time that is not disclosed in advance to the project's employees or residents.
GOV5-05	Transportation Demand Management - Transit Incentives The DEIR notes that paid transit passes would be provided to employees in workplaces with over 50 employees in all Scenarios (pg. 3-12), and Scenario 4 includes a measure to provide "free transit passes for all Palo Alto residents in transit accessible areas based on the VTA's EcoPass program" (pg. 3-43). VTA supports these measures and requests that the City coordinate with VTA on their implementation VTA also notes that these measures would help implement the Bay Area Air Quality Management District (BAAQMD) Regulation 14, Rule 1, which requires employers with 50 or more full-time employees to offer commuter benefits.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
GOV5-06	Freeway Impacts and Mitigation MeasuresThe DEIR identifies significant impacts to five directional segments of US 101 and two directional segments of I-280, based on the CMP LOS standard. Mitigation Measures proposed in the DEIR include TDM programs (see above) and a proposal for the City to "Take a leadership role in regional transportation planning and advocating for specific multi-modal freeway improvements, such as dynamic pricing, express bus service, transit and HOV priority, and other enhanced mobility options" (p. 4.13-60). With these Mitigation Measures, four of the impacts remain significant and unavoidable.VTA notes that certain cities in Santa Clara County have identified contributions to regional transportation improvements as mitigation measures for significant freeway impacts. VTA recommends that the City include voluntary contributions to projects in VTP 2040 that provide congestion relief and additional transportation options along the impacted corridors, including: • US 101 Express Lanes (VTP ID Hl) • I-280 Express Lanes (2040 VIP ID Hl 1-13) • I-280 Ramp Metering Implementation • I-280 / Foothill Expressway Improvements (2040 VTP ID H45, H35) • I-280/ Page Mill Rd Modifications (VIP 2040 Xl5)	The City of Palo Alto appreciates VTA's suggestion regarding voluntary contributions to freeway projects included in VTP 2040. The City will consider these at a later time in relation to specific development projects for which they may be appropriate.

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	These projects range from short-term to long-term. VTA would be happy to work with the City to identify appropriate projects for contributions as specific development projects implementing the Comprehensive Plan come forward. Please see the March 6, 2014 Report to the VTA Board of Directors (Agenda Item 6.18), available online athttp://www.vta.org/sfc/serv let. shepherd/ document/ download/ 069AOOOOOO1LwZYIAO, for further information about Voluntary Contributions to Transportation Improvements.	
GOV5-07	CMP Intersection Impacts and Mitigation Measures The DEIR indicates significant impacts to three CMP Intersections. The DEIR identifies Mitigation Measures to adopt TDM programs, work to advance grade separation projects at intersections along the Caltrain tracks, and take a leadership role in advancing transit improvements, however, these impacts remain significant and unavoidable (pgs. 4.13-51 - 4.13-52).In addition to the proposed Mitigation Measures, VTA also recommends that the City prepare an area-wide Multimodal Improvement Plan (previously "Deficiency Plan"), to address these CMP Impacts. The California CMP legislation requires Member Agencies to prepare Deficiency Plans/Multimodal Improvement Plans for CMP facilities located within their jurisdictions that exceed, or are expected to exceed in the future, the CMP traffic LOS standard. The preparation of a Multimodal Improvement Plan can be an opportunity to implement multimodal (nonautomotive) transportation improvements as offsetting measures, when mitigations to meet the LOS standard are either infeasible or undesirable. The Multimodal Improvement Plan contains a list of actions to help offset the vehicular level of service impacts, and an implementation plan with specific responsibilities and a schedule. These off-setting improvements can include improvements to transit, bicycle, and/or pedestrian facilities, as well as Transportation Demand Management (TDM) Programs. For further information on Multimodal Improvement Plans please see VTA's Deficiency Plan Requirements located online at: http://www.vta.org/cmp/technical-guidelines.Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.	The City of Palo Alto acknowledges that VTA, as the Congestion Management Agency for Santa Clara County, requires that a Multimodal Improvement Plan (previously known as a Deficiency Plan) be prepared if any CMP intersections are expected to exceed the CMP level of service standard. Accordingly, the City will prepare a Multimodal Improvement Plan that will include improvements to transit, bicycle, and pedestrian facilities, as well as TDM programs, after final adoption of the Comprehensive Plan Update, as called for in Mitigation Measure TRANS-1d.
GOV6	Wynne Furth, Board Member, Architectural Review Board City of Palo Alto, June 2, 2016	
GOV6-01	RECOMMENDATION: Consider forwarding this memorandum to the City as a supplemental response to its request for comments on the Comprehensive Plan Update Draft EIR. BACKGROUND:On April 21st of this year, the Board held a public hearing on the Draft EIR for the Comprehensive Plan Update and made a number of comments. Vice Chairman Alec Lew and I agreed to meet and report back on any additional comments, arising from the ARBs *[sic]* areas of responsibility, that might be useful. We focused on impacts likely to	This EIR is a program-level document that evaluates the impacts of a policy Plan. It would be speculative to evaluate the project-level impacts of individual future development projects. The project-level impacts associated with specific development projects, including the demolition of buildings, will be evaluated as future development is proposed.

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	arise under any of the alternative scenarios being considered by the City Council, including the "no project" alternative. The public comment period closes on June 8, 2016. We met to discuss the issues but did not produce a joint report. This memorandum is based upon my notes of our discussion. Because Architectural Review is focused on on-site/nearby aspects of new development of commercial and multiple family projects, we looked at site-specific impacts that are of cumulative importance: • The prevalence of site *redevelopment,* including the demolition of "perfectly sound" buildings which have not yet reached the end of their useful life but can be replaced by more profitable structures. We do not have adequate metrics or policies to evaluate this aspect of a project. The EIR should analyze the environmental effects of such demolitions and propose mitigation if needed, including considering re-use first.	
GOV6-02	• The protection of scenic vistas, including those from El Camino Real and San Antonio Avenue. Site-by-site analysis may need to be supplemented with block-by-block analysis.	As noted in the February 2016 Draft EIR (pages 4.1-19 to 4.1-22) and the Supplement to the Draft EIR (pages 4.1-5 to 4.1-7), compliance with existing City regulation and procedures would ensure new development would not impact scenic vistas.
GOV6-03	• The *reduction of landscaping* on a site when it is redeveloped, or the failure to increase the scale of landscaping to match newer, larger buildings. There is evidence that areas with more "biomass" are not only more appealing to humans but positively affect health. In reviewing projects, the Board has observed that code-compliant projects may still result in substantial reduction in the mass of plants on site – sometimes a conflict between parking and planting. Smaller trees and more compact and formal plantings provide less relief from hardscape. Extensive underground parking can significantly reduce the surface area in which plants can actually tap into native soil and the water table. Landscaping is converted into large-scale container gardening. Consider mitigation measures that require maintenance or intensification of on-site greenery, both to retain Palo Alto's characteristic look and to improve the comfort and livability of the City as temperatures rise.	In response to this comment, Mitigation Measure AES-1, found on page 4.1-2 of the Supplement to the Draft EIR, was revised as part of the Supplement to the Draft EIR to ensure that requirements for landscaping and street trees are included in the proposed Plan to help maintain the visual character of Palo Alto. In addition, Policy L-6.6 of the June 30, 2017 draft Comp Plan, related to building design, requires design to complement streets and public spaces, and promote personal safety, public health, and well-being. Policy N-1.1 seeks to preserve, protect, and enhance public and private open space and ecosystems in Palo Alto, while Policy N-1.9 promotes these requirements in all development within the foothill portion of the Planning Area. In addition, Policy N-2.5 seeks to enhance tree health and appearance.
GOV6-04	• The increased use of highly reflective *walls,* which can create problems of glare, excessive illumination, and heat gain in the vicinityConsider *[sic]* mitigation measures which add new standards or metrics to address these issues.	As noted in the February 2016 Draft EIR (pages 4.1-3 and 4.1-22), the City's Zoning Code (Title 18 of the Municipal Code) requires all development projects to avoid the use of reflective surfaces that can create glare. This would include highly reflective walls. Compliance with existing City regulations, including design review from the City's Architectural Review Board, would avoid excessive

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		illumination, glare, and heat gain. Therefore, no new mitigation measures are necessary.
GOV6-05	• The need for better tools for assessing how a a proposal will increase or decrease the *"heat island"* characteristics of a site, and the desirability of requiring that new development in fact decrease the site's heat generation. The ARB is required to address heat island issues in evaluating landscaping under its existing standards but does not have metrics to do so. The US EPA and others have formulated strategies for quantifying and reversing heat island effects. Consider as a mitigation measure for new development standards requiring reduction of heat island effects – cooling the City.	Please also see Response GOV6-03. Assessing the "heat island" characteristics of a site is not a CEQA requirement per se, but the EIR does include an analysis of visual changes and air pollutant emissions, including GHG emissions. Also, the draft Comp Plan includes policies that are protective of the urban forest and landscaping generally. See Policies N-1.1, N-2.6, N-2.12 of the June 30, 2017 draft Comp Plan, which seek to protect, revitalize and expand natural and landscaped areas, such as the urban forest, including through education, regulation and a long-term financial commitment.
GOV6-06	• The problem and opportunity created by increased building/redevelopment in areas where *ambient noise* levels are so high that outdoor use areas are too loud for comfort. City codes require usable outdoor spaces and developers propose them as amenities but noise studies are often focused on indoor areas. Mitigation measures requiring evaluation and mitigation of noise impacts on outdoor spaces in high "noise contour" areas should be considered for commercial and multiple family development.	The EIR evaluates indoor and outdoor noise impacts within the EIR Study Area. Mitigation Measures NOISE-1a and NOISE-4a include strategies to address excessive noise levels for all land use types. See Policies N-6.1, N-6.5, N-6.6, N-6.7 in the draft Comp Plan for related policy language.
GOV6-07	• More intense and *"multi-modal" use of sidewalks* should consider both on-site and public ROW improvements. All of the scenarios described in the Draft EIR contemplate worse and worse congestion for motor vehicles, as VMT per capita decreases less quickly than population increases. That support should be for the full range of people who walk and bicycle and push strollers, not just the fittest. Architectural Review looks at bicycle and pedestrian support building by building; for adequate mitigation the City should consider setting standards by block or frontage as well and systematically supplementing private development with its own efforts.	All of the scenarios, including the preferred scenario, include implementation of the City's *2012 Bicycle + Pedestrian Transportation Plan*, which includes projects that improve mobility and safety for pedestrians.
GOV6-08	• The need to revise *standards for on-site bicycle parking* so that a larger percentage of a building's users can be confident that bike parking will be available when they arrive. The City's bicycle parking formulas do not seem to have kept pace with either the actual increase in bike use or the City's desired increase in bike use. In addition, provision for parking for the larger bicycles used to transport small children seems to be non-existent. Correcting these problems would help mitigate anticipated mobility losses.	The comment is noted. The comment does not raise a specific concerns regarding the adequacy of the analysis in the February 2016 Draft EIR. Policy T-1.18 of the June 30, 2017 draft Comp Plan provides bicycle facilities, including on-site bicycle parking, while Policy T-5.12 increases the number of bicycle parking spaces in order to promote bicycle use. Further, Policy L-4.10 would increase the number of bicycle parking spaces in Town and Country Village.

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GOV6-09	• The need to aggregate and integrate the City's existing development standards in a *comprehensive matrix* so that applicants and reviewers can in fact implement the numerous and often far-sighted standards and projects that the City Council, with the advice of its boards, commissions and citizenry has already produced. Any mitigation and monitoring plan for the Comprehensive Plan Update should include provisions for creating and maintaining that matrix and assessing the City's compliance with it.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
B. Non-Governmental Organizations and Private Companies		
ORG1	Keith Bennett, Ph.D., Save Palo Alto's Groundwater, February 5, 2016	
ORG1-01	The following comments are relevant to the discussion of groundwater, both the "shallow" and "deeper" groundwater layers in Section 4.8 of the DEIR, Hydrology and Water Quality. The DEIR completely misses the point on the shallow aquifer.	The February 2016 Draft EIR was prepared prior to the issuance of Palo Alto's revised guidelines for basement dewatering. The Supplement to the Draft EIR includes revisions to incorporate updated policy information as of February 2017 in the Regulatory Framework and the groundwater discussion in the Existing Conditions section was also revised in accordance with this new information and comments from Save Palo Alto's Groundwater. Mitigation Measure HYD-2, which relates to the depletion of groundwater resources, was also revised as part of the Supplement to the Draft EIR. Since the publication of the Supplement to the Draft EIR, the City Council voted on March 7, 2017 to update the City's construction Dewatering Guidelines and adopt an ordinance codifying the Dewatering Guidelines as part of Municipal Code Chapter 16.28. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect these updates.
ORG1-02	*"The proposed Plan would result in a significant impact to hydrology and water quality if it would:* *… 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." --- DEIR, pg. 4.8-46* **There is no quantitative discussion on the impacts of construction dewatering on either the shallow or deep aquifer layers, nor any projection on the future amount of construction dewatering expected to occur under any of the Scenarios in the DEIR.**	The Supplement to the Draft EIR contains Palo Alto's February 2016 revised and strengthened policy on basement dewatering, which was issued after the Draft EIR was prepared, as well as additional information on the shallow and deeper groundwater aquifers in the Existing Conditions section. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations. It would be speculative and difficult to accurately calculate how much construction dewatering will occur in the future given the unknown nature of specific future development projects and with the increased

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		permit fees and more stringent requirements with the new policy. The City of Palo Alto maps the location and number of the dewatering sites on the Public Works website. The number of construction dewatering sites decreased from 14 in 2015 to 9 in 2016. It is not known if this is a consistent downward trend due to the new requirements. The City is exploring incremental changes to its dewatering policy for the 2017-2018 season, which is scheduled to begin at the end of the rainy season.
ORG1-03	1. In 2015, the amount of groundwater removed for construction dewatering was approximately equivalent to 50% to 100% of the total annual aquifer recharge from precipitation within Palo Alto estimated by Todd Engineers. 2. The volume of water removed during construction dewatering is currently not limited by the City, and has roughly tripled in the last 10 years. 3. Although basement construction and dewatering are currently generally concentrated in a small area of Palo Alto, construction dewatering is very likely to expand dramatically into areas of Palo Alto "south" of Oregon Expressway, for example in the single story overlay districts that are not in the flood zone.	This comment letter was prepared prior to the issuance of the City's updated basement dewatering regulations. The volume of water removed is now limited to a period of 10 weeks to ensure minimization of pumping duration and there are permit fees and geotechnical studies required. With the new restrictions and fee structure, the number of construction dewatering sites decreased in 2016. In addition, the City adopted updates to the City's dewater guidelines and regulations in March 2017. Therefore, it is unlikely that construction dewatering will expand dramatically in areas of Palo Alto south of Oregon Expressway.
ORG1-04	4. There is little acknowledgement of the serious consequences of groundwater overdraft.	The potential for a reduction in groundwater recharge is discussed in Impact HYD-2 and additional information on water supply can be found in Chapter 4.14, Utilities and Service Systems, of the February 2016 Draft EIR and Supplement to the Draft EIR. Because the City receives 100 percent of its water from the San Francisco Public Utilities Commission (SFPUC), surface supplies), groundwater overdraft was not discussed in detail although it is noted in the EIR that the City could use groundwater to supplement SFPUC supplies during drought conditions.
ORG1-05	5. There are no metrics for the "temporary, localized impacts [that] could occur to the shallow aquifer during the dewatering process," which potentially could be unlimited as the number of basements constructed using dewatering is unlimited.	This comment letter was written prior to the implementation of Palo Alto's updated construction dewatering regulations, which now requires a geotechnical study to be conducted for any projects involving construction-related dewatering of more than 30 gallons per minute. In addition, the anticipated drawdown curve in the geotechnical study is required to be verified through pump tests performed on monitoring wells installed on the project site.
ORG1-06	6. There are no considerations of the cumulative impacts of dewatering from multiple	Because of the concern for cumulative impacts from dewatering,

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	dewatering sites and over multiple years, including drought years, or the time and conditions required for recovery. Are the impacts truly "temporary," or do the impacts accumulate for years?	in March 2017 the City of Palo Alto revised its construction dewatering guidelines and regulations to address the potential for long-term impacts and has imposed restrictions on the volume of water discharged from individual dewatering sites. These updates are described in the revised Hydrology section (Chapter 4.8) in Chapter 3 of this Final EIR.
ORG1-07	The shallow aquifer layers should be explicitly considered, and valued as a resource by City Policies. • The shallow aquifer provides environmental services in the ground. It is well-known that removing groundwater can result in ground settling and subsidence, as noted on page 4.8-27 of the DEIR. Settling risk is especially high where the ground is supporting buildings or structures that provide forces on the ground. • Shallow groundwater has multiple beneficial uses: o Historically and currently, water from the shallow aquifer layer is used and usable by individual households for domestic purposes. In the vast majority of Palo Alto, water in the shallow aquifer is usable for irrigation without further treatment, and could easily substitute for current uses of potable water for irrigation, thereby reducing potable water consumption. o Most shallow groundwater is likely potable with minimal further treatment. The City of Palo Alto is considering production of "purified" water from treated sewage water, and water in the shallow aquifer is generally of much higher quality than untreated sewage or brine (being considered for desalination). The small areas of toxic plumes in groundwater are documented in the DEIR. Water from these areas requires additional treatment to be usable and care must be taken when pumping groundwater that the toxic plumes do not migrate. o In much of Palo Alto, the natural groundwater table is 3 to 10 feet below ground surface, and through capillary action increases soil moisture a few feet below the ground surface, providing moisture to trees and other vegetation within their root zones. o In a severe emergency, water in the shallow aquifer levels could be accessed through many existing private wells, or using hand tools to rapidly (1 day) dig a new well and a manual pump, or, if (solar) electricity available through an electrical pump. Flow rates from even shallow wells can be high – over 50 gallons per minute. This water could support human life with filtration and / or boiling, and would be extremely welcome if, due to disaster and failure of other emergency water systems, other water was not available. o Deep aquifer zone recharge. The only local-origin source of water for deep aquifer recharge within Palo Alto is precipitation, which must percolate through the shallow	The comment is noted and the hydrology section of the Supplement to the Draft EIR has been revised in response to these comments. The potential impact from ground settling and subsidence is addressed in the City's revised construction dewatering regulations by requiring developers to prepare a geotechnical study of dewatering on adjacent private or public structures prior to pumping, survey and mark elevations on structures on adjacent parcels, and, with the consent of neighboring property owners, water trees and other vegetation on adjacent properties. The Existing Conditions section in Chapter 4.8, Hydrology and Water Quality, of the Supplement to the Draft EIR includes revisions to indicate that the shallow aquifer is suitable for irrigation or as a substitute for recycled water. The areas that have been or currently are undergoing remediation from contaminated shallow groundwater are provided in Chapter 4.7, Hazards and Hazardous Materials. The comment that water in the shallow aquifer could be accessed in case of an emergency is noted but the development of detailed procedures and policies to access this source is beyond the scope of this programmatic EIR. The comment regarding deep aquifer one recharge is noted and Chapter 4.8 of the Supplement to the Draft EIR includes revisions to indicate that unconfined aquifer conditions west of El Camino Real are a main recharge area and provide rainfall recharge to both the shallow and deep aquifer zones. The importance of the

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	aquifer zones to reach the deeper aquifer. In addition, models of groundwater recharge used by the City of East Palo Alto for their wells include imported water sources within the shallow aquifer zones in Palo Alto: leakage from water supply and sewage pipes, and irrigation. These sources are at risk due to water conservation measures and infrastructure upgrades, such as replacing aging pipes. See the Groundwater Management Plan, City of East Palo Alto, (August, 2015), prepared by Todd Engineers. http://www.ci.east-paloalto.ca.us/DocumentCenter/View/2045. o The importance of the shallow aquifer for storing, filtering and draining storm waters (without using the storm drains) is not considered at all.	shallow aquifer for storing, filtering, and draining stormwater is considered in the Supplement to the Draft EIR with the discussion of the implementation of LID and BMP features for new development and redevelopment sites. Although infiltration is the preferred LID/BMP feature, the presence of low permeability soils (Bay muds) and high groundwater limit the use of infiltration in some areas of Palo Alto.
ORG1-08	This DEIR ignores many real and potential consequences of the unregulated pumping out of our groundwater such as its contribution to sea level rise, streamflow losses, damage to infrastructure, etc. Additionally, the DEIR simply ignores many important valuable and beneficial uses of the shallow aquifer; apparently, only potable water coming out of the tap is valuable.	The Supplement to the Draft EIR includes revisions to describe the new Palo Alto construction dewatering policy that deals with the consequences of groundwater pumping. Also, a discussion was added that describes the beneficial uses of the shallow aquifer. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations.
ORG1-09	Specific comments: Pg. 4.8-18: Awahnee Principle for Water Efficient Land Use One of the stated goals of the Awahnee Principle is "recharging groundwater." City policies permitting discharge of water from construction dewatering directly contradicts this principle, and the amount of water discharged from construction dewatering is very significant: in calendar year 2015, using estimates from City Staff, the volume of water discharged to storm drains from residential basement construction alone (~400 acre-feet) was roughly equivalent to the total amount of rainwater on city streets (199 miles by 30 feet average width) for the year, or 50 times the total amount of water stored in the new El Camino Reservoir.	Page 4.8-1 of the Supplement to the Draft EIR includes revisions to reflect that groundwater recharge is part of the Awahnee Principle for Water Efficient Land Use.
ORG1-10	Pg. 4.8-18: Basement Exterior Drainage Policy In practice, this policy appears to be partially circumvented simply by placing a slab, perhaps with imperfect waterproofing, below the main basement slab, and connecting drainage pumps in collection depressions above the lower slab. For an example, see the new construction at 736 Garland. If not replaced into the aquifer, for example if discharged either to the storm drain or sanitary sewer, even a slow, 1 gallon / minute leakage results in groundwater depletion of over 525,000 gallons / year (1.6 acre-feet) for a single residence every year. This is enough water to irrigate 15 typical Palo Alto residences for the year; when multiplied by the large number of residences expected to be built with basements in permanent groundwater such pumping becomes a very major continuous	Page 4.8-1 of the Supplement to the Draft EIR includes revisions to reflect that the City does not allow permanent drains around basement foundations for the continuous pumping and removal of groundwater and requires that basements must be constructed to be waterproof.

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	contributor to groundwater depletion.	
ORG1-11	**Pg. 4.8-19: Construction Dewatering System Policy**The DEIR does not state the estimated amount of groundwater pumped and discharged forconstruction dewatering in 2015, or compare this amount to (shallow) aquifer recharge rates.The number of construction dewatering sites permitted in 2015 is incorrect. The correct number of construction dewatering sites in 2015 is fifteen (14 residential, 1 commercial). The addresses are:1. 1950 Newell2. 2133 Webster3. 1820 Bret Harte4. 1405 Harker5. 713 Southampton6. 3832 Grove7. 2230 Louis8. 1210 Newell9. 385 Sherman (commercial, this site may not need to dewater, permit was issued to minimize disruption of construction)10. 897 Southampton11. 736 Garland12. 684 Wellsbury13. 2130 Byron14. 51 Jordan Place15. 804 Moreno	Pages 4.8-2 to 4.8-3 of the Supplement to the Draft EIR includes revisions to reflect the City's updated construction dewatering policy as well as the number of dewatering permits issued in 2016 (nine permits) and 2015 (15 permits). Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations.
ORG1-12	Pg. 4.8-19. Unless dewatering policies are further revised, the current policies emphasize protection of property, but generally treat groundwater as a construction waste product, and do not value groundwater as a resource.	Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations.
ORG1-13	**Groundwater** **Pg. 4.8-27.** The statement that the shallow groundwater is "non-potable" is misleading. Palo Alto is considering the use of "recycled water" and "purified water," both of which are generated from sewage, which are surely "non-potable." In general, shallow groundwater quality is far superior to untreated sewage, and, for irrigation, generally superior to current recycled water as the salt content is lower. Furthermore, use of on-site shallow groundwater for irrigation requires less energy than either recycled or imported water.	Page 4.8-10 of the Supplement to the Draft EIR includes revisions to reflect that groundwater is considered to be non-potable, but is suitable for irrigation or as a substitute for recycled water.
ORG1-14	**Groundwater Depth Map in Palo Alto** **Pg. 4.8-27.** Terradex constructed a comprehensive groundwater depth map, using data from a very large number of geotechnical surveys for construction in Palo Alto: http://savepaloaltosgroundwater.org/files/PaloAlto_ShallowGroundwater_Update_wPlumes_V3_red.pdf The above map also shows the boundaries of the flood zones and toxic waste plumes.	Page 4.8-9 of the Supplement to the Draft EIR cites the Terradex map as a reference to the fact that groundwater levels typically range from 5 to 50 feet below ground surface.
ORG1-15	Pg. 4.8-28. There is no discussion of the source(s) and locations of water for recharge of the deep aquifer levels.The only sources of deep aquifer recharge within Palo Alto must be from the shallow aquifer and San Francisquito Creek. Table 8 (attached) of the Gloria Way Water Well Production Alternatives Analysis & East Palo Alto Water Security Feasibility Study (2012, Todd Engineers) for the City of East Palo Alto's Groundwater Master Plan attributes more than 85% water available for their (deep) aquifer for their wells to sources within or through the shallow aquifer, with a significant fraction of that from Palo Alto. The impacts of construction dewatering on the supplies of water for Palo Alto and East Palo Alto's municipal wells is not quantitatively analyzed.	Page 4.8-10 of the Supplement to the Draft EIR includes revisions to reflect this information.

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ORG1-16	The interaction between the shallow and deep aquifer layers is complicated, and furthermore water flows laterally in the shallow aquifer. Cross sections provided by the Bay Area Water Supply and Conservation Agency (BAWSCA)[4] indicate lateral connectivity in the shallow aquifer above the clays from the areas of construction dewatering to the high recharge areas west of El Camino Real. Removing water from the shallow aquifer (for example near Community Center) causes groundwater to flow from above the high recharge areas to replace the water pumped, reducing the water pressure and recharge rates. Additionally, this model indicates significant flows to the deeper aquifer layers from the shallow aquifer for the "Southern Focus Area," located in Menlo Park, which is geologically very similar to the areas with significant construction dewatering in Palo Alto. It insufficient to simply state that the shallow aquifer and deep aquifer layers are separated by clays in the area of a construction dewatering site, and therefore removing water from the shallow aquifer does not affect deep aquifer recharge. The dynamics are more complicated, and if the assertion were true, the sustainable, local supply of groundwater in the deep aquifer is less than currently believed.	Page 4.8-10 of the Supplement to the Draft EIR includes revisions to reflect this information.
ORG1-17	**Pg. 4.8-44** **HYD-2 Ground Water Resources** 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. (Potentially Significant and Mitigable – All Four Scenarios).	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
ORG1-18	**Pg. 4.8-45***Temporary, localized impacts could occur to the shallow aquifer during the dewatering process.*The text of the DEIR uses the word "temporary" in multiple places to describe the effects on the shallow aquifer of dewatering. However, there is neither data nor analysis of the cumulative effects of multiple basement dewatering projects either in a single year, nor evidence that natural aquifer recharge rates are sufficient to completely replace the water in the shallow aquifer in the following rainy season, particularly during periods of drought. Unless the water removed from the shallow aquifer is completely replaced in the following rainy season, deficits will accumulate from year to year, resulting in the long-term lowering of the shallow groundwater table.Evidence for lowering of shallow groundwater levels by groundwater pumping is provided by the groundwater depth map generated by Terradex (see comments for page 4.8-27). The 20 foot depth groundwater contour is significantly deflected near the pumping site at Alma and Oregon Expressway, which pumps about 200 acre-feet of groundwater annually. Groundwater pumping for construction dewatering in Palo Alto already significantly exceeds this	The Supplement to the Draft EIR presents the City's revised construction dewatering policy and the word "temporary" has been removed from the text. It is difficult to determine from the Terradex groundwater depth map whether the deflection of the 20-foot contour is due to groundwater pumping or due to subsurface stratigraphic conditions. The 10-foot contour also has a significant deviation that does not appear to be related to pumping conditions. The well graphs to the right of the contour map show seasonal variations in depth to groundwater but there is no significant trend of decreasing groundwater levels. With the revised Palo Alto construction dewatering policy, it does not appear that the amount of construction dewatering will significantly increase as the number of dewatering sites decreased from 2015 to 2016 by 36 percent and further restrictions on

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	amount, and without regulation, is likely to further increase.Furthermore, an individual owning and operating a well for geothermal heating and cooling with records for 40 years (including previous periods of extended local drought in the late 1970's and again in the late 1980's) has reported that this winter was the first time ever that their well has been dry, even though both the winters of 2014 – 2015 and 2015 – 2016 were normal rain years locally, again suggesting that the shallow aquifer water levels and flows are being lowered by construction dewatering.	construction dewatering has been proposed for implementation in 2017.It is also difficult to determine whether the operational difficulties with a geothermal heating and cooling system are due to construction dewatering impacts because the depth of the geothermal well and subsurface conditions are not known. Typically, these wells are fairly deep to take advantage of temperature differentials. Problems with a dry well could also be related to clogging of the screen after 40 years of operation due to poor water quality and scaling.
ORG1-19	**Pg. 4.8-47Mitigation Measure (HYD-2)**The DEIR does not support the conclusion that the impacts are "less than significant after mitigation." The proposed mitigation measures do not address the core issue, which is protection of groundwater.1. There is absolutely no quantitative analysis of the amount of groundwater pumped currently or expected to be pumped in the future, which under current policy is unlimited.2. The additional recharge expected from C.3 programs is not quantified.3. The parties pumping groundwater are not required to pay for recharge programs to replace the groundwater, and no specific programs for shallow aquifer recharge are proposed.4. No sustainable source of replacement groundwater for mitigation has been identified.5. The analysis does not include any measures to address water continually pumped frombasements that slowly leak.6. Applicants are not required to pay the costs of replacing the groundwater that is removed, as is generally required for other pumping of groundwater in the Santa Clara Valley Water District area, with the exception of construction dewatering. This exception is inappropriate considering the amount of construction dewatering now and expected in the future in Palo Alto.It is unlikely that the implementation of LID measures and onsite infiltration, as specified under the C.3 provisions of the MRP, would increase the groundwater recharge adequately to offset the amount of water removed by construction dewatering. The amount of water removed by construction dewatering in 2015 was approximately equivalent to the total rainfall on 5% of the entire city area. Most of the city residential areas, excluding streets, already drain to soils. For example, downspouts from older homes drain to the soils from which water is absorbed, and not to storm drains.	Mitigation Measure HYD-2 was revised in the Supplement to the Draft EIR to reflect the new Palo Alto construction dewatering policy. A quantitative analysis of the amount of groundwater that will be pumped or expected to be pumped in the future is beyond the scope of a programmatic EIR and it is not possible to speculate because the number of future permit applications is not known. However, the new policy does limit the duration of dewatering to 10 weeks and permit fees are part of the application process, which also requires a geotechnical study to determine the amount of groundwater that will be pumped and impacts on properties within a 400-foot radius of the site. The mitigation measure does not address water pumped from basements, because the City prohibits the pumping of groundwater after the completion of basement construction. The City is also considering additional construction dewatering requirements for 2017 and 2018, which could include the use of groundwater cut-off walls to limit pumping to 30 gallons per minute.The statement that the implementation of LID features and on-site infiltration will not offset the amount of water removed by construction dewatering is correct. However, the City's revised construction dewatering guidelines and regulations, which were adopted after the February 2016 Draft EIR and Supplement to the Draft EIR were prepared, will most likely result in a reduction in the number of dewatering sites and the amount of groundwater withdrawn in the future. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and

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		regulations.
ORG1-20	*Strengthening outreach on the water cycle and value of fresh water flows to storm drains, creeks, and the Bay.*The DEIR does not provide any analysis on the impacts of additional freshwater flows into the Bay, and is contradicted by materials from the Santa Clara Valley Water District stating encouraging reductions of fresh water inflows into the Bay. Matadero Creek already receives approximately 200 acre-feet of year of pumped groundwater from the Oregon Expressway / Alma underpass, and the Regional Water Quality Water Treatment Plant discharges over 10,000,000 gallons / day of fresh water. This claimed benefit needs to either be definitively supported with scientific evidence showing that the benefits of water to the Bay, in the specific areas that receive the fresh water are greater than the environmental benefits of groundwater, including consideration of sea level rise.Mitigation measures should be prescriptive building practices that require:• Use of best-practice construction methods, such as clay barriers or sheet pilings that minimize the amount of groundwater removed during construction, particularly for residentialconstruction.• All water removed be either used for beneficial purposes or infiltrated into the soils so as to recharge groundwater, with a possible exception for discharge of water of low quality requiring treatment before discharge.• Strictly require and enforce provisions to ensure that basement leakage does not result in groundwater depletion, for example by strict inspection of construction to ensure that basements are actually leakproof and requiring any basement drainage pumps to discharge to highly pervious soils.	This EIR does not provide any analysis on the impacts of additional freshwater flows into the Bay, because this is beyond the scope of a programmatic EIR and is not one of the nine significance criteria evaluated in the impact discussion. However, the City continues to work with Santa Clara Valley Water District to further understand the North County groundwater systems and ensure that any new City policies are consistent with their goals.Under the City's revised construction dewatering policy, which is reflected in Mitigation Measure HYD-2 and was issued after release of the February 2016 Draft EIR, there are measures to restrict the period and duration during which groundwater may be removed during construction and there is a requirement to provide at least one filling station at dewatering sites to ensure that the extracted groundwater will be used for beneficial purposes. The City does not allow the pumping of groundwater once basement construction has been completed.
ORG1-21	*Table 8: Estimated Annual Groundwater Recharge, San Francisquito Groundwater Subbasin*	Table 8 was used to estimate the amount of groundwater removed for construction dewatering as compared to the total annual aquifer recharge, as cited on page 1 of the comment letter. From Table 8, the total recharge is estimated to be 5,001 to 10,089 acre-feet/year. If the extraction of groundwater in 2015 was 126 million gallons (386 acre-feet), this would be equivalent to 3.8 percent to 7.7 percent of the total recharge.
ORG2	Keith Bennett, Save Palo Alto's Groundwater, May 5, 2016	
ORG2-01	Please find additional comments from Save Palo Alto's Groundwater related to the DEIR for the Comprehensive Plan.In particular, not the section on impacts of basements on groundwater flows and impacts on flood risks. *Proposed Updates to City of Palo Alto Policies Pertaining to Pumping of Groundwater for Basement Construction* Prepared by Save Palo Alto's Groundwater	The comment is noted. The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR. The commenter's specific comments are addressed in the responses below.

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	http://savepaloaltosgroundwater.org April 2016 **Introduction** Using a construction practice known as "dewatering", in which very large amounts of groundwater are pumped to build basements when construction site soils are saturated with water, residential basements have been permitted and constructed in Palo Alto at a rapidly increasing rate, from an average 5 per year from 2006 to 2008[1] to 14 in 2015 (Attachment A). In 2015, it is estimated that approximately 126 million gallons, or 16.8 million cubic feet, of water were pumped from the area's shallow aquifer for residential basement construction in Palo Alto. This is enough water to supply one average Palo Alto residence for 1,500 years, based on average July 2015 residential consumption of 226 gallons per day[2], or more than 50 times the amount of water stored for Palo Alto's emergency water in the El Camino Park Reservoir.An estimated 98-99% of this extracted groundwater is discharged directly into City storm drains despite regulations mandating "fill stations" for public use of the groundwater at each site. Only 1-2% of the extracted groundwater is beneficially used.We believe aquifers and groundwater are an unseen public trust resource and play an important role in supporting the geological foundation for Palo Alto's infrastructure, public and private structures, providing moisture for our canopy and plants, recharging aquifers supplying water to public and private wells, and handling storm water. The nearly 300% increase in approved dewatering permits and over 100 million gallons of groundwater extracted during the 2015 do not appear to have been anticipated by the authors of the City's existing dewatering policies and regulations. Current dewatering regulations do not accurately address localized impacts of dewatering, including, but not limited to: potential ground settling; reduced soil moisture for trees and vegetation; public compensation for the private use of community groundwater; potential impacts on public and private water supplies; and necessary changes in public policy in an era ofclimate change. Additionally, the longer-term and cumulative impacts of basements on aquifer flows and storm water drainage are ignored.Although the winter of 2015-2016 is expected to benefit from "El Niño" with abovenormal rainfall, NOAA's long range forecast for January to February 2017 is a 30%chance of below normal precipitation. (Attachment B)For these reasons, which are discussed in greater detail below, we believe City policies and regulations regarding dewatering should be immediately and significantly revised. Specifically builders should be required to achieve performance-based outcomes using	

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	best-practice construction methods. These include practices such as restricting the pumping duration and quantity of groundwater that can be pumped maximizing re-use of pumped groundwater for purposes where it can substitute for potable water (such as irrigation) or replacing the groundwater into the aquifer nearby.	
ORG2-02	**Background** A number of residents, especially those in neighborhoods where dewatering has occurred, are very concerned about the effects of dewatering, as well as the waste of groundwater, an increasingly scarce and vital community resource. While dewatering has been a community concern for over 13 years, the level of concern has intensified because of the unexpected increase in dewatering projects in 2015 and the global focus on the limited supply and value of groundwater, especially during periods of prolonged drought. The Palo Alto City Council is planning to discuss City policies related to basement construction dewatering at its February 1, 2016 meeting. City policies regarding dewatering are based primarily on the 2004 EIP Associates report, http://www.cityofpaloalto.org/civicax/filebank/documents/13500. This report was last reviewed by City staff in 2008 in response to citizen complaints and in consideration of Green Building policies. Staff analysis, discussion and final report, which were reviewed at the September 24, 2008 Planning and Transportation Commission meeting may be viewed at: http://www.cityofpaloalto.org/civicax/filebank/documents/13737 Additional relevant facts not accounted for in Palo Alto's current dewatering policies are summarized below:Staff memo 13500 includes a 7/19/2008 letter of expert written testimony from Dr. David Stonestrom (Attachment C), a Palo Alto resident and professional hydrologist (Ph.D., Hydrology, Stanford University). His letter provides an analysis of the issues related to dewatering including ground settling, impacts of basements on groundwater flows during rainfall, and the importance of soil moisture for plants. Dr. Stonestrom concluded: "basements must be restricted to areas that have adequately thick unsaturated zones – not all areas of Palo Alto are suitable. Large-scale dewatering should not be permitted. Groundwater is a City resource so precious that no one should be permitted to squander it on grand scales." Three other local hydrologists (Dr. Leah Rogers, Dr. Allen Moench, retired from the US Geological Survey, who focused on developing analytical methods for well hydraulics and stream/aquifer interaction, and provided	Subsequent to this letter and the issuance of the February 2016 Draft EIR, the City implemented a revised construction dewatering policy. The Supplement to the Draft EIR includes revisions to reflect those policy updates. Since the publication of the Supplement to the Draft EIR, the City Council voted on March 7, 2017 to update the City's construction Dewatering Guidelines and adopt an ordinance codifying the Dewatering Guidelines as part of Municipal Code Chapter 16.28. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect these updates. The City is also considering the implementation of more stringent requirements for 2018.

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	analysis for the Palo Alto Baylands, and Roger Pierno, a civil and environmental engineer professionally familiar with the aquifers in Palo Alto) have also provided written commentary (Attachments D, E, F) on expected impacts of dewatering, including spatial extent of the lowering of the groundwater; settling; deep aquifer recharge; soil moisture; and groundwater flows. The amount of groundwater being removed by dewatering is substantial. Per City staff, the amount of groundwater extracted per basement issued a dewatering permit is typically 8 to 10 million gallons over a 3- to 6-month period[3]. For any specific basement, the quantity of water pumped may be more or less than this estimated range. For the 14 single-family residential basement dewatering permits issued in 2015, at an average of 9 million gallons per basement, the total amount of groundwater extracted equals 126 million gallons, approximately 16.8 million cubic feet or nearly 400 acre-feet of groundwater, and excludes dewatering for other construction. This quantity of groundwater water pumped is visualized in Figure 1. There are currently no limitations on either the depth of the basement or the amount of community groundwater that can be removed, or any requirement to measure the amount of water pumped.*Figure 1. Height of groundwater water extracted during residential basement construction in Palo Alto in 2015, assuming an average of 9 million gallons per basement, if placed on an 8,000 ft^2 lot and compared to the height of One World Trade Center.* Alternatively, this same amount of water is equivalent to: • More than 50 times the amount of water in Palo Alto's El Camino EmergencyWater reservoir • 50,400 full 2500-gallon water tank trucks; • Enough water to fill a football field including end zones to a depth of 275 feet[4]; • Enough to lower the existing water table by 14 inches over an area of two andone-half square miles (1600 acres) assuming a soil porosity of 20% and no inflow; • 4,200 gallons per Palo Alto household, or • More than the current 2016 Santa Clara Valley Water District allocation ofuntreated, non-potable water from the State Water Project (10,000 acre-feetfor 1.9 million persons) [5] on a per capita basis. A typical 10-foot-deep, 2500 square foot basement with a 3-foot-thick foundation on an 8,000 square foot lot will require dewatering to a depth of 15 feet, per current City regulations[6]. Assuming the extractable groundwater is 20% of the soil volume, the maximum amount of water attributable to the lot to be pumped would be 24,000 cubic feet. (8,000 ft2 x 15 ft. x 0.2 = 24,000 ft^3). In contrast, the City estimates the typical amount	

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	of groundwater pumped per basement to be 9,000,000 gallons or 1.2 million cubic feet. Therefore, at most, 2% (24,000 / 1,200,000 x 100% = 2%) of the groundwater extracted is from the property being dewatered up to a depth of 15 feet. The remaining 98% is either from surrounding properties, or from a much deeper depth than required by current building regulations.Dewatering has the potential to affect plants, especially trees, unless compensated for by surface watering. In the areas where most residential dewatering has occurred, the groundwater is typically between 7 to 13 feet below the surface, with a seasonal variation of 1 to 2 feet. (City map supplied, Attachment G). While the roots of most trees in Palo Alto extend 7 feet or less below the surface[7], capillary action in soils typically brings moisture several feet above the level of saturated soils, and therefore into the root zone of some plants. In addition, the open trench for basement construction dries the surface soils on adjacent properties. All extracted groundwater discharged into a storm drain is required to be tested for contamination per City and Regional Water Quality policies. If contaminant levels are below accepted standards, it may be dumped into the storm drains without treatment other than sediment removal. This groundwater is usable for irrigation and other beneficial uses[8]. Moreover, with routine treatment, or perhaps simply boiling, water of this quality is potentially potable.The City charges the applicant approximately $634 for a 6-month dewatering project, which includes the dewatering permit ($142) plus $82/ month[6]. The Santa Clara Valley Water District (SCVWD) specifically exempts payment of fees for groundwater extraction for construction projects. By comparison a resident who installed a well and extracted the same amount of non-potable, untreated groundwater to irrigate their garden would be charged approximately $24,585 by the SCVWD[9], and moreover are prohibited from extracting groundwater from depths less than 50 feet[10]! The amount of extracted community groundwater diverted into the storm drain system during a residential basement dewatering project is equivalent to approximately 480 years of discharge into the storm drain system from one residence.	
ORG2-03	**Deficiencies of 2004 EIP Associates Report**We believe the 2004 EIP Associates report used by the City as the basis for currentpolicy is inadequate and inaccurate when viewed under current conditions. Also of concern is the concentration of the 14 permitted residential dewatering sites within an area of about one square mile in 2015.The EIP Associates report, while offering a general overview of the basic geology and aquifers in Santa Clara County, had many deficiencies, as it: • Did not provide geological maps covering the detailed geology and hydrology of Palo Alto or quantitative groundwater modeling.	Subsequent to the issuance of the February 2016 Draft EIR and this comment letter, the City implemented a revised construction dewatering policy, based on concerns expressed by residents and Save Palo Alto's Groundwater. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations.

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	• Primarily considered only the long-term effect of groundwater pumping due to "one or several simultaneous dewatering operations" on groundwater stored within the entire Santa Clara Valley Sub-Basin. This basin extends from the Coyote Narrows in southern Santa Clara County into San Mateo County. • Did not accurately analyze the local impacts of dewatering. It did not consider the pumping depth or duration, groundwater extraction rate, or include local analysis of site soil characteristics. (The report did acknowledge dewatering would cause "temporary and local effects.") • Stated, incorrectly, that the shallow and deep aquifer are not connected, when in fact a 2013 groundwater model prepared for the Bay Area Water Supply and Conservation Agency (Figure A5) indicates that Palo Alto groundwater is a significant source of water for recharge for the deeper aquifer. Todd Engineers also modelled sources in the shallow aquifer and surface soils within Palo Alto as a significant contribution to sustainable supply of groundwater available for wells into the deeper aquifer (Attachment H). See also Supplementary Materials A for a discussion of Palo Alto hydrology. • Did not provide a quantitative analysis of the expected impacts or cumulative effects from multiple simultaneous dewatering operations in Palo Alto. • Assumed single year impacts from dewatering would automatically be corrected the following year, regardless of extended drought conditions or the amount of dewatering. • Assumed incorrectly that the total amount of water pumped was negligible compared to the local recharge rate of the aquifer system and capacity (i.e., implied that the aquifer system is an infinite resource).	
ORG2-04	**Impacts of Dewatering**Impacts from dewatering for basement construction are both "local"; i.e., primarily affect locations near the dewatering site, and "global"; i.e., affect the aquifers more generally.**Local Impacts** Local impacts occur primarily within the dewatering site's zone of depression, the region where the water table is lowered due to the groundwater extraction. The zone of depression may extend well beyond the dewatering site and depends upon the duration and rate of groundwater extraction, local soils characteristics, such as buried gravel beds and channels and/or the cumulative effects of multiple dewatering sites occurring in the same geographical area. Reducing the depth or duration of pumping, or both, reduces the extent and depth of the zone of depression. The zone of depression may be spatially asymmetrical (i.e., not conically-shaped) depending upon soil structures and pumping conditions, and pumping from multiple sites may interact, but are potentially significant 1,000 feet from the pumping site.. In general, to determine the zone of depression accurately, field measurements are required. See comments from Dr. Rogers, Attachment D. The three main local impacts of dewatering are	Based on the potential for local impacts associated with construction dewatering, the City has revised its construction dewatering guidelines and regulations, subsequent to the issuance of the Supplement to the Draft EIR and this comment letter. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations.

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	ground settling; effects on vegetation, especially trees; decrease of the amount of soil available to absorb and associated risks of flooding during storms. **1. Ground Settling.** The soils in Palo Alto expand and contract depending upontheir water content, as they contain smectite clays. There are normal seasonalfluctuations in the soil moisture, i.e., doors may be tighter in one season thananother due to uneven soil expansion and contraction. When dewatering lowersthe water table below the normal seasonal range, soil that has historically beensaturated becomes unsaturated and may contract. This contracted soil may notre-expand even when water returns, possibly resulting in permanent settling.Since water is removed faster from soils closest to the dewatering site, thereduction in soil moisture may not be uniform across the property (andneighboring properties), resulting in uneven settling and possible cracking offoundations, walls and masonry. The potential impacts of uneven ground settlingare likely to be exacerbated during periods of drought when the water table isalready abnormally low.Save Palo Alto's Groundwater is concerned because:• Careful analysis with measurements of settling of ground supporting loadssuch as buildings, caused by dewatering has not been made.• Neither estimates nor measurements of the rate of water table recovery atand around dewatering sites have been made.• Possible impacts on public and private infrastructures have not been carefullyconsidered. Even temporary settling can cause permanent damages.• The cumulative effects of multiple, nearby dewatering sites in a single"season" are not considered, either locally or area wide? How much watercan be pumped in total per year, and is that figure dependent upon the yearlyprecipitation or aquifer levels?	
ORG2-05	**2. Effects on Vegetation, Especially Trees.** The 2008 Planning and Transportation Commission's report stated tree roots can extend up to 7 feet below the ground. Soils wick moisture several feet from the water table due to their capillary action. Tree roots are not "in" the aquifer, but instead benefit from moisture in the soil from the aquifer pulled up by capillary action. Trees including City street trees and other vegetation benefit from the water normally occurring in soils. Normally, residential irrigation (using potable water) provides an additional source of moisture for trees. The effects of mandated residential watering restrictions suggest trees are more dependent upon soil moisture to meet their water needs in times of drought. City Memo 13500 report stated: "A Planning Arborist reviews all basement construction projects to determine if the proposed basement will adversely impact an adjacent tree's	The City Arborist inspects building projects for physical impacts to roots, trunks, and limbs that could result in the loss of a tree, and does not consider the potential impacts of a project on soil moisture. The arborist may determine that supplemental watering is required to protect a tree. The City Council's adopted March 2017 updates to the City's dewatering guidelines and regulations require, with the consent of neighboring property owners, the watering of trees and vegetation on adjacent properties.

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	root system and plans would need to be identified if adverse impacts are identified[6]…". However, we believe without accurate site-specific measurements of soil moisture and groundwater levels, it would be difficult for an arborist to make the required review; we further believe that planning arborist reports are currently generally pro-forma.	
ORG2-06	**Area-wide Impacts of Dewatering**As California's Water Action Plan[11] states, "historically, inconsistent and inadequate tools, resources and authorities have made managing groundwater difficult in California and have impeded our ability to address problems such as overdraft, seawater intrusion, land subsidence, and water quality degradation. Pumping more than is recharged lowers groundwater levels – which makes extracting water more expensive and energy intensive. Under certain conditions, excessive groundwater pumping could mobilize toxins that impair water quality and cause irreversible land subsidence which damages infrastructure and diminishes the capacity of aquifers to store water for the future."	Preparation of a region-wide or statewide groundwater management plan is beyond the scope of this EIR. However, the City is coordinating with Santa Clara Valley Water District to further understand the North County groundwater systems and ensure that any new City policies are consistent with their goals. Although Palo Alto does not currently use groundwater as a water supply source, the City is exploring the possibility of groundwater extraction during emergency drought conditions in the future.
ORG2-07	**Relationship between Shallow Groundwater and Potable Water** Aquifers are underground layers of water-bearing permeable rock, rock fractures or unconsolidated materials (gravel, sand, or silt) from which groundwater can be extracted by using water wells. Aquifers store and transport water, but they do not create water. The Bay Area Water Supply and Conservation Agency (BAWSCA) utilizes a four-layer model for the aquifers around Palo Alto. There is the upper waterbearing zone (the "shallow aquifer") and two lower water bearing zones (the deep aquifer), separated in some areas by a layer of clays which are relatively, but not completely, impermeable. The deeper aquifer is used for Palo Alto's Emergency Water supply (Carollo Engineers) and is currently being studied for new municipal supply wells in East Palo Alto (Todd Engineers), and as a source of brackish water for desalination (BAWSCA). In addition, both the deeper and shallow zones of the aquifer currently supply public and private wells in Palo Alto, East Palo Alto, Menlo Park, Atherton and other cities (See also Attachment H, Table 9, and Figure A5) . City staff and others have stated that the groundwater removed during dewatering is non-potable. Additionally, it is said that as this groundwater is extracted from the shallow aquifer, all or most of it would normally flow into the Bay, and therefore, dewatering has no impacts on water available for beneficial uses, including potable water. However, these assertions are misleading for several reasons:1) Groundwater in the shallow aquifer is generally suitable for irrigation of mostplants without any treatment, and can partially or	The Existing Conditions section of the Supplement of the Draft EIR includes revisions to reflect that the deep aquifer occurs under both confined and unconfined conditions. It should also be noted that the deeper aquifer is not currently being used for Palo Alto's emergency water supply. The Carollo Engineers 2003 report explored the possibility of using groundwater wells for emergency supply but currently all water supplied to the City is from the SFPUC (surface water sources). The comment references Attachment H, Table 9, and Figure A5, which were not included with the comment letter.

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	completely substitute for potable water for this purpose. Groundwater removed during dewatering can beused for irrigation, replacing and reducing the use of potable water. This extracted groundwater is too valuable to waste and not reuse.2) The shallow aquifer is the source of most of the water that recharges the deeper aquifer. It is this deeper aquifer that currently supplies active and emergency wells[13, 14].The shallow and deep aquifers underlying Palo Alto are connected. Relying on the EIP Associates 2004 report, Palo Alto's staff has long held that the shallow aquifer's water did not recharge the deeper aquifer. However, all other studies evaluating the quantity of groundwater sustainably available for municipal supply wells, including Palo Alto's, have modelled the shallow aquifer in Palo Alto as the source of most of the freshwater recharge to the deeper aquifer[12,13,14]. Most relevantly, the recent groundwater model prepared by BAWSCA details extensive extraction and use of water from the shallow aquifer and models flows both within the shallow aquifer and to the deeper aquifer. See Supplementary Materials A.The flows of water in the shallow aquifer are similar to other water flows in Palo Alto, such as those in the San Francisquito Creek. Water flow rates are highest during and after the rainy season and this period accounts for most of the shallow aquifer water flows into the Bay. Yearlong, including during the dry season, water flows are slower and occur mainly from the shallow aquifer by percolation into the deeper aquifer, or are extracted by pumping. However water remains year around in the shallow aquifer section, including water trapped in pockets ("perched groundwater") that never naturally flows to the Bay. Supplementary Materials A includes a discussion of aquifer hydrogeology and a map of the estimated aquifer recharge rates.	
ORG2-08	**Permanent Impacts of Basements on Amount of Water-Absorbing Soils and Associated Risks of Storm Flooding**None of the above referenced reports consider the impacts of new basementconstruction on the lot's absorption of storm water runoff or the potential impacts of basements on neighboring homes. Palo Alto staff and the public have both expressed concerns regarding existing storm drain capacity and increased risks of flooding from severe rainstorms. Several of the streets identified as requiring storm drain improvements are in the same areas as basements are now being constructed, including Lincoln Avenue and Clara Drive (Attachment I). The City Council is considering a ballot measure for additional storm drain funding after the current storm drain fees expires in 2017.• The soil which is removed and replaced by a basement is no longer available to absorb water, thereby reducing the total amount of rainwater that is absorbed. Palo Alto and the SCVWD provide rebates to encourage residential use of permeable paving materials to reduce the load on storm drains. This program assumes soil can absorb rainfall allowing for slow percolation into the aquifer and flow to the Bay.• Basements are dams in	It is unclear how the permanent impact of basements will increase the risk of storm flooding. Although it is true that the soil removed when excavating a basement is no longer available to absorb water, the same would be true for any construction project that involves subterranean parking or foundation excavation. The requirement for new development and redevelopment projects to implement LID features and employ BMP practices, such as porous pavement, bioswales and infiltration galleries, is designed to partially offset the impact of increased impervious surfaces and decreased groundwater recharge.The concept of basements acting as dams that could result in flow into the storm drain system does not appear to be feasible (Figure 2 of the comment letter). The rate of groundwater flow is very slow and groundwater does not flow in a straight

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	the unseen "river" flowing through the soils and aquifers beneath Palo Alto. (Figure 2.) The majority of new residential constructions which include basements may cover one-half or more (of the width) of the property. A basement requires groundwater to flow around it. If the groundwater cannot flow along its natural pathway, it becomes elevated by basement "dams," and may flow into older non-watertight utility basements or into the storm drain system. If the storm drain capacity is exceeded, this redirected and unabsorbed rainfall may flood City streets and properties, potentially causing serious damage.*Figure 2. Illustrations of the interaction of homes with basements and the aquifer. Without appropriate engineering, basements extending into the aquifer block groundwater flow and, like a boulder in a river, cause "upstream" elevated water levels.*	linear path although groundwater can have a generalized flow direction. Each groundwater particle will follow the path of least resistance and thin permeable zones within the uppermost aquifer may exhibit different flow directions. Although groundwater would flow around an impermeable surface, such as a basement, the potentiometric surface would quickly equilibrate around the back side of the basement so that there would be no significant difference in water levels on the front and back sides of the basement. This could be verified by the installation of piezometers at a basement site. It is not conceivable that the basement would act as such a barrier to groundwater flow that the backed up water would rise to the surface and result in an overflow to the storm drain system.
ORG2-09	**Lower Impact Construction Alternatives**Palo Alto's policies regarding dewatering for basement construction provide noincentives for builders to minimize the amount of groundwater extracted. As a result, community groundwater is treated as a construction waste, not as a valuable resource.We believe use of construction best practices could significantly reduce the amount of groundwater pumped during basement construction. Methods of reducing the amount of groundwater extracted during basement construction include:• Minimize the allowed pumping duration. The amount of groundwater removed isapproximately proportional to the pumping duration. Limit pumping to the shortest duration consistent with construction best practices. Dewatering occurring over a 4-week period, instead of 16 weeks, could reduce the amount of groundwater extracted to approximately 1/4th of amount extracted in 16 weeks.• Reduce the placement and the depth of the dewatering pumps. In Palo Alto soils,flow rates are highest through the gravel layers of former stream beds. Avoidingthese stream beds would reduce the groundwater flow rate. Usually groundwaternearer the surface is at a lower pressure than deeper groundwater, and flows more slowly. Placing the dewatering pumps closer together would reduce the pumping depth required to achieve the required drawdown. Using horizontal, perforated pipes with a few pumps could achieve the same outcome.• Sheet piles could reduce and/or block groundwater flow into the construction site and allow for faster construction. Additionally, sheet piles can be used to create a watertight basement wall and support vertical loads, i.e., they become the foundation of the home. They can also be used to anchor the basement to the soil, and prevent the house from "floating." Doing so greatly reduces (70 – 80%) the amount of concrete required, greatly reducing greenhouse gas emissions from concrete. It is commonly, but incorrectly, believed that installing sheet	Subsequent to issuance of this comment letter and the Supplement to the Draft EIR, the City of Palo Alto has been exploring lower impact construction alternatives and has updated its construction dewatering guidelines and requirements. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations. The new requirements limit pumping to a 10-week period and require that pumping must result in groundwater drawdown of no more than 3 feet below the depth of the slab. These measures address the first two bullet items of this comment.The City is also considering additional changes for the 2018 construction season which includes the requirement to use groundwater cut-off walls, or similar construction methods, which would limit pumping to 30 gallons per minute.

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	piles are noisy and involves either large shocks and/or vibrations. “Silent” hydraulic sheet pile installation equipment, available since 1975 from Giken and others is a viable alternative. (https://www.giken.com/en/. A short video of the method is available at https://www.youtube.com/watch?v=66cD5xyOFqo. Construction services for press-in pilings are available in the Bay Area from Blue Iron, Inc. http://www.blueironinc.com/). When used as the foundation for the building, the costs of sheet pile – based basement construction are comparable to that of conventional construction, but with the additional advantage of significantly faster construction.	
ORG2-10	**Recommendations**In consideration of the potentially significant impacts cited in this document and ongoing citizens’ concerns regarding dewatering, we respectfully request Palo Alto’s City Council and staff consider and implement modifications to the City’s basement construction and dewatering policies in two phases following the guidelines set out in the City’s Sustainability Policy to use performance-based guidelines:“Use performance based, rather than prescriptive approaches, to building and energy conservation regulations in order to encourage innovation focused on the outcomes the community wants, not necessarily on the pathways to achieve those outcomes. Consider the same approach for planning and development, such as programmatic mitigation measures requiring outcomes and impacts, while being as flexible as possible on the best ways to achieve those outcomes."**Effective** prior to the issuance of **2017 dewatering permits.** A program that does not permit any water to be discharged into the storm drains from construction dewatering, with some limited possible exceptions for public buildings.**1. Remove restrictions on pumping duration.** Pumping can continue as long asnecessary, consistent with best-practices construction methods and contingentupon meeting the requirements for total water pumped and zero-discharge intothe storm drains. **2. R-1 Residential basement construction requiring dewatering shall be subject to Individual Review,** as is the currently the case for multi-story homes. Such Individual Review shall encompass the site-specific dewatering plan.**3. All extracted groundwater shall be metered and accurate measurements ofsuch extracted groundwater and monitoring well data kept in a City managed electronic data base.** This will provide information the City can use for monitoring, analysis and sustainability purposes.**4. Applicants issued dewatering permits shall pay all costs incurred by City dewatering policies, including, but not limited to, collection of monitoring well data and costs associated with reuse and/or recycling of the extracted groundwater.5. Groundwater pumped and not recharged on-site shall be limited to no more than 5 cubic feet (37.5 gallons) per square foot of lot, i.e., 50,000 cubic feet or 375,000 gallons for a 10,000 square foot R-1 residential lot.** This amount is derived from	In response to concerns from residents and Save Palo Alto's Groundwater, the City revised its construction dewatering policy in 2016 and updates its guidelines and regulations in 2017. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council’s March 2017 adopted updates to the City’s dewater guidelines and regulations.

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	criteria which take into account sustainability and the amount of groundwater extracted from surrounding properties and is possible with appropriate design and construction methods, such as the use of sheet piles orslurry clays..**6. All groundwater removed during construction shall be used in a manner that substitutes for potable water use,** such as irrigation, and/or used to recharge the aquifers and such uses and method of replacement into the aquifer shall be described in the submitted Site Specific Plan. Directing extracted groundwater into any storm drain shall be prohibited. **7. Require designs for basements that do not impede the flow of water through the surrounding soils during periods of exceptional rainfall.** **8. Strictly require and enforce provisions to ensure that basement leakage does not result in groundwater depletion,** for example by strict inspection of construction to ensure that basements are actually leakproof and requiring any basement drainage pumps to discharge to highly pervious soils. **9. Data in soil studies and associated hydrology reports prepared for basement construction will be public domain and not subject to copyright restrictions for non-commercial use.**	
ORG2-11	**Conclusion**Many Palo Alto residents are deeply concerned about dewatering during the construction of residential basements in their community. Reasons for their concerns range from personal experience and observations of damage to their properties and public infrastructures that correlate with nearby dewatering to firm beliefs that shunting millions of gallons of extracted groundwater into the storm drain is simply wasteful and inconsistent with sustainability. Residents believe the City and the property developer each have the responsibility to ensure current dewatering practices are not harming neighboring properties or the environment. For many residents, their current home is truly their “dream house.”	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
ORG2-12	The 2004 EIP report upon which the City has relied upon to justify current policies for dewatering is simply inaccurate and inappropriate to support policy in the current context. To support our recommendations for policy revision, this White Paper includes statements and references from four professional geo-hydrologists, including a civil engineer familiar with the local area providing scientific and technical bases that support resident’s concerns.	Based on input from Save Palo Alto's Groundwater and the referenced White Paper as well as concerned residents, the City's construction dewatering policy was revised in 2016. This occurred after publication of the February 2016 Draft EIR and this comment letter. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council’s March 2017 adopted updates to the City’s dewater guidelines and regulations.
ORG2-13	Appreciation of the value of groundwater as a resource, and as an (emergency) water	The comment does not address the adequacy of the February

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	supply has greatly increased as a result of the recent drought, and this White Paper includes a discussion of the relationship between water pumped for dewatering and water supplies. Summaries and references to multiple studies performed to analyze the potential of groundwater as a municipal supply source for Palo Alto, East Palo Alto and in San Mateo County show that rainfall percolation, irrigation and leaking pipes within Palo Alto (separate from Stanford) are the main sources of aquifer recharge, including recharge to the deeper aquifer levels. Specifically, the recent groundwater model prepared by Bay Area Water Supply and Conservation Agency clearly shows Palo Alto's shallow groundwater as a major source of deep aquifer recharge, and contradicts the assertion that (all) water pumped for dewatering would "flow into the Bay anyway." Simply put, dewatering removes water from the sources that recharge the aquifers which we and nearby cities are designating as our emergency water supply as well as a possible supplemental water source during droughts.	2016 Draft EIR or Supplement to the Draft EIR.
ORG2-14	Mature, proven, economically practical technologies that greatly reduce the need for dewatering, such as the use of sheet piles with "silent" driving technology are available, and contractors working in this area can provide the required construction services.	The City is considering changes to the construction dewatering policy for the 2018 construction year and is investigating a requirement to use groundwater cut-off walls or other construction methods to limit the pumping of extracted groundwater.
ORG2-15	Finally, we have provided recommendations for modification to City policies in two phases: Phase 1 to be implemented prior to the issuance of dewatering permits for 2016, and Phase 2 to be implemented prior to issuance of dewatering permits for 2017. These policies simply require the adoption of best practices for basement construction that treat groundwater as a valuable resource, and not as construction waste.	The recommendations provided by Save Palo Alto's Groundwater in this letter as well as input from City engineers and planners were used to revise the City's construction dewatering guidelines and regulations. The hydrology section in the Supplement to the Draft EIR incorporates revisions to address policy changes that were adopted in 2016. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations.
ORG2-16	Future groundwater sustainability includes the need to consider predicted severe droughts, severe rainfall events and flood risks expected because of global climate change in planning. To quote the California Water Foundation: "When it comes to water, one could say that right now California [and Palo Alto] has 19th century laws and 20th century infrastructure to deal with 21st century challenges." *(Italicized text added.)*We look forward to working with the City Council and Staff on this vital issue and may be contacted at info@savepaloaltogroundwater.org.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR. The commenter's specific comments are addressed in the responses above.

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ORG2-17	*Attachment "Supplementary Materials A, Summary of Groundwater Studies and Geology Reports*	Attachment A provides a summary of groundwater studies and hydrogeology of the Palo Alto area.
ORG3	Ronald Malouf, Director of Facilities, Jazz Pharmaceuticals, May 27, 2016	
ORG3-01	Jazz Pharmaceuticals, a global biopharmaceutical company, has been a business resident of Palo Alto's Stanford Research Park for 11 years. Our core values - integrity, collaboration, passion, pursuit of excellence and innovation - define our corporate practices and demonstrate our commitment to our mission of improving patients' lives. We have remained committed to Palo Alto for many reasons, including that the City, its residents and its attraction to businesses focus on innovation, technology and meaningful impact. Palo Alto has been an ideal location for our current employee base, many of whom have lived in the Bay Area for years. Many started their careers with local biotechnology companies. We also have close ties with Stanford University and their School of Medicine. As a result, we find Palo Alto to be central to where our employees live and the development of our product line. Jazz Pharmaceuticals is committed to Palo Alto, and importantly to collaborating with the City and the Stanford Research Park to find solutions to an important issue of increasing traffic congestion. We recognize that the City and its residents, many of whom are our employees, are concerned with the impact of traffic congestion they attribute to local business activity. As the Stanford Traffic Demand Management group has introduced programs to help alleviate congestion, Jazz Pharmaceuticals has eagerly introduced them to our employees. In tum, many of our employees have taken advantage of these programs and we expect the trend to continue.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR. The City commends Jazz Pharmaceuticals' efforts to reduce vehicle trips.
ORG3-02	While we understand that the City Council has a mandate to preserve/enhance the quality of life in Palo Alto, several measures being discussed could have a detrimental effect on our ability to develop our products. For example, quotas on headcount allowed within our facility could restrict our ability to hire the professionals required to guide a new drug through clinical trials and FDA approval. On March 30, 2016, the FDA approved our drug, Defitelio. Defitelio is used for the treatment of adult and pediatric patients with hepatic veno-occlusive disease (VOD). VOD is a life-threatening organ dysfunction following stem-cell transplantation. Defitelio is currently the only treatment for patients with VOD. Jazz Pharmaceuticals hired dozens of specialists in Palo Alto to design, administer and manage the clinical trials and approval to ensure Defitelio would be available for patients in dire need of this life-saving drug. Having the ability to ramp up our headcount for special projects is very important to us.Jazz Pharmaceuticals would like the opportunity to repeat this type of success with other products to address unmet medical needs. We plan to continue our involvement with the Stanford TDM and work toward reducing traffic	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR. The commenter should note that the preferred scenario and the June 30, 2017 draft Comp Plan do not include restrictions on new employment or require a use permit for new office/research and development (R&D) uses.

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	congestion for not only the residents of Palo Alto, but for our employees who come to our facility in the SRP as well.	
ORG4	LindaMarie Santiago, Director, Real Estate & Workplace, Vmware, Inc., June 2, 2016	
ORG4-01	VMware respectfully submits this letter to communicate our concerns regarding the City of Palo Alto's Draft Environmental Impact Report for the Comprehensive Plan Update (Draft EIR). We appreciate the City's desire to ease traffic congestion; however, measures to regulate employee headcount and traffic mitigations contained in the Draft EIR, coupled with the recent proposal to implement a head count tax on local businesses, are unsettling. Prior to taking action that will inadvertently hinder economic stability and impede our current efforts to reduce traffic congestion, we encourage the City to further analyze the proposed mechanisms and mitigations, utilize the additional data to make informed decisions and engage in further outreach with the business community. VMware is confident a concerted effort from interested stakeholders will produce a thoughtful plan to mitigate traffic congestion while simultaneously allowing the City, its residents and businesses to continue to thrive.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR. The commenter should note that Mitigation Measure TRANS-1a in the EIR and related policies in the draft Comp Plan have been somewhat revised to reflect input received on the earlier drafts.
ORG4-02	As a multinational company, VMware is proud to be one of the largest tenants in the Stanford Research Park (SRP) and headquartered in Palo Alto. We have historically enjoyed a mutually beneficial relationship with both the City and SRP. VMware cares deeply about this community, our people and our campus. We share the City's concerns regarding traffic congestion as it impacts directly our people (many who live in Palo Alto) and our ability to recruit and retain top talent.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
ORG4-03	VMware has long been motivated to offer our employees various commuting alternatives. We voluntarily and privately fund several transportation demand management programs aimed at reducing single occupant vehicle (SOV) commutes during peak hours. Additionally, because we see the value in working collaboratively with the local community, we are actively involved in the SRP TDM Working Group. In that organization, we are capturing the benefits of leveraging the efficiencies and opportunities of having several SRP employers pool our resources to provide additional shared transportation options. As you are likely aware, collectively, we SRP employers have implemented a robust EcoPass purchase program, a carpool ridesharing program (SCOOP), a guaranteed ride home program, bicycling events and clinics, and an SRP Transportation website, to name a few. And, we expect to launch a point-to-point shuttle bus program to/fromSan Francisco this summer. Individually, VMware's commitment to transportation is also evidenced by the fact that we have a full-time Transportation Manager on our staff to represent VMware within the SRP TDM Working Group and to implement new programs run exclusively by VMware. We care deeply about and respect the fact that what we do is a	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR. The City commends VMware's efforts to reduce vehicle trips.

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	model for others in SRP, that our programs meet the needs of our people and the community, and that what we dois sustainable (environmentally and financially). We have invested significant funding in such programs given VMware's commitment to solving these issues that impact the entire City.	
ORG4-04	Our concern is that we will be forced to divert a substantial share of those financial resources to pay for a head count tax that is contemplated to solve the same issues we are solving. Furthermore, we understand the head tax would provide general funds to the City, which means the City would not be obligated to spend the head tax revenues on local infrastructure or TDM programs that would benefit residents and businesses alike. Additionally, while the City officials are stating such general funds would be targeted towards mitigating traffic, such City initiatives are currently undefined in scope, timing and cost. VMware remains concerned regarding the lack of clarity and substantiated analysis of the proposed tax-funded solutions, and therefore VMware urges the City to approach these highly impactful policy decisions with great care. For VMware, a head count tax of $100 per person per year drastically undermines our ability to fund our own transportation management programs and the SRPTDM programs, all of which are proving to be effective in reducing traffic impacts in SRP and beyond.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR. No “head tax” is proposed by the EIR or the draft Comp Plan.
ORG4-05	VMware has also made substantial investments in our Palo Alto headquarters and in partnership with the City and Stanford University, we have developed a master building plan that covers our 1.6 million square feet of R&D and office space (existing and future space). The master plan provides for measured and reasonable growth, which we rely on to maintain a flexible workforce that is able to respond to the cyclical employment demands of product innovation.Therefore, we have particular concerns regarding the consideration of a Zoning Code Amendment to regulate employment densities or control the proportion of office and R&D uses in new or existing buildings through a discretionary Conditional Use Permit process, which would subject VMware to lost productivity and unreasonable risk. We believe such a measure would impede on our ability to quickly adapt to a changing workforce, as product innovation moves quickly, and being agile is paramount to success.	The comment is noted. Please note that the Zoning Code amendment referred to by the commenter is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG4-06	There are additional measures contemplated in the Draft EIR, such as requiring companies with over 50 employees to charge for parking, which also appear to have a punitive nature on businesses without evidence that such a program will produce the desired result of reduced vehicle trips to SRP.	The opinion of the commenter is noted. Please note that the preferred scenario, which is described in Chapter 2 of this Final EIR, does not include the parking charge referred to by the commenter; however, consideration of this concept is included in recent drafts of the City’s Sustainability/Climate Action Plan documents and is one that the City continues to explore. This is because charging for parking can encourage the use of

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		alternatives to single-occupancy vehicles (SOV) for commute trips.
ORG4-07	The proposed density restrictions and traffic mitigation regulations contained in the Draft EIR have potentially adverse consequences for VMware and create uncertainties for the business community, which must remain agile in order to succeed. As the second largest employer and a long standing member of the City's business community, VMware has a vested interest in ensuring the continued culture of innovation and success that Palo Alto is known for. We believe our significant investments in time, personnel and funding to date evidence our strong commitment to working to reduce traffic congestion in the City. In our commitment to working with the City and Stanford to reduce traffic congestion, it is essential to VMware that all traffic congestion management methods we fund are effective, measurable, and substantiated by robust data analysis, and most importantly, such methods must not impede our ability to successfully conduct business operations within Palo Alto or undermine our robust TDM efforts to date.	The comment is noted. Please note that the Zoning Code amendment referred to by the commenter is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR). The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR.
ORG5	Victoria Valenzuela, General Counsel, MZ, June 2, 2016	
ORG5-01	Mayor Burt, Vice Mayor Scharff, and Fellow Council Members:We are writing to express our concern with the Draft Environmental Impact Report ("Draft EIR") for the Comprehensive Plan Update. In particular, we are concerned about the proposed mechanisms in the Draft EIR that are supposed to address traffic congestion.First and foremost, as a Palo Alto born and raised company, we have and will continue to be proactive, responsible neighbors and community members. Having operated in downtown Palo Alto at 555 Hamilton for six years, we understand the community's concerns with traffic congestion. Even at 555 Hamilton, we encouraged our employees to use alternative modes of transportation in an effort to neutralize our Company's presence downtown. When we moved to our new location at 1050 Page Mill Road, we made a commitment to doing what we, as a company, could to help alleviate the traffic problem. Below is a list of some of the traffic mitigation measures that we currently offer:1. CalTrain GoPass: MZ is an active participant in this program, offering all employees working more than 20 hours per week a Go Pass at no charge. This program is advertised during new hire onboarding and reminders are sent to current employees. To further encourage participation in this program, we, along with our Landlord Sand Hill Property Company, offer a shuttle to and from the California Avenue CalTrain station to our campus.2. Core Hours: MZ's core business hours are intentionally set from 10am to 7pm daily so our employees can avoid peak traffic hours during their daily commute. This also then takes our employees off the road and lessens traffic for fellow commuters.3. HQ Relocation Bonus Program: MZ offers	The comment is noted. The City commends MZ's efforts to reduce vehicle trips. The comment does not address the adequacy of the analysis in the February 2016 Draft EIR.

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	eligible employees financial assistance to relocate closer to the Company's headquarters in Palo Alto. Any active, full-time employee in good standing with the Company who relocates their primary residence to within 8 miles of the Company's headquarters shall be eligible for relocation assistance.	
--	4. Alternative Transportation: MZ provides ample indoor bike racks (which are well used), which provide our employees with a secure option should they choose this method of transportation to work.5. Carpooling app: MZ recently launched the carpooling/ridesharing app called Scoop, which allows our employees to coordinate carpooling/ridesharing options on a flexible basis. Not only does this option take cars off the road, but it provides an opportunity for our employees to significantly reduce their commuting costs.In addition to these company-specific TDM programs, we are also members of Stanford Research Park's ("SRP") TDM group and are working in collaboration with other SRP companies to come up with programs to further drive tangible results. For example, MZ has adopted, along with other SRP-based employers, the carpooling/ridesharing application called Scoop. This program was brought to ourattention by the SRP TDM group and has been well-received by our employees. The SRP TDM group shares a common goal with the City to reduce traffic and can leverage the group's collective technology and expertise to innovate, adapt, and self-fund various programs.	The comment is acknowledged for the record, however, does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.The opinion of the commenter regarding proposed mechanisms for traffic congestion is noted.
ORG5-02	Some of the measures, in particular the CUP and limit on employee density, among other proposed measures to regulate business and a means to regulate traffic, would have a serious, detrimental impact to our operations, including, but not limited to, our need for flexible hiring on critical, time-bound projects. Further, since MZ works during off peak hours, such measures would unfairly impact us since we do not have same impact on peak hour traffic as others similarly situated to us. MZ, and our fellow SRP employers, are willing to commit to addressing such problems, but need to have the flexibility to come up with effective and relevant solutions.	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG5-03	Further, the recent proposal for a head tax is also of particular concern to us. As mentioned earlier, we have already committed substantial funds towards traffic-mitigating measures and are highly motivated by our own business interests to continue to do so. The proposed additional head tax appears to target the same problem(s) we are currently working on and solving with the SRP TDM group. To impose such a tax would undermine funding that we have already earmarked for TDM solutions. As we understand, this head tax would provide general funds to the City, which means that the city would not obligated to spend this tax revenue on TOM measures, within the SRP or even on local infrastructure that would benefit local residents and businesses. We are quite concerned that the proposed tax lacks clarity in its implementation and allocation of funds. We strongly urge	The comment is noted. Please note that the preferred scenario does not include a “head tax.” The comment does not address the adequacy of the February 2016 Draft EIR.

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	the City to analyze proposed solutions to make sure that decisions are well-informed and will yield real results for those being asked to carrying the financial burden. We strongly encourage you to please engage with MZ, the SRP and other members of the business community before taking any action. We believe that we can work collaboratively with the City to effectively and efficiently address these issues.	
ORG6	Tiffany Griego, Managing Director, Stanford Research Park, Stanford Real Estate, Stanford University AND Jean McCown, Associate Vice President, Government & Community Relations, Office of Public Affairs, Stanford University, June 3, 2016	
ORG6-01	Stanford University provides the following comments on the Draft Environmental Impact Report for the Comprehensive Plan Update (the "Draft EIR"). These comments focus on the Stanford Research Park ("SRP"). Our principal concerns with the Draft EIR relate to specific proposed mechanisms for addressing traffic congestion and the insufficient analysis of these mechanisms. At the outset, we want to emphasize that we share the City's desire to reduce traffic congestion. Stanford and the employers within the SRP are deeply invested in tackling the challenge of reducing employees' commute trips, and we are motivated to experiment with new programs and see our efforts produce results. This consensus has been the basis for forming, staffing, and privately funding the Stanford Research Park Transportation Demand Management ("TDM") Working Group, a Stanford-led consortium of SRP employers working together to develop and offer TDM programs tailored to the needs of employees working within the SRP. As we reported to the City Council on March 14, 2016, we have piloted programs such as EcoPass, a series of bicycle advocacy events and services, a guaranteed ride home program, a custom transportation planning service (www.SRPgo.com), Scoop carpool planning service, and a soon-to-be-launched long distance shuttle to San Francisco. We are working with all major employers in the SRP, and as we stated in March, we need time to implement our first round of programs, monitor the results and report back to the City on our progress. Both in this early phase and going forward, we will need the flexibility to innovate and adapt. We are excited about the momentum we have built.	The comment is noted. The City commends Stanford University's efforts to reduce vehicle trips.
ORG6-02	The Draft EIR proposes measures to regulate density and mitigations to reduce trips that could have detrimental and perhaps unintended consequences for the economic vitality of the Stanford Research Park. At the same time, the Draft EIR does not analyze the effectiveness of such policies in preventing future increases in traffic congestion. We have outlined below the risks we see in implementing the proposed policies, followed by some more technical Draft EIR comments that request further traffic analysis.	The comment is noted. The commenter's detailed comments are addressed in the responses below.

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ORG6-03	**I. Risks to the Stanford Research Park Business Community and Palo AltoA. Economic Contributions from the Stanford Research Park** First, we believe it is important to understand the economic benefits to the City of Palo Alto and community generated by the Stanford Research Park. From its inception, the SRP lands were annexed into the City of Palo Alto so that the property taxes and other tax revenues would benefit Palo Alto citizens. As reflected in Figure 1 below, total tax revenue generated from the SRP has more than doubled in the past 14 years. In 2015 alone, the SRP generated $45 million in total tax revenues, of which $18.2 million flowed to Palo Alto and Palo Alto Unified School District, as highlighted below. Total tax revenues are comprised of (i) property taxes, which are reassessed as long-term ground leases are sold or as investment in existing properties occurs, (ii) sales and use taxes, which generally result from certain companies' decisions to locate point of sale in Palo Alto, and (iii) transfer taxes, which are paid when ground leases are sold. This steady increase in total taxes produced from the SRP results from City policies that thus far have supported renewal and investment in the existing building stock, the buildout of additional square footage, and the liquidity of SRP leaseholds. It is noteworthy that it has taken six decades to achieve this trend of revenue growth for the City of Palo Alto and other entities, working within the legislative framework of Palo Alto's zoning code. *Figure 1. Total Tax Revenues Produced by Stanford Research Park Since 2002 (with Total Tax Revenues to City of Palo Alto and PAUSD highlighted in orange)* Palo Alto and Stanford have made the Stanford Research Park a world-renowned epicenter for research, discovery, and innovation by globally-recognized businesses, including Varian Medical, VMware, HP, Hewlett Packard Enterprise, SAP, Merck, Tesla, Jazz Pharmaceuticals, Skype, Nest, and Ford, to name a few. These employers have given us feedback about their election to locate or remain in the SRP. They tell us they elect to come to the SRP because they believe they will be able to grow within a clear and consistent set of parameters, and they believe they will benefit from a flexible zoning code that allows their businesses to evolve over time. In addition, they are permitted by the City to improve their aging facilities to remain competitive in their respective industries. We hear that another important benefit of locating in the SRP is the competitive advantage that comes from adjacency of traditional research and development businesses to best-in-class support services. R&D tenants say the well-rounded business ecosystem, which includes professional service providers (e.g., investors and attorneys) expedites the time to market for R&D intellectual property. Finally, employers tell us they desire flexibility to adapt their business models to an increasingly competitive global economy, including hiring employees as needed. For example, SRP employers may need to hire specialists to	This comment does not address the adequacy of the February 2016 Draft EIR. Please note that the preferred scenario and the draft Comp Plan do not contain limits on employment densities.

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	run a new clinical trial for an extended period of time, to bring in contractors to support peak development cycles that are commonplace for many companies, to recruit summer interns, or to rebuild a team after experiencing a cycle of downsizing.Thus far, the City's long-standing balanced, predictable, and objective set of rules and codes has supported the economic vitality of this unique Palo Alto asset.'	
ORG6-04	**B. Concerns with the Traffic Congestion Measures Identified in the Draft EIR** We believe that the success of the SRP can be easily diminished if legislative and policy choices are not made with care and are not based on robust data analysis. We and the employers of the SRP have the following significant concerns with the traffic mitigation approaches proposed in the Draft EIR: • *Limitation on Employment Densities through Conditional Use Permitting.* Three of the four scenarios studied in the Draft EIR (pp. 3-15, 3-31, 3-36, 3-41) consider a Zoning Code amendment to regulate employment densities in office and R&D uses by requiring a conditional use permit for new office and R&D uses, including new uses in existing buildings. Although the Draft EIR does not clearly explain this concept, such a limitation could have several negative consequences in the SRP:	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG6-05	• First, employee density regulations and CUPs would discourage new companies from locating in the SRP. If business leaders believe they may be hindered from hiring new employees as their business needs change, or hindered from sub-leasing space if their business contracts, they will certainly consider locating elsewhere. For a company to decide to locate in Palo Alto, their leaders need predictability and flexibility to grow and/or contract within existing space, repurpose existing space to meet evolving business needs, or "exit" space by sub-leasing excess space to another entity, whose employee headcounts would be outside of their control.	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG6-06	• Second, employee density regulations and CUPs would impair the SRP's continued ability to support the most vibrant and broad mix of R&D businesses as the economy evolves decade after decade. During the SRP's 65-year history, we have seen the local and national economy transition from a focus on the production of advanced goods (hardware, pharmaceuticals, medical devices and aerospace components) to advanced services (enterprise software, data processing, and consumer software) to today's tech and "innovation industries," which reflect the convergence between technology and content. Palo Alto has been able to participate in – and often lead – all of these changes because of the R&D and office uses currently permitted in the SRP. Changing this system to require a CUP based on a change of labels between "R&D" and "office", or any other use categories, would expose Palo Alto-based businesses to the uncertainties of discretionary review, delay and approval risk. Imagine a company like Tesla being required to first secure a CUP	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).

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	for increased headcount or a change in use within its existing building before it could adapt to the evolving competitive landscape around electric vehicle production. Such a process would put Palo Alto-based companies at a disadvantage relative to their non-Palo Alto-based competitors.	
ORG6-07	• Third, a limitation on employment densities could inadvertently lead to construction of more building square footage, in Palo Alto or elsewhere, to accommodate the same amount of employment growth, as opposed to increasing employment densities in existing, smaller building footprints. Such a policy cuts against current thinking about sustainable land use, and could result in an inefficient increase in energy consumption and unnecessary consumption of building materials associated with new buildings elsewhere. Equally important, concentration of employee density is a necessary factor in achieving successful trip reduction programs.	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG6-08	We also note that the Staff Report for the May 16, 2016 City Council meeting indicated that when new Comprehensive Plan scenarios are analyzed, those scenarios may not include a CUP requirement per se, but are likely to include an "alternate mechanism…for moderating employment densities, either through regulation or revenue collection." Such an alternative mechanism would likely raise most of the same practical concerns as a CUP requirement and would send the same message – businesses are hindered in their ability to remain nimble, evolve or grow within Palo Alto.	The comment is noted. Please note that mechanisms to limit employee density are not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG6-09	• *Parking Charges for Employees on Private Land.* Scenario 4 in the Draft EIR (pp. 3-16, 3-43) considers adoption of a parking charge program for existing businesses with more than 50 employees; the charge would be imposed on employees as a disincentive to drive. Because numerous SRP sites include a mix of businesses with fewer than 50 employees, often in multi-tenant buildings, implementation of such a policy would be infeasible and could create spill-over parking and other enforcement issues. We also have questions about how this mechanism relates to the measures set forth in the City's 2016 Sustainability and Climate Action Plan Strategy T-INC-2.1 through T-INC-2.4.	The comment is noted. Please note that parking charges for employees are not includes in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR). Consideration of this concept is included in recent drafts of the City's Sustainability/Climate Action Plan documents and is one that the City continues to explore. This is because charging for parking can encourage the use of alternatives to SOV for commute trips.
ORG6-10	• *Annual Cap on New Commercial Square Footage.* Scenario 2 in the Draft EIR (p. 3-25) considers imposition of an annual limit on new office and R&D development citywide, distinct from both the current interim cap that applies only in certain areas of Palo Alto and from the larger commercial square footage cap from the 1998 Comprehensive Plan. An annual development limit could eliminate the flexibility SRP employers have to expand up to the square footage allowed under existing zoning if and when their businesses need additional space. The types of businesses that occupy the SRP want to know that they can at least seek a discretionary permit from the City to add square footage in any year, given that their business needs can evolve quickly. For instance, in February 2015, both Hewlett-	The comment does not address the adequacy of the February 2016 Draft EIR. The preferred scenario and the draft Comp Plan do not include an annual limit on office/R&D, although the City Council has expressed its intent to modify and continue the current interim program in some form. The City Council is aware of Stanford's concerns regarding inclusion of the Stanford Research Park in the areas of the City subject to an annual limit.

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	Packard and Varian Medical stated in letters to City Council that a then-proposed annual growth limit effectively would eliminate their ability to plan for an efficient, timely build out of their remaining square footage available under zoning because in both cases the unbuilt square footage would exceed the amount allowed under the annual growth limit. It is unreasonable to expect an SRP company to win the beauty contest two or three years in a row before being able to expand and modernize its campus.	
ORG6-11	• *Traffic Mitigation for Individual New Projects.* Draft EIR Mitigation Measure TRANS-1a (p. 4.13-51) would apply to all four scenarios. The measure would require individual new development projects to implement a TDM plan to achieve a specified reduction in peak period motor vehicle trips (30 percent in the case of the SRP) from the relevant rates identified in the Institute of Transportation Engineers' Trip Generation Manual, with the project's TDM program to be approved by the City, and enforcement mechanisms or penalties accruing if targets are not met. Mitigation Measure TRANS-1a (p. 4.13-52) also would require individual new development projects to offset remaining peak period motor vehicle trips by directly contracting with a third party to reduce trips generated from another site or by paying an annual fee to the City.	The comment is descriptive and does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR.
ORG6-12	• Our approach to reducing trips is based on leveraging all SRP employers' efforts and resources to offer all SRP employees a comprehensive set of alternate commute options. We are concerned that achieving a 30 percent reduction in peak period trips compared to ITE rates would be difficult on an individual business-by-business basis, and would undermine the comprehensive TDM Program underway in the SRP. For example, if an individual business or project were required to meet TRANS-1a through the provision of private shuttles for its own employees, this would undermine the impact of a long-distance shuttle program currently planned as part of Stanford's SRP-wide TDM program, which is based on providing scaled services to employees from multiple SRP companies.	The City of Palo Alto agrees that it is preferable for employers to work together to implement some TDM measures, such as shuttle services, since combining the efforts and resources of multiple employers can lead to better results than an individual business acting on their own. The City acknowledges that the cooperation of employers in the Stanford Research Park allows them to leverage their efforts in a more comprehensive program. As stated on page 56 of the Supplemental TIA, "the intention of these mitigation measures is to encourage such cooperation." A TDM Plan could indicate which measures an applicant would provide on its own and which measures it would provide through a TMA or other group of nearby employers.
ORG6-13	• We are also concerned that achieving the additional 70 percent reduction could only be accomplished with a fee, as currently written, and we are furthermore concerned with how the fee would be determined and allocated. Given the SRP TDM program already involves cost-sharing among SRP employers, we are concerned that paying a fee to the City would undermine our effort to sustain SRP employers' private investment in our SRP-wide program. If this mitigation measure were nevertheless adopted after greater coordination with Stanford University and the SRP companies, it would be appropriate for the 70 percent fee generated by SRP projects to be invested in the SRP TDM program.	The portion of Mitigation Measure TRANS-1a that is the subject of this comment was revised as part of the Supplement to the Draft EIR. Mitigation Measure TRANS-1a no longer includes a requirement to offset remaining vehicle trips by directly contracting with another property owner or organization or by paying an annual fee to the City. Mitigation Measure TRANS-1b requires development projects to pay a Transportation Impact Fee for peak hour trips that cannot be eliminated. The amount of

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		the Transportation Impact Fee and the projects on which it would be spent will be determined through the Nexus Study that is currently underway.
ORG6-14	In short, we are concerned that adoption of these policies described above would cause companies to look outside the SRP when they need to choose a location or expand, which would in turn undermine the SRP's ability to keep pace with the emergence of new technology industries, evolving scientific discovery, and increased competition	Please see above for responses to the issues raised.
ORG6-15	**II. Insufficient Analysis on the Effectiveness of Traffic-Mitigating Measures Identified in the Draft EIR** Despite the various proposed mechanisms to limit traffic congestion, the Draft EIR does not analyze the effectiveness of these approaches. Specific examples of insufficient analysis include the following measures that apply to future changes in land uses or new development: • Scenarios 2, 3, and 4 include a new conditional use permit ("CUP") requirement that would be designed to regulate employee densities if there were a change in use on a site. *However, the Draft EIR does not attempt to identify any vehicle trip reduction attributed to this new conditional use permit requirement.*	The comment is noted. The components of the scenarios, as described in Chapter 3, Project Description, of the February 2016 Draft EIR and Supplement to the Draft EIR, are analyzed collectively and comprehensively in the EIR. Please note that the conditional use permit requirement is not included in the preferred scenario, which is described in Chapter 2 of this Final EIR.
ORG6-16	• Scenario 4 includes a requirement that there be no new net new car trips as a result of new office development. *However, the Draft EIR does not show any beneficial effect at all from the "No Net New Trips" component of Scenario 4. The underlying Traffic Impact Analysis does not list "No Net New Trips" as one of the factors taken into account in analyzing Scenario 4 and the resulting analysis does not assume any reduction in future trips associated with increased office growth.*	The comment is noted. The components of the scenarios, as described in Chapter 3, Project Description, of the February 2016 Draft EIR and Supplement to the Draft EIR, are analyzed collectively and comprehensively in the EIR. Please note that the "no net new trips" requirement is not included in the preferred scenario, which is described in Chapter 2 of this Final EIR.
ORG6-17	• Mitigation Measure TRANS-1a requires that, as a condition of new office and R&D development, vehicle trips must be reduced by 30 percent below Institute of Traffic Engineers ("ITE") rates, and applicants must pay a fee to fund measures designed to offset the remaining 70 percent of new trips. *However, the Draft EIR does not quantify the effect of Mitigation Measure TRANS-1a. It only provides a qualitative analysis and assumes the resulting trip reductions will be modest.*	The Supplement to the Draft EIR analyzes post-mitigation conditions for Scenarios 5 and 6, as suggested in this comment. Post-mitigation conditions incorporate the TDM trip reductions required in Mitigation Measure TRANS-1a for different areas of the city. The original language in Mitigation Measure TRANS-1a requiring an annual fee to offset the remaining trips (70 percent in the case of Stanford Research Park) has been eliminated.
ORG6-18	The additional measure that appears to apply to existing businesses in existing buildings includes: • A program to require businesses with more than 50 employees to charge for parking. *However, there is no information about how this measure would be implemented. Nor is it clear in the Draft EIR how much automobile trip reduction if any, has been assumed for a program to impose parking charges.*	Parking charges at workplaces with more than 50 employees were included as a scenario assumption in Scenarios 4, 5, and 6. This assumption was incorporated into the travel demand forecast model for those scenarios. The mode share, VMT, level of service, and other results reflect each scenario's underlying assumptions, including the measure regarding parking charges at workplaces.

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		However, the preferred scenario that has been identified by the City Council does not include this measure.
ORG6-19	The Draft EIR results in more questions than clarity. The lack of data and careful analysis behind these proposed policies is disconcerting to the SRP business community, given how detrimental many of the policies would be to their ability to conduct business. It is necessary to fully analyze the environmental impacts of these measures – positive and negative – in the EIR. We also request that you conduct outreach with the SRP business community on all of these matters before taking action.Thank you for considering Stanford University's comments on the Comprehensive Plan Update Draft EIR. Please do not hesitate to contact us with any questions.	The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR. The commenter's detailed comments are addressed in the responses above.
ORG7	Whitney McNair, Director, Land Use Planning, Land Use & Environmental Planning, Stanford University, June 3, 2016	
ORG7-01	Stanford University provides the following comments on the Draft Environmental Impact Report for the Comprehensive Plan Update (the "Draft EIR"). We are pleased to continue playing an active role in the Comprehensive Plan Update process and appreciate the City's consideration of these comments. We also are submitting comments on behalf of Stanford Research Park under separate cover. Those comments are provided separately to highlight issues with the Draft EIR that are specific to that unique employment district. This letter is divided into two sections. First, we provide clarification regarding land use regulation of Stanford lands and potential cumulative impacts from campus growth in unincorporated Santa Clara County. Second, we provide comments on individual sections of the Draft EIR addressing various environmental resources.	This comment serves as an opening remark and does not address the adequacy of the February 2016 Draft EIR. The commenter's specific comments are addressed in the responses below.
ORG7-02	**I. The Draft EIR's Analysis of Stanford Lands Within the City's Sphere of InfluenceA. Unique Regulatory System Applicable to Stanford's Lands in the Palo AltoSphere of Influence**The Draft EIR discusses Stanford lands that are outside Palo Alto's city limits but within Palo Alto's sphere of influence. Normally, a city's general plan must address areas within the city's sphere of influence due to an expectation the area may be annexed to the city within the general plan's time horizon. Here, in contrast, an existing three-party agreement between the City, Stanford, and Santa Clara County largely precludes annexation of Stanford lands by the City.The three-party agreement provides for the County to retain regulatory control over these lands. The agreement states:Unincorporated Stanford lands in Santa Clara County are subject to the Santa Clara County General Plan and zoning ordinance, the general use permit for Stanford University lands adopted by Santa Clara County, and pertinent review and Approval procedures employed by Santa Clara County.As this provision indicates, when the County acts on land use approvals for unincorporated	The comment is noted. The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR.

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	Stanford lands, it considers only the County General Plan and zoning ordinance, the general use permit issued by the County, and County review and approval procedures. The County does not consider Palo Alto Comprehensive Plan land use designations or policies, or the City's zoning ordinance. The Palo Alto Comprehensive Plan and zoning ordinance affect only Stanford property that lies within City limits:Stanford lands annexed to the City of Palo Alto are subject to the Palo AltoComprehensive Plan and Zoning Ordinance, any area plans adopted by the City of Palo Alto, and pertinent review and approval procedures employed by Palo Alto.The Comprehensive Plan Update and mitigation measures in its EIR, therefore, will not govern or affect Stanford lands in unincorporated Santa Clara County during the applicable planning period.	
ORG7-03	The Draft EIR's discussion of the City's sphere of influence on pages 3-5, 4.9-1, and 4.9-2 should be revised to acknowledge the unique regulatory structure governing unincorporated Stanford lands due to the agreement between the County, the City and Stanford that such lands will not be annexed by Palo Alto.	The text on page 3-4 of the Supplement to the Draft EIR has been revised, as shown in Chapter 3 of this Final EIR, to incorporate the commenter's input. Chapter 4.9 of the February 2016 Draft EIR was revised as part of the Supplement to the Draft EIR.
ORG7-04	Additionally, to reduce the potential for public confusion regarding which general plan land use designations govern Stanford's lands in unincorporated Santa Clara County, we request that the City remove Comprehensive Plan land use designations from such lands as part of the Comprehensive Plan Update process. If the City retains land use designations for any Stanford lands in unincorporated Santa Clara County, the Comprehensive Plan should be amended to make such designations consistent with the land use designations provided for Stanford lands in the Stanford University Community Plan, part of the Santa Clara County General Plan, as shown on Figure 4.9-3. If any City land use designations for these areas continue to be shown on Figure 4.9-2, a note should be added beneath the figure to advise readers that such designations have no present legal effect and are provided for reference only.	The revised Comprehensive Plan land use map for the proposed Plan is included in Chapter 2 of this Final EIR. This map shows Stanford lands outside of the city limit and SOI as blank, consistent with lands within neighboring cities are mapped. Stanford lands within the SOI but outside the city limit are shown with designations that are consistent with those contained in the *Stanford University Community Plan*. Stanford lands within the city limit are mapped with their City land use designations and have not changed as part of the proposed project.
ORG7-05	**B. Effect of the Stanford University Community Plan and General Use Permit** Included within the Santa Clara County General Plan is the Stanford University Community Plan. The Community Plan is "an integral part" of the County's General Plan and, as such, is not subordinate to the General Plan. See Stanford University Community Plan at ii. Rather, the Community Plan "refines the policies of the General Plan as they apply to Stanford lands within the County" and, for each General Plan element, "tailor[s] the treatment of each subject to those aspects of an element most applicable and pertinent to Stanford." [4] See Community Plan at i, ii.Stanford's academic campus lands are zoned by Santa Clara County as A1. Under the A1 district, university uses are allowed with a use permit. See Santa Clara County Zoning Ord. § 2.20.020. The Stanford University General Use Permit, approved by the County in December 2000, fulfills the zoning code's use permit requirement and is the	The existing (i.e., 2014) housing unit data for the SOI for use in the EIR was developed by City staff using data published in the 2010 Decennial Census and Stanford's annual General Use Permit reports. The City used 2010 block data from the 2010 Decennial Census data as a starting point and added to it the units constructed between 2010 and 2014 according to the Stanford University General Use Permit (GUP) Annual Reports. The 2010 GUP Annual Report reports 1,358 units had been approved under the GUP by 2010 and the 2014 GUP Annual Report reports that 1,884 units had been approved by 2014, which is an increase of 526 units from 2010 to 2014. However, in *Projections 2013* ABAG

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	"principal means" of implementing the Community Plan. The General Use Permit requires all development that occurs under it to be consistent with the Community Plan, as well as with General Plan and zoning designations. See Community Plan at iii; General Use Permit at 2, 4.The General Use Permit authorizes incremental net new academic and supporting square footage and net new housing units above the levels existing when it was adopted in 2000, subject to specific conditions to address areas of environmental and community concerns. The table below shows housing existing in 2000, additional housing allowed under the General Use Permit, additional housing that has been completed and/or approved to date, housing capacity remaining under the General Use Permit, and total current housing, including approved projects.*Table 1: Stanford University Housing Within Unincorporated Santa Clara County*We provide the information in Table 1, above, to inform the EIR's identification of the number of existing housing units at Stanford. Statistics reported in the Draft EIR's project description (pp. 3-24, 3-33, 3-38, 3-44) indicate that in 2014 there were 4,525 housing units in the City's sphere of influence, outside of City limits (Stanford lands), and a figure in the Population and Housing section (p. 4.11-2) reports 4,230 housing units in 2014 in the same area. As shown in Table 1, there currently are 13,240 beds/units at Stanford.	only forecasted a growth of 54 households within the SOI between 2010 and 2015. Rather than use ABAG's numbers, the City used Stanford's reported 526 net new units and allocated these units to Traffic Analysis Zones (TAZs) containing Stanford housing sites within the SOI.There is no single way to calculate housing estimates for a given time period. The City used 2010 Decennial Census data as a starting point, believing the Decennial Census block data to be a reliable data source as a reporting of existing conditions in 2010. As described above, the City used Stanford's annual reporting to quantify the net change in housing on Stanford lands from 2010 to 2014. One reason for a discrepancy with Stanford's housing estimates may be that the City was using 2010 Census data as a starting point, whereas Stanford's annual reports use 2000 (before the GUP was approved) as a starting point. Another reason may be that the City is concerned with the SOI as a whole, and not just Stanford lands.
ORG7-06	For purposes of analyzing cumulative traffic impacts, it is important to recognize that employment and housing growth under the General Use Permit has not contributed to significant traffic impacts. Stanford has had tremendous success in operating a TDM program on the academic campus that has resulted in no net new commute trips over the life of the General Use Permit.To gauge Stanford's success against this metric, third-party monitoring is used. Independent consultants hired by the County completed a baseline traffic count in 2001. Each year since 2001, the independent consultants have measured commute trips twice per year and reported the results. Measurements of University vehicular traffic are taken with trip counters (rubber hoses extended across the roads) located at sixteen entry/exit points that define a cordon line around the campus. Under the General Use Permit (p. 14), Stanford also receives credit toward its attainment of the no net new commute trips standard by actively reducing off-campus vehicular trips.Results from Stanford's TDM program, one of the most comprehensive in the country, have been striking. Between 2002 and 2015, the percentage of employees commuting in single-occupant vehicles dropped from 72 percent to 50 percent.[6] As shown in the figures below, despite growth, Stanford has not added any net new commute trips to the academic campus. *Figure 2. Stanford University Annual Morning Peak Inbound Commute Trips* *Figure 3. Stanford University Annual Afternoon Peak Outbound Commute Trips*	The comment is noted. The comment does not address the adequacy of the February 2016 Draft EIR. The City appreciates Stanford University's continued efforts to reduce vehicle trips and commends Stanford for the success of these efforts.

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ORG7-07	Similarly, since the General Use Permit was approved in 2000, Stanford has transformed its university energy supply from a 100 percent fossil-fuel-based combined heat and power plant to grid-sourced electricity and a first-of-its-kind campus heat recovery system at the new Central Energy Facility. This new system, along with Stanford's solar power procurement, is anticipated to reduce campus greenhouse gas emissions approximately 68 percent and save 15 percent of campus potable water.	The comment does not address the adequacy of the February 2016 Draft EIR. The City commends Stanford's success in reducing its reliance on fossil fuels.
ORG7-08	In several places, the Draft EIR states that its cumulative impact analysis may need to be revised to address new graduate student housing to be constructed under the General Use Permit at Escondido Village on the Stanford campus. In fact, no revisions to the Draft EIR's cumulative impact analysis are required. The County has determined that the Escondido Village project will have no new or substantially more severe environmental impacts compared to those previouslyanalyzed. In particular, with regard to traffic, the County relied on an analysis for potentially affected intersections to determine that traffic generated by the project would be consistent with the environmental analysis and conclusions in the 2000 Community Plan/General Use Permit Program Environmental Impact Report. The traffic analysis for the Escondido Village housing project explained that trip generation rates for graduate student residents are lower than for graduate student commuters, as resident students do not need to commute to campus. Based on the project's location and forecasted trip generation, the traffic study showed that analyzed intersections would operate at acceptable levels of service according to their designated level-of service standard. No significant impacts would result.	The comment is noted and no change to the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR has been made. Please see Master Response 3.
ORG7-09	Stanford has begun work on an application for an updated General Use Permit to address the next phase of campus land use consistent with the Community Plan. We anticipate that the updated General Use Permit will reflect future needs of the University, including a modest increase in undergraduate enrollment, on-campus housing for students and faculty, facilities for emerging fields of study, and interdisciplinary institutes formed to address global problems. The Community Plan will continue to serve as the legislative policy framework for campus land use, as both the Community Plan and General Use Permit have proven successful in providing predictability and flexibility for Stanford and accountability to the County and the community. We do not anticipate that development under an updated General Use Permit will result in new or substantially more severe cumulative impacts because we intend to continue to implement a robust TDM program designed to achieve no net new commute trips goal, and we do not plan to seek to move the existing Academic Growth Boundary.	The comment is noted and no change to the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR has been made. Please see Master Response 3.
ORG7-10	**II. Specific Comments on the Draft EIR A. Project Description** *Page 3-24:* Footnote 9 states that "Stanford has recently proposed an increase in housing	Chapter 3, Project Description, in the Supplement to the Draft EIR reflects the revisions requested by the commenter.

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	beyond what is allowed in their General Use Permit. If approved by the County, this increase would need to be assessed as part of the cumulative context of the Comprehensive Plan Update." The first sentence of this footnote is inaccurate, as the General Use Permit specifically supports the development of housing units beyond the 3,018 units it initially authorized, subject to Santa Clara County Planning Commission approval. Additionally, in March 2016, the County granted Stanford's request for the housing allocation based on an Addendum to the 2000 Stanford Community Plan and General Use Permit Program Environmental Impact Report that showed the addition of this housing would not result in any new or substantially more severe impacts beyond those identified in the Program Environmental Impact Report. As such, no revisions to the Draft EIR's cumulative impact analysis are required. We request, therefore, that the statement quoted above be revised as follows: "Stanford has recently ~~proposed~~ received authorization for an increase in housing beyond what ~~is allowed in their~~ initially was authorized under its General Use Permit. ~~If approved by the~~ The County, has determined that this increase would ~~need to be assessed as part of the cumulative context of the Comprehensive Plan Update~~ not result in any new or substantially more severe impacts beyond those identified in previous environmental analysis for the Stanford Community Plan and General Use Permit."	
ORG7-11	*Page 3-38:* Under Scenario 4, the proposed policy of "foregoing new natural gas hookups" would not be feasible for several reasons. Natural gas is the most efficient energy source for certain industrial and medical processes, and is the preferred source for space heating under the California Building Code.	The comment is noted. Please note that the preferred scenario and the June 30, 2017 draft Comp Plan do not include the sustainability measure referred to by the commenter.
ORG7-12	The City's Draft Sustainability and Climate Action Plan (S/CAP), released in April 2016, is consistent with our request and inconsistent with a Comprehensive Plan policy of simply foregoing new natural gas hookups. The Draft S/CAP takes a pragmatic and gradualist approach to electrifying the City. For example, the plan states: "Palo Alto will first seek to reduce natural gas usage through energy efficiency and conservation, followed by electrification of water heating, space heating and cooking where cost effective." Draft S/CAP page 18 (4/18/2016). The Draft S/CAP also recognizes the state law barriers to a city simply mandating electric equipment; it suggests "advocating at the state level to address CEC requirements for cost effectiveness." The S/CAP represents a commitment to sustainability that Stanford shares, but it also reflects a measured, deliberate approach to electrification rather than a sudden mandate.	The comment is noted. The comment does not address the adequacy of the February 2016 Draft EIR. As stated in Response ORG7-11, the preferred scenario and the June 30, 2017 draft Comp Plan do not include the sustainability measure referred to by the commenter.
ORG7-13	*Page 3-40:* Under Scenario 4, the proposed PTOD shown on Figure 3-9 appears to be a "bubble" that does not coincide with parcel or leasehold lines. We understand that, at least with respect to the Stanford Research Park, this bubble does not reflect the City's	Figure 3-9 was revised as part of the Supplement to the Draft EIR. Please note that boundaries mapped in the EIR scenario concept figures are illustrative and do not indicate precise regulatory

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	intentions for Scenario 4. We request that Figure 3-9 be revised to show the proposed boundaries of the Expanded PTOD Zones within the Stanford Research Park.	districts.
ORG7-14	**B. Aesthetics and Visual Resources** *Page 4.1-24:* Mitigation Measure AES-4 provides for the City to develop an ordinance that will require certain projects to prepare an analysis of potential shade/shadow impacts. The mitigation measure further states: "Projects that are shown to shadow open spaces during [specified] times shall mitigate these impacts through building and site design features." In appropriate situations, removing all shadows from public open spaces through "building and site design features" may not be desirable or feasible. After careful consideration, the City may wish to approve a development project that casts shadows on open space in recognition of competing policy goals advanced by the project. To ensure City decision-makers retain this discretion, the final sentence of Mitigation Measure AES-4, quoted above, should be revised to add "to the extent feasible and deemed desirable by the City."	Mitigation Measure AES-4 was revised in the Supplement to the Draft EIR to specify that a potential shade/shadow impact analysis shall explain how a proposed 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.
ORG7-15	**C. Air Quality** *Pages 4.2-44 and 4.2-45:* Please revise the text and Figure 4.2-2 to delete California Avenue south of El Camino Real from the "High Volume Roadways" designation and to delete the "500ft High Volume Roadway Screening Buffer" around that roadway. We have been unable to find a source for the "High Volume Roadway" designation on California Avenue. The Transportation Impact Analysis for the Comprehensive Plan Update does not include California Avenue, so it cannot be the source. In fact, City records show that California Avenue south of El Camino Real does not meet BAAQMD's definition of a high volume roadway, which is a roadway that averages 10,000 or more daily vehicle trips. City-generated maps (copies enclosed as Appendix B) show that in 1999, at the height of the dot-com boom, average daily trips (ADT) on California Avenue south of El Camino Real reached 6,700; in 2010, when Facebook occupied 1601 California Avenue, the highest ADT recorded was 6,300; and in 2013, the Comprehensive Plan EIR's baseline date, ADT was 4,900. Accordingly, property owners near California Avenue should not be subject to Mitigation Measure AIR-1b, which imposes requirements on applicants for residential and other sensitive land use projects that are within 1,000 feet of high volume roadways.	Figure 4.2-2 was revised as part of the Supplement to the Draft EIR to remove the designation of California Avenue south of El Camino Real as a High Volume Roadway. However, the 500-foot buffer was inadvertently left. Figure 4.2-2 has been revised and is included in Chapter 3 of this Final EIR.
ORG7-16	**D. Biological Resources** *Page 4.3-1:* The first sentence under the heading Federal Endangered Species Act should be revised to reflect that USFWS has jurisdiction over non-anadromous and non-marine fishes.	Page 4.3-1 of the Supplement to the Draft EIR includes revisions to reflect that the USFWS has jurisdiction over all species except marine species and anadromous fish.
ORG7-17	*Page 4.3-9:* The discussion of the Stanford University Habitat Conservation Plan (HCP) should be revised to reflect only the approved, March 2013 revised HCP, which addresses	Page 4.3-2 of the Supplement to the Draft EIR includes revisions to reflect only the approved, March 2013 *Stanford University*

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	three covered species. The prior version of the HCP, covering five species, is not in effect.	*Habitat Conservation Plan*.
ORG7-18	*Pages 4.3-9, 4.3-23, and throughout the chapter:* Statements and suggestions that the federally listed San Francisco garter snake occurs at Stanford University should be corrected. The San Francisco garter snake is not found on Stanford lands. The garter snakes found at Stanford are an intergrade form between two subspecies of the common garter snake found on the San Francisco Peninsula, the San Francisco garter snake and the red-sided garter snake. SanFrancisco garter snakes are located to the north and west, and red-sided garter snakes are located to the south, with the intergrade zone extending from Boronda Lake in Foothills Park to Lower Crystal Springs Reservoir, and from the Bay to the crest of the Santa Cruz Mountains. Even though the San Francisco garter snake is not present at Stanford, the HCP covers this species. Please see HCP Section 2.4.3.	Page 4.3-2 of the Supplement to the Draft EIR includes revisions to clarify that the snakes that may occur on Stanford lands have not been proved to be the San Francisco garter snake subspecies nor the San Francisco garter snake subspecies, although the HCP still covers them. Pages 4.3-4 and 4.3-5 of the Supplement to the Draft EIR include revisions to delete the reference to the possible presence of the San Francisco garter snake in Woodside.
ORG7-19	*Page 4.3-11, last two sentences:* These sentences incorrectly state that Lagunita Reservoir and the Dish are in Palo Alto. The Stanford lands in Palo Alto that are not in HCP Zone 4 are certain lands south of Foothill Expressway near Deer Creek (Zones 1, 2 and 3). Please see HCP Figures 1-2, Governmental Jurisdictions, and 4-2, Management Zones.	Page 4.3-4 of the Supplement to the Draft EIR includes revisions to delete the statement that Lagunita Reservoir and Dish are in Palo Alto.
ORG7-20	*Pages 4.3-23 and 4.3-25:* It should be noted that although it was historically present, the California red-legged frog has not been found in San Francisquito Creek since 2007.	The comment is noted. The discussion of Impact BIO-1 in the Supplement to the Draft EIR acknowledges that there is no suitable habitat for the California red-legged frog in the Project Area. No revisions to the February 2016 Draft EIR or Supplement to the Draft EIR are required.
ORG7-21	*Page 4.3-29:* The San Francisco garter snake should be described as a subspecies rather than a species, and the text should distinguish between the San Francisco garter snake subspecies (not present) and the non-protected intergrade garter snakes (present). Intergrade snakes have been found in very small numbers at Stanford and in Palo Alto; Boronda Lake provides habitat for the intergrades and not for the San Francisco garter snake.	Page 4.3-2 of the Supplement to the Draft EIR includes a footnote that reflects that the San Francisco garter snake is a subspecies and that science indicates the snakes that occur on Stanford lands are not the San Francisco garter snake subspecies.
ORG7-22	*Page 4.3-30:* Please add the following to the paragraph regarding Western pond turtle: "Western pond turtle has been found in San Francisquito Creek, Felt Reservoir, and Searsville Reservoir."	Page 4.3-5 of the Supplement to the Draft EIR includes revisions to reflect that the Western pond turtle has been found in San Francisquito Creek, Felt Reservoir, and Searsville Reservoir.
ORG7-23	*Page 4.3-31:* Please correct the last sentence of the American badger discussion along the following lines: "Suitable habitat for American badger occurs in Palo Alto foothills. Outside the City, an American badger was observed near Searsville Reservoir in 1997 and another was photographed at Jasper Ridge in 2014."	Page 4.3-5 of the Supplement to the Draft EIR has been revised in response to this comment.
ORG7-24	**E. Cultural Resources**Demolition of Historic Resources. The Draft EIR appears to indicate that the City might prohibit demolition of historic resources. We do not believe this is the	Pages 4.4-2 and 4.4-3 of the Supplement to the Draft EIR include revisions to clarify the mitigation approach to protect historic

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	City's intent, and the mitigation measures identified in the Draft EIR do not expressly include such a prohibition, but we request that the EIR be clarified on this point.Our concern arises from the following text in the Draft EIR. The document states that implementation of the proposed Plan could: a) adversely affect historic resources listed or eligible for listing on the National and/or California Register, or listed on the city's Historic Inventory (Impact CULT-1); b) eliminate important examples of major periods of California history or prehistory (Impact CULT-2); (c) directly or indirectly destroy a local cultural resource that is recognized by City Council resolution (Impact CULT-6); and (d) contribute to significant cumulative impacts with respect to cultural resources (Impact CULT-7). The Draft EIR further concludes that these impacts would be significant, in part because the City "does not have an ordinance that prohibits demolition or alterations to historic structures" (pages 4.4-21 - 4.4-23), "does not have an ordinance that prohibits demolition or alterations to local cultural resources" (page 4.4-30), and "does not have an ordinance in place that would prevent demolition or alteration of historic or cultural resources (page 4.4-32) (emphasis added). The Draft EIR then concludes that with such mitigation, impacts to historic resources would be mitigated to less than significant. The mitigation measures identified in the Draft EIR, however, do not – and should not – state that demolition is prohibited.A wholesale prohibition on demolition of historic structures would represent a reversal of longstanding City policy. Currently, when demolition of a historic resource is sought as part of a discretionary development application and a significant unavoidable impact is found, the City's Comprehensive Plan and ordinances allow the City Council to decide whether to: 1) deny the development application; or 2) issue a statement of overriding considerations and allow demolition to proceed due to identified benefits of the development project. A Comprehensive Plan policy or an ordinance prohibiting demolition of historic structures would strip this discretion from the City Council. The SUMC Facilities Renewal and Replacement Project is a recent example of a project the City Council could not have approved if a prohibition on demolition of historic resources had been in place. In 2011, the City Council concluded, following full CEQA review, that the 1959 Hospital Building complex that the SUMC Project sponsors proposed to replace was a historic resource, and that its demolition would constitute a significant unavoidable impact of the SUMC Project. The project EIR analyzed preservation of the complex, but determined that the existing buildings could not be retrofitted into state-of-the art clinic, medical office and research facilities. Faced with the decision whether to reject the SUMC Project or override the loss of the historic 1959 Hospital Building complex, the City Council made a statement of overriding considerations. The statement included the following:	resources listed on the national and/or California Register or the City's Historic Resource Inventory. Mitigation Measures CULT-1a, CULT-1b, and CULT-1c were deleted and replaced with Mitigation Measure CULT-1. The revised mitigation measure does not prohibit the demolition of historic structures, but strengthens the process for evaluating potential historic resources for eligibility to be included in the State or federal registers prior to issuance of a demolition or alterations permit. This mitigation measure is supported by Policy L-7.2 in the June 30, 2017 draft Comp Plan.

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	"The Project will enable the SUMC Project sponsors to continue their important work to provide advancements in medicine, and health care services to their patients." Because the City Council had the discretion to approve a development project that necessitated demolition of a historic resource, these benefits of the SUMC Project will be realized.Not every development project that the City might wish to approve has the life-saving benefits of a hospital and medical research project. But in a city that is, as the Draft EIR notes, largely built out, the City Council should retain its discretion to consider replacement of historic resources to achieve other benefits of redevelopment. As an example, in June 2015, the City Council unanimously approved the replacement of a historic office building at 2555 Park Boulevard. The Council's statement of overriding considerations cited project benefits that included support for the Pedestrian Transit-Oriented Development Overlay and the Bicycle and Pedestrian Transportation Plan; development of a modern building that meets current standards for structural design; and creation of a pedestrian and bicycle friendly street frontage with wide sidewalks and amenities. The City should not preclude its Council from weighing such benefits against the benefits of historic preservation of individual resources in the future. Finally, although it is possible that development under the proposed Plan would affect historic resources, it is not certain that this would occur, and the Draft EIR does not anticipate impacts to any particular historic resource. This is an additional reason that the EIR should make clear that the City Council will retain its current discretion with respect to impacts on historic resources.	
ORG7-25	*Impact CULT-4.* The impact statement for Impact CULT-4 is inconsistent with the analysis that follows and should be revised. The Draft EIR (pp. 4.4-27 – 4.4-28) explains that human remains, including those interred outside formal cemeteries, could be unearthed during ground disturbing activities for development that is consistent with the Comprehensive Plan Update (all four scenarios). The Draft EIR further explains that compliance with regulations and procedures established by existing law to address such disturbances (providing for work stoppage, notices, and potential re-interment, among other provisions) "would ensure that impacts are less than significant under all four scenarios." However, the impact statement at page 4.4-27, which is repeated elsewhere in the Draft EIR, provides: "Implementation of the proposed Plan would not disturb any human remains, including those interred outside of formal cemeteries." (Emphasis added.) This statement is not accurate; to avoid misunderstanding, we recommend substituting "…would not cause a significant impact due to disturbance of human remains…."	The impact statement for Impact CULT-4 was revised accordingly in the Supplement to the Draft EIR.

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ORG7-26	F. Hydrology and Water Quality *Page 4.8-23:* For accuracy, Figure 4.8-1 should be revised to reclassify most "engineered channels" identified on the Stanford campus as "pipes." Additionally, the "creeks" depicted as tributaries to Lagunita Reservoir on the Stanford campus should be reclassified as "ditches." Appendix C to this letter shows the necessary revisions to Figure 4.8-1.	Figure 4.8-1 of the Supplement to the Draft EIR incorporates revisions to reclassify "engineered channels" as "pipes" on the Stanford campus. Additionally, the "creeks" depicted as tributaries to Lake Lagunita have been reclassified as "ditches."
ORG7-27	*Page 4.8-24, third paragraph:* This paragraph should be revised for accuracy as follows: In addition to the creeks and engineered channels, there are several surface water bodies in and around Palo Alto. Three ~~reservoirs~~ dams built for water conservation and storage purposes are located on Stanford University property, outside city limits. Searsville ~~Lake~~ Dam impounds Corte Madera Creek, Sausal Creek, Dennis Martin Creek, and Alambique Creek and at one time was a major reservoir in the San Francisquito Creek watershed; however, the reservoir is slowly filling up with sediment so it currently has less than 10 percent of its original capacity.[32] Felt Lake ~~and Lagunita Reservoir are~~ is an off-stream reservoirs fed by ~~diversions from~~Los Trancos Creek, Searsville Lake, and San Francisquito Creek~~, respectively~~. Lagunita Reservoir is ~~filled every year with surface water and~~ fed by surface runoff from its tributary area in the foothills, which is sometimes supplemented with water diverted from San Francisquito Creek ~~or~~ wells, or other sources to support California tiger salamander reproduction.[33] Additional lakes, each located within city limits, include Boronda Lake in Foothills Park and Arastradero Lake in the Arastradero Preserve.[34]	Page 4.8-8 of the Supplement to the Draft EIR includes revisions made in response to the comment.
ORG7-28	*Page 4.8-38, first paragraph:* Please provide further information regarding the source, date, and basis of development of Figure 4.8-5. The final sentence in this paragraph also should be revised as follows: "In addition, the actual dam inundation zones for Searsville and Lagunita Reservoirs would be much smaller than shown on Figure 4.8-5, as discussed in the following paragraphs."These revisions are necessary to recognize that Stanford has no intention of removing Lagunita Dam, and Lagunita Reservoir occasionally fills to its capacity with storm water.	Page 4.8-10 of the Supplement to the Draft EIR incorporates revisions reflect that the California Office of Emergency Services is the data source for Figure 4.8-5.
ORG7-29	*Page 4.8-38, third paragraph:* This paragraph should be revised for accuracy as follows: Stanford University also owns and operates Lagunita Reservoir, which used to be filled with diversion from San Francisquito Creek to allow recreational use by students. However, the ~~lake~~ reservoir has not been filled to facilitate recreation since the late 1990s and today serves as a storm water drainage basin ~~with vernal pools~~ and seasonal wetland. ~~Stanford University is also considering removing the dam in the future. Because of the lack of water behind the dam, the actual dam inundation zone is minimal to non-existent as compared to that shown in Figure 4.8-5.~~ Flooding impacts in Palo Alto from a failure of the dam at Felt Lake would be minimal, because the dam inundation zone is primarily outside of the	Page 4.8-10 of the Supplement to the Draft EIR incorporates revisions made in response to the comment.

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	city limit ~~or SOI~~. As stated above, Stanford has no intention of removing Lagunita Dam. However, note that the University is proceeding with a project to remove the Lagunita Diversion Dam, which is located on San Francisquito Creek and has not been used for water diversion for several decades. Also, as indicated above, Lagunita Reservoir occasionally fills to its capacity with storm water.	
ORG7-30	*Pages 4.8-45, last paragraph and 4.8-47, Mitigation Measure HYD-2:* Stanford is concerned about the vagueness and potential infeasibility of two elements of Mitigation Measure HYD-2, which is intended to address localized lowering of the shallow aquifer during construction dewatering activities. These elements are a potential requirement to provide "one day / week water truck hauling service for neighbors" and fill stations that provide for "multiple concurrent users." We do not know what these measures would require and request that they either be clarified or deleted from the mitigation measure. We note that at page 4.8-45, the Draft EIR states that the City is "currently in the process of evaluating additional requirements for the Basement Construction Dewatering Program" and request that no new requirements be imposed without a full opportunity for public and stakeholder input.	Mitigation Measure HYD-2 was revised accordingly as part of the Supplement to the Draft EIR.
ORG7-31	*Page 4.8-59, second paragraph, first sentence:* This sentence should be revised as follows: "As described above, the dam inundation zones for two one of the dams overestimate the potential flooding impacts."	Page 4.8-24 of the Supplement to the Draft EIR includes revisions to reflect this information.
ORG7-32	*Page 4.8-59, third full paragraph:* This paragraph should be deleted entirely or revised for accuracy as follows:Lagunita Reservoir is located on the western side of the Stanford Universitycampus and used to be filled with diversion from San Francisquito Creek to allow recreational use by students. However, the reservoir has not been artificially filled to facilitate recreation since the late 1990s and today serves as a storm water drainage basin ~~with vernal pools~~ and seasonal wetland during the winter and spring months. ~~In addition, Stanford University, which owns and operates this reservoir, is conducting periodic assessments for removal of the dam as the result of multiple lawsuits filed by environmental groups.75 With the lack of water behind the dam, the mapped inundation zone should be minimal to nonexistent.~~Lagunita Dam has not been the subject of any lawsuits against Stanford, nor is Stanford considering the dam's removal. As stated above, note that the University is proceeding with a project to remove the Lagunita Diversion Dam, which is located on San Francisquito Creek and has not been used for water diversion for several decades.	Page 4.8-24 of the Supplement to the Draft EIR includes revisions to reflect the requested edits.

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ORG7-33	G. Land Use and Planning *Page 4.9-12:* Consistent with our comment on page 3-24 of the Project Description, above, please revise the last two sentences in the final paragraph on page 4.9-12 as follows: "In October 2015, Stanford announced a proposal to build a net increase of 1,450 graduate student beds beyond what ~~is allowed~~ initially was authorized under the approved GUP.[10] ~~This proposal~~ The authorization of additional units for this proposal, in the Escondido Village area, was approved by the County following ~~would be subject to~~ environmental review showing that the project would not result in any new or substantially more severe impacts beyond those identified in previous environmental analysis for the Stanford Community Plan and General Use Permit ~~and County approval~~."	Page 4.9-2 of the Supplement to the Draft EIR includes revisions based on the comment.
ORG7-34	*Page 4.9-34:* Consistent with our comment on page 3-24 of the Project Description, above, please revise the penultimate sentence and add a sentence in the second paragraph on page 4.9-34 as follows: "As noted in Section 4.9.1, above, Stanford University ~~is seeking~~ received County ~~approval of~~ authorization for a net increase of 1,450 graduate student beds beyond what ~~is allowed~~ initially was authorized under the GUP. The County found that these additional beds would not result in any new or substantially more severe impacts beyond those identified in previous environmental analysis for the Stanford Community Plan and General Use Permit."	Page 4.9-17 of the Supplement to the Draft EIR includes revisions based on the comment.
ORG7-35	H. NoisePage 4.10-6: The Draft EIR gives as an example of specific noise-sensitive land uses outside city limits "essentially all of Stanford University." While Stanford agrees that specific sites on its campus could be considered noise-sensitive uses, much of the campus is composed of uses that plainly are not noise-sensitive, such as administrative facilities, athletic venues, and open space / recreation areas where quiet environments are not necessary for enjoyment, public health, and safety. As such, the second sentence of the last paragraph on this page should be revised to replace "essentially all of Stanford University" with "certain sites within Stanford University."	The majority of the Stanford University campus is considered to be sensitive to excessive levels of community noise, to one degree or another. Student housing and the educational venues are probably the most noise-sensitive, but faculty offices, administrative facilities, auditoria, health centers, audio and visual studios, practice and performing arts venues, and similar uses/venues would also benefit from appropriately-controlled noise intrusions. While not as sensitive as housing facilities, these education-support facilities are also sensitive to environmental noise. The combination of these residential-, education-, and support-focused uses make up the majority of the Stanford University campus. Campus facilities that would not be considered to be noise sensitive include mechanical equipment buildings, athletic facilities, open-space/recreational venues.

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ORG7-36	*Page 4.10-18:* Please revise Figure 4.10-2 to show residential uses at the former 1451, 1501, and 1601 California Avenue, where Stanford is constructing 180 residences in compliance with the 2005 Palo Alto / Stanford Development Agreement. Additionally, consistent with our comment on page 4.10-6, please revise the legend on Figure 4.10-2 to read "Land Uses Potentially Associated with Sensitive Receptors."	Figure 4.10-2 has been revised accordingly, as shown in Chapter 3 of this Final EIR.
ORG7-37	*Page 4.10-36:* Mitigation Measure NOISE-1c addresses rail noise and vibration. Like most of the Draft EIR's noise mitigation measures, it is designed to reduce impacts of the surrounding noise environment on development under the proposed Plan, rather than to address any significant noise impact of new development. But under the California Supreme Court decision in California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (2015), "agencies subject to CEQA generally are not required to analyze the impacts of existing environmental conditions on a project's future users or residents." Except where a specific CEQA provision requires analysis of existing environmental conditions on a project, or where the project itself will exacerbate the existing environmental condition, requiring such analysis "would impermissibly expand the scope of CEQA." Here, no CEQA provision requires analysis of impacts of rail noise or vibration on future project users, and the proposed Plan will not exacerbate that noise or vibration. Accordingly, although consideration of the effects of rail noise and vibration on future development is entirely within the City's planning authority, it is not a CEQA issue, and Mitigation Measure NOISE-1c should not be treated as a CEQA mitigation measure.	The Supreme Court's decision in CBIA v. BAAQMD does not preclude or prohibit a lead agency from voluntarily analyzing and mitigating impacts that may exceed CEQA requirements for its own projects, such as the Comprehensive Plan. See California Building Industry Association v. Bay Area Air Quality Management District (2016) 2 Cal.App.5th 1067, 1083. Rail service along the corridor is expected to increase in the future, as noted on page 4.10-8 of the Supplement to the Draft EIR, which states, "As discussed in the February 2016 Draft EIR, future increases in the number and frequency of railway operations, as a result of the Caltrain Modernization Program, would result in higher noise level contributions near the rail lines…" As such, for a complete, thorough, and informative presentation, the City of Palo Alto has voluntarily elected to include a discussion of potential impacts from non-project sources onto sensitive receptors. Mitigation Measure NOISE-1c has been revised, as shown in Chapters 1 and 3 of this Final EIR, to focus on actions within the City's control to reduce the impacts associated with rail noise and vibration.
ORG7-38	Regardless of whether it is retained as a mitigation measure or simply adopted as a City policy, Mitigation Measure NOISE-1c should be revised. The requirement that habitable buildings be "sited at least 100 feet from the centerline of the tracks whenever feasible" is not needed. Inhabitants of new buildings are protected by the two subsequent elements of the measure, requiring compliance with specified noise and vibration standards for habitable buildings. A general rule excluding habitable buildings within this area "whenever feasible" would discourage rail-oriented development without providing a benefit to building users. In addition, as the Draft EIR states, Caltrain electrification will reduce rail noise, and high-speed rail will reduce both noise and vibration, compared to existing conditions. As those projects are implemented, development near the rail line may more easily be able to demonstrate consistency with noise and vibration standards intended to protect the occupants of such developments. We request that the City not place unnecessary restrictions on development adjacent to rail.	Changes have been made to Mitigation Measure NOISE-1c in the Supplement to the EIR, which include removing the specific 100-foot siting distance, as well as simplifying the policy language.

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ORG7-39	I. Population and Housing *Page 4.11-2.* For accuracy, please revise the first sentence under #2 as follows: "The 2014 Stanford General Use Permit (GUP) Annual Report states that there were 1,358 housing units in the SOI ~~in~~ added from 2000 to 2010 and 1,884 housing units in the SOI ~~in~~ added from 2000 to 2014, for a gain of 526 housing units in those four years (2010 to 2014)."	Page 4.11-1 of the Supplement to the Draft EIR includes revisions based on the comment.
ORG7-40	*Pages 4.11-3 and 4.11-7.* Consistent with our comment on page 3-24 of the Project Description, above, please revise both the second sentence in the first paragraph on page 4.11-3 and the third paragraph on page 4.11-7, and add a sentence to each, as follows: "In addition, in late 2015, Stanford announced that it would seek Santa Clara County approval to build an additional 1,450 graduate student beds beyond what ~~is allowed~~ initially was authorized under the approved GUP.[fn] The County authorized the additional units following environmental review showing that the project would not result in any new or substantially more severe impacts beyond those identified in previous environmental analysis for the approved Community Plan and GUP."	Page 4.11-2 of the Supplement to the Draft EIR includes revisions based on the comment.
ORG7-41	J. Transportation and Traffic *Effect of Requirement for No Net New Vehicle Trips Under Scenario 4.*The Draft EIR does not truly analyze Comprehensive Plan Scenario 4 and should be revised to do so. The idea behind Scenario 4 is that it would allow the most growth of the four scenarios studied – as the only scenario that would accommodate growth consistent with ABAG projections – but would also impose the most stringent performance standards to minimize the impacts of such growth: This scenario would test strategies to concentrate growth in transit-rich areas of the city where there are ample neighborhood services, and would seek to address the impacts of employment growth rather than slowing or controlling the rate of growth. As a result, this scenario would include the most growth of the four scenarios; however, growth would be allowed only on the condition that it (individually or collectively) incorporates stringent performance standards intended to achieve significant sustainability improvements. *One of these would include "no net new car trips" as a result of any new office development.* Draft EIR, p. 3-38 (emphasis added). But rather than account for the effect of the "no net new car trips" requirement, the Draft EIR and the Transportation Impact Analysis simply ignore it in their analysis of impacts from Scenario 4. See Draft EIR, App. G, page iii, Table ES-3, Summary of Scenario Assumptions ("no net new office trips" requirement for Scenario 4 not included); page v (no mention of no net new trips requirement in discussion of Scenario 4). Nothing in either the TIA or the Draft EIR attempts to analyze this vital aspect of Scenario 4. The result of analyzing only the growth projections of Scenario 4, and not its key traffic-reducing feature, is that the TIA and Draft EIR identify greater drive-alone trip generation for Scenario 4 than for Scenarios 2 and 3, and greater roadway segment impacts than for any other scenario. Draft EIR, App.	As requested in Comment ORG7-41, the Supplement to the Draft EIR analyzes post-mitigation conditions for Scenarios 5 and 6. These post-mitigation scenarios include the same assumptions as Scenarios 5 and 6, respectively, plus the implementation of the proposed mitigation measures. Thus, by comparing the post-mitigation results for Scenarios 5 and 6 with the result for pre-mitigation Scenarios 5 and 6, respectively, the effectiveness of the mitigation measures can be evaluated. The Supplement to the Draft EIR presents mode share, ADT, VMT, level of service at intersections, and all other metrics for the post-mitigation scenarios.

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	G, pages 13, 25. This means that neither the public nor decision makers have had any opportunity to judge the environmental benefits and costs of Scenario 4. Scenario 4 is deemed to cause the greatest impacts of any of the three action scenarios because the element that was supposed to address the effects of an ABAG-consistent scenario were never studied. We request that the Final EIR analyze the effect of this vital element of Scenario 4.	
ORG7-42	*Mitigation Measure TRANS-1a.* The Transportation Impact Analysis and Draft EIR do not quantitatively analyze the effectiveness of Mitigation Measure TRANS-1a, which would require substantial reductions in new peak period vehicle trips as well as offsets or fees to address remaining new trips, with TDM plans to be approved by the City and penalties to accrue for noncompliance. This mitigation measure is the centerpiece of the Draft EIR's vehicle traffic mitigation measures and would apply to all four Scenarios. However, rather than attempt to model the effectiveness of this measure, the Transportation Impact Analysis and Draft EIR assume that actual trip reductions achieved will be modest. Draft EIR App. G, p. 37-38; Draft EIR, p. 4.13-52. As a result, the Transportation Impact Analysis and Draft EIR conclude that even with this mitigation, significant impacts will be avoided at only one of six intersections, and that intersection is one where just a nine percent reduction in trips is needed to reduce the impact to less-than-significant. Draft EIR, p. 4.13-53; Draft EIR App. G, p. 36.	As noted in Response ORG7-41, the Supplement to the Draft EIR analyzes post-mitigation conditions. For the purpose of evaluating the effects of Mitigation Measure TRANS-1a, it was assumed that the TDM trip reduction targets required for each area of the city would be achieved by all new development projects. However, the post-mitigation conditions scenarios for Scenarios 5 and 6 did not assume "no net new trips" from new development projects, since the mitigation measure for Impact TRANS-1 has been revised. Mitigation Measure TRANS-1b requires payment of a Transportation Impact Fee.
ORG7-43	*Vehicle Miles Traveled Per Capita.* We believe that the errors described in Section II above regarding the population of the Stanford campus outside the City limits may have resulted in an error in the Transportation chapter of the Draft EIR. Tables 4.13-13 and 4.13-14, at page 4.13-49 of the Draft EIR, state that vehicle miles traveled per capita is higher in the City's sphere of influence (i.e., the Stanford central campus) than in the City itself. Given that the vast majority of Stanford students do not drive, and in light of Stanford's success in diverting employees to alternative transportation modes, this conclusion seems incorrect. We request that this conclusion be explained or corrected in the Final EIR, or that the City, for the reasons described in Section II above, remove the sphere of influence from the EIR's analysis.	The comment notes, with reason, that one would expect the VMT per capita in the city plus SOI to be lower than for the city only, given that so many people on campus do not drive and given Stanford's very successful TDM program. Even though the traffic model used for the EIR analysis does include the number of students living in congregate living quarters, the additional population that lives on campus is not included in the "total population" figure used to calculate VMT per capita (Tables 7 and 8 in the EIR TIA). The Stanford University website reports that 12,509 students currently live on campus.[20] Adding 12,509 to the total population reported in the EIR, the VMT per capita is slightly lower within the city plus SOI (32.9) than for the city only (33.0) for Existing Conditions.

[20] Stanford University website, http://facts.stanford.edu/campuslife/, accessed on May 25, 2017.

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		Chapter 2 of this Final EIR presents the VMT per capita data for the preferred scenario. As shown in Chapter 2, VMT per capita in the city plus SOI would be 33.8 (slightly higher than the VMT per capita of 31.9 to 32.0 within the city only). Please note that the VMT per capita figures for the city plus SOI are not the basis for any impact findings or mitigation measures. Please also see Response ORG7-05.
ORG7-44	K. Utilities and Service Systems *Page 4.14-88.* Please revise the third paragraph as follows to reflect updated information about energy sources, infrastructure, and distribution at Stanford:Stanford University (within the SOI) purchases electricity from the electric powermarket for ~~some~~ all of its electric power needs. Power is delivered to the campus through a connection to the local public utility, PG&E.[100] Stanford University's ~~Power Systems group within Utilities Services~~ Energy Operations group within the Department of Sustainability & Energy Management is responsible for the design, operation, maintenance and repair of all Stanford's electrical energy infrastructure, as well as ~~overseeing the management of~~ the Central Energy Facility ~~currently operated by Cardinal COGEN, a subsidiary of General Electric.~~ Stanford's Central Energy Facility produces electrical and thermal energy for the main Stanford campus. ~~Steam~~ Hot water is generated for heating buildings, and chilled water is generated for cooling buildings. Electrical and thermal utilities are delivered through distribution systems operated by the Stanford ~~Utilities Services Department~~ Energy Operations group within the Department of Sustainability & Energy Management.Thank you, once again, for considering Stanford University's comments on the Comprehensive Plan Update Draft EIR. Please do not hesitate to contact me with any questions.	Page 4.14-32 of the Supplement to the Draft EIR includes revisions to reflect the requested edits.
ORG7-45	*Attachment: Appendix A*	This attachment is a news article that summarizes Stanford's process to apply for an updated General Use Permit. The attachment does not address the adequacy of the February 2016 Draft EIR.
ORG7-46	*Attachment: Appendix B*	This attachment is a series of maps that shows the City of Palo Alto's 1999 major street traffic flow, volume, and average daily traffic. The attachment does not address the adequacy of the February 2016 Draft EIR.

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ORG7-47	*Attachment: Appendix C*	This attachment is a mark-up of Figure 4.8-1 with suggested edits to correct illustration of pipes and ditches in Palo Alto. Page 4.8-7 of the Supplement to the Draft EIR incorporates these suggested edits into Figure 4.8-1.
ORG8	Marshall Case, Vice President, Infrastructure Services, Lockheed Martin Space Systems Company, June 6, 2016	
ORG8-01	Lockheed Martin is proud to be one of the founding tenants in the Stanford Research Park. We contributed to establishing the Park, which helped launch the City of Palo Alto as a research and technology hub.We are writing today to express our concern regarding the Draft Environmental Impact Report (DEIR) for the City's Comprehensive Plan. We understand and appreciate the City's concern regarding traffic congestion. Since the 1970s, Lockheed Martin has sponsored a robust Commute program to assist our employees in choosing options to work other than the single occupant vehicle, and in Palo Alto, we continue to collaborate with our fellow Stanford Research Park neighbors on programs and services to help reduce traffic congestion.We have been operating successfully under the City zoning that has been in place since Lockheed Martin established operations in the City of Palo Alto. Consistency and clarity of land use regulations have been essential to us as we have continued to evolve over the past five decades. Now, however, we are concerned about measures contained within the DEIR designed to regulate business growth.	The comment does not address the adequacy of the February 2016 Draft EIR.
ORG8-02	Specifically, we are concerned about the potential Conditional Use Permit requirement for new office or R&D uses. It is unclear to us what level of activity would trigger this requirement. We are continually investing in our facilities to perform renovations or updates to respond to changes in our business operations. Not being able to depend upon a consistent process or timeline has the potential to negatively impact our ability to perform our operations within our current facility.	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
ORG8-03	We are also concerned about a potential annual cap on new commercial square footage. Recently, Lockheed Martin worked with the City to redevelop an outdated, single-story 55,375-square-foot office/R&D building on our campus. In its place, we built a new two-story 85,959-square-foot office/R&D facility that much better serves our current and growing needs. Working within the zoning and FAR standards that have been in place for years, we added an additional 30,000 square feet on the site. Further, the new building followed California Green Building Code and LEED requirements, resulting in a much more sustainable building. If a growth limit had been in place at the time of this work, it may have been impossible to build this new, state-of-the-art facility. We have other buildings on our Palo Alto campus that we may want to repurpose should the need arise in the future. An office/R&D cap may make these plans impractical and	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.

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	serve as a disincentive to our investment in Palo Alto for the long-term. We look forward to further engagement on the DEIR and specifically, how to achieve responsible redevelopment and growth in way that supports local businesses, the community and the continued economic vitality of the area. We believe that through collaboration, we can continue to work in partnership with the City to carry on our shared history of success in Palo Alto.	
C. Members of the Public		
PUB1	Geri McGilvray, January 15, 2016	
PUB1-01	YOU ARE SO NICE ! I am so wiped out after painting on Tuesdays, but, I will try to come. Is there any way to know the latest I could sign up for my 3 minutes ahead of time? I SO think total safety from traffic speeding should become important again. It always was. We had a great weekend. We sang at BUCKS and recently saw "Concussion", since I have a grandchild in college on a football scholarship.	The comment is noted. Enforcement of speed limits is not within the purview of this EIR. However, the EIR addresses safety issues associated with traffic under Impact TRANS-9. This impact would be less than significant after mitigation.
PUB2	Stephanie Enos, January 19, 2016	
PUB2-01	Please make noise from overhead jets and light aircraft flying almost constantly overhead in Palo Alto an urgent priority. This has affected many people's quality of life.	While existing aircraft fly-over noise may be readily audible or discernible at times, there are no noise-sensitive land uses anywhere within the city limit that are currently or projected to be with any aircraft noise impact zones (either with respect to the federal standard of 65 dBA CNEL or the more conservative 60 dBA CNEL level). As such, current aircraft noise does not constitute a significant impact under CEQA. However, unknown future operations patterns, while not part of the proposed Plan, could potentially result in unacceptable aircraft-related noise environments.. To address this concern, Mitigation Measure NOISE-1b requires that the proposed Plan address compatibility between land uses and the Palo Alto airport. This reduces future impacts arising from flight operations at the Palo Alto Airport from "potentially significant" to "less than significant." The larger issue

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		of noise exposure associated with flight operations at the San Francisco and San Jose airports, while not directly relevant in the CEQA context, has been addressed in the draft Comp Plan through Policies N-6.12 and L-10.3 in the June 30, 2017 draft Comp Plan.
PUB3	William Leong, February 22, 2016	
PUB3-01	Based on the draft report, I understand that the four proposed scenarios all result in significant unavoidable adverse impacts on traffic, congestion and air quality. As a Palo Alto resident, traffic has been the most important factor affecting quality of life in this city. Please do not adopt any scenario that does not begin by addressing existing traffic. Thank you.	The comment is noted. The comment does not address the adequacy of the February 2016 Draft EIR.
PUB4	Shannon McEntee, February 22, 2016	
PUB4-01	All of the four scenarios for growth in Palo Alto will result in significant environmental pollution and traffic. We need a fifth scenario that protects our quality of life and provides for a sustainable future. Perhaps it's time to halt the growth of both housing and businesses if the sacrifice is too great.	The comment is noted. The Supplement to the Draft EIR analyzes two additional scenarios: Scenario 5 and Scenario 6. Scenario 5 lowers job growth below current projections and allows a modest increase in housing. Scenario 6 also lowers job growth below current projections and would allow a robust increase in housing. These scenarios included ambitious sustainability measures. The preferred scenario that has been chosen by the City is described in Chapter 2 of this Final EIR.
PUB5	Gretchen Hillard, March 25, 2016	
PUB5-01	I live in Midtown. I love my home and neighborhood. I have lived here for over 30 years. I am writing to address the need to reduce noise in my neighborhood, including the cumulative impact of noise from a variety of sources, especially at existing single family homes. The Draft Comprehensive Plan Update DEIR shows an unacceptable level of noise from US 101 in the Greer Rd. Area in Midtown. No possible mitigations are identified, except during new construction, to reduce the noise to a level more acceptable for residents. This is a built residential area. Already built. The noise level, with increasing freeway traffic, is likely to increase and become more destructive here, and to grow in areas farther from the Bay, affecting more homes in Midtown and elsewhere in Palo Alto. Serious mitigation is needed just to reduceor even maintain the noise level in this area.	The February 2016 Draft EIR and Supplement to the Draft EIR conclude that there would be no significant impacts due to traffic noise increases within the extent and depth of the project's traffic study. The analysis does show that several areas within the city, including portions of Greer Street, have existing highway noise levels that are near or above 65 dBA CNEL. CEQA does not require agencies to mitigate existing problems, and focuses instead on changes that may be significant in the future. Because the existing conditions noise contour map and future (2030) conditions noise contour map are very similar, increases in highway traffic noise are projected to be imperceptible over the years. As noted by the commenter, any increases that do occur would be due to traffic flows on Highway 101, which is under the control and jurisdiction

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		of the State, not the City. The City does not have the ability to impose mitigation that would affect highway traffic volumes.
PUB5-02	What can be done to reduce the level of noise? Surely the City can work with the State to develop noise mitigating walls and develop and enforce more effective standards for private airplane, helicopter, car, motorcycle and truck noise generation. And perhaps subsidize noise mitigation measures at affected homes to make greater insulation and installation of double pane windows economically feasible.	The draft Comp Plan provides policies regarding the noise environment that are consistent with State requirements, and includes Policy N-6.12 to ensure compliance with airport-related land use compatibility standards for community noise environments by prohibiting incompatible land use development within the 60 dBA CNEL noise contours of the Palo Alto airport. Further, Policies N-6.5 and N-6.6 refer to protecting residential properties from excessive noise sources, and apply site planning and architectural design standards that reduce noise impacts on both proposed new and existing buildings. The EIR is required to assess the impacts of the proposed Comprehensive Plan and to evaluate the significance of those impacts. Mitigation is only required for future impacts that are found to be significant. Roadway noise level increases were determined not to present a future impact, and therefore no mitigation is required for those sources. Mitigation Measure NOISE-1b addresses future impacts associated with to Palo Alto Airport and Mitigation Measure Mitigation Measure NOISE-1c addresses future impacts associated with to rail operations within the city.
PUB5-03	Midtown is not just affected by noise from US 101. We also experience serious noise from above. Jets, private planes, small commercial planes and helicopters, all impact our neighborhood with high levels of noise. This noise is constant at certain times of the day and week, and intermittent at other times. All these forms of flight should be required to mitigate the noise they generate to the ground to acceptable levels. They should be restricted to paths and airways that are not over residential areas. They should fly high enough so the noise does not helicopters, private planes and small commercial aircraft are not measured or addressed in the Comprehensive Plan update or the DEIR. (There is a study committee addressing commercial aircraft impacts.) Not only should their noise be measured, it must be monitored, regulated and noise levels enforced to maintain a reasonable quality of life on the ground.	Please see Response PUB5-01 and Response PUB5-02. Aircraft noise within the city limit was analyzed in the February 2016 Draft and Supplement to the Draft EIR as was found to be less than significant with the implementation of Mitigation Measure NOISE-1b (and per the accepted standards under the CEQA process). This reduces future aircraft-related noise impacts associated with flight operations at the Palo Alto airport from "potentially significant" to "less than significant." Noise from flight operations at the San Francisco and San Jose airports are not considered in the EIR, but are addressed in draft Comp Plan Program N6.12.2.
PUB5-04	Finally leafblowers continue to emit very loud noise at many properties weekly in Midtown. The police can't find a way to enforce this law. Gardeners operating leafblowers wear large ear protection devices. Should we, the neighbors have to live wearing these devices as well?	Residents are encouraged to use the Palo Alto 311 mobile app to report the use of gasoline-powered leaf blowers in residential areas. City code enforcement staff investigates all complaints they receive and can cite the gardener and the property owner

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		involved. The comment does not raise a specific concern with the February 2016 Draft EIR or Supplement to the Draft EIR.
PUB5-05	Our 2030 Palo Alto Comprehensive Plan Update has an over ten year horizon. The Vision Statement does not mention noise. Noise is as important as the other subjects. It should have equal emphasis. Goal N-8 and the following Programs address noise, but the omissions mentioned above in this letter should be addressed. More actions are needed to restore quiet in affected neighborhoods like Midtown. One goal of the plan should be to measure and find effective ways to reduce noise levels in residential areas from all sources to liveable standards. • Noise-with policies to decrease exposure to undesirable levels of noisein the community. • OUR PALO ALTO 2030 Addressing State regulations requirements fortransportation noise generated from roadways, airways, and railways, and limiting construction noise around sensitive receptors. GOAL N-8 An Environment That Minimizes the Adverse Impacts of Noise.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB6	Frank Ingle, April 11, 2016	
PUB6-01	I regret that I have not been able to participate in the hearings on this project, due to medical limitations. I offer my concern about an interaction between the proposed Caltrans electrification, High Speed Rail, and the transportation plan that I have not found addressed in the documents. The Caltrans electrification project would seem to be a very reasonable and desirable change for many reasons. However, I found drawings in the rail plan that indicate that the height of the poles which are the hangers for the electrical cables are 40 feet high. This means that the installation of the poles would not be possible wherever there is an overpass with less clearance than this, which would be most of the overpasses. Thus, the electrification of Caltrans would require removal and reconstruction of the overpasses with inadequate clearance, which would take a period of several years each, and would require a far longer runup on each side of the overpass to maintain the present slope. And, it would not be possible to construct multiple overpasses simultaneously because the already congested auto cross traffic would be greatly increased as auto traffic bypasses the overpass under construction. And it would also seem not possible to route the trains through tunnels or below grade trenches because the height of the rail electrification cable hangers would still be 40 feet, requiring trenches of a considerable depth. The elevation of the ground is very low in much of the peninsula and hence such a deep trench would be far below the water table, risking flooding of the system. In addition, there are creeks and streams crossing the path of the tracks periodically. It is not feasible to block the streams, and tunneling below the streams would require considerable cost and extra delay. Further, the path of the tracks would cross	The comment pertains to the design of the Caltrain electrification project, which is currently being pursued by the Joint Powers Agency via a design-build contract. The City has commented at length on the proposed project, seeking to minimize visual impacts. The comment also addresses the need for grade separations at Caltrain crossings and the impact of those grade separations. The preferred scenario and the draft Comp Plan call for grade separating Caltrain crossings and the resulting changes in traffic flow are illustrated in the analysis of Scenarios 5 and 6 as well as the preferred scenario. The impact of the grade separations themselves (on property taking, local street closures, and traffic detours during construction) cannot be assessed until specific design proposals are developed. Please see http://www.cityofpaloalto.org/gov/depts/pln/transit/railways.asp for more information.

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	multiple jurisdictions, creating problems and very long delays with project approval, as seen at San Francisco creek between Palo Alto and Menlo Park. I ask that these key issues be addressed, and I am available for discussions on these issues.	
PUB7	Frank Ingle, April 12, 2016	
PUB7-01	In my earlier email, I pointed out possible technical problems with Caltrain electrification. Consider as an alternative, a commuter train drawn by a battery powered locomotive. This is particularly feasible if the engine or perhaps just a separate battery car is changed out as needed. Ideal for commuter rail traffic which has limited range, little change of grade, and lightweight loads to pull. The advantages include: • No overhead wiring or need for poles to hang them, or the long traffic interruption caused by the need to install them. • No pollution during operation. • No electrical power facilities needed along the rail line. One at each end or at a convenient location is all that would be needed. • A purely electrical locomotive would be much more reliable than the present diesel engines. • Separable rechargeable battery carrying cars would be charged as needed, available in quantity, and easy to swap out if a module has problems. • Battery technology is rapidly improving, so we could expect the cost to continually decrease and the reliability to continually increase. • Regenerative energy recovery braking systems are already demonstrated. The UK Rail system already has a demonstration battery powered train carrying passengers: http://www.theguardian.com/environment/2015/jan/13/low-carbon-battery-powered-train-carries-first-passengers In the US, Norfolk Southern has a working demonstration device powered by lead acid batteries. A future change to lithium ion batteries would be expected to reduce mass and increase capacity. http://www.axionpower.com/profiles/investor/ResLibraryView.asp?ResLibraryID=67649&GoTopage=1&Category=1562&BzID=1933 And Norfolk Southern has an issued US patent for such as system: http://www.google.com/patents/US8342103 However, this patent is very weak and would be easy for ANYONE to work around. Perhaps Tesla would interested in providing the battery modules for the battery cars, since they are busily building battery factories.	The comment pertains to the design of the Caltrain electrification project, which is assumed as a background condition in this EIR but is not part of the proposed project.
PUB8	Geri McGilvray, April 13, 2016	
PUB8-01	Thank you. Please include traffic safety in our COMP PLAN. The the *[sic]*airplanes some folks hear have not maimed and hurt us like the hundreds of REAR ENDERS by speeding	The City understands that traffic safety is a serious concern. While the EIR assesses this issue qualitatively and concludes that there

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	cars have in Palo Alto along our residential arterials. We can NOT turn left or get out of our driveways safely. Please forward this to helpful leaders. OUR CITY kept us safe until 2011. We still need road safety and true traffic calming. Geri MCGILVRAY EVERYDAY SAFETY AND WALKABILITY, MIDTOWN and, all of Middlefield Road Our group includes many citizens for 25mph speed limit within our city borders. Midtown is right I the heart and soul of Palo Alto.	would be no significant impact in 2030, the draft Comp Plan includes policies to address traffic safety such as Goal T-6, which seeks to provide a safe environment for motorists, pedestrians and bicyclists on Palo Alto streets. Policies under Goal T-6 prioritize safety in transportation planning, pursue the goal of zero severe injuries and roadway fatalities, seek to increase safety at train crossings, and continue the Safe Routes to School partnership with PAUSD. Enforcement of safety includes through policies that monitor safety via technology and traffic laws.
PUB9	Steve Levy, Center for Continuing Study of the California Economy, April 16, 2016	
PUB9-01	Please forward to Joanna's team and I am happy to discuss. also attached are materials related to state legislation pending on secondary units. Steve CENTER FOR CONTINUING STUDY OF THE CALIFORNIA ECONOMY 385 HOMER AVENUE • PALO ALTO • CALIFORNIA • 94301 TELEPHONE: (650) 321-8550 FAX: (650) 321-5451 www.ccsce.com DATE: April 16, 2016 TO: PTC Members and Staff FROM: Stephen Levy SUBJECT: Regional Housing Projections This is a written and expanded version of the comments I made at the PTC in oral communications on Wednesday. There are three official sets of regional housing projections. Two of them are familiar to you and a third is being developed currently. All of the evidence below suggests that the current adopted regional housing projections are low and will be or are being revised upward.	Thank you for the background information. The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB9-02	**Regional Housing Needs Allocation (RHNA)**Under state law the Department of Housing and Community Development (HCD)gives each regional/metro area planning organization a	Thank you for the background information. The comment does not address the adequacy of the analysis contained in the

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	regional housing needsallocation covering an 8 year period. The regional planning agency (ABAG in ourarea) then allocates the regional total among local jurisdictions.This memo covers only the regional allocation.HCD gave ABAG a regional allocation for the 2014-2022 years in mid-2012 and itwas accepted by ABAG.The regional allocation was based on expected population growth as determinedby the state Department of Finance (DOF) and assumptions about vacancyrates, demolitions and second homes. The key factor in translating populationgrowth into housing needs is the projection of household formation rates, whichare the tendency of residents in specific age and ethnic groups to formhouseholds.The regional allocations are negotiable with HCD if contradictory technicalevidence is presented.	February 2016 Draft EIR.
PUB9-03	**Plan Bay Area (PBA)** Regional planning agencies are required to prepare long-term job, population and housing projections under federal law (to receive federal transportation $) and state law, SB 375, to provide for adequate housing and to meet emission reduction targets. The current PBA projections cover the period to 2040 and were adopted by ABAG in July 2013. These projections are accurately reflected in the EIR and other Comp Plan documents. CCSCE prepared the initial regional projections under contract to ABAG. Both the RHNA and PBA technical processes are a little more complex than can be easily summarized but I am available to answer questions and clarify as needed. Some of the key methodology points are explained below.	The commenter is correct that the EIR utilizes regional projections to assess future conditions in 2030.
PUB9-04	**How do the Existing Regional RHNA and PBA Compare?** The regional RHNA was not based on the adopted PBA. The regional RHNA was based on regional population projections that were substantially lower than the PBA projections and as a result the regional RHNA housing growth projections, which were translated into local allocations, were lower than if they had been based on the adopted PBA. In addition both the RHNA and PBA used household formation rate projections that substantially locked in the doubling up that occurred as a result of the recession and low housing production.	The comment observes that the RHNA and PBA have some differences. It does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB9-05	**There are New PBA Regional Update Projections**A PBA update will be adopted in April 2017 on the existing schedule. New regional projections were released in January 2016.They are higher than the adopted PBA growth levels and the largest change was in the housing projections as in addition to higher job and population growth, ABAG was required under a	The Environmental Setting section of Chapter 4.11, Population and Housing, of the Supplement to the Draft EIR includes revisions to include mention of *Plan Bay Area 2040*. As noted on page 4.11-3 of the Supplement to the Draft EIR, the forecast for Palo Alto

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	legal settlement with the Building Industry Association to add housing for existing commuters from outside the region. These upward projections are modest compared to the 2040 levels but **are an additional upward factor in determining regional housing need into the future.**CCSCE was not involved except in an advisory role with these updated PBA projections and I do not know the household formation rates that were used though from the results, it appears they still "lock in" most of the existing doubling up.	projects a lower level of household and employment growth than projected in *ABAG Projections 2013* and are generally consistent with the development projections evaluated in this EIR in Scenarios 1 through 6.
PUB9-06	In addition after the existing regional RHNA was adopted DOF published a new set of regional population projections, which correspond closely to the adopted PBA projections. This occurred as a result of a now followed DOF methodology that requires DOF to consult with and incorporate the job projections of regional planning agencies. So a major discrepancy between DOF and ABAG population projections as briefly occurred in 2013 was corrected and will not happen again.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB9-07	**The New State Housing Plan** HCD is developing an update to the last state housing plan adopted in 2000. The program is being led by Glen Campora who is and has been the technical lead on the RHNA process for the state.I serve on the technical advisory committee for the state plan update, have seen the preliminary state housing projections and talked to Glen after the PTC meeting on Wednesday. As input to the new state housing projections will be new DOF population projections, both of which will also be at county level so can be added to get a Bay Area total. While I have not seen the preliminary new DOF projections, a reasonable assumption is that they will be higher than the existing ones. **The major difference in the new county housing projections is that they do not assume that all the current doubling up will continue.** That means that these projections will not only take account of future population growth but will also provide for catch up—and for that reason have more housing for a given population level than the existing RHNA or PBA. Since the new household formation rate projections are being developed by HCD, it seems reasonable to assume that they will be used in the next RHNA and to make assumptions on this basis as to what a higher regional RHNA target for 2030 might look like when considering in scenario 5 as to how best to represent a fair range of household growth to 2030.I am available to meet on any questions and will certainly inform the PTC andcouncil as new state and regional projections are developed. The state plan will also have policy suggestions.Finally, I am attaching material about current state legislation to ease restrictions on secondary units.	The commenter suggests that the next RHNA process will result in higher housing numbers than currently projected for 2030. Scenario 6, which was analyzed in the Supplement to the Draft EIR, shows the impacts with higher housing numbers in Palo Alto than were included in ABAG Projections 2013. The updated RHNA projections, when they are available, will be the subject of a separate update to the Housing Element of the Comprehensive Plan for the period of 2023 to 2030.

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PUB9-08	*Attachment (pages 5 thru 31): Copy of Amended Senate Bill 1069*	The attachment contains California State Senate Bill 1069, which replaces the term "Second unit" with "accessory dwelling unit" in the Planning and Zoning Law. The attachment does not address the adequacy of the February 2016 Draft EIR.
PUB10	Herb Borock, April 18, 2016	
PUB10-01	Tonight's agenda item is yet another process that affects the Draft Environmental Impact Report (EIR) for the Comprehensive Plan that was made available for comment on February 5, 2016, and is still open for review until May 5, 2016. After the Draft EIR was released the Council had agenda items on the following dates that are related to the Draft EIR, but were not publicly noticed as hearings on that EIR: February 8, 2016, Item #8: Review of Citizens Advisory Commission (sic) recommendation for Community Services and Facilities Element of the Comprehensive Plan; February 22, 2016, Item #4: Discussion regarding Fifth Scenario for inclusion in the EIR. March 21, 2016, Item #12: Comprehensive Plan housing sites and programs. Tonight, you will be discussing the Sustainability and Climate Action Plan that you intend to refer to in the Comprehensive Plan. Courts have ruled that an EIR requires an accurate, stable, and finite project description. Your discussions and actions referred to above prevent the Comprehensive Plan Draft EIR from having a stable and finite project description. The remedy is to prepare a Revised Draft EIR after you stop changing that document. State and local law define the legislative process, including the bodies required to review an EIR and the order in which those bodies review the EIR. Your discussions and actions referred to above do not follow the required EIR review process.	The commenter states that the EIR has not provided an accurate, stable, and finite project description. The February 2016 Draft EIR and Supplement to the Draft EIR evaluate the potential environmental impacts of six scenarios for the proposed Comp Plan update. The six scenarios represent not one, but six stable and finite project descriptions for analysis in the EIR. The scenarios share many commonalities and share an overall vision, but test different strategies to achieve that vision. The scenarios were specifically crafted to enable analysis of those characteristics of the Comprehensive Plan that would be most likely to generate physical impacts, including the type of development that would be likely to occur and where it would be located. Page 6-7 of the Supplement to the Draft EIR states, “The Final EIR will describe the preferred scenario and how it aligns with the information and analysis presented in the February 2016 Draft EIR and Supplement to the Draft EIR. Supplemental environmental analysis would only be required if the preferred scenario deviates substantially from the scenarios included in the February 2016 Draft EIR and Supplement to the Draft EIR, or results in unanticipated impacts.” Chapter 2 of this Final EIR describes the preferred scenario and explains that it falls within the range of impacts evaluated in the February 2016 Draft EIR and Supplement to the Draft EIR. In addition, this Final EIR links the EIR mitigation measures to the Comprehensive Plan policies and programs with parenthetical references to the June 30, 2017 draft of the proposed Plan. Incorporating public and decision-maker input into a planning document is the explicit purpose of the public review process for an important planning document such as the Comprehensive Plan. Discussing, refining, and revising policies and programs in the planning document is a typical and expected part

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		of the review and approval process. Chapter 2 of this Final EIR explains that the refinements and revisions made through the public review process to date do not generate the need for additional analysis beyond that the City has already completed in the February 2016 Draft EIR and Supplement to the Draft EIR. If future changes to the Comprehensive Plan would have the potential to create new impacts outside of the envelope already extensive analyzed, then the City would conduct any additional analysis required under CEQA.
PUB11	Hamilton Hitchings, May 15, 2016	
PUB11-01	This is the first time in the Land Use Subcommittee we've seen the changes we discussed, reflected in a draft of the Land Use Element. Overall, I'd say you've done a great job. I did have one area where I think the changes can be streamlined to make it easier for city council and that's on L-8 since I feel the options are repetitive and can be reduced without materially changing the choices. Here are my suggestions and please include this in the full CAC meeting in-place handouts:Replace Options 2, 3A, 4A and 5A with: NEW PROGRAM: monitor new residential and non-residential development to proactively address its adverse effects, including traffic, parking, air quality and noise. (I don't see how this would be considered controversial and I would assume almost everyone would support it) OPTION 1: Maintain the 3,257,900 limit on non-residential development. OPTION 2: Expand the 3,257,900 limit on non-residential development to city-wide. Combine NetZero options 4B and 5B since they look identical*[sic]* Thank you.	The comment offers suggestions regarding specific plan policies and does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB12	Bob Wenzlau, May 16, 2016	
PUB12-01	This is a short note regarding my views toward the EIR and the development of a 5th scenario. I ask that Scenario 5 be put on hold. As context, I am a member of the CAC and worked diligently to form a sustainability subcommittee that would strive to integrate the SCAP into the comprehensive plan. **My comments are as an individual and not as part of the CAC.** The relevance of the EIR, and its use, have been underdeveloped in the CAC and are ambiguous in their application. All the discourse on policy and program occurs without any consideration of the EIR. My view is that Council is debating a view of our comprehensive plan within the EIR that	The comment is noted. A supplement to the February 2016 Draft EIR was prepared to evaluated to evaluated two additional scenarios, Scenarios 5 and 6, and was published on February 10, 2017.

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	would be better framed by giving constraints and direction to the CAC. If the Council would aspire to a Palo Alto that is consistent with Scenario 5, then offer that constraint to the CAC and we would necessarily apply that direction. My recommendation would be to hold on implementing a new Scenario 5 until the CAC returns with an*[sic]* for of the Comp Plan for Council to work with. If more attention were placed by Council on how to apply the CAC as well as establishing a better CAC deliberative process, my opinion is that a better outcome from the CAC could be generated. With a better outcome generated, then a future Scenario 5 could reflect a Comp Plan that would be chosen. In essence the EIR continues to be the "cart before the horse" ... and we need the Council to lead more and allow the EIR to be formed around an comp plan is built by the Council. **Instead, we may end up with a Scenario 5 that has ambiguous value, and would be a waste of nearly $400,000.** This is a staggering amount of money to spend for ambiguous value. In summary, **my view is the development of Scenario 5 should be put on hold. The Council should slow down, if at all possible, the EIR process so that the EIR does not precede the development of a comprehensive plan document.** Staff should also spend more time with the CAC explaining how to apply the EIR to the Comp Plan process. Good luck in your deliberations.	
PUB13	Jennifer Chang Hetterly, June 7, 2016	
PUB13-01	So it looks to me like the problem is an inconsistency in the Student Generation Rates used. Please let me know if my reasoning or data is unsound. DEIR Student Generation Rates per Unit (for multi-family units) Elementary .10 Middle .04 High .04 PAUSD Student Generation Rates per Unit (for multi-family units) - (PAUSD Residential Research Summary for 2016 Projections, Appendix B, p. B-2 under Board Packet Item 12 in the link below.) Elementary .23 Middle .12 High .15 Even taking the DEIR's multi-family-units-only approach, (which is inaccurate based on the known pipeline), the PAUSD generation rates applied to 3880 units (Scenarios 1&2) would yield 1940 new students, almost three times as many kids as projected in the DEIR. At PAUSD's current cost per student ($14,766), the DEIR's undercount represents an $18M error (1940-698=1242. 1242*14,766=$18.3M) Taking it a step further, using PAUSD generation rates for Scenario 4, we're looking at 2790 new students by 2030 -- 2,126 more than the 664 new kids PAUSD projects by 2025, at an additional cost of $31,392,516. It's hard to imagine that could be a "less than significant" impact. Thanks again for looking into it, I look forward to your response. Jennifer	The Supplement to the Draft EIR includes a revised analysis of impacts to schools that is based on the updated student generation rates provided in the comment.Please see Master Response 2, which explains that the EIR uses multi-family generation rates based on the City's expectation that the *net new* increase in housing by 2030 will be in the form of multi-family housing. The commenter's concerns regarding school costs are noted and the City appreciates the information. However, for CEQA purposes this EIR focuses on the potential physical impacts associated with the provision of school services, rather than the potential fiscal impacts.

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	On Jun 6, 2016, at 5:30 PM, Jennifer Chang Hetterly <jchetterly@gmail.com> wrote: Hi Elena, Here's the link. It is item #12. You have to scroll down fairly far to see the various attachments (including generation rates by housing type (different from DEIR) and students generated by project and study block). They are below the summary report and powerpoint. http://www.pausd.org/sites/default/files/pdm-meeting/materials/pkt_151208.pdf Thank you for looking into it. JenniferHi Elena and Andrew, I've been combing through the DEIR and I'm confused by the school enrollment estimates for the various scenarios. P. 4.12-11 of the DEIR uses School Generation Rates of .10, .04, and .04 students per housing unit for elementary, middle and high schools respectively. For example, as applied to Scenarios 1 and 2, it calculates 388 elementary students generated from 3880 new multi-family housing units, for a total projection of 698 new students. When I look at the PAUSD Enrollment Report for 2015-2016, the narrative under "New Housing" on p. 4 describes a projected 314 new students in the first three years, coming from 485 units of approved new housing projects. Yet applying the DEIR's .10, .04 and .04 generation rates to 485 units yields only 87.3 total new students (48.5+19.4+19.4=87.3). Obviously, there is a very big difference between 314 new students and 87.3 new students. Furthermore, in the out years PAUSD uses a placeholder of 70 new units, yielding 50 new students each year. Applying the DEIR generation rates results in only 12.6 new students. Surely those disparities are not due exclusively to a different projected mix of housing types? And even if they are, why does the PAUSD anticipate a different mix than the City does? I understand that it is easier to make projections assuming a single housing type. However, to the extent multi-family units have a lower student generation rate than other types, the DEIR methodology seems to SEVERELY underestimate school impacts, especially in light of the fact that multi-family units comprise only 38% of our current housing stock. Even counting approved pipeline projects for 2016-2018, PAUSD tallies 174 single-family (attached and detached) units, yet the DEIR counts all as multi-family. Please explain the disparity. And if it is indeed due to the uniform multi-family overlay used in the DEIR, please add my concern about the resulting under projection of new students (especially in light of approved pipeline projects to the contrary) as a formal comment.	

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PUB14	Greg Schmid, June 7, 2016	
PUB14-01	Introduction Towards the end of the PTC Meeting of April 13, 2016, the Placeworks representative (Joanna Jansen) made several very important comments about key elements in the DEIR process: • "I definitely have heard from some of you or maybe all of you…that the scenarios don't really seem to represent a range…. the goal of the scenarios was to present a low and a high." (Staff Report to Council, June 6, 2016, Packet page 477) • "EIR mitigation measures really have a responsibility to be specific, feasible and enforceable" (page 480) • "Every community we look at is different." (page 481) • Do the preferred scenario and mitigation measures effectively reduce impacts or do we need to have additional measures?" (page 483) The DEIR (February 2016) Section 6, Alternatives, cites CEQA guidelines (Section 15126.6) that state that the EIR should "consider a range of potential feasible alternatives that will foster informed decision making and public participation" (DEIR, page 6-1). Yet that is immediately followed Section 6.1 "Alternatives Considered But Rejected". There, an assertion is made that if the City put a moratorium on non-residential growth, the growth would only continue in neighboring cities and "some impacts could potentially be worsened…." On this flimsy basis, a "no growth" alternative or even a low-growth scenario was rejected from further consideration. Only scenarios that foster annual non-residential growth to be almost double our long-term average (94 thousand square feet of residential per year) are presented as the "low growth" alternatives. This basic assumption from Section 6 results in a set of scenario impacts that do not represent "a high and a low" alternate that make for informed decision-making. (Jansen, April PTC meeting, page 477). Let me give six concrete examples from the DEIR:	As discussed in Chapter 6, Alternatives, of the Draft EIR on page 6-1, the alternatives evaluation was prepared consistent with Section 15000 of the CEQA Guidelines, which states that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Additionally, as explained in Chapter 3, Project Description, the EIR considers a "range of reasonable alternatives" throughout the document, in the form of the six scenarios. The six scenarios test different possible approaches to achieving the City's objectives for the Comprehensive Plan Update and meeting the City's housing obligations as well as different approaches to avoid or lessen the significant effects of various land use changes, transportation investments, and growth management strategies that the Comprehensive Plan Update may allow. These scenarios are analyzed at an equal level of detail.
PUB14-02	1 . Jobs/Housing Balance (Pop 4) The EIR process is based on the premise that "every community is different". (Jansen, Placeworks, PTC meeting, April 16, page 481). Palo Alto is especially unique in having one of the highest jobs to employed resident ratio of any city over 50,000 in the country. The Palo Alto ratio of 3 jobs to every 1 employed resident exceeds virtually every city in the country over 50,000. Palo Alto's jobs/employed resident imbalance is much worse than all of its neighbors. The ratio for San Francisco 1.4; for Santa Clara 1.8; for Mt View 1.6; for Sunnyvale 1.2; for San Jose 0.9; for Cupertino 1.3; and for Berkeley 1.4 (data from 2010 ACS) . The extraordinarily high number—a jobs/employed resident ratio of 3:1-- puts Palo Alto well above its Silicon Valley neighbors (and double the ratio in San Francisco). Palo Alto is unique and needs to discuss its uniquely unbalanced	Please see Response PUB9-05, which explains the standard of significance used to evaluate impacts associated with the local jobs/housing balance. The City is aware of the existing imbalance in the city and seeks to improve the imbalance with a draft Comp Plan that reflects the preferred scenario described in Chapter 3. Specifically, the Draft Plan would seek to achieve a ratio of jobs to employed residents of 2.88 to 3.01 jobs per employed resident, which would be less than the existing ratio of 3.06 and the anticipated ratio of 3.20 under Scenario 1 (the "Business as Usual" scenario). The preferred scenario assumes development of 1.7

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	jobs/housing ratio and whether dealing with it directly will help both us and our neighbors. The argument that reducing job growth in Palo Alto merely puts it in a place where it would cause more trouble has no merit. **The DEIR fails to analyze whether limiting non-residential growth to near its longer term historical average (1989-2015) of 94 thousand square feet per year would offer an effective alternative mitigation and thus avoids an obvious part of a high/low discussion.** Non-residential growth leads directly to the exacerbation of a second issue--traffic.	million new square feet of office/R&D space over a 15-year period, between 2015 and 2030 (an average of about 113,000 square feet per year) and by focusing on office/R&D only would – for the first time – account for existing retail, warehouse, and other non-residential space that is converted from those uses to office/R&D.
PUB14-03	**2 . Traffic (Trans 1)** The impacts discussed in Trans 1 show that all scenarios will have significant negative traffic impacts even after mitigations. All of the scenarios analyzed show at least three key intersections will be operating at F level by 2030 (Table 4.13-10). And this analysis leaves out six of the intersections that had been included in the 1998 Comp Plan, including important intersections on Middlefield, Sand Hill and Arboretum. Further, recent intersection analysis from specific projects discussed at Council showed other important intersections on El Camino and Page Mill will also be operating at level F. And at least four freeway entry ramps and key freeway segments will be at F levels. Mitigation suggestions propose solutions that are difficult to implement: Transportation Demand Management (TDM), grade separation, and regional solutions. TDM, for example, "would not eliminate the projected impacts at five of the six impacted intersections and the impact is considered significant and unavoidable" (page 4.13-52). **The DEIR needs to analyze all the intersections utilized in the 1998 Comprehensive Plan and those on main thoroughfares that have been identified in traffic studies of recent projects.** Let's look more directly at the key mitigation tool mentioned in Trans 1--TDM.	In response to this comment, four additional intersections were added to the Supplement to the Draft EIR. All four intersections that were added to the analysis were included in the 1996 Comprehensive Plan Draft EIR. They are: Middlefield Road and University Avenue, Middlefield Road and Embarcadero Road, Middlefield Road and Oregon Expressway, and Embarcadero Road and East Bayshore Road. All intersections included in the 1996 Comprehensive Plan Draft EIR were considered for inclusion, although a few were not added. For example, the intersection of University Avenue and Woodland Avenue in East Palo Alto was not added because the City of East Palo Alto included it in their own recent General Plan analysis. As another example, the intersection of Arboretum Road and Quarry Road was included in the 1996 Comprehensive Plan Draft EIR because the connection of Sand Hill Road to El Camino Real had not yet been constructed. The Comprehensive Plan Update includes the intersection of El Camino Real and Sand Hill Road-Alma Street instead, because the intersection of Arboretum and Quarry no longer serves the same function that it did prior to the Sand Hill Road connection.
PUB14-04	**3 Transportation Demand Management (Trans 1)** Transportation Demand Management (TDM) has been an identified policy priority for decades in Palo Alto. It was a key recommendation of the "Citywide Land Use and Transportation Study", (September 1988) and in the 1998 Comprehensive Plan included under Transportation Policy T-3 (Palo Alto Comprehensive Plan 1998-2010). The Placeworks representative during the April PTC meeting said that "EIR mitigation measures really have a responsibility to be specific, feasible and enforceable" (PTC, April 2016, packet page 480).The only TDM program currently in force in Palo Alto that is "specific, feasible and enforceable" is with the Stanford University Medical Center (SUMC). SUMC is the single employer for the 11,000 workers involved. They have a ready record of each employee and their place of residence.	Mitigation Measure TRANS-1a has been written to be "specific, feasible, and enforceable." It would require all new development projects to prepare a TDM Plan to meet specific trip reduction goals that have been established for different areas of the city. These goals are considered aggressive, but feasible. The City will require all TDM plans to include a section that addresses the monitoring process. In addition, there will be penalties for non-compliance, based on the monitoring results. The success of the Stanford University Medical Center agreement and the City of Mountain View's TDM requirement for the North Bayshore area

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	SUMC owns every available parking space in the area. SUMC has agreed to a specific target (35.1% of workers arriving to work in non-Single Occupancy Vehicles by 2025. To make the accord work, Stanford provides a rich range of alternative transport modes: Caltrain and regional transit passes, regular shuttle service, cash incentives for bicyclists, significant investments in bike and pedestrian infrastructure, guaranteed rides in emergency situation, and widespread zip car availability. They have guaranteed to spend well over $125m over 51 years (about $2.5m/year in 2011 $). They have also agreed to a fine of $177K per year if they fall short of the agreed upon 35% SOV. Finally, Stanford has agreed to provide the City of Palo Alto with annual reports that reflect a survey of SUMC workers. Demonstrating the difficulty of establishing an effective annual tracking mechanism, Stanford recently acknowledged that after a few years of tracking data they had to reduce their estimates of annual achievements by 15%-20% because they had used the wrong weighting in assessing their survey results. A neighboring community, Mountain View, is establishing a TDM for the area east of 101. This area, too, has some unique characteristics: two main employees account for the bulk of the workers and there are only three road entry points to the area. They are establishing a cap on vehicle entry and are monitoring vehicular traffic on a regular basis. To achieve "specific, feasible and enforceable" compliance, the Stanford agreement and the Mountain View agreements should be used as a model.	are acknowledged. Because this mitigation measure would apply to all new development projects, including residential projects and projects that are much smaller than the Stanford University Medical Center, it was determined that the measure should be written to allow all types of projects to develop TDM plans that are appropriate for their size, land use, and other site-specific factors.
PUB14-05	**The DEIR mitigation measures for TDM should have clear quantitative targets that are quantitative defined, objectively measureable, and strictly enforced with outside oversight.**	As noted in Response PUB14-06, Mitigation Measure TRANS-1a has been crafted to include quantitative targets, to be objectively measurable, and to be enforced with outside oversight. The language that indicates the TDM plans are to be monitored by the property owner on an annual basis is intended to mean that the property owner will be financially responsible for the monitoring. In some instances, the City may require that independent third parties be engaged to conduct the monitoring.
PUB14-06	Mitigations cost money. The fiscal impacts of growth are an important element in assessing the benefits and costs of growth. Let's look at the fiscal impacts of growth.	The standards of significance under CEQA do not address fiscal impacts. However, the City has prepared a fiscal analysis of the proposed Plan, which has been published separately from this EIR. Please also see Response PUB14-09.
PUB14-07	**4. Fiscal Impacts** Each of the scenarios maintains a growth rate for non-commercial space well above our current long-term average. Palo Alto's long-term average non-residential square footage growth between 1989 and 2015 was about 94K square feet/year. That includes all commercial areas covered by the 1998 Comp Plan (both monitored and non-monitored).	Please see Response PUB14-06 and PUB14-09.

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	The minimum in the Four Scenarios is 188K (twice as much), the maximum is 250K (2.6 times as much). Even the new scenarios 5 & 6 are 80% above our long term average. The fiscal impact of a rapid build-up in non-residential buildings is to undermine the financing of local government. Property tax (and the associated Documentary Transfer Tax) accounts for about 43% of Palo Alto's tax revenue (and is the fastest growing source of such tax revenue). The same property tax also pays for over 90% of the tax revenue of the Palo Alto school district, close to 90% of the tax revenue of the County and local Community Colleges and over 90% of the tax revenue of local Special Districts (such as water districts, fire districts, open space districts). Yet despite the rapid growth of non-residential building in Palo Alto (jobs have been growing three times as fast as employed residents for the last decade), the share of property tax paid by non-residents has been falling each year by about one percentage point. It now stands at 25% of the total. **The Fiscal Impact Study should examine the fiscal impact of a scenario that has lower job growth and a higher residential ownership. Growing non-residential space faster than our long-term average seems to be harmful to the financial future of local governments in and around Palo Alto.**	
PUB14-08	**5. Demographics and Schools (PS 2)** The impact on schools is less than significant. But the way the scenarios accomplish this is the *[sic]* assume that the population influx will not include many children. Each of the Four scenarios presented by the DEIR identify "smaller housing units geared towards empty nest senior and young singles with jobs in Palo Alto". (DEIR page 4.11-24). This has profound implications for our community. The school assumption made by the DEIR is that the number of new elementary and high school students added to PAUSD from the new smaller housing units will be dramatically reduced from the current housing stock. Traditionally, each housing unit in Palo Alto on average has generated about .34 public school students. This is in line with the rates in our neighboring communities and the whole of Santa Clara County and San Mateo County. It reflects the share of children in the community and the presence of mature householders as parents. But the yield forecast for the years 2015-2030 with smaller housing units is only .18-- about half the traditional rate. This is a dramatic shift for Palo Alto. The only City in the Bay Area that has a number that low for their entire housing stock is San Francisco, currently at .15 (Census Bureau, American Community Survey). Traditionally, Palo Alto has been a family-oriented community, and schools have been a magnet that has attracted talented and	Please see Master Response 2, which explains that the EIR uses multi-family generation rates based on the City's expectation that the net new increase in housing by 2030 will be in the form of multi-family housing. The EIR analysis considers these new students from new housing in the context of the overall student enrollment at PAUSD schools, which includes the existing housing stock.

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	experienced workers to locate here and stay during their most productive years. The scenarios paint a picture of either a dramatic switch in the family composition of the City or they are seriously underestimating the impact of the number of new school age children.	
PUB14-09	The DEIR does not examine the profound shift of moving Palo Alto in the direction of becoming an employment-centric city (like San Francisco), with a falling share of its population under 18 or having the schools overwhelmed. This is directly contrary to Palo Alto's unique role in Silicon Valley of providing a seed bed at the heart of the Valley that has provided a core of talented, experienced workers who live and work in the same community. These community characteristics establish an environment where individuals are more likely to draw on a rich set of contacts, collaborate, partner, establish new firms. They are twice as likely to take risks and change jobs as workers in other communities ('Job-Hopping in Silicon Valley', FRB 2005-11). It will also dramatically change the family-centered character of our city, replacing families with transient young workers and aging seniors. **The DEIR mitigation provides for a plethora of small housing units but fails to examine the consequence for the social and economic life in the city.** There is also an issue with the longer term availability of water for a sustainable future.	The concerns of the commenter are noted. The social and economic implications associated with a proposed project are outside the purview of CEQA, which is intended to examine the physical environmental effects of a proposed action. Section 15064(e) of the State CEQA Guidelines states, "Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant." This EIR evaluates the physical effects associated with anticipated population and employment buildout, such as impacts associated with traffic patterns, air quality, GHG emissions, and public services.
PUB14-10	**6. Water (Util 1, Util 4)** Palo Alto has been conserving water over the last several years under state drought mandates. These long term drought conditions reflect a new weather trend: lower precipitation and gradual rise in temperatures. The SFPUC has experienced a long term decline in water supply from the central Sierra. The actual deliveries of water from the SFPUC to its customers have declined from an average of around 250 million gallons a day in the mid-2000s to 196 mgd in 2015 (UWMP, Table 20). While the current water shortage may be temporary, it is reasonable to assume that with the gradual reduction in precipitation and the gradual rise in temperatures, this trend toward decreasing water supplies may continue. The City's Urban Water Management Plan forecasts an increase in water usage of only 4.5% between 2015 and 2030 (Table 4.14-1).	The decrease in deliveries from the SFPUC cited by the commenter is due to a decrease in demand, rather than supply shortages. After a partial post-drought rebound, continued gains in water use efficiency are predicted resulting in falling demand for water even as population and employment increase. History has also borne out this phenomenon, and the per capita use has more room to shrink. Declining water supplies and drought conditions are acknowledged on pages 4.14-24 to 4.14-25 of the February 2016

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	The updated UWMP projects a growth rate of 2.3% over the same time period ((UWMP May 2016 draft, Table 11). In contrast the Scenarios project an increase in population of between 10% and 20% and an increase in jobs ranging from 9% to 16% over the same time period. The daily per capita use of water in Palo Alto in 2015 was already at a very low 142 gallons per capita per day (UWMP SB x7-7 Table 9). Where is the water to be found for this huge increase in demand? Clearly these contrary trends deserve some critical discussion in the DEIR. Yet in looking at cumulative impacts, the DEIR uses only the experience of how effective conservation has been during the current drought, not how effective it will be with a substantial increase in workers and residents (Trans 1, page 4.14-25). The DEIR's conclusion that "all four scenarios would result in a less-than-significant impact" does not seem to address the underlying problem of water scarcity in combination with increased demand for water. It fails to examine the potential impact of a sizeable growth of jobs and housing during an extended period of limited supply of water.	Draft EIR and on pages 4.14-3 to 4.14-4 of the Supplement to the Draft EIR. SFPUC supplies are expected to be sufficient during non-drought years. The EIR analysis includes an examination of the potential impacts on water use from job and housing growth. The February 2016 Draft EIR and Supplement to the Draft EIR calculate and disclose increased water demand from increased residential and non-residential development, as shown in Table 4.14-2. The analysis demonstrates that water demand would increase over existing levels and compares future demand from increased development with the City's ISG. The City's Individual Supply Guarantee (ISG) is 19,118 AFY; the projected demand under the preferred scenario is 13,766 to 13,767 AFY. Based on the surplus of approximately 5,350 AFY, the Supplement to the Draft EIR concludes that all six scenarios would result in a less-than-significant impact. This conclusion includes consideration of the "underlying problem of water scarcity in combination with increased demand for water" and considers the potential impact of growth of jobs and housing during an extended period of limited supply of water. With the proposed Plan, demands will remain below the City's ISG through 2035. Likewise, the projected demand for all wholesale customers of the SFPUC is forecast to be well below SFPUC's perpetual contract obligation to provide 184 MGD.
PUB15	Hamilton Hitchings, June 8, 2016	
PUB15-01	My name is Hamilton Hitchings, I've been a resident of Palo Alto since for about 25 years. I am a member of the Citizen Advisory Committee for the Comprehensive Plan Update but my comments are my own. The Comprehensive Plan Update should drive the DEIR and not the other way around. The City Council has stated this as well.	The comment is noted. The City has identified a preferred scenario, which is described in Chapter 2 of this Final EIR.

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PUB15-02	The DEIR is also too long for residents to review so saying it's been available for public review is a misnomer. A 20 - 50 page document outlining the scenarios and their impacts could have been quite informative but an 834 page document is unmanageable. This level of detail should be reserved for after the revised comp plan is in draft form.	CEQA requires that EIRs contain an executive summary that lists all of the impacts and mitigation measures identified in the report. This would be the best section to review if you do not have time to review the entire environmental document. The City circulated the Supplement to the Draft EIR, including a 36-page executive summary, for a 45-day review period, pursuant to CEQA requirements.
PUB15-03	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 HH> There are still many seismically unsafe buildings in Palo Alto that need to be upgraded and there should be a mitigation to ensure those are upgraded.	The February 2016 Draft EIR and Supplement to the Draft EIR evaluate the environmental impacts of future development that would be allowed under the proposed Comp Plan. Requiring existing buildings to be seismically upgraded is outside the scope of this project. However, as noted in the Draft EIR, Chapter 18.18.060 of the Municipal Code provides bonuses in the Floor Area Ratio (FAR) requirements for buildings that have undergone such seismic upgrades. In addition, the draft Comp Plan that is being considered for adoption includes Policies S-2.5 and S-2.6 seek to minimize exposure of people and structures to geologic hazards, including by providing incentives for seismic retrofits, rehabilitation, and renovation of existing buildings.
PUB15-04	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. HH> Building East of 101 is on a liquifaction zone and construction is potentially subject to significantly increased damage during an earthquake. Mexico City's devastating earthquake was because that city was on soil that liquified. The mitigation should be no housing or increased development on the East side of 101.	As noted in the Draft EIR and Supplement to the Draft EIR, liquefaction hazards can be reduced to a less than significant level by adhering to Municipal Code requirements.
PUB15-05	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. HYD-7: The proposed Plan would not substantially impede or redirect flood flows through placement of structures within the 100-year flood hazard area. HH> Need to have a program to complete Newell and Chaucer Street Bridge replacements	The City is currently evaluating replacement options for the Newell Road Bridge over San Francisquito Creek. An EIR is being prepared that will consider five alternatives for the replacement project. The San Francisquito Creek Joint Powers Authority (SFCJPA) has identified the Pope/Chaucer Street bridge as a necessary bridge replacement project. The Santa Clara Valley Water District is currently working with the SFCJPA and the cities of Menlo Park and Palo Alto on the plan and design for the bridge

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	to mitigate flood risk from San Francisquito Creek. Limit new development on the East side of 101 including no upzoning nor expanded footprints.	replacement project. An EIR is being prepared with four potential alternatives. The proposed project does not propose any changes to zoning or new development on the east side of Highway 101.
PUB15-06	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. HH> I believe College Terrace is at risk due to existing hazardous materials in the soil that need further mitigation so that should be included.	The comment is noted. The proposed Plan does not include any policies or actions that would exacerbate existing hazards. As noted in Chapter 4.7, Hazards and Hazardous Materials, compliance with applicable existing laws and regulations regarding cleanup and reuse of a listed hazardous material sites would ensure that no impacts would occur as new development is allowed under the proposed Plan. The draft Comp Plan Safety Element includes Goal S-3, which envisions an environment free of the damaging effects of human-cause threats and hazardous materials. Under Goal S-3, Policy S-3.3 requires property owners and private entities to disclose the presence of hazards, including soil contamination, as part of development review.
PUB15-07	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.HH> Numerous residents have complained about excessive noise from the Palo Alto Airport due to the fact it operates 24 hours a day 365 days of the year and includes frequent low flying planes & helicopters.	Please see Response PUB5-01, Response PUB5-02, and Response PUB5-03 regarding aircraft noise.
PUB15-08	POP-4: Implementation of the proposed Plan would not create a substantial imbalance between employed residents and jobs. HH> The plans keep the current jobs to housing ratio all around 3:1, the country's highest for a city the size of Palo Alto. This is why the City Council voted to add a 5th and 6th scenarios.	Please see Response PUB9-05, which explains the standard of significance used to evaluate impacts associated with the local jobs/housing balance. The City is aware of the existing imbalance in the city and seeks to improve this imbalance through the proposed Plan. (Please also see Response PUB14-02.)
PUB15-09	PS-2: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to school service. HH> The impacts on schools have not been adequately accounted for in the increased housing growth scenarios. This will be even bigger in the additional scenarios. The LTS and No Mitigation Necessary are not accurate.	Please see Master Response 2, which provides a detailed description of the schools analysis in the February 2016 Draft EIR and Supplement to the Draft EIR and the rationale for the impact finding. Also, please note that the draft Comp Plan contains Policy L-2.11, which addresses this issue.

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PUB15-10	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. Mitigation: Pursue reliable and sustainable mechanisms to address a growing gap in maintenance funding as park and community services facilities uses increase. HH> “reliable and sustainable mechanisms” - sounds very nebulous. Put some definition actionable steps in. In general, what is missing is the ability to keep parks within the city boundaries at the same ratio as population grows.	Mitigation Measure PS-7 was revised as part of the Supplement to the Draft EIR and no longer includes the text referenced by the commenter.
PUB15-11	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.HH> There are numerous key intersections that are already below the vehicle of service standard as documented by the City of Palo Alto. This DEIR should have effective mitigations to bring those intersections back up to a good service standard. Examples include all intersections around Stanford Research Park during morning and afternoon rush hour. An example of an effective mitigation is require every new redevelopement project in the Stanford Research Park to reduce single vehicle occupancy trips until the service standard and be reached and maintained. Another one is not to allow large downtown projects to be built that increase the number of single occupancy vehicle trips to downtown and actually help reduce it. Reductions listed in the DEIR under mitigation are good numbers if they can be achieved for the entire traffic for downtown, Stanford Research Park, etc… not just for individual buildings being redeveloped. One of my biggest concerns is many of the traffic mitigations may end up being temporary but need to be structured so they will be permanent with need for constant monitoring and enforcement by the city, which is weak in enforcement.HH> VTA Bus 88 is likely to be canceled.HH> We need bullet trains to stop at California Ave Train stop since that most heavily serves Stanford Research Park and would likely be one of the busier CalTrain stops.	Mitigation Measure TRANS-1a would require all new development projects above a specific size threshold, including those in the Stanford Research Park and in the Downtown area, to write a TDM plan in order to meet the vehicle trip reduction goals specified for the area where it is located and size of the project. All TDM plans would be required to include a section that addresses monitoring, which would be the financial responsibility of the property owner. Monitoring would be conducted by an independent third party and would be required for the life of the project. It is not feasible for new development projects to reduce "the entire traffic for downtown, Stanford Research Park, etc., not just for individual buildings being redeveloped." A new project would be responsible to reduce the trips that it would generate, but cannot be held responsible to reduce trips generated by other development. However, the City has recently created a Transportation Management Association which is intended to address vehicle trips generated by existing development in the downtown area. Potential future changes to VTA bus services are noted, but are outside the authority of the City of Palo Alto. The request for "baby bullet" train service to the Caltrain station at California Avenue is noted, but is also outside the authority of the City of Palo Alto and the scope of this EIR. However, the June 30, 2017 draft Comp Plan includes Goal T-8 to influence the shape and implementation of regional transportation policies. Under Goal T-8, Policy T-8.2 states that

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		Palo Alto would participate in regional planning initiatives for the rail corridor and provide a strong guiding voice.
PUB15-12	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. 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. HH> Given the likelihood of continued droughts the fact there is no mitigation for increased demand for water seems very problematic and overly optimistic.	As discussed in Response PUB14-10, the City has an Individual Supply Guarantee (ISG) of 19,118 AFY from SFPUC. The 2015 UWMP (adopted in May 2016) for the City projects the water supply of SFPUC (i.e., the ISG) to be in excess of the City demand for SFPUC water through 2035 (see Table 4-14.3 of the Supplement to the Draft EIR). The 2015 UWMP notes that, "During a severe drought the City could utilize groundwater to supplement SFPUC supplies, but the City anticipates that even in dire circumstances only a small amount of groundwater would be served (e.g., < 10% of overall demand). In response to a severe drought the City would work with residents and businesses to significantly reduce water use, and groundwater from City wells would be considered a supplemental resource."
PUB15-13	Proposed Zoning Changes• Neighborhood Commercial should not allow housing as that reduces the critical mass necessary for retail and redevelopment will push out many of the existing businesses.• While I personally oppose increasing the height limit, any exceptions should increase the minimum below market housing percentage of units significantly above 15%.• Strongly opposed By Right streamlined process for Downtown and California Ave. based on past experience where important per project concerns have been raised.• While I oppose conditional use, I feel limiting parking for day employers is a better parking. I do support not allowing large businesses downtown to expand and we should find ways to encourage them to leave in favor of smaller businesses.	The comment is noted. The comment does not raise a specific concern regarding the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR. The zoning amendments included in the preferred scenario are described in Chapter 2 of this Final EIR.
PUB15-14	I strongly support the Infrastructure projects approved.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB15-15	I oppose paid 2 and 3 hour parking for University and Cal Ave and would like to see those remain free but have only one parking zone for the entire area.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
PUB15-16	I think paid transit passes should only be paid for retail workers and commercial enterprise corporations should be required to provide them to their employers.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR.
D. Oral Comments		
PH1	Planning & Transportation Commission Minutes, April 13, 2016	
PH1-01	Stephen Levy: No, I mean you know. A document like the one that Joanna prepared can be completely accurate, professionally done and not respond fully to the information needs that this community deserves, and I believe that's the case. I think there is one striking	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR. Please note, however, that Scenario 6 was designed to

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	omission and basically I'm urging you to urge everyone in the new alternative to correct the omission. I think there are two thorny problems that may be a result of the way the EIR is structured. Not anyone's fault, but omissions. As Joanna said, they crafted the alternatives based on a series of community meetings. I went to all of them; you went to some of them in 2004. The housing alternatives, even the high one in 4, do not reflect my oral communication to you at the beginning that there are no regional population numbers, new regional job numbers, new regional household numbers. They are all higher for two or three reasons, but more than that the EIR alternatives do not reflect the May Summit that most of you went to, and the enormous public comments before this body, before the CAC on which I serve, and before the Council about housing. So I encourage you to encourage Joanne and the staff to go big on housing in alternative 5. The Council will ultimately decide. We are not talking about decisions now; we are talking about a community getting the information to understand what it is to really contribute to the regional housing shortage. We've had 280,000 new jobs, 170,000 new people since this alternative was crafted, so go big.	"go big" on housing and its analysis in the Supplement to the Draft EIR describes the resulting impacts.
PH1-02	Stephen Levy: The two technical points are, and you know more about this than we do, that the community in the EIR is transfixed with identifying and mitigating what Joanne has correctly said are differences, but small differences among growth alternatives. But we all know that if you want to reduce the impacts on the air, on the environment, on traffic and parking, we need to be talking about mitigation measures that change the behavior not of the new residents or whether it is 5 or 10 percent, but of the 100 percent of existing residents who are here. If the EIR and the Comp Plan and my committee and your Commission are going to move the needle we need to be talking about not mitigating primarily new growth, but mitigating and changing the behavior of the parking and traffic and environment of existing people.	The commenter's point is well taken. Although some tables in the February 2016 Draft EIR and Supplement to the Draft EIR present net new project data, the analysis in the EIR evaluates the effects of the proposed Plan in the context of total development and not only net new growth, unless noted otherwise. For example, the evaluation of public services uses net new population to calculate potential new school and park facilities in order to assess whether new facilities may need to be constructed.
PH1-03	Stephen Levy: And the last point, and it's just a fixation of how CEQA is done or city councils and planning commissions work, the EIR and Joanna correct me if I'm wrong, because I think you did a completely wonderful job, but the EIR when it looks at the impacts on a city pretends that if it doesn't happen here, it doesn't happen nearby, and that's demonstrably false. And so if you are a regional thinker and Joanne mentioned that we are doing this in the regional context, then this community deserves to know so at least they can make the decision about whether a little bit of growth here has fewer impacts than that same growth in Sunnyvale or Menlo Park or Redwood City because we are the most mitigating, environmental sensitive community and I can't believe that growth anywhere else is better for the regional environment, for the global climate than here. I know that the EIR and the CEQA process forces us to think of us as an island, but we're not.	The comment is noted. The EIR evaluates impacts within the EIR Study Area, which includes the city and SOI. The EIR also evaluates cumulative impacts by considering the project's potential contribution to impacts that may occur as a result of development in the EIR Study Area when combined with growth in other areas of the region. In some areas, impacts are considered globally, such as impacts associated with GHG emissions. In addition, the EIR in some areas considers the impacts of growth elsewhere in the region on the city, such as traffic impacts, which include trips that originate and end outside of the EIR Study Area.

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	So encourage the Staff and the consultant and you all to think about whether it's better to limit growth here and push it elsewhere if we really are regional environmentalists or whether we should just be an island. And thank you for five minutes. That's refreshing.	
PH1-04	Acting Chair Gardias: So if you just let's go to the Page 1.8 that is the first from the impacts series and just talks about the aesthetics. And this refers to the, refers to the discussion that was at the Council level about how should Palo Alto look like. And I think that there will be probably a specific Council direction about how truly architecture and aesthetics of Palo Alto should be derived and I'm sure that they will provide some sort of pointers and guidance in that perspective, but there should be some policy or mitigations because of the changes. And some of the mitigation measures that address the first aesthetic points talk about variety of the different of promotion of quality design and some other items. It is always a question what is a quality design. And then there will be many parties just arguing about this.There is from perspective of the aesthetics and architecture and visual resources there is a concept of vernacular design that pretty much addresses pretty much everything that's rated to the environment because that's the design that just takes the resources that are in, the local resources and builds locally. So there is no transportation, no environmental impact and so forth. And then pretty much there is a certain aesthetic look that is derived from the local environment. So this is how adobe buildings were built at a certain point of time because they were natural. They built out of natural resources; clay and straw and whatever was available. That pretty much gave the old missions their look and then that is a possibility or opportunity for Palo Alto. So I would if I, I would suggest to insert vernacular definition into this document that would maybe be more appropriate. So that's comment number one.	The Supplement to the Draft EIR identifies potentially significant Impact AES-1 associated with the potential for development allowed by the proposed Plan to degrade visual character and includes Mitigation Measure AES-1, under which the proposed Plan will include policies to ensure high-quality design and visual compatibility. The opinion of the commenter that vernacular architecture should be encouraged is noted.
PH1-05	Acting Chair Gardias: Then if you turn to Page 1.17 and before I just go to the specific item I would like to just also know . that this that was kind of obvious during this discussion, but when you look at that significance of different scenarios as my colleague observes, observed, all of them are pretty much the same for all the, for all impacts which is truly to believe. There are some differences, like for example for Culture-3 item, but throughout all of them those scenarios they pretty much they have the same impact. And I would recommend that you just go and review them again because when I was just looking myself and I can give you maybe couple of comment after the meeting I find that some of them were truly to be, were not really... they should vary among themselves. That was my perception. So on Page (interrupted)	The comment is noted. The commenter is correct that many of the impacts are the same for the scenarios. The primary reason for this is that all scenarios would include the same land use map (with the exception of the land use designation for the Fry's Electronics site) and therefore would have the same spatial impacts (such as impacts to public viewsheds, historic resources, or land use patterns). While the net growth assumptions vary among the scenarios, they are roughly similar in magnitude, relative to existing conditions, particularly considered in the context of regional development. Therefore, the outcomes of the quantitative analyses (such as impacts to air pollution, GHG emissions, or intersection operations) are also similar.

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PH1-06	Acting Chair Gardias: And I just don't want to just use too much time on this. So there is like for example when I go to Page 117 and that's a good, I'm going to give you an example on that relates to a Culture-lC item, a mitigation measure, and this talks about archeological resources, but pretty much take this comments throughout. There is number of the state level policy requirements which I believe that are not necessary to be in this document. They just put a haze and lots of verbiage in this documentation that may not be necessary. If there is already a policy, state policy measure that we need to comply with this doesn't have to be in this document. This is just an obvious reference.Ms. Jansen: I agree.Acting Chair Gardias: So if there is a possibility and then pretty much this was a bullet point within this mitigation about protection of Palo Alto's archeological resources; this is governed with state level documentation so I don't believe that we need to pretty much repeat what's governed with the state measures. And I may find more examples like this. So now I'm going to just go back to my colleagues and I know that Commissioner Rosenblum has a comment.	The comment is noted. The February 2016 Draft EIR describes applicable regulations at the federal, State, regional, and local level that could reduce the potential impacts of the proposed project. The Supplement to the Draft EIR only reproduces this information where revisions have been made.
PH1-07	Commissioner Rosenblum: [...] So do we try to advocate for specific mode shares through more aggressive TDM programming? So the thing I'm thinking of specifically we just launched our Transportation Management Association (TMA). They're beginning to acquire funding. They are, they have their own goals for trying to work on mode shift. And so under Scenario 4, under all the scenarios actually, probably the biggest lever in managing impacts is changing people's behaviors in mode shift. Should this EIR anticipate the level of funding or the kind of TDM's that may be required? Because right now it just says "require TDM," but is that something that's going to be anticipated by the Comp Plan or as part of the EIR? So that's the question. The comment would be I want this probably to be the biggest lever that we could use particularly under Scenario 4.	The comment is noted. Transportation management programs will be carried out through the implementation of both Comprehensive Plan policies and EIR mitigation measures. Mitigation Measure TRANS-1a will be implemented on a project-by-project basis and Mitigation Measure TRANS-1b was revised as part of the Supplement to the Draft EIR to reference the City's Transportation Impact Fee.
PH1-08	Acting Chair Gardias: Ok, very good. Thank you. So let me just take a couple of minutes myself. So I would like to just refer you to Page 123. That is about, that is about greenhouse gas emissions and climate change and because of the draught that's hopefully just ending I have couple of thoughts that I would like to add to this and specifically on the Page 123 there is verbiage about flooding. So in some countries, for example, Germany, planning focuses on 1,000 flooding zone. We still just take into the consideration 100 years flood zone. And also this is the flooding. The same may be flopped and we can say there should be also impact from the draught perspective. So my question to you is like this: what would be the impact if we changed the language from 100 to more restrictive 1,000?	All federal and State regulations regarding flood plains are based on the 100-year flood event. Most floodplain maps also include the 500-year flood event but there are no requirements to purchase flood insurance for properties outside of the 100-year floodplain. Changing to a 1,000-year floodplain mapping system would be a massive federal and State effort and it would be less restrictive than the 100-year floodplain. The term 100-year floodplain means that there is a 1 percent chance you would see a flood of this magnitude every year. A 1,000-year floodplain would mean that there is a 0.1 percent annual chance of a flood of this magnitude.

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PH1-09	Acting Chair Gardias: Ok, very good. Thank you. So if I may just give another example. So on Page 125 there is a hydrology and water quality and then it just there is couple of risks that talks about the watering of the basement construction, which of course was the subject of various articles. And then just I found that and then this in addition to the severe draught that we had this year and some tree loss that we had in the, in Palo Alto which maybe we can somehow connect those three items together. Of course I know that would be hard to argue that the watering of the basement would impact it, but it would just could add to the conditions, to the impact on the lack of trees if you do water certain construction site for basement.I think that what we should do we should make sure that we have a specific mitigation measure that spells out that pumped water belongs to the local, belongs locally. Otherwise what is happening is just pretty much it flushes back to the bay and I know that under pressure it comes back later on a couple of months later, but still this water, right, it's not the bay, the water from the bay, but the water from that vicinity where the construction is occurring. So I believe that there should be a specific mitigation measure that would require somehow to distribute this water locally as opposed to just doing analysis. Of course analysis would be one of the parts, right, but then specific requirement to distribute this water locally as opposed to flush it to the bay, which of course is easy.	Subsequent to issuance of the February 2016 Draft EIR, the City revised its construction dewatering policy. These revisions are reflected in the Supplement to the Draft EIR. Chapter 3 of this Final EIR includes revisions to the Supplement to the Draft EIR to reflect the City Council's March 2017 adopted updates to the City's dewater guidelines and regulations. One of the requirements is to water trees and plants on adjacent properties, with the property owner's consent. Also, it is required that a fill station be constructed at the dewatering site so that the extracted groundwater can be reused by City residents.
PH1-10	Acting Chair Gardias: So Page 129 there is a program to maintain and periodically review height and density limits to discourage single uses. I'm not really sure if we need such a program. It's just pretty much it's just a part of ongoing operations, right? It just goes back to my comment that we should not just making certain, we should not be just reinventing this what already is in place.	Mitigation Measure LAND-2 was been revised as part of the Supplement to the Draft EIR, as shown on pages 4.9-7 to 4.9-8 of the Supplement to the Draft EIR. Mitigation Measure LAND-2 no longer includes the policy referred to by the commenter and instead focuses on use of City procedures, plans, and requirements to ensure high-quality building design and architectural compatibility.
PH1-11	Acting Chair Gardias: Then there is another comment as to the noise level, Page 131. It just talks about and this is Noise-lA. It just talks about exterior noise level. And one second... and I'm sorry I think that it's just, I would just take you to Page 132 as opposed to 131. That when it talks about interior noise level, but pretty much it's within the same logic, right? So we have a noise ordinance which is 9.10 that already just specifies a certain standard. I would like to ask you just to review this, this certain numbers because I think that we have stricter. I think that our 9.10 just talks about 30 decibels for the, for residential rooms and then 40 decibels for others. So pretty much making reference to the standards that are not as strict as ours, it's not necessary here. Please double check on this.	The commenter appears to be referring to the Municipal Code section that deals with definitions. The definitions portion of the Code prescribes the establishment of the "local ambient" (background) noise environment (in the absence of the potentially-offending noise source). That section [9.10.020 (d)] establishes that if one does not have actual measured data, then one is supposed to *assume* background noise levels of no less than 30 dBA within [residential] interior spaces and no less than 40 dBA for other exterior environments. Thus, the 30 and 40 dBA numbers are not noise restriction limits ¬ as is implied in the comment – but, rather, noise "floors" to use for the allowable increment approach that is used in the rest of the Municipal Code

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		(i.e., +6, +8, +15 dB limits above "local ambient").
PH1-12	Acting Chair Gardias: So and then there was a discussion within the community about the airplane passing over Palo Alto. I couldn't find anything in the document. Maybe there is something, I don't know, but please take a look at this as well.	Please see Response PUB5-01, Response PUB5-02, and Response PUB5-03. Only new future impacts that would occur as a result of the proposed project can be mitigated in this EIR. Aircraft noise within the city limits was analyzed in the February 2016 Draft and Supplement to the EIR as was found to be less than significant with the implementation of Mitigation Measure NOISE-1b (and per the accepted standards under the CEQA process). Nonetheless, Policies N-6.12 and L-10.3 in the draft Comp Plan address this issue.
PH1-13	Acting Chair Gardias: Understand. Thank you very much for responding. So that's we can take it off the table right then? So then just going to the population and housing 141 and we it also relates to the scenario discussion in a certain way, right? Because it just it talks here about balance between if you look at the impact Pop-4 on Page 141 it just talks about that there will be possible imbalance or not imbalance between residents and jobs. I think that this specific issue that needs to be studied farther and there needs to be a specific as opposed to comment that no mitigation necessary that's what this, well, I'm sorry, no. This says Pop-3 has no mitigation necessary. There needs to be you're just referring to the study that needs to be 1 done and I think the study should be, would be good if that study would be accomplished within the perimeter of the Comprehensive Plan. It may be too late.Because we talk about different, we have different sides about one argues for more housing, the other side argues about the bonds, but to be honest I'm not really sure if we truly know mathematically what this balance is, right? And we can just if you think about the jobs, you can say that there is, there are different, there is a different structure of jobs. So like for example there are County related jobs, there are original jobs, right, there are different haps there are local jobs as well. So it would be nice if somebody just looked at this, truly conducted the study as quickly as possible and just provide us with some perspective which jobs we can just support with the housing in Palo Alto, which jobs we will not be able to support in Palo Alto because regardless what we do those jobs would be pretty much or just the employees would be coming from the outside. So I think this is important distinction so that is maybe not the correction, but some action item that could be accomplished. And also (interrupted)	Please see Response PUB9-05, which explains the standard of significance used to evaluate impacts associated with the local jobs/housing balance. The City is aware of the existing imbalance in the city and seeks to improve the environmental effects associated with this imbalance through the proposed Plan.
PH1-14	Acting Chair Gardias: Very good, thank you; I will look at this. And then finally this will be my last comment, on Page 145 you talk about TOM what my colleague Rosenblum talk about. And this has specific reduction percentages and I would like to and those are coming from the transportation engineer's manual.	The trip generation rates in the Institute of Transportation Engineers (ITE) Trip Generation Manual will be used as the starting benchmark of how many peak hour vehicle trips a development project would be estimated to generate. The

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		percentages specified in TRANS-1a will be applied to the project's peak hour trip estimate to determine the number of vehicle trips it needs to eliminate through TDM measures.
PH2	Joint Architectural Review Board and Historic Resources Board Meeting Minutes, April 21, 2016	
PH2-01	Board Member Baltay wanted the EIR to address the potential impact of reducing parking requirements for some higher-density residential developments. Allowing only one parking unit per development was worth study and could have the impact of making it easier for builders and architects to develop units, which could encourage or force people to use alternate means of transportation. The EIR should study in detail the impact of changing parking requirements in a non-obvious way to promote greater densities of housing.	The February 2016 Draft EIR and Supplement to the Draft EIR evaluate a range of sustainability measures and mitigation measures intended to encourage the use of transit, walking, and bicycling. While reduce parking requirements for high-density residential uses are not specifically included, the EIR does evaluate unbundled parking costs for multi-family units under Scenarios 3 through 6. Parking itself and parking demand are not considered impacts under CEQA and are not discussed in depth in the EIR. However, there are numerous policies in the draft Comp Plan about this issue.
PH2-02	The DEIR discussed potential shade and shadow impacts as it impacted open public spaces. That should be broadened to surrounding structures.	As described in the February 2016 Draft EIR, in determining which standards of significance to use for evaluating the aesthetic impacts of the proposed Plan, Appendix G of the CEQA Guidelines and the City's published environmental criteria were considered. The City's environmental criteria specify public open space as the area of concern under this threshold.
PH2-03	Vice Chair Lew was struck by the similar numbers of the four scenarios, but the aesthetics of the four scenarios were potentially very different.	The analysis in the February 2016 Draft EIR and Supplement to the Draft EIR evaluate the six scenarios and identifies differences among the scenarios where relevant to the analysis.
PH2-04	He suggested the four scenarios contain illustrations of the aesthetics for each scenario.	The suggestion is acknowledged. This EIR is a program-level document and it would be difficult to illustrate potential aesthetic conditions under future scenarios given that the specific details of future development projects are not yet known.
PH2-05	He also suggested traffic data be illustrated with graphics.	The traffic analyses in the February 2016 Draft EIR and Supplement to the Draft EIR, as well as the TIA included in Appendix G, uses maps, tables, and charts as needed to convey information.
PH2-06	He liked the shadow studies for public open space and was interested in the standards for shading impacts.	Under Mitigation Measure AES-4, the City will require future development projects of a certain size and location that are subject to CEQA analysis to evaluate shade/shadow impacts. The analysis will disclose whether projects would shadow open space

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		during specified times and identify ways to mitigate substantial impacts through feasible design measures.
PH2-07	Baseline numbers in the DEIR would be helpful to determine the percentage of change.	It is unclear in the comment whether there is a specific set of information for which the commenter would like to see baseline numbers. The February 2016 Draft EIR and Supplement to the Draft EIR do include baseline (2014) data for most tables.
PH2-08	An important point of the EIR was that it circumscribed the outer limit of possible policy changes that would not require further environmental review. However, the document did not go far enough. Small changes in vehicle miles traveled per capita meant an overall increase in vehicles mile traveled, which suggested decreased mobility.	The comment is noted. Chapter 4.13, Transportation and Traffic, of the EIR uses standards of significance from Appendix G of the CEQA Guidelines and the City's published environmental criteria in order to provide a comprehensive analysis of impacts associated with mobility. The comment does not present a specific example of how the analysis in the EIR is inadequate in evaluating impacts based on these standards of significance. The TIA for this EIR (see Appendix G of the Supplement to the Draft EIR) also evaluates additional metrics outside of the CEQA criteria for Scenarios 1 through 4, such as multi-modal level of service.
PH2-09	She suggested the document include a table of acronyms.	The suggestion is noted. Each acronym used in the EIR is defined at least once in each chapter. Also see the draft Comp Plan for a glossary of terms.
PH2-10	She suggested more discussion of the environmental effects of demolition of existing buildings.	The air quality and greenhouse gas emissions data analyzed in the EIR includes construction-related emissions based on development assumptions. The traffic analysis uses modeling that includes trips generated from heavy truck traffic. Due to the programmatic nature of this EIR, the analysis does not include project-specific construction truck traffic. Further analysis of demolition impacts are difficult to assess at the program level given that specific details of future development projects are not yet known.
PH2-11	In analyzing the "business as usual" scenario, staff should assume that all sites would be built to maximum FAR with underground parking.	Scenario 1 includes existing (2014) development, plus net new growth based on reasonably foreseeable growth under existing regulations between 2014 and 2030. It is not likely that all sites in the EIR Study Area will be built to the maximum FAR with underground parking within this 15-year horizon, so full buildout was not analyzed.
PH2-12	She expressed concern regarding the effects of that in terms of intensity of development and in terms of greenhouse gas and other pollution issues. It was now	The EIR evaluates development projections based on allowable uses and densities envisioned under each scenario, as described

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	possible to have a light-industry software factory in any space except a retail space. Actually, it could even occur in a retail space. That issue should be addressed.	in the Project Description.
PH2-13	She expressed concern that small professional offices were being replaced with larger uses and that urban greenery was being lost. They needed analytic tools to indicate whether redevelopment would increase greenery and to determine whether development would result in heat islands. She did not find an analysis of heat islands in the DEIR.	Regarding greenery, please see Response GOV6-03. Regarding heat island, this EIR uses standards of significance from Appendix G of the CEQA Guidelines and the City's published environmental criteria in order to assess the proposed Plan's potential impacts. Neither CEQA nor the City's environmental criteria requires an analysis of heat islands.
PH2-14	She hoped proposed demolition regulations for historic resources and evaluation of potential historic resources were tied together.	The proposed Plan includes policies to protect potential historic resources as new development activities (including demolition) are proposed.
PH2-15	She expressed concerns regarding loss of views of the Foothills and the skyline changing from greenery to buildings. Perhaps the definition of scenic highways should be expanded.	As described on pages 4.1-19 to 4.1-20 of the February 2016 Draft EIR, the EIR Study area does not contain any State-designated scenic highways. Therefore, the analysis of impacts to view corridors is based on the scenic routes and corridors identified in the City's Comp Plan.
PH2-16	Board Member Kim agreed that illustrations and drawings and that a study session would be helpful.	Please see Response PH2-04.
PH2-17	In addition, summaries indicating Comprehensive Plan and EIR components subject to ARB review would be helpful.	The requested information is outside of the scope of the CEQA analysis for inclusion in the EIR.
PH2-18	They needed better definitions of high quality and creative design as they could be subjective.	Mitigation Measure AES-1 was revised as part of the Supplement to the Draft EIR to refer more specifically to high-quality design; compatibility with the neighborhood and adjacent structures; and appropriate building form, massing, and setbacks; among other characteristics.
PH2-19	Chair Bernstein concurred with comments regarding a study session. The HRB was encouraging applicants to request a study session with the HRB prior to submitting an application. Perhaps the EIR could include encouragement of study sessions with the HRB.	The opinion of the commenter is noted. The request for study sessions is outside of the scope of the impact analysis in the EIR.
PH2-20	With respect to POP-4A, page 8, affordable housing should be placed on the site being considered rather than elsewhere.	As described on page 4.11-15 o the Supplement to the Draft EIR, Mitigation Measure POP-4 was removed because the City is already implementing these measures. The City has completed the Commercial and Residential Impact Fee Nexus Studies called for in Mitigation Measure POP-4a. With regard to Mitigation Measure POP-4b, the City continues to implement its Housing Element, has adopted an interim annual limit on office/research and development (R&D) development, in addition to a

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		longstanding "cap" on new non-residential square footage. This change does not affect the findings of this EIR because the impact is less than significant without mitigation.
PH2-21	A study session regarding a historic resource should be required and should include review of an area of potential effect.	The opinion of the commenter is noted. The request for study sessions is outside of the scope of the impact analysis in the EIR.
PH2-22	Perhaps the DEIR could analyze a central district where cars were prohibited.	The comment is noted. Such as a district is not included in the proposed Plan that is the subject of this EIR.
PH2-23	Scenario 3 should include analysis of lower-income households in areas of increased housing densities.	All six scenarios include implementation of the City's Housing Element, which was prepared separately from the proposed Plan and which serves as the City's primary document regarding planning for affordable housing. Scenarios 3, 4, 5, and 6 all include more housing than would be produced if the City continued to produce housing at the same rate it has over the last 40 years.
PH3	City Council Meeting Minutes, June 6, 2016	
PH3-01	Judy Kleinberg: Thank you, Mayor and Council Members. Thank you for letting us address the Draft Environmental Impact Report (DEIR). Appreciate that. We have a lot of hope for the new EIR and for solving the jobs/housing imbalance in town. We want to work collaboratively, as we've said many, many times, with the City on solving all of the problems that come with increased population and the vitality of the job market. We have a few concerns. The conditional use permit, which I think you'll hear others speak about tonight, we believe would have a negative impact on business by preventing flexibility in uses and job growth and would slow down the progress that makes Palo Alto so vital. The Conditional Use Permit (CUP) would hinder the ability for a business to thrive in Palo Alto and damage how business operates. You can't actually legislate how a business will operate to have it really innovate and grow its product and its services. We believe the City should really focus on impacts and mitigations, not limiting empty density and job reductions. The CUP and density controls really would have a chilling effect on small startups. We've heard over and over again that you really favor this City as being a hotbed for startups. In fact, the CUP would absolutely jeopardize them. The Chamber represents the ecosystem of businesses in Palo Alto from very small to global enterprises. By hampering the startup environment, the vitality and vibrancy of the business community will be dangerously jeopardized. Impeding job growth, limiting square footage and controlling employee density would drastically change the business and, we believe, is a misguided strategy for solving the jobs/housing imbalance. It also could jeopardize tax revenues, and that's part of the fiscal analysis that your consultants are doing. The smarter alternative strategy is to mitigate impacts through Transportation Demand Management	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR). Scenario 6 was analyzed in the Supplement to the Draft EIR, which was circulated for its own public review period.

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	(TDMs) and the Transportation Management Association (TMA) program plus adopting policies and zoning that encourage and allow more housing and reduce commute traffic, especially through trip reduction. The Staff analysis shows that impacts from lowest density to highest is virtually equal; that's in the first four scenarios. We note that 45 percent of the residents are tenants who want or need permanent housing. The City's own poll has shown that 76 percent of likely voters believe affordable housing is the most severe challenge and that the City must address that unmet need. We believe Scenario 6—we're looking forward to that analysis. It's too bad public comment will end before that's analyzed. We believe Scenario 6 is really worth very careful examination. We appreciate the fact that you've added that scenario. Thank you.	
PH3-02	Tiffany Griego: Thank you, Mayor and members of the City Council. My name is Tiffany Griego. I'm responsible for Stanford Research Park. Thank you for the opportunity to share with you Stanford University's concerns about Comp Plan policies in the Draft EIR that are related to mechanisms that are designed to do four things: regulate the number of employees a business can hire in Palo Alto; control the proportion of office and R&D uses through the Research Park and possibly even on a building-by-building basis; charge for parking spaces in Stanford Research Park; and regulate the build-out of square footage currently available under RP zoning. This is quite frankly a profound shift in the regulatory framework for Stanford Research Park (SRP), and it's proven deeply disconcerting to SRP employers and to our business community. The DEIR does not quantify the impacts of these regulations. From what we could tell, there's no quantitative evidence that they would do any good. We're concerned that the City's also unaware of how much detriment these policies would cause the business community in the Research Park. As we are all aware, Research Park employers represent a fountainhead of revolutionary inventions, therapies and advances in sustainability. They also serve as an important economic engine for the City of Palo Alto. In 2015, the Research Park generated $45 million in taxes of all entities and 40 percent of that flowed to Palo Alto and to the Palo Alto Unified School District. Businesses need predictability in their regulatory framework. Could you imagine a longstanding Palo Alto sales-tax-producing company in the Research Park if it were denied the right to hire new employees in scale as their business needs changed? Would its founders have located its startup here or its point of sale in Palo Alto if they didn't believe they could grow here? Could you image if a Research Park company had to wait 12 months for a discretionary permit before it could modify the proportion of R&D and automotive labs inside its existing Palo Alto headquarters? How would they innovate within the very competitive electric vehicle and automotive mobility spaces? Could you imagine if an SRP medical systems company needs to add 100,000 square feet but be subject to the 50,000	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR). The comment states that the February 2016 Draft EIR does not quantify the impacts of proposed regulations. However, the TIA quantifies the impacts of the suite of measures included in the Project Description. In addition, the Supplement to the Draft EIR evaluates post-mitigation conditions to evaluate the effects of the mitigation measures proposed for Scenarios 5 and 6.

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	per year annual cap? They would have to win the very unpredictable beauty contest two years in a row before it could actually build its facility to advance medical diagnostics imaging. Could you imagine a pharmaceuticals company telling patients that they had to wait for a very promising leukemia clinical trial, but they're waiting for Palo Alto to sign off on a conditional use permit to hire employees for that clinical trial? It's very hard to imagine this regulatory framework. Please ask yourself, after you've had a chance to read several letters that SRP employers have provided, how will these changes affect businesses here in Palo Alto and in Stanford Research Park. We encourage you to work with us to craft policies that will not limit the ability of these innovative companies to compete here in Palo Alto. We definitely encourage you to work with us to support the very solid framework we have developed for reducing traffic congestion in Stanford Research Park, which we hope will improve quality of life as well. Thank you very much.	
PH3-03	Jamie Jarvis: Thank you. Good evening. My name is Jamie Jarvis, and I'm the Transportation Demand Manager for Stanford Research Park. I lead the Stanford Research Park transportation working group, an organization dedicated to developing and implementing transportation programs tailored to the needs of employees in the Stanford Research Park. The working group was convened by Stanford in 2015 in response to Research Park employers identifying traffic congestion as the top priority issues that adversely affects their ability to recruit and retain talented employees. The group consists of 18 key employers, ranging in size from less than 150 employees to over 3,500 employees and representing a variety of business sectors including high tech, pharmaceutical, mobility and professional services. I am consistently impressed by the members' willingness to work together, share information and promote new programs. With their support and efforts, we have made VTA Eco Passes available to over 14,000 employees in the Research Park, launched an informative transportation website and a personalized trip-planning tool, enhanced and modernized our guaranteed ride home program, provided ten free safe cycling and repair clinics at worksites throughout the Research Park, celebrated and rewarded over 1,100 cyclists on Bike to Work Day, promoted and subsidized an on-demand carpool app that has attracted over 1,500 users, and will soon launch a long-distance shuttle to the west side of San Francisco to provide a much needed commute option along the 280 corridor. Employer and employee response to these programs has been tremendous, and each success generates additional enthusiasm and support for new programs. I'm truly excited about the momentum we have built, but I am concerned that some of the proposed Comp Plan measures could distract from our future efforts, de-motivate our employers and even potentially defund our programs. It is important to remember that the Research Park business community shares the same key goals as the	The comment is noted. The comment does not address the adequacy of the February 2016 Draft EIR. The City appreciates Stanford University's continued efforts to reduce vehicle trips and commends Stanford for the success of these efforts.

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	greater Palo Alto community, to effectively reduce traffic congestion and improve quality of life. For this reason, I encourage the City of Palo Alto to engage with Research Park employers and our transportation working group to ensure that the Comp Plan enables us to achieve the results we all desire. Thank you.	
PH3-04	Karen Bouvier: Thank you, Mayor Burt and Council Members. I'm Karen Bouvier, the Manager of Environment, Health and Safety of the Palo Alto Research Center (PARC). PARC's been in the Stanford Research Park since the early '70s. Our management, employees and clients highly value this location. PARC is dedicated to the objective of reducing car traffic in the Stanford Research Park. We've had an active green team for many years. This grassroots effort convinced our management team a decade ago that it would be wise to invest in employees' alternate transportation choices. We've had a reimbursement program covering public transit, carpooling, bicycling and walking since that time. I'm delighted to participate in the SRP TDM working group that Jamie just described. This effort has enabled PARC to offer our employees additional alternative commute options as a result of the economies of scale that we couldn't have done on our own. In reviewing the Draft EIR, we have concerns about some of the proposed traffic congestion mitigation measures. PARC's cutting-edge research programs rely on both attracting employee talent with specific expertise and on close collaboration with researchers from academia and industry. The changing nature of our projects result in a fluctuating headcount of employees, visiting researchers and onsite startup companies. The conditional use permit as proposed could limit our technical flexibility. We're also concerned that the mitigation measures Trans 1A, which would require a specific TDM plan for individual new development projects, could undermine the SRP-wide TDM programs that are providing a smaller company like PARC the benefits of scale and allowing us to drive down our trip counts. PARC looks forward to working with the SRP and the City toward our mutual goal of reducing the number of cars on our streets. The baseline commute mode information being collected will help us to set quantifiable objectives for that goal. Thank you for your time.	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR). Mitigation Measure TRANS-1A has been revised and will only apply to new development projects above a specific size. The revised mitigation measure also clarifies that development projects may achieve required reductions by contributing to citywide or employment district shuttles or other proven transportation programs that are not directly under the property owner's control. The mitigation measure is intended to complement, rather than undermine, any existing TDM efforts.
PH3-05	Linda Marie Santiago: Good evening, City Staff and Council Members. My name is Linda Marie Santiago. I'm a Director in the Real Estate and Workplace Group for VMware. As I think all of you know, our headquarters is in Stanford Research Park, a beautiful 105 acres of it. I want to take this opportunity to communicate VMware's concerns regarding the City of Palo Alto's Draft Environmental Impact Report for the Comprehensive Plan Update. We appreciate the City's desire to ease traffic congestion; however, measures to regulate employee headcount and traffic mitigations contained in the Draft EIR coupled with the recent proposal to implement a headcount tax on local businesses are unsettling. Prior to	The comment is noted. Please note that a "headcount tax" and a requirement for a Conditional Use Permit to limit employee density and parking charges for employees are not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).

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	taking action that will inadvertently hinder economic stability and impede our current efforts to reduce traffic congestion, we encourage the City to further analyze the proposed mechanisms and mitigations, utilize the additional data to make informed decisions, and engage in further outreach with the business community. VMware is confident a concerted effort from interested stakeholders will produce a thoughtful plan to mitigate traffic congestion while simultaneously allowing the City, its residents and businesses to continue to thrive. As a multinational company, VMware is proud to be one of the largest tenants in the Stanford Research Park and headquartered in Palo Alto. We have historically enjoyed a mutually beneficial relationship with both the City and the Stanford Research Park. VMware cares deeply about this community, our people and our campus. We share the City's concerns regarding traffic congestion, and it impacts directly our people, many of whom live in Palo Alto, and our ability to recruit and retain top talent. We respect the fact that what we do is a model for others in SRP, that our programs meet the needs of our people and the community, and that what we do is sustainable, environmentally and financially. We have invested significant funding in such programs, given VMware's commitment to solving these issues that impact the entire City. The proposed density restrictions and traffic mitigation regulations contained in the Draft EIR have potentially adverse consequences for VMware and create uncertainties for the business community, which must remain agile in order to succeed. Maintaining a flexible workforce that is able to respond to the cyclical employment demands of product innovation is key to progress and ultimately success. There are additional measures contemplated in the Draft EIR such as requiring companies with over 50 employees to charge for parking, which also appear to have a punitive effect on businesses without evidence that such a program will produce the desired result of reduced vehicle trips to SRP. In our commitment to working with the City and Stanford to reduce congestion, it is essential to VMware that all traffic congestion management methods we fund are effective, measurable and substantiated by robust data analysis. Most importantly such methods must not impede our ability to successfully conduct business operations within Palo Alto or undermine our own robust TDM efforts to date. Thank you for your consideration.	
PH3-06	Bob Moss: Thank you, Mayor Burt and Council Members. This reminds me of late Mayor Jack Sutorius' comment on how he found three things to like about the Comprehensive Plan. First, it was comprehensive. Second, it was only a plan. Third, it could be amended at any time. What we have before us leaves out a lot of important factors, and I think they should be considered. For example, Scenario 6 would add 6,000 housing units. That would increase the net cost to the City about $17 million a year, because every housing unit costs between $2,700 and $2,800 a year more for services than it pays in taxes. This is not new;	The comment does not address the adequacy of the February 2016 Draft EIR.

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	this was true 45 years ago when I helped to incorporate Rancho Palos Verde. We did a study on the validity of the property tax supporting the government, and we found it would not. We made it because we had several business districts in that area, and that made it possible to incorporate the city. One of the things that you should be thinking of, that was kind of interesting, is if we're going to put housing in the Stanford Research Park, would Stanford agree. Are you aware of the fact that part of the Stanford Research Park was zoned for housing more than 30 years ago? The area was basically along Arastradero Road and then went up toward the Foothills. Stanford said, "We will not at any time, under any circumstances, allow housing in that area." After seven years of prohibiting any development there, the City gave up and rezoned it for industrial. In exchange, Stanford helped to fund the low-income housing project on Alma. If you're going to be talking about where we're going to—one other thing that's very important. I think we know it, but it doesn't focus on it. Changing the zoning and the land use does not build anything. It makes it possible it could be built, but it doesn't do anything. I'll give you an example. When the area along El Camino was rezoned CN and CS, those zones allowed residential on the upper floor. We thought there was going to be a lot of residential development along El Camino because now it's allowed. I can think of five or six properties between Adobe Creek and Page Mill Road that have housing on the upper floors. All the rest are low-density commercial. The housing has not been built. As I say, zoning doesn't create anything.	
PH3-07	Shani Kleinhaus: Good evening again. Shani Kleinhaus. I'm a resident, and I'm on the CAC; although, I don't speak for the CAC for the Comp Plan. It's not surprising to me that there are just a few comments from residents in the package that you have and that not very many residents wish to speak. It's a difficult process to follow. We have the Comp Plan that has not finished its work. We have an EIR that has changed its scenarios. Those scenarios don't exactly compare to the previous scenarios. I would just step back and say let's create one good EIR and release it later as a revised EIR and have the public comment on that. Perhaps, during that time, the CAC will have done more work, and you will have a preferred alternative and not just throw it all out there, and we'll figure it out later. Scenarios 5 and 6 both propose adoption of the Sustainability and Climate Action Plan (S/CAP) goal of 80 percent reduction in greenhouse gas emissions by 2030. I don't know why the other alternatives and scenarios do not include that; they should. What troubles me a little bit is that it calls for an alignment of the Comprehensive Plan Update with the S/CAP principles. Now, I'm not opposed to that necessarily, but I don't want to see that the S/CAP becomes a mitigation measure, because that actually becomes much more important than a lot of other plans legally, than a lot of other plans that we have like the Urban Forest Master Plan or the Parks Master Plan or the Bicycle Plan or a lot of other	The comment requests that the EIR be released later in the process. This Final EIR includes Chapter 2, which describes the preferred scenario that has been selected for the proposed Plan. While the proposed Comp Plan is intended to be consistent the S/CAP that is under development as a parallel planning effort, and certain aspects of the S/CAP are included in the preferred scenario, the S/CAP is not included in the EIR as a mitigation measure.

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	things. I was under the impression that the S/CAP is the umbrella, and the S/CAP should fall under that, not drive it. I guess that's what I want to say. This is the most important document in our City's life, and there's not a lot of people involved. The CAC is confused, and this is premature. Thank you.	
PH3-08	Rita Vrhel: Thank you. I'd like to second the comments that were just made as a resident. It has been confusing. I just think there's a couple of factors to include or to consider. I'm sorry if they sound a little bit naïve. Again, everyone can't work or live in Palo Alto. It's simply an impossibility. I think that, again, I'd like to see some quantitative analysis or data from not only Stanford Research transportation mitigation programs but from al the businesses which have come into Palo Alto in the last five years and have been speaking of these measures. I think that Stanford—it sounded from the speakers that were from Stanford Research Park that they would like unlimited headcount and development opportunities. I don't think that is possible in Palo Alto. I really have the belief that if they had a tenant that left, they probably have a waiting list for tenants who would quickly fill those buildings. I think that compromise needs to be the point of start among all people. I would also support limited growth and a compromise in this issue of housing and jobs in Palo Alto. I remember I was living here when Burger King came into the plaza Downtown. It was really interesting, because Palo Alto put in some very strict rules. I think it was the first business that had to have employees go out and clean up the plaza every couple of hours to make sure that trash around, the trash that is usually generated by a fast food environment. I think in the years that I've been here since 1983, I've always felt that if Palo Alto had zoning requirements and asked businesses to do certain things, there would be no shortage of businesses. I think that there does need to be a limit as to how many people can work in any building within Palo Alto. Thank you.	The comment does not address the adequacy of the February 2016 Draft EIR.
Letters on the Supplement to the Draft EIR		
Governmental Agencies		
SUPP-GOV1	Glenn "Max" McGee, Superintendent, Palo Alto Unified School District, March 20, 2017	
SUPP-GOV1-01	We have received and have begun to review the updated Supplement to the Draft EIR for the Comprehensive Plan Update. It is an important document and we appreciate the extensive thought and effort that went into producing it. That said, we have a number of concerns with various scenarios in the document and would like the opportunity to share these with you and members of your staff and/or City Council. We would like to understand some of bases for your assumptions as well as share our own	Please see Master Response 2, which provides a detailed description of the schools analysis in the February 2016 Draft EIR and Supplement to the Draft EIR. Specific concerns of the PAUSD are found in response to the comments below.

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	analysis and and understanding of the effect that these proposed scenarios would have on our district. Some would be highly significant in terms of future construction and traffic generated by sizable enrollment increases and also have a profound effect on the school district's ability to continue to provide its high quality educational programs.	
SUPP-GOV1-02	We understand that the Comprehensive Plan Update will be presented to Council tonight. However, we urge that the next steps in the process not be rushed and respectfully request that the Council allocate time for school district staff to meet with City staff and respond to the document prior to the end of the formal comment period, which I understand is not until the end of the month.We greatly appreciate the collaboration and communication between City and District staff in these matters.	The City appreciates the PAUSD's input in the Comp Plan process and EIR. The City subsequently met with District representatives and will continue to collaborate with the District. Please also see Master Response 2 and responses to Letter SUPP-GOV4.
SUPP-GOV2	Eliza Berry, Coastal Planner, San Francisco Bay Conservation and Development Commission, March 30, 2017	
SUPP-GOV2-01	Thank you for the opportunity to comment on the Draft Environment Impact Report (DEIR) for the Comprehensive Plan Update Supplement to the Draft EIR for the City of Palo Alto. The DEIR covers a wide range of issues with the sections on: Environmental Analysis; Biological Resources; Greenhouse Gas Emissions and Climate Change; Hydrology and Water Quality; and Public Services and Recreation being most relevant to BCDC's authority and expertise. The Notice of Availability dated February 10, 2017 was received in our office on February 13, 2017. The Commission has not reviewed the DEIR, and the staff comments below are based on the Commission's law, the McAteer-Petris Act, the Commission's San Francisco Bay Plan (Bay Plan), and review of the DEIR as it relates to the Commission's jurisdiction. Jurisdiction. The Commission has "Bay" jurisdiction over all areas of the Bay subject to tidal action, which defines the location of the shoreline. The shoreline is located at the mean high tide line, except in marsh areas, where the shoreline is located at five feet above mean sea level. The Commission also has jurisdiction over managed wetlands, salt ponds, and the tidal portion of certain waterways, as identified in the McAteer-Petris Act, and the "shoreline band" which is an area 100 feet wide landward of and parallel to the shoreline. Commission permits are required for activities including dredging, fill placement, shoreline development, and substantial changes in use to any land, water, or structure within the Commission's jurisdiction. In accordance with provisions of the McAteer-Petris Act, the Commission has designated certain areas for specific priority uses such as ports, water-related industry, water-oriented recreation, airports and wildlife refuges. To the area northeast of the project area, the	The comment is noted. The comment does not raise a specific concern regarding the February 2016 Draft EIR or Supplement to the Draft EIR.

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	Commission has a designated the Palo Alto Baylands Nature Preserve and the Faber-Laumeister Tract as areas reserved as waterfront park and wildlife reserve respectively. The Faber-Laumeister Tract (part of the Don Edwards San Francisco Bay Wildlife Refuge) borders San Francisquito Creek. You explain in the DEIR that the creek is valuable from a wildlife conservation perspective and as such, potential project impacts on the creek must be carefully considered. Naturally, at BCDC, we agree that these impacts must be carefully considered. While the project site itself is inland of BCDC's permitting jurisdiction, this comment letter is focused on the approach taken in the plan regarding the assessment of flood risk due to sea level rise in the project area. For additional information about Commission policies and permit requirements, please visit BCDC's website at www.bcdc.ca.gov.	
SUPP-GOV2-02	Sea Level Rise. The DEIR acknowledges how vulnerable eastern Palo Alto is to flooding from sea level rise. As the City works towards better understanding its risks and exploring adaptation measures to address that vulnerability, please be aware that that the state of California will be updating its Sea-Level Rise Guidance Document based on the National Resource Council's updated sea level rise science and projections shortly. The new scientific guidelines will be circulated in April and new policy guidance will be developed and circulated later in the year. Please note that BCDC's Bay Plan calls for use of the best available science-based projection for sea level rise. The Bay Plan does not specifically call for use of the 55-inch sea level rise scenario for assessing long-term impacts as stated in the DEIR. As you await your site-specific risk assessments by engineers, you may wish to refer to the newly completed sea level rise inundation maps for Santa Clara County. These locally-reviewed and locally-refined maps were developed under the Adapting to Rising Tides (ART) Program's Bay Area Sea Level Rise Analysis and Mapping project. You can find out more about the project and this new resource here: http://www.adaptingtorisingtides.org/project/regional-sea-level-rise-mapping-and-shoreline-analysis/. The maps for Santa Clara County were recently finalized and are not yet available online. As such, my colleagues or I will be happy to provide them directly to you or your team. A report summarizing methodology and key findings will be finalized later in the spring.	The commenter states that information and guidelines for addressing vulnerability to sea level rise is being updated. The February 2016 Draft EIR and Supplement to the Draft EIR acknowledge that data on sea level rise is evolving. The City will continue to consult available information as it is released and will consider policies to further protect the Palo Alto community in light of updated information.
SUPP-GOV2-03	Your DEIR finds that impacts related to exposing people or structures to physical effects of climate change will be mitigated to a less than significant level for all six scenarios. Your assessment points to the City's ongoing development of its Sustainability and Climate	The City does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR. The City will consider the ART Program at BCDC and

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	Action Plan (S/CAP) as the avenue for this mitigation. The S/CAP is focused on reducing the city's greenhouse gas emissions while turning towards adaptation and increasing the city's ability to respond to drought and sea level rise. Through the ART Program at BCDC, we have provided support and guidance to a number of municipalities around the Bay working on sea level rise adaptation planning. We wish to remind City staff and partners that our program is available for advisory services if needed as they move forward with adaptation-focused portions of the S/CAP. Thank you for considering staff comments on the DEIR. If you have any questions regarding this letter please contact me by phone at 415.352.3660 or email eliza.berry@bcdc.ca.gov.	other support as Palo Alto implements the adaptation portion of the S/CAP.
SUPP-GOV3	Roy Molseen, Senior Environmental Planner, Santa Clara Valley Transportation Authority, March 31, 2017	
SUPP-GOV3-01	Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Supplemental Draft EIR (SDEIR) for an update to the Palo Alto Comprehensive Plan that includes two new land use/transportation scenarios. Please note that VTA commented on the original NOP for the Comprehensive Plan Update (June 30, 2014) and the original Draft EIR (May 5, 2016). We have the following comments on the SDEIR. Land Use VTA supports the City's efforts to further study two new land use/transportation scenarios that concentrate growth of housing near established transit supportive corridors, although both Scenario 5 and 6 create a framework for less job growth over time and relatively modest new population growth.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-GOV3-02	VTA recommends that the City include in the Comprehensive Plan Update the land uses, land use policies and transportation framework of Scenario 4 or 6 as described in the SDEIR. These scenarios show the highest transit mode share and lowest vehicle miles traveled per capita (Table 4.13-15). Scenarios 4 and 6 are projected to reduce overall congestion by 2030 and increase mode share.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-GOV3-03	VTA would like to take this opportunity to call attention to the 27 University Avenue site located at the Palo Alto intermodal transit facility, and to work with the City and Stanford to enhance the land use intensification of this site and support Transportation Oriented Development in both Scenarios 4 and 6 beyond what is projected in the Comprehensive Plan. The 27 University site is a relatively lightly developed site within the City boundaries, used by many transit operating entities. VTA envisions that this location, which is very well served by transit, could be enhanced to include housing, jobs and community uses that would meet City needs while potentially generating far fewer trips than development at other locations in the City.	The comment is noted. The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR. The preferred scenario is described in Chapter 2 of this Final EIR and envisions the 27 University Avenue site remaining in its existing use. Thus, any proposal to intensify uses at the 27 University site would require a separate, site-specific analysis.
SUPP-GOV3-04	Congestion Analysis on Transit Travel Times VTA again commends the City for including an analysis of congestion impacts on transit	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the

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	operations in the SDEIR. The SDEIR identified significant impacts to transit operations in all six scenarios as a result of increased vehicle congestion, and included a modified Mitigation Measure for the City to "Include policies in the Comprehensive Plan Update that address transit access and give priority to buses and to transit facilities" (p. 4.13-43). VTA supports the proposed mitigation measure giving priority to transit on congested corridors and looks forward to working with the City to implement these transit improvements in Palo Alto.	Draft EIR.
SUPP-GOV3-05	Transportation Demand Management - GeneralMitigation Measure Trans-I a applied to all six scenarios would require new development projects to prepare and implement Transportation Demand Management (TDM) Plans to achieve vehicle trip reductions of 20% - 45%, depending on location within the City. The SDEIR notes "TDM Plans must be approved by the City and monitored by the property owner on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets are not met" (pg. 4.13-10). VTA reiterates our recommendation that the City require TDM monitoring to be performed by the City or a third party, to provide more reliable monitoring results. This best practice has been proven to yield stronger results than property owner based monitoring.	Please see Response GOV5-04.
SUPP-GOV3-06	Mitigation Measure Trans-I b has been modified from calling for the City to establish and implement a policy to "unbundle" free or subsidized parking in new commercial and residential development, to now calling for the City to "Study the feasibility of unbundled. parking for office, commercial and multi-family residential development (including senior housing developments) that are well-served by transit" (p. 4.13-10). This change results in a mitigation measure and policy framework that is weaker in the SDEIR than in the DEIR. VTA encourages the City to consider reverting to the earlier mitigation measure language, but in any case will support the City with its feasibility study and efforts to implement parking unbundling.	The City appreciates VTA's support for its efforts related to unbundled parking. Because of the potential for unbundled parking to result in drivers parking in nearby residential neighborhoods, the City determined that the topic should be considered carefully and allow for more public input prior to implementation.
SUPP-GOV3-07	Transportation Demand Management - Transit Incentives The SDEIR notes that paid transit passes would be provided to employees in workplaces with over 50 employees in all Scenarios (p. 3-16), and Scenario 4-6 include a measure to provide "free transit passes for all Palo Alto residents in transit accessible areas based on the VTA's EcoPass program" (pg. 3-19). VTA will continue to support these measures and requests that the City coordinate with VT A on their implementation. VT A also notes that these measures would help implement the Bay Area Air Quality Management District (BAAQMD) Regulation 14, Rule 1, which requires employers with 50 or more full-time employees to offer commuter benefits.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.

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SUPP-GOV3-08	Freeway Impacts and Mitigation MeasuresThe SDEIR identifies significant impacts to four directional segments of US 101 and two directional segments of I-280, based on the CMP LOS standard. Mitigation Measures proposed in the SDEIR include TDM programs (see above) and a separate measure for the City to "Include policies in the Comprehensive Plan that advocate for efforts by Caltrans and the Valley Transportation Authority to reduce congestion and improve traffic flow on existing area freeway facility consistent with Statewide GHG emissions reduction initiatives." (p. 4.13-3). With these Mitigation Measures, these impacts under Scenarios 5 and 6 remain significant and unavoidable. VTA reiterates our comment that certain cities in Santa Clara County have identified contributions to regional transportation improvements as mitigation measures for development that causes significant freeway impacts. VTA again recommends that the City include voluntary contributions to projects in VTP 2040 in the Comprehensive Plan, as a mitigation measure in the SDEIR. Projects in the VTP that provide congestion relief and additional transportation options along the impacted corridors, include: • US 101 Express Lanes (VTP ID Hl) • I-280 Express Lanes (2040 VTP ID Hl 1-13) • I-280 Ramp Metering Implementation • I-280 / Foothill Expressway Improvements (2040 VTP ID H45, H35) • I-280/ Page Mill Rd Modifications (VTP 2040 X15) VTA would be happy to work with the City to identify appropriate projects for voluntary contributions, as specific development projects are implemented following the adoption of the Comprehensive Plan Update.	Please see Response GOV5-06.
SUPP-GOV3-09	CMP Intersection and Mitigation MeasuresThe SDEIR indicates significant impacts to three CMP Intersections. The DEIR identifies Mitigation Measures to adopt TDM programs, work to advance grade separation projects at intersections along the Caltrain tracks, and take a leadership role in advancing transit improvements, however, these impacts remain significant and unavoidable.In addition to the proposed Mitigation Measures, VTA also recommends that the City prepare an area-wide Multimodal Improvement Plan (previously "Deficiency Plan"), to address these CMP Impacts. The California CMP legislation requires Member Agencies to prepare Deficiency Plans/Multimodal Improvement Plans for CMP facilities located within their jurisdictions that exceed, or are expected to exceed in the future, the CMP traffic LOS standard. The preparation of a Multimodal Improvement Plan can be an opportunity to implement multimodal (nonautomotive) transportation improvements as offsetting measures, when mitigations to meet the LOS standard are	Please see Response GOV5-07.

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	either infeasible or undesirable. The Multimodal Improvement Plan contains a list of actions to help offset the vehicular level of service impacts, and an implementation plan with specific responsibilities and a schedule. These off-setting improvements can include improvements to transit, bicycle, and/or pedestrian facilities, as well as Transportation Demand Management (TDM) Programs. For further information on Multimodal Improvement Plans please see VTA's Deficiency Plan Requirements located online at: http://www.vta.org/cmp/technical-guidelines.Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.	
SUPP-GOV4	Max McGee, Superintendent of Schools, Palo Alto Unified School District, April 12, 2017	
SUPP-GOV4-01	We have reviewed the Comprehensive Plan Update to the Draft Environmental Impact Report (EIR) and are submitting the following comments. **School Grade Levels.** The Draft EIR shows the elementary grades as K-6 and middle school grades as 7-8. Some school districts have this configuration, but ours does not. Any conclusions reached based on a K-6/7-8 configuration should be re-examined. We currently have twelve K-5 elementary schools, three 6-8 middle schools, two 9-12 high schools, and one separate pre-Kindergarten school.	The impact discussions in the February 2016 Draft EIR and Supplement to the Draft EIR erroneously labeled elementary schools as serving grades K-6 and middle schools as serving grades 7 and 8. The text in the Supplement to the Draft EIR has been revised accordingly, as shown in Chapter 3 of this Final EIR. This revision does not affect the calculations or conclusions in the EIR.
SUPP-GOV4-02	**School Enrollment Capacity.** The school capacities provided to the City are in fact numbers based on the notion of fully loading every room in every school with classrooms of students at the contractual maximums. While there may be some school districts that operate this way, Palo Alto schools carve out spaces for wellness services, project-based learning, music and art activities, special education classrooms, makers spaces, and other purposes. Currently, we also provide rooms at Fairmeadow and Duveneck elementary schools for both DreamCatchers and Youth Community Services. These scenarios would impact available space for quality education at all levels.	The City acknowledges the capacity constraints of PAUSD's facilities and appreciates the District's input to better understand the function of PAUSD schools and capacity analysis. Please see Master Response 2, which addresses school capacity concerns.
SUPP-GOV4-03	**Available School Sites.** The District has a limited number of school sites not currently in use by schools:1. Garland is five acres and could be used for a smaller elementary school.2. 525 San Antonio is 2.67 acres. It could be combined with adjacent Greendell, but then the pre-school program there would have to be relocated.3. Fremont Hills is located away from any potential housing development in Palo Alto.4. The District has an option to repurchase the small Ventura site from the City.5. Cubberley is available, but the District's 27 acres of Cubberley is much smaller than the District's current high schools. There is of course no site available in Palo Alto for a large third high school.While additional sites could be acquired, sites comparable in size and configuration to our current schools are not readily available and extremely costly.	The City acknowledges the limited availability of additional school sites and appreciates the information regarding potential expansion plans. Please see Master Response 2, which addresses school capacity concerns.

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SUPP-GOV4-04	**Precision of Enrollment Projections.** The Draft EIR treats the student generation rates and enrollment projections by the District's current consultant as precise projections of the future. The projections are generally not accurate. The projections are based on the past and often the actual future differs from those projections. We believe it is wiser to think in terms of ranges of numbers, rather than specific precise numbers. In particular, the multi-family student generation rate referenced in the Draft EIR is based on a very limited number of developments, which generated a wide range of students.	The City appreciates the District's input and understands that student generation rates are difficult to develop with precision and that impacts to schools may be better considered as a range of possible outcomes. Please see Master Response 2, which provides a range of enrollment numbers for the preferred scenario.
SUPP-GOV4-05	The Bubble Effect. None of the scenarios take into account the "bubble" effect that accompanies rapid development, and which PAUSD is currently experiencing due to rapid housing growth in 2008-2011. When new housing is built, families tend to move in with young children, not a mix of young and older. This means that rather than spread across the grades, as assumed in the Draft EIR scenarios, they are concentrated in a few grades - a bubble. This places huge pressure on physical capacity at individual sites. In PAUSD today, our middle schools are at or above capacity; our high schools expect to grow by 15-20% over the next three years; while our elementary schools are currently shrinking . This roller-coaster effect is an expected impact of rapid and large scale housing development.	The City appreciates the District's input to understand this "bubble effect." Since this EIR evaluates a citywide, program-level document, it is unknown precisely when and where future development under the proposed project will occur, and what the scale of future individual development projects will be. Therefore, it would be speculative to attempt to provide a quantitative enrollment projection that takes this bubble effect into account. Nevertheless, the City is committed to working collaboratively with PAUSD. Please see Master Response 2, which provides a range of enrollment numbers for the preferred scenario to provide the District and the public with a better sense of the potential student generation of the preferred scenario.
SUPP-GOV4-06	Stanford Expansion. Stanford's new General Use Permit (GUP) application calls for 550 additional family housing units, plus 900 graduate student units. Altogether, it seems likely Stanford's housing growth will generate a substantial number of new students for the District. This count is not included in the analysis but will impact the District's limited available capacity.	Please see Master Response 2, which discusses cumulative development, including Stanford University's expansion that have been proposed or approved since the NOP for this EIR was issued. Please also see Master Response 3, which addresses the potential impacts of recent cumulative development to schools. As described in Master Response 3, an increased assumption regarding cumulative development would not affect the findings of this EIR regarding schools impacts. However, the traffic model does account for an increase in school-related vehicle trips and therefore potential associated impacts. However, as explained in Master Response 3, because it is unknown where future school facility expansions may occur, the allocation of those trips within the EIR Study Area may not match future plans for school improvements. The City acknowledges this challenge and looks forward to working with the school district, the University, and the County on this issue as future school facility locations or expansions become known.

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SUPP-GOV4-07	Teacher Housing. PAUSD is exploring an innovative effort to build affordable teacher and staff housing on under-used sites. This effort could be beneficial in recruiting and retaining teachers and bringing teachers back into our community, as well as relieving housing pressure and reducing traffic, with no required taxpayer subsidy. But this can only happen if currently unutilized school sites can be safely put to use. If significant enrollment growth is anticipated in the future, available sites must be held back. One consequence of high-growth plans in general housing will be the loss of potential teacher-specific housing.We appreciate the opportunity to present the School District's perspective. We welcome any comments, and will be pleased to provide any further information needed.	The City appreciates the PAUSD's efforts to improve housing choices for local teachers and understands the limited availability of school sites. The City also recognizes that repurposing currently unutilized school sites will be a difficult decision given the imprecision of enrollment projections noted in Comment SUPP GOV4-04. The City is committed to continuing a dialogue about these issues and the Comprehensive Plan includes a number of new policies and programs to support additional housing in Palo Alto. Also see Master Response 2 for a discussion about school capacity and enrolment.
Non-Governmental Organizations and Private Companies		
SUPP-ORG1	Tiffany Griego, Stanford Research Park Managing Director, Stanford Real Estate and Jean McCown, Government and Community Relations Associate Vice President, Stanford University Office of Public Affairs, March 28, 2017	
SUPP-ORG1-01	Thank you for the opportunity to comment on the February 20, 2017 Supplement to the Draft Environmental Impact Report for the City's Comprehensive Plan Update. Our comments below are specific to issues raised by the Supplement that would particularly affect the Stanford Research Park. The University is submitting a separate letter addressing issues that are more generally applicable. *Background* These comments build on those provided in our June 3, 2016 comment letter on the February 2016 Draft EIR. That letter briefly described the economic contributions of the Stanford Research Park, identified elements of Scenarios 1-4 that could undermine the Research Park's continued ability to provide these economic benefits, and requested environmental analysis of traffic-reducing measures listed in the Draft EIR. The February 2017 Supplement describes and analyzes new Scenarios 5 and 6, which delete some elements of Scenarios 1-4 that caused particular concern (for example, a CUP requirement for new R&D and office uses). The Supplement also provides some analysis of the effectiveness of traffic mitigation measures for Scenarios 5 and 6. However, the Supplement continues to include statements that raise concern for the future of the Stanford Research Park. On March 20, 2017, the City Council identified a preferred scenario that describes ranges of estimated housing growth, non-residential square footage and employment growth, and states: "Additional Zoning Code amendments and policies would be those listed in the Staff Report, subject to additional review and refinement when the Land Use Element returns to Council on May 1." The Zoning Code amendments and policies recommended in the March 20 Staff Report exclude several that appear in the Draft EIR and Supplement and would be problematic for the future of Stanford Research Park. Nevertheless, no final decisions have been made, and in the interest of clarity and completeness, Stanford requests that the preferred scenario not	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.

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	include, and the Final EIR delete or clarify, the following statements from the Supplement:	
SUPP-ORG1-02	1. Page 3-7: Table 3-1, Proposed Zoning Code Amendments. For the reasons stated in our June 3, 2016 letter, Stanford requests that the following Zoning Code amendments not be included in the preferred scenario or the Final EIR: • "A Conditional Use Permit (CUP) would be required for new office and R&D uses in order to regulate employment densities." (Scenarios 1-4). • "An alternate mechanism to the CUP would be explored for moderating employment densities, either through regulation or revenue collection." (Scenarios 5 and 6). • "In the … Service Commercial (CS) districts, non-retail portions of allowable commercial floor area ratios (FARs) would be reduced by a modest amount and replaced with residential use." (Scenarios 2, 3, 5 and 6). Stanford requests that any such amendment not apply to CS-zoned property in the Stanford Research Park (see section 3 below).	The comment is noted. Please note that the requirement for a Conditional Use Permit to limit employee density is not included in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
SUPP-ORG1-03	2. Pages 3-10 (Table 3-3, Summary of Sustainability Measures), 3-19. As noted in our June 3, 2016 letter, a parking charge program for existing workplaces with over 50 employees would harm the competitiveness of the Stanford Research Park, and enforcement at many Research Park sites would be difficult or impossible due to shared parking among some businesses that have more than 50 employees and other businesses that have fewer than 50 employees. Stanford requests that this not be included.	The comment is noted. Please note that parking charges for employees are not includes in the preferred scenario (see Chapter 2, Preferred Scenario, of this Final EIR).
SUPP-ORG1-04	3. Page 3-14 (Table 3-7, Land Use Changes, Scenario 6) states: "Mixed uses in the Stanford Research Park … would be allowed, with an increased focus on housing *and reduction in non-residential development in comparison to Scenario 4*." Similarly, page 3-22 states, "In the Stanford Research Park . . . particularly along El Camino Real, . . . [t]he mix of uses would support a vibrant 24-hour environment and would include housing, restaurants, and retail establishments open during nighttime hours. In comparison to Scenario 4, these nodes would have an increased focus on residential *uses and would experience less of an increase in non-residential space*." We request that the italicized language not be included in the preferred scenario. As Stanford has stated, the University supports adding housing to appropriate sites in the Stanford Research Park, but not as a substitute for any of the non-residential space for which the Research Park is currently zoned. In other words, residential use would need to be truly additive in order for Stanford and the City to achieve the vibrant innovation community they seek.	The comment is noted. The preferred scenario that has been chosen by the City is described in Chapter 2 of this Final EIR. The preferred scenario does include fewer jobs than were considered for Scenario 4 but includes more jobs than were considered for Scenarios 5 and 6. The primary reason for this is that the preferred scenario assumes the current interim annual limit of 50,000 square feet of new office/R&D development will be made permanent through an ordinance (unlike in Scenario 4) but will likely not apply citywide (as assumed in Scenarios 2, 5, and 6).
SUPP-ORG1-05	4. Pages 3-2, 3-13 (Table 3-7, Growth Management), 3-17 and 3-19: For the reasons stated in our June 3, 2016 letter, Stanford requests that no annual non-residential growth cap be applied to the Stanford Research Park.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-ORG1-06	5. Page 3-17 states that "proposed Plan policies and regulations could be developed to prevent the conversion of existing R&D space to office space." As we explained in our June	The comment is noted. The preferred scenario that has been chosen by the City is described in Chapter 2 of this Final EIR.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	3, 2016 comments on the original Draft EIR, an effort to so closely regulate the uses of existing buildings would undermine adaptation by businesses in the Stanford Research Park and place them, and the Research Park itself, at a competitive disadvantage. We request that this concept not be included in the preferred scenario. Thank you for considering our comments on the Supplement to the Draft EIR. Please do not hesitate to contact us with any questions.	
SUPP-ORG2	Whitney McNair, Land Use Planning Director, Stanford University, March 31, 2017	
SUPP-ORG2-01	Thank you for the opportunity to comment on the February 20, 2017 Supplement to the Draft Environmental Impact Report for the City's Comprehensive Plan Update. We understand that in the Final EIR, the City will respond to the comments the University submitted on June 3, 2016, addressing the February 2016 Draft EIR for the Comprehensive Plan Update. Accordingly, the comments below address only: 1) new questions raised by the Supplement; 2) updates to certain comments we made on June 3, 2016; and 3) requests for corrections in a few instances where we believe the Supplement was intended to fully address our June 3, 2016 comments, but appears not to have entirely done so. As was the case in June 2016, we are submitting these comments on behalf of the University as a whole. We are also submitting a separate letter addressing issues specific to the Stanford Research Park. 1. Page 3-4: Although the Land Use section of the Supplement includes appropriate revisions in response to our June 3, 2016 comment letter regarding the City's sphere of influence, a similar section of the Project Description has not been revised. We request that this revision be made uniformly in the Final EIR.	Page 3-4 of the Supplement to the Draft EIR has been revised accordingly, as shown in Chapter 3 of this Final EIR.
SUPP-ORG2-02	2. Pages 3-12, 3-20: Scenarios 5 and 6 continue to state that the City might require "foregoing new natural gas hookups." The University's June 3, 2016 comment letter (page 9), noted that such a ban would not be feasible and was not consistent with the then-current draft of the City's Sustainability and Client Action Plan (S/CAP), which took a more pragmatic and gradualist approach to electrification. Similarly, the November 2016 S/CAP draft states: **2.3 Goal: Reduce natural gas use in building through electrification** Reduce natural gas usage through energy efficiency and conservation, followed by electrification of water heating, space heating and cooking where cost effective. Find ways to reduce or eliminate gas use by encouraging the more efficient gas or all electric appliances such as cook tops and clothe[s]s driers. **2.3.1 Strategy: periodically evaluate electrification of water heating and space heating for cost effectiveness and technical feasibility, and to identify barriers and policy levers.**	The comment is noted. Please note that the preferred scenario does not include the sustainability measure referred to by the commenter.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	2.3.2 Strategy: Incentivize all-electric new buildings (NG-GAS-1) **2.3.3 Strategy: Develop options to incentivize electrification of existing buildings.** Through its new Central Energy Facility and related initiatives, Stanford has significantly reduced both its reliance on natural gas and its greenhouse gas emissions. The University recognizes, however, that natural gas hookups will remain necessary for various uses for the foreseeable future, and requests that the Final EIR and preferred scenario reflect the step-by-step approach included in the draft S/CAP rather than a sudden ban on natural gas hookups.	
SUPP-ORG2-03	3. Pages 3-18, 4.13-41: Scenarios 2, 5 and 6 identify 2040 County Expressway Study improvements. Those proposed improvements appear to include installation of a new trail on Stanford land near Page Mill Road. A bicycle and pedestrian trail in this location was part of the County's original plan for its S1 Trail, but the County decided to substitute a new alignment for the S1 Trail in a different location. Stanford has constructed the new S1 trail on its lands in the agreed-upon location.	The commenter's updated information is appreciated. Transportation improvements for the preferred scenario are described in Chapter 2 of this Final EIR and include support for the County's *Expressway Plan 2040* and implementation of the City's *2012 Bicycle + Pedestrian Master Plan*.
SUPP-ORG2-04	4. Pages 3-19, 3-24 and 4.13-4.14: The Supplement perpetuates the error, identified in our June 3, 2016 letter, of understating the number of housing units existing on Stanford lands in unincorporated Santa Clara County. This error may, in turn, contribute to the questionable conclusion, also noted in our previous letter (page 19) that vehicle miles traveled per capita on the Stanford academic campus are higher than in Palo Alto, despite the campus's student and faculty population and its success in meeting its no net new trips goal. We request that the housing unit numbers be corrected and the VMT conclusion be explained or corrected in the Final EIR.	Please see Response ORG7-05.
SUPP-ORG2-05	5. Draft EIR page 3-24: Although our June 3, 2016 corrections regarding the University's General Use Permit have been incorporated elsewhere in the Supplement, footnote 9 on page 3-24 of the Draft EIR has not been updated.	As noted in Response ORG7-10, the Project Description of the Supplement to the Draft EIR has been revised to incorporate the requested text revisions regarding the University's General Use Permit.
SUPP-ORG2-06	6. Page 4.2-27: The Supplement correctly no longer designates California Avenue south of El Camino Real as a "high Volume Roadway," but the Supplement does not remove the corresponding "screening buffer" designation from Figure 4.2-2.	At the request of the commenter, Figure 4.2-2 has been revised, as shown in Chapter 3 of this Final EIR.
SUPP-ORG2-07	7. Page 4.3-2: Please revise the fifth sentence under the heading "Stanford University Habitat Conservation Plan" to delete "and NOAA Fisheries," so that the sentence reads, "The HCP was a required element for the University's application to the USFWS for the ITP under the federal ESA."	Page 4.3-2 of the Supplement to the Draft EIR has been revised accordingly, as shown in Chapter 3 of this Final EIR.
SUPP-ORG2-08	8. Page 4.3-6 - 4.3-8: The discussion of Impact BIO-1 does not include all potential direct impacts to special-status species under Scenarios 5 and 6; nor does it describe the regulatory requirements that would address these potential impacts. We suggest that this	Scenarios 5 and 6 assume that grade separations would be installed at all at grade crossings in the Caltrain right-of-way. The grade separation project at Alma Street and Palo Alto Avenue is

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	section be revised to: • correct the discussion of the potential Alma/Palo Alto Avenue grade separation project that is included in Scenarios 5 and 6;	within HCP Management Zone 4. Any grade crossing project would be required to undergo separate review under CEQA and obtain any necessary resource agency permits for impacts to special-status species or water quality. While Scenarios 5 and 6 assume that these improvements would occur in Palo Alto, the City of Palo Alto is still developing specific proposals for these improvements and is still considering different alternatives for trenching, undercrossings, bridge types and sizes, and right-of-way designs. Any potential impacts resulting from future grade separation projects are beyond the scope of this EIR. Page 4.3-6 of the Supplement to the Draft EIR has been revised accordingly, as shown in Chapter 3 of this Final EIR.
SUPP-ORG2-09	• add the potential impacts of the proposed Page Mill Road widening and PageMill/Foothill Expressway grade separation under the County's 2040 Expressway Plan;	The February 2016 Draft EIR addresses the potential impacts of the proposed Page Mill Road widening, Page Mill/Foothill Expressway grade separation, and Arastradero/Foothill Expressway grade separation, as follows: "Scenario 2 assumes that the Page Mill Road expressway would be widened and that significant changes would be made to two intersections on Foothill Expressway (Foothill and Arastradero, and Foothill and Page Mill). These projects are included in planning documents prepared by Santa Clara County, which oversees expressway improvements, and these improvements will be required to undergo separate review under CEQA. While Scenario 2 assumes that these improvements would occur in Palo Alto, the City of Palo Alto is not the responsible agency for these improvements and any potential impacts resulting from these improvements are beyond the scope of this EIR." The same assessment is true for Scenarios 5 and 6.
SUPP-ORG2-10	• refer to regulations that can reduce impacts to special-status species to a less-than-significant level, similar to the discussion that is currently provided for sensitive natural communities under Impact BIO-2.	The Supplement to the Draft EIR only includes regulatory text that was changed from the February 2016 Draft EIR. The complete discussion of the regulatory setting is provided in Section 4.3.1.1 of the February 2016 Draft EIR, as revised by edits provided in the Supplement to the Draft EIR.
SUPP-ORG2-11	It is also important that statements suggesting that the Stanford HCP would mitigate impacts from development of non-Stanford lands be corrected. The HCP addresses only the impacts of activities on certain Stanford lands, including the Stanford Research Park	The Stanford HCP is a program that Stanford developed to mitigate impacts that activities on Stanford lands could have on federally-listed species that are known or suspected of occurring

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	and other Stanford lands in Palo Alto.	there. It is acknowledged that the HCP is not intended to mitigate for impacts generated outside of Stanford. Impacts to species on Stanford lands are mitigated through the HCP. These species are located on Stanford land, or could be found in Palo Alto open space properties, although activities that impact these species outside of Stanford lands are not covered by the HCP or ITP. The development scenarios do not directly impact the areas where HCP Covered Species are located, including both on Stanford land within Palo Alto or in Palo Alto open space. It is important to note that the HCP-related activities that Stanford is undertaking for California tiger salamander (CTS) reduce exposure to roadkill on Junipero Serra Boulevard, regardless of the source of traffic.
SUPP-ORG2-12	We recommend that the first paragraph of the Supplement's discussion of Impact BIO-1 be revised along the following lines: The Comp Plan Update would substantially directly affect special-status species if it would allow development that would result in take of individuals, or removal of their habitat, without adequate mitigation. Although most or all private (residential and non-residential) development allowed under the Comp Plan Update is not expected to affect special-status species, both Scenario 5 and Scenario 6 assume infrastructure projects that are in the early planning stages and may have the potential to affect such species. The first is a grade separation project at the intersection of the Caltrain tracks with Alma Street and Palo Alto Avenue. This project has not yet undergone environmental review and would be constructed adjacent to San Francisquito Creek, which provides habitat for federally threatened winter run Central Coast steelhead. If construction of the grade separation might affect this habitat, review by the City, the Regional Water Quality Control Board, the California Department of Fish & Wildlife, NOAA Fisheries, and potentially the U.S. Army Corps of Engineers would be required. Review by these entities pursuant to CEQA, the federal Endangered Species Act, the Clean Water Act, the Porter-Cologne Act, and NEPA would result in mitigation or avoidance of impacts or in disapproval of the grade separation project. Second, Scenarios 2, 5 and 6 assume implementation of the County of Santa Clara 2040 Expressway Plan (with Scenario 2 assuming additional general-purpose lanes on Page Mill Road and Scenarios 5 and 6 instead assuming HOV lanes). The draft 2040 Expressway Plan includes widening of Page Mill Road between the I-280 interchange and Foothill Expressway as well as a grade separation project at the intersection of Page Mill Road and Foothill Expressway. Construction of parts of these projects would occur in areas that are	Page 4.3-6 of the Supplement to the Draft EIR has been revised in response to this comment, as shown in Chapter 3 of this Final EIR. Text has been revised on page 4.3-6, so that it now reads: The Comp Plan Update would substantially affect special-status species if it would allow development that would result in take of individuals, or removal of their habitat, without adequate mitigation. Although most or all private (residential and non-residential) development allowed under the Comp Plan Update would not directly impact special status species, both Scenario 5 and Scenario 6 assume grade separation projects at all at-grade crossings of the Caltrain right-of-way, including the one at Alma Street, near San Francisquito Creek, which provides habitat for the federally listed (Threatened) winter-run Central Coast steelhead. Caltrain would be the lead agency for all these projects, including the grade separation project at Alma Street. Any grade crossing project would be required to undergo separate review under CEQA and obtain any necessary resource agency permits for impacts to special-status species or water quality. While scenarios 5 and 6 assume that these improvements would occur in Palo Alto, the City of Palo Alto is not the responsible agency for these improvements and any potential impacts resulting from them are beyond the scope of this EIR. If construction of the grade separation at Alma Street were to affect

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	biologically sensitive, particularly for the red-legged frog. (See Draft EIR Figure 4.3-1, depicting Zones 1, 2, and 3 of the Stanford HCP.) These impacts will require analysis when the County conducts its CEQA review of the proposed 2040 Expressway Plan, and may require review by the Regional Water Quality Control Board, California Department of Fish & Wildlife, U.S. Army Corps of Engineers, and the U.S. Fish & Wildlife Service. Review by these entities pursuant to CEQA, the federal Endangered Species Act, and potentially the Clean Water Act, the Porter-Cologne Act, and NEPA, would result in mitigation or avoidance of impacts or in disapproval of the project.	San Francisquito Creek, review by the City, the Regional Water Quality Control Board, the California Department of Fish and Wildlife, NOAA Fisheries, and potentially the U.S. Army Corps of Engineers would be required. Compliance with CEQA, the federal Endangered Species Act, the federal Clean Water Act, the state Porter-Cologne Act, and the federal National Environmental Policy Act would result in minimization/avoidance or mitigation of the impacts.
SUPP-ORG2-13	We request that the last sentence on page 4.3-6 be revised as follows: "The potential impacts to California tiger salamander as a result of increased traffic on Junipero Serra Boulevard generated by Stanford development under the scenarios are addressed through specific measures that are being implemented in the Stanford HCP."	Page 4.3-6 of the Supplement to the Draft EIR has been revised in response to this comment, as shown in Chapter 3 of this Final EIR. This issue was carefully considered in the February 2016 Draft EIR (see pages 4.3-34 to 4.3-35), including communications with Stanford University representatives. It is agreed that the HCP only mitigates for impacts caused by development on Stanford lands, however, in this particular situation, the measures that Stanford will be implementing reduce CTS mortality on Junipero Serra Boulevard, regardless of the source of the vehicle traffic.
SUPP-ORG2-14	We request that the second-to-last sentence on page 4.3-7 be revised to state: "With the possible exception of certain assumed infrastructure improvements that would undergo separate environmental review, neither scenario would directly impact special-status species or remove the habitat of special-status species."	Page 4.3-7 of the Supplement to the Draft EIR has been revised in response to this comment, as shown in Chapter 3 of this Final EIR.
SUPP-ORG2-15	9. Pages 4.3-8 and 4.3-9: The potential for the Alma/Palo Alto Avenue grade separation, Page Mill Road widening and Page Mill Road/Foothill Expressway grade separation to affect sensitive natural communities (Impact BIO-2) and movement corridors or wildlife nursery sites (Impact BIO-3), in the absence of mitigation through compliance with regulations, should also be addressed in the Final EIR. The City's creek setback requirements for new development are also relevant to these impacts, but are not currently discussed.	The Page Mill Road widening, and Page Mill Road/Foothill Expressway and Arastradero Road/Foothill Expressway grade separation projects were addressed in the February 2016 Draft EIR (see pages 4.3-38 to 4.3-39). The Caltrain grade separation at Alma Street would be addressed in a similar way and would be a separate project subject to future environmental review. Please also see Response SUPP-ORG2-09, Response SUPP-ORG2-12, and Response SUPP-ORG2-14.
SUPP-ORG2-16	10. Section 4.10 of the Supplement does not correct the text (page 4.10-6) and figure (4.10-2) from the Draft EIR indicating that all of the Stanford University academic campus constitutes a noise-sensitive land use.	Please see Response ORG7-36.
SUPP-ORG2-17	11. Page 4.11-1: A mistake was made in revisions to the last full sentence on the page. "1,884 housing units in added from 2000 to the SOI in 2014" should be "1,884 housing units in the SOI added from 2000 to 2014."	Page 4.11-1 of the Supplement to the Draft EIR includes revisions to reflect the requested edits.
SUPP-ORG2-18	12. Page 4.14-32: Please revise the seventh line in the "Existing Conditions" section as	The information in the Supplement to the Draft EIR is consistent

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	follows: "Stanford's Central Energy Facility produces electrical and thermal energy for the main Stanford campus."	with the information provided in the comment.
Members of the Public		
SUPP-PUB1	Nancy Adler, March 20, 2017	
SUPP-PUB1-01	Due to community concerns over both Transportation and School plan impacts shown in the plan, I ask the Council to delay action by 2 weeks to allow full newspaper coverage. Informed and engaged citizens are necessary to achieve full public confidence in the Comp Plan and City Council. Thank you.	The City has provided a 49-day comment period on the Supplement to the Draft EIR, consistent with CEQA requirements. This follows a 124-day comment period on the February 2016 Draft EIR. The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB2	Todd Collins, March 20, 2017	
SUPP-PUB2-01	Please accept the below email as comments on the Draft EIR for the Palo Alto Comprehensive Plan. I request that the City review the impact of the proposed housing plans on the PAUSD schools, addressing the concerns and questions below.Thank you,Todd Collins ---------- Forwarded message ---------- From: Todd Collins <todd@toddcollins.org>Date: Mon, Mar 20, 2017 at 8:38 AM Subject: Important for Tonight's Meeting - Impact of Housing Scenarios on PAUSD Schools To: city.council@cityofpaloalto.org Cc: Hillary.gitelman@cityofpaloalto.org, CityMgr@cityofpaloalto.org, Max McGee <mmcgee@pausd.org>, Cathy Mak <cmak@pausd.org>, Robert Golton rgolton@pausd.org Dear Council Members,I have reviewed the updated Supplement to the Draft EIR for the Comprehensive Plan Update as it relates to our PAUSD schools, and I have some serious concerns.Please note that I am not speaking for the school board, which has not discussed this matter, but only for myself. I do have the additional qualification of having led a major part of the District's enrollment forecasting efforts in 2015-16, and as a result I am very familiar with the underlying data and forecast assumptions, as well as the District's current physical school capacity and available school sites. **Preliminary points:** • the Draft EIR mistakenly lists Elementary grades as "K-6" and Middle School grades as "7-8." Of course the correct grades for all of PAUSD are K-5 and 6-8. It is not clear whether this is simply a labeling error or if the student numbers are mis-counted for those levels.	Please see Response SUPP-GOV4-01.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
SUPP-PUB2-02	• the PAUSD Board has not been presented with the Draft EIR scenarios or discussed them. I am not aware that the PAUSD staff has done any analysis on these scenarios either. It seems important that the Council and City should coordinate and get input from the Board and the District before moving ahead with such an important decision.	The City appreciates the commenter's effort in reaching out to start a dialogue. The City has met with the PAUSD and accepted Letter SUPP-GOV4 which was received from the District on April 12, 2017.
SUPP-PUB2-03	**My observations:** • The estimated enrollment for all EIR scenarios is potentially under-forecast by 30-40%. This is the result of using a "multi-family" apartment unit student generation rate throughout. In fact, the vast majority of housing built in the last several years has not been multi-family apartments, and has generated substantially more students per unit than forecast.	Please see Response PUB14-08 and Master Response 2.
SUPP-PUB2-04	• Even multi-family apartment units, depending on their configuration, have generated very different levels of students, from almost zero (Treehouse) to 0.7 students/unit (801 Alma).	Please see Response SUPP-GOV4-04 and Master Response 2.
SUPP-PUB2-05	• **PAUSD has a limited number of available school sites held in reserve -** Garland, 525 San Antonio, Fremont Hills, Cubberley, and, under certain circumstances, Ventura.Garland (5 acres) is suitable for an elementary school only. • 525 San Antonio is sub-scale (3 acres) for a school site. It could be combined the Greendell pre-school site, but then a new facility would be required for the pre-school program (no obvious choices is available)o Fremont Hills is located far from where any new housing is likely to be built. • Cubberley is available for a new school site. At 35 acres, the site is materiallysmaller than our current high school sites (45+ acres) and larger than our middleschool sites (<30 acres) • Ventura can be repurchased by the District at a discount to FMV; this site is smaller than all current elementary school sites and has no room for expansion. • Note that there is NO site available in the district for a third high schoolcomparable in size or facilities to the existing two high schools.	Please see Response SUPP-GOV4-03 and Master Response 2.
SUPP-PUB2-06	• **The enrollment capacity listed in the Draft EIR on page 4.12-2 overstates functional capacity at each level by 5-10%.** PAUSD has learned from experience that operating at or near 100% enrollment capacity creates a host of problems that make it unsustainable, including student overflows, lack of swing space, meeting space, art/music space, pull-out instruction space, teacher collaboration space, storage space, etc. Functional capacity is between 90-95% of theoretical capacity.	Please see Response SUPP-GOV4-02 and Master Response 3.
SUPP-PUB2-07	Please review the attached analysis, which shows the number of additional schools, by level, required for each Draft EIR Scenario, both per the EIR Supplement and assuming more conservative (and more appropriate in my view) student generation rates.	The City appreciates the commenter's input. Please see Master Response 2, which explains the rationale for the impact finding in the EIR and provides a range of enrollment numbers for the preferred scenario. The draft Comp Plan proposed for adoption

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	Based on this analysis, in my view, only Scenarios 1 & 2 can safely be said to fit within available District capacity, including available new sites. Scenarios 3 through 5 would stretch beyond current limits and require some combination of larger class sizes, widespread and permanent use of portable classrooms (absorbing play and open space), or new schools sites that currently do not exist. Scenario 6 under any assumption exceeds available capacity and would require new sites or significant crowding.	has also been modified to include Policy L-2.11 regarding continued coordination between the City and the school district on this issue.
SUPP-PUB2-08	**Important Factors Not Considered**In addition to basic capacity analysis, there are important factors omitted from the Draft EIR analysis which will impact the physical capacity of the schools during the forecast period.• **Bubble Effect -** None of the scenarios take into account the "bubble" effect thataccompanies rapid development, and which PAUSD is currently experiencing due to rapid housing growth in 2008-2011. When new housing is built, families tend to move in with young children, not a mix of young and older. This means than rather than spread across the grades, as assumed in the Draft EIR Scenarios, they are concentrated in a few grades - a bubble. This places huge pressure on physical capacity at individual sites, as well as the need to shift staff year by year, creating uncertainty and turnover among the teaching staff. In PAUSD today, our middle schools are at or above capacity; our high schools expect to grow by 15-20% over the next 3 years; while our elementary schools are sharply shrinking. This roller-coaster effect is an expected impact of rapid and large scale housing development.	Please see Response SUPP-GOV4-05.
SUPP-PUB2-09	• **Stanford Expansion -** Stanford's new GUP application calls for 550 additional family housing units, plus 900 graduate student units. Under the current GUP, Stanford is in the process of building a net new 2000 graduate student units. The grad student units, while "non-family," have in the past driven increased enrollment due to "displacement effect," as grad students moved on campus, leaving behind units available for families with children. Altogether, it seems likely that Stanford's housing growth will generate between 500-1000 new students for the District, the equivalent of 1.25-2.5 elementary schools or an entire middle school. This count is not included in the analysis, but will consume the District's limited available capacity.	Please see Response SUPP-GOV4-06.
SUPP-PUB2-10	• Teacher Housing - PAUSD is exploring an innovative effort to build affordable teacher and staff housing on under-used sites, such as Cubberly and 525 San Antonio. This effort could be extremely effective in recruiting and retaining teachers and bringing teachers back into our community, as well as relieving housing pressure and reducing traffic, with no required taxpayer subsidy. But this can only happen if currently unutilized school sites can be safely put to use - if high enrollment growth must be planned for, available sites must be held back. A cost of high-growth plans in general housing will be the loss of teacher-specific housing.	Please see Response SUPP-GOV4-07.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
SUPP-PUB2-11	*Table: Draft EIF [sic] Supplement Scenario Analysis Impact on PAUSD Enrollment vs. Capacity* *19-Mar-17*	This table is referenced in Comment SUPP-PUB2-07. Please see Response SUPP-PUB2-07.
SUPP-PUB3	Bob Moss, March 20, 2017	
SUPP-PUB3-01	The staff report on the Comprehensive Plan EIR appears to have some errors in the data on housing impacts that should be addressed and corrected as needed. My comments are based on both data from a variety of sources and statements made in the past by former city planning directors and traffic engineers.Packet p. 442 tabulates the projected costs from 6 scenarios. Cost impacts fromresidential development range from $927/unit/year for the lowest growth of 2720 units to $897/unit/year for the highest growth of 6000 units. This cost seems low. Some of you may recall that several years ago City Manager Keene in his introductory remarks t *[sic]* a city council meeting said that the net cost/residential unit was almost $2800/year. When I was helping to incorporate Rancho Palos Verdes in 1971 I was charged with determining the expected revenue and service costs/residential unit. At that time cost to service residential units was $750/year. Even if service costs have not risen in the past 45 years, in today's dollars that would be over $2500/unit/year. The net cost of residential development to the Palo Alto budget is grossly understated.	The comment refers to fiscal issues and does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB3-02	Traffic impacts on p. 402 seem to be understated. Scenario 6 is projected to create 5600 fewer car trips than scenario 4 even though Scenario 6 has 2000 more housing units. Multifamily housing normally generates about 8 vehicle trips/unit/day. The % of people driving alone is assumed to stay at 58.6% for both Scenario 4 and Scenario 6 per the table, so the number of car trips for Scenario 6 should be at least 4500 trips/day higher, and total trips for Option 6 should be closer to 470,000 than 457,633. Of course, the claim will be made that more people will take transit than drive, but the % taking transit, biking, and walking is the same in the table, so more housing units = more vehicle trips. BTW several years ago, I was talking to the man who was then chair of the homeowner's association at Palo Alto Central, the condos next to the California Ave. Cal train station. He had recently polled his neighbors and found that 85% drove to work, only 15% took transit. Hard to live any closer to transit, but people still don't use it.	This comment compares the number of vehicle trips projected under Scenario 4 (463,255) and Scenario 6 (457,633), as presented in Table 4.13-12 on page 4.13-22 of the Supplement to the Draft EIR. As noted in the comment, Scenario 6 includes more housing units than Scenario 4. However, Scenario 6 includes far fewer new jobs (8,868) than Scenario 4 (15,480). Thus, the reason that the model projects fewer vehicle trips under Scenario 6 than under Scenario 4 is due to the lower number of new jobs assumed. The trips generated by Scenario 6's higher number of new housing units is more than offset by the lower number of trips generated by fewer new jobs.
SUPP-PUB3-03	I suspect the number of current and projected jobs shown on p. 407 is understated. The business registry still has not had responses from a significant number of local businesses, and probably won't have a full update until later this summer, if then, as a number of businesses have been ignoring the requirement to respond. The fine for failure to respond is the same as the cost of obtaining a license and filling out lots of data on the business, so many businesses seem to have decided it is easier to just pay the fine and not provide time-consuming data reports.	The existing jobs numbers in the EIR are derived from data in ABAG's *Projections 2013*, which provides data for 5-year intervals, and are not based on the business registry. City staff interpolated 2010 and 2015 jobs data to develop jobs numbers for the EIR's baseline year of 2014. Job projections for 2030 were developed using professional judgement based on the key components of each scenario.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	Since so much data is lacking or questionable, it is too soon to select a "preferred scenario". I urge the council to defer action until all the data required, such as that noted above, is obtained and verified.	
SUPP-PUB4	Tirumala Ranganath, March 20, 2017	
SUPP-PUB4-01	I am writing as a long term resident of South Palo Alto who is concerned about the alarming turn of events in the direction of the new City Council's plan to first, gut the community based Comprehensive plan that was worked on for two years in a thoughtful, systematic and deliberate manner and second to sign onto Scenario 6 !The so-called Scenario 6 housing growth plan appears to be an unreasonable and poorly thought out attempt to ram through an enormous number of housing units over the next 14 years. I would respectfully urge you to not choose the Scenario 6 housing growth plan. I believe this would be an unmitigated disaster for the many quality of life issues, on so many levels that, I am left speechless. PLEASE DON'T TAKE THIS ROUTE.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR. Scenario 6 was not selected as the preferred scenario, which is described in Chapter 2 of this Final EIR.
SUPP-PUB4-02	Most of the residents in Palo Alto do favor more and especially better-priced housing here, but that is consistent with the city's ability to absorb its impacts. If one goes out during the morning commute hours (that are already quite drawn out), one can see the traffic issues on all of the main thoroughfares, such as the Page Mill/Oregon corridor, the El Camino corridor, the Charleston/Arastradero corridor, the Alma corridor, the Middlefield corridor, the Embarcadero corridor, the University Avenue corridor and last but not least the Park Blvd corridor in the vicinity of Groupon and onto California street. It is imperative that the City council take note of these traffic bottlenecks before signing onto any new proposals of housing growth within the town.	The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB4-03	It is absolutely essential that traffic as a city wide problem needs to be addressed in a much more comprehensive manner. A great first step would be to hire a proven and reputable outside to carry out the traffic study. I believe the record of the existing traffic studies and their implementation (resulting in the kind of grid lock we see today), begs for a more comprehensive approach.	The traffic analysis conducted for the Comprehensive Plan Update was conducted by Hexagon Transportation Consultants, Inc. following standard methodologies. Hexagon is a consulting firm with a long record of providing comprehensive and independent analysis to Bay Area cities. The Comprehensive Plan Update includes a comprehensive, citywide approach to traffic analysis.
SUPP-PUB4-04	The plan for 6,000 new units by 2030 would TRIPLE the city's long term population growth rate, and make this new growth rate permanent policy in the Comprehensive Plan, presumably for decades, is not a sensible way to go. I believe taking this route will guarantee a serious backlash from the community along the lines of what happened with the Maybell Avenue project of the not too distant past. Few reasonable people would agree to this, 6000 units by 2030 plan.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR. See Chapter 2 of this Final EIR for a description of the preferred scenario.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
SUPP-PUB4-05	There is no precedent ever for this kind of growth in Palo Alto, and no evidence the city's infrastructure, services and schools could keep up very long. Arguments why all this new housing won't produce more cars, traffic, parking demand, school enrollment etc can be actualized only if the city plans to prevent the new residents of these units to own cars ! Surely this cannot be a serious idea that the City Council is contemplating. So, please back off and reconsider, no matter how much pressure " developers " put on you. If one were a developer, it would be an economic bonanza to be allowed to build housing units in Palo Alto - one would make a killing! I for one can understand that, but as a resident who is concerned about the quality of life questions, I don't want to sign up for the developers making a killing at the expense of the rest of us! It is certainly not in the best interest of the residents to sign up for this kind of a situation and I would expect the City council to weigh-in, in a very carefully thought out way.Housing matters, but most of us still care about other things too and want balance. Please make a carefully considered and wise judgment, that Palo Altans will be happy with in the long run. Thanks for your attention in reading my input.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB5	Peter Rosenthal, March 20, 2017	
SUPP-PUB5-01	As a longtime Palo Alto resident I am glad that Council is reconsidering incorporating the Program Elements back into the comprehensive plan. I think this is a wise move. I would urge you to postpone a decision on the 6 different scenarios for several weeks, to allow sufficient time for the community and the media to more fully flesh out the implications of each of these scenarios and to give residents sufficient time to more fully consider the broader impacts of each of these plans on the future of our community.	The City published the February 2016 Draft EIR on February 5, 2016, and closed the public comment period on June 8, 2016, allowing a public comment period of 124 days. The City has further provided a 49-day comment period on the Supplement to the Draft EIR, exceeding CEQA requirements. On March 20, 2017, the City Council provided direction to City staff on its preferred scenario, as described in Chapter 2 of this Final EIR. The preferred scenario will not be finally adopted until the City Council considers and approves the draft Comprehensive Plan Update this fall. Public input on the draft will be accepted as part of the Council's public hearing on the draft Comp Plan.
SUPP-PUB5-02	I am concerned that many of the proposals do not adequately address the impacts on traffic, parking, school enrollment and general livability that are all important to mainting *[sic]* the character of our city.	The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR. The preferred scenario that is being pursued by the City is described in Chapter 2 of this Final EIR.
SUPP-PUB6	Greg Schmid, March 20, 2017	
SUPP-PUB6-01	One of the critical goals of the DEIR is to assess consistency among the Elements. It is important that assumptions are aligned and that impacts are identified.The Council's preferred scenario for net new office/R&D would yield up to three million square feet of	Please see Response PUB14-02.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	new construction during the period 2015-2030, exempting only the SUMC area that was removed from the cap in 2011. Of the 3m in total, 1.3M square feet has already been approved at the SUMC and 1.7M remains under the existing cap.It is important to note that the three million square feet of additional space would be a major increase in non-residential construction compared to historic periods. Between 1989 and 2015, total construction (including both 'monitored' and 'non-monitored' sites) averaged 94 thousand square feet per year, about one half of the projected 2015-2030 average of 200 thousand sq ft. per year. Even if we excluded the SUMC 1.3m sq ft, that would drop the 2015-2030 average to 113 thousand sq ft per year, it would still be about double the 57 thousand that were included in the 'monitored' 1989-2015 total (that basically excluded health care and non-profit facilities). (Existing Conditions Report, August 2014, Table A.3).	
SUPP-PUB6-02	The impact of this doubling in the rate of commercial/R&D space would certainly exacerbate the traffic and parking concerns already identified by residents in the Annual Citizens Survey from existing developments. The City has been monitoring Downtown parking since 1989. In its most recent report, the City estimated the Downtown parking deficit at 777 (Downtown Monitoring Report 2013-2015). The deficit is actually larger since the Downtown Residential Parking Permit program has issued approximately 1400 commercial permits, well above the identified deficit. There are now at least four other neighborhoods working on local RPP programs and the City is still assessing numbers, placements and costs. The City is also supporting the initiation of a Transportation Demand Management Plan to deal with peak hour traffic and parking. Both the TDM and the RPP programs are targeted to mitigate existing as well as new demand. But, note that the Transportation Element (Trans-1 Mitigation) states that it will "adopt a program with goal of achieving no net increase in peak period motor vehicle trips from new development". It is hard to build credibility in a program that is expected to mitigate new development without having a strong handle on existing deficits.	As noted above, the preferred scenario would not double the rate of commercial/R&D space. Averaged over 15 years, the available square footage under the cumulative cap would be 112,000 instead of 94,000, but for the first time, the conversion of existing retail and warehouse space to office/R&D would count towards the cap. The comment cites the parking deficit estimated in the City's Downtown Monitoring Report 2013-2015 and suggests that the "existing deficit" in peak hour traffic should be quantified. The EIR is not required to assess parking deficits and analyzes changes to the level of service of key roadway segments, freeway segments, and intersections. This analysis, and the mitigation measures that result, follow the methodology that is standard in traffic analyses.
SUPP-PUB6-03	Effective traffic and parking mitigations cost money. The most effective program in the City is the City's accord with SUMC. There, SUMC has agreed to get 36 percent of all workers into non single occupancy vehicles and has pledged the equivalent of $2.5million per year to reach that goal (SUMC Annual Report, 2014-2015, pages 10-12). Any effective program needs to have an adequate cash supply to provide realistic alternatives.	Every new project development over a certain size will be required to prepare a TDM plan, in accordance with Mitigation Measure TRANS-1a, and will need to commit to its implementation. That commitment includes financial support for the TDM measures included in the plan. The specific TDM measures and financial resources needed to implement them will vary by the size and other specific characteristics of the proposed projects, most of which would be far smaller than the Stanford University Medical Center. In addition, Mitigation Measure

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
		TRANS-1a requires new development projects to pay a Transportation Impact Fee. The amount of the fee will be determined through the Nexus Study that is currently underway.
SUPP-PUB6-04	The traffic analysis seems understated. A number of key intersections are left out of the DEIR that have shown future F grades in recent traffic forecasts done for projects at 2555 Park and 1050 Page Mill (e.g., Middlefield/Oregon, Page Mill/El Camino, Page Mill/Hanover, El Camino/Grant).	At the commenter's request, the Supplement to the Draft EIR includes four intersections that were not included in the Draft EIR. Please see Response PUB14-03. The intersection of Middlefield Road and Oregon Expressway was one of the intersections added to the traffic analysis in the Supplement to the Draft EIR. The intersection of El Camino Real and Page Mill Road is included in both the February 2016 Draft EIR and the Supplement to the Draft EIR. The intersection of Page Mill Road and Hanover Street was considered for inclusion, but was not added because Hanover is not a major arterial and this intersection has already been studied extensively as part of the Page Mill Road Corridor Study and improvements have already been identified for it. The intersection of El Camino Real and Grant Road is in Mountain View and has been studied as part of the Mountain View General Plan.
SUPP-PUB6-05	Further the traffic analysis cites an F grade for 1-280/Sand Hill interchange but leaves out similar interchanges that are just as crowded: I-280/Sand Hill, 101/University, 101/Oregon, 101/San Antonio and, of course the 280 and 101 Freeways.	The traffic analysis includes an evaluation of freeway segments on both Interstate 280 and Highway 101 (see Table 4.13-18 on pages 4.13-35 to 4.13-36 of the Supplement to the Draft EIR). It also includes an analysis of all ramps leading to and from those freeway segments (see Table 4.13-19 on pages 4.13-39 to 4.13-40 of the Supplement to the Draft EIR).
SUPP-PUB6-06	In general, the traffic analysis seems to play down traffic moving westward in the morning and eastward in the evening to Highway 101 and the Bay crossings.	The travel demand forecasting model used in the traffic analysis assigns vehicle trips to roadway segments and freeway segments based on the locations of residences and employment in the entire Bay Area region. The projections of traffic flow in the morning peak hour and the evening peak hour are the result of that modeling process.
SUPP-PUB6-07	The water analysis (Appendix C, pages C-31 & 32) states that the available water will be the same whether we have a population increase of 6 thousand or 14 thousand, a job increase of 9 thousand or 15 thousand. The CEQA baseline availability is given as 12,983 AFY (including recycled water). This compares with an actual supply of 11,582 in 2015 (2015 UWMP, p 103). The assumption is that SFPUC supplies will rise from 10,724 AFY to 12,692 AFY over the next decade and use will fall per capita to meet availability. You are making big assumptions about drought, environmental issues and neighboring demands without	The City has an Individual Supply Guarantee (ISG) of 19,118 AFY from SFPUC. The cited CEQA baseline value of 12,983 AFY is the estimated baseline water demand as published in the Air Quality and Greenhouse Gas Emissions Modeling in Appendix C of the Supplement to the Draft EIR. The comment cites an actual supply of 11,582 in 2015 (2015 UWMP, p. 103). However, the City of Palo Alto 2015 UWMP does not show "actual supply" of 11,582 AFY in

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	any discussion.	2015 on page 103 of the UWMP; rather, the 2015 UWMP on page 103 shows a total retail demand of 10,177 AFY in 2015. Page 106 of the 2015 UWMP includes several "DWR standardized tables," including tables showing a) 10,724 AFY "Actual Volume" of water purchased from SFPUC in 2015 and b) 11,582 AFY of "reasonably available" "projected water supply" including recycled water. In any case, the City's 2015 UWMP projects the City's supply of SFPUC water (i.e., the ISG) will exceed the City's demand for SFPUC water through the horizon year of 2030 (see Table 4.14-3 of the Supplement to the Draft EIR). The analysis in the EIR relies in part on the 2015 UWMP (adopted May 2016), which by design makes reasonable assumptions about drought while comparing supply and demand.
SUPP-PUB6-08	The need for a steady stream of income from new jobs to offset the impacts of traffic, parking and water needs should be covered in the Fiscal Analysis. The main tax that business pays directly to the City is the Property Tax. Property Tax is the largest source of tax dollars for the City and the fastest growing. (It plays the same role for all local governments—School Districts, County, Community Colleges, Special Districts). If the City must pay towards the mitigation of growth on traffic and parking, a critical source will be from Property Taxes.	Regarding fiscal issues, please see Response PUB14-09. The City has prepared a fiscal analysis of the proposed Plan, which was released separately from this EIR.
SUPP-PUB6-09	The Fiscal Analysis estimates that the relative contribution of resident and employment uses are relatively balanced and will meet new demands (Fiscal Analysis, Figure B-1). Yet the key generator of additional Property Tax funds is property turnover.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB6-10	The Fiscal Analysis assumes that the turnover rate for residential properties over office/R&D is twice as high or 2:1 (Figure 13). This 2:1 figure does not seem remotely relevant for Palo Alto. Numbers for Assessed Valuation from Palo Alto's Comprehensive Annual Financial Report for 2010 and 2016 show that the tax generation differential between residential and non-residential based on turnover is on the order of 9:1 (The average annual rate of increase in assessed valuation between 2010 and 2016 for residential is 6.6% per year, for non-residential it is 2.5% per year. Subtract an annual increase of 2% from both since that is the automatic annual cap on valuation growth for unsold properties. That leaves comparable annual growth rates based on property turnover and new building of 4.6% for residential and 0.5% for non-residential or about 9:1.)	The comment pertains to the fiscal analysis prepared for the proposed Plan and does not address the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
SUPP-PUB6-11	In the long run, adding to non-residential properties relative to residential without mitigation has a serious long-term negative consequence for the tax burden on residents of the City.	The comment does not address the adequacy of the analysis contained in the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB6-12	Be explicit. Three million square feet of new commercial/R&D space for 2015-2030 has major consequences calling for substantial mitigations and the funds needed to meet the costs of effective mitigations.	The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR. The preferred scenario that is being pursued by the City is described in Chapter 2 of this Final EIR.
SUPP-PUB7	Steve Levy, March 23, 2017	
SUPP-PUB7-01	The EIR is required to look at the impacts of changes in growth. However, there is a methodological flaw in this approach. The total impacts to a future point are the changes related to growth AND the changes related to the impact of trends and policies apart from growth.	The analysis in the EIR considers the potential impacts of the proposed Plan in the context of existing conditions and cumulative development. The analysis of potential impacts is based on the project as defined in Chapter 3, Project Description, of the February 2016 Draft EIR and Supplement to the Draft EIR, which includes buildout projects as well as policy directives, transportation and infrastructure improvements, and sustainability measures.
SUPP-PUB7-02	This note is oriented to the school impacts identified in the draft EIR and presented to council on March 20th. First, my conversation with Joanna indicated she selected the higher of alternative factors provided by the school district relating enrollment to new housing. I have two requests here 1) that the lower factors provided by the district be added to the EIR and	Please see Master Response 2, which explains that, while data that demonstrates decreasing birth rates is acknowledged by the City, no single data source can be known to accurately predict the future. The City believes that the PAUSD's own rates, which are based on recent development projects within the city, provide the best indicator of future student enrollment. No revision to the February 2016 Draft EIR or Supplement to the Draft EIR has been made.
SUPP-PUB7-03	2) that the EIR or at least to the council that a full explanation of the new factors and why they were changed.	Master Response 2 contains updated calculations to show a range of student enrollment effects that may occur as a result of the preferred scenario.
SUPP-PUB7-04	I am attaching a file that I complied from population projections developed by the California Department of Finance (DOF) and published in March 2017 and school enrollment projections published in December 2016. The data show that Santa Clara County is expected to add slightly more than 300,000 residents between 2015 and 2030 yet school age population is anticipated to decline slightly with a larger decline in the 5-13 age groups and a small increase in the 14-17 age groups.	Please see Response SUPP-PUB7-02.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	This reflects two trends--1) falling birth rates and 2) a larger share of the population over 65. So for any school district it is important to assess the impact of these trends on the school age population in existing housing units, which I expect and the evidence indicates, will decline.	
SUPP-PUB7-05	The increment from new units is not the same as and is likely to be higher than the enrollment change taking into account what will happen in existing housing units. I am happy to meet if you wish and discuss this further.	The EIR analysis considers the expected number of new students from net new housing in the context of the overall student enrollment at PAUSD schools, which includes the existing housing stock.
SUPP-PUB7-06	*Table: From California Department of Finance, Population [sic] by age group* *Table: Projected California Public K-12 Graded Enrollment by County by School Year* *Table: Total Population [sic]*	This table is referenced in Comment SUPP-PUB7-04. Please see Response SUPP-PUB7-04.
SUPP-PUB8	Steve Levy, March 24, 2017	
SUPP-PUB8-01	I recommend grabbing a copy of the Post for today.Collins is quoted as saying birth rates are falling all around the region and the number of women in childbearing ages is falling.To reemphasize the clarification needed in the EIR and discussion of school enrollment it depends on1) the number of new housing units and how many kids, which depends on the type of unit and2) the number of women in childbearing ages and their fertility rates.Both parts of point 2 go to the importance of understanding and reporting on what will go on in existing homes.I think the EIR can be improved relative to the tables on pages 407 and 408 I think.	Please see Response SUPP-PUB7-02.
SUPP-PUB8-02	Remember the confusion council member Tanaka had on the small percentage difference between the fiscal impacts of scenarios RELATIVE TO THE BASE LEVELS. And my memory is thaT the fiscal study had %S IN THE REPORT	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PUB8-03	But the tables on 407 and 408 do not though one can infer them. So for vehicle trips, water use, GHG as well as population and jobs, an additional table showing changes relative to each other and to the base would be very helpful. THE IMPORTANT POINT IS THAT SUCH PERCENTAGES WOULD SHOW CLEARLY THAT WHAT HAPPENS TO THE EXISTING RESIDENTS AND WORKERS IS CRITICAL RATHER THAN SMALL CHANGES IN GROWTH LEVELS.	The comment is noted. Chapter 2 of this Final EIR presents a summary of the preferred scenario's potential impacts as total 2030 total values alongside the 2030 totals for existing conditions and Scenarios 1 through 6.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
	Do an example for trips or GHG and you will see the impact. It is a flaw in the EiR methodology but one that can be corrected.	
SUPP-PUB9	Steve Levy, March 26, 2017	
SUPP-PUB9-01	meant to say scenario 4 versus 3 and would like to know outside of the formal process whether scenario 4 trips are lower from mitigation as am going to PTC on Wednesday.	The trip numbers presented in the February 2016 Draft EIR and Supplement to the Draft EIR incorporate the sustainability measures and infrastructure improvements described in Chapter 3, Project Description, of the February 2016 Draft EIR and Supplement to the Draft EIR.
SUPP-PUB9-02	I made this spreadsheet to give staff an idea of how to include a more detailed comparison of alternatives in the final EIR.	The comment is noted. The City appreciates the information as compiled and presented by the commenter.
SUPP-PUB9-03	I want to point out the question about why trips in scenario 5 are fewer than in scenario 3 despite more jobs and housing.I think the answer if it is more mitigation measures and not an error is illuminating for thinking about growth impacts and policy.	As noted in Comment SUPP-PUB9-01, the comment is referring to Scenario 4 instead of Scenario 5. The motor vehicle trip data for Scenario 4 reflects the sustainability measures the pro-transit policy direction of Scenario 4, as is also illustrated by the increased mode share of non-automotive travel modes. Page 4.13-50 of the February 2016 Draft EIR states, "Scenario 4 would result in the greatest increase in the non-auto modes, with a total of 19.6 percent of travelers choosing to use transit, ride a bike, or walk. The significant increase in transit's mode share under Scenario 4 is consistent with that scenario's pro-transit policies, such as implementing BRT, providing free transit passes to Palo Alto residents who live near transit, and charging for parking in the Downtown and California Avenue areas."
SUPP-PUB9-04	As usual with the restricted EIR requirements, it is hard for policy makers to see how much more power there is in changing the behavior of existing residents and workers compared to small changes among feasible growth alternatives. I am around this week and then off to Cape Town and as always happy to come and chat. Staff could take this template and apply it to water, energy, GHG and the like.	The comment is noted. The City appreciates the information provided by the commenter.
SUPP-PUB9-05	*Table: Motor Vehicle Trips*	This table is referenced in Comment SUPP-PUB9-02. Please see Response SUPP-PUB9-02.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
SUPP-PUB10	Steve Levy, March 30, 2017	
SUPP-PUB10-01	For your discussion tomorrow with the District. The official long-term demographic projections are done by the California Department of Finance. They released a new set in January 2017 developed by Ethan Sharygin on their staff. Earlier I sent you a Santa Clara County file showing that with a population gain of 300,000 projected between 2015 and 2030, there are actually fewer K-12 age residents.	Please see Response SUPP-PUB7-02.
SUPP-PUB10-02	On Monday and again last night Todd Collins made a number of assertions about generation rates and fertility rates. I attach a statewide file showing the sharp drop in fertility rates (righ *[sic]* hand column) in the past decade and the projection that they will continue to decline, which is a more recent finding that whatever Collins was referring to when he said rates would stay flat. I have asked Ethan for the county rates, which in my memory were also declining when I reviewed the new projections under contract to SCAG.	Please see Response SUPP-PUB7-02.
SUPP-PUB10-03	For two reasons it is reasonable to conclude that generation rates for new housing will be lower than existing rates.One, even if fertility rates do not decline more the students in existing new developments were born in a time of higher birth rates. Even today's rates would produce fewer children per family.	Please see Response SUPP-PUB7-02.
SUPP-PUB10-04	Two, the projected continuing decline in birth rates would produce even lower generation rates.	Please see Response SUPP-PUB7-02.
SUPP-PUB10-05	The state department of finance is the authority on birth rate trends and Ethan consulted national, state and regional demographers when preparing the new population projections. This is not the expertise of school enrollment assessment firms.	Please see Response SUPP-PUB7-02.
SUPP-PUB10-06	Of course a major impact on enrollment will come from existing homes and these declining birth rates should, other things being equal, reducee *[sic]* the enrollment over time from the existing housing stock. I hope that good technical advice prevails and let me know if I can help. When Ethan responds about our county, I will pass it along.	Please see Response SUPP-PUB7-02.

TABLE 5-4 RESPONSE TO COMMENTS MATRIX

Comment #	Comment	Response
SUPP-PUB10-07	*Table: Calendar year age-specific fertility rates: historical and projected; California 1990-2040*	This table is referenced in Comment SUPP-PUB10-02. Please see Response SUPP-PUB10-02.
SUPP-PUB11	Fred Balin, March 31, 2017	
SUPP-PUB11-01	Hazards and Hazardous Materials Section The discovery of a new source of hazardous materials three years ago at the 1601 California Avenue site following building demolition (Trichloroethylene in particular) and follow-up resident-initiated expert testing in the adjacent neighborhood indicates that additional discoveries of hazardous materials in Stanford Research Park are still possible and that the spread of volatile organic compounds such as TCE is not completely identified. The draft EIR does not clearly and completely map the areas and extent of these hazardous materials and the danger they pose.	The discussion of Impact HAZ-4 in the February 2016 Draft EIR and Supplement to the Draft EIR evaluate whether future development allowed under the proposed Plan would expose future occupants or users of development sites to existing hazardous materials contamination in soil and/or groundwater at these sites. The discussion of Impact HAZ-2 discusses whether demolition of existing structures could potentially result in release of hazardous materials (including, but not limited to, asbestos or lead paint) into the environment. As development occurs under the proposed Plan, it will be subject to all existing regulations to reduce potential hazards associated with existing hazardous materials that may be encountered during construction. The EIR describes the existing regulations and procedures that are in place and would ensure that hazardous materials are appropriately handled and remediated (if required) on a project-by-project basis. The proposed Plan does not include any policies or actions that would exacerbate existing hazards. The proposed Plan includes policies intended to address concerns regarding existing hazards, including Policies S-3.2 and S-3.3. Under Policy S-3.2, the City will continue working with appropriate agencies to identify and clean up hazardous waste sites and contaminated groundwater. Under Policy S-3.3, the City will require, as part of development review, property owners and private entities to disclose the presence of contaminated soil or groundwater, identify potential health impacts, prevent vapor intrusion, and remediate contamination.
SUPP-PUB12	Steve Levy, March 31, 2017	
SUPP-PUB12-01	1) text and slides re the fiscal analysis are using language that suggest the fiscal benefits of each new resident are slightly larger than for each new employee.As council member Tanaka pointed out, this makes no sense.It is an artifact of a choice the consultant made that I flagged two years ago and which has not been changed. that decision was to attribute night time police work downtown to the employees of establishments rather	The comment pertains to the fiscal analysis prepared for the proposed Plan and does not address the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR.

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	than to the rowdies.This is an even stranger decision (and to remain) since the consultants (fine folk all) did make the distinction of adding visitors as a category for attributing hotel and shopping center activity.Since the existing conclusion is illogical and has become political. the update should either change the balance (it simply involves moving one number between categories) or noting that choice and how it affects the resident/employee balance	
SUPP-PUB12-02	2) You now have information that the existing student generation rates reflect history and not the future (and did Jaonna *[sic]* ever clarify that the city was given a range and chose the high). The choice to say that new households either moving into new or existing homes will have the same generation rates as those coming from a cohort where birth rates were much higher is the same as the often stated and false implication that the next generation of Latino workers will have the same income profile as their parents despite knowing that their education and language skills are rising and already much higher than their parents. Readers of the EIR should be informed that birth rates have declined and are expected to fall more and, moreover, that the District consultant was not asked to project generation rates for 2030 and has no expertise to do so.	Please see Response SUPP-PUB7-02.
SUPP-PUB12-03	This is also political including a sitting school board member citing garbage to the council and PTC. As Cara wrote to the CAC it is against state law to deny housing related to potential enrollment. Finally I hope for changes and substantive responses, not claims that there is no time or we really appreciate your comments and will include them in the next Comp Plan EIR in 2030.	The comment is noted. The comment does not raise a specific concern regarding the February 2016 Draft EIR or Supplement to the Draft EIR. The commenter's specific concerns are addressed in the responses above.
Oral Comments		
SUPP-PH1	City Council Meeting, March 20, 2017	
SUPP-PH1-01	Council Member Holman: I have a different memory—I could be wrong—of that. In some of the things we have here—we recently, the majority Council, approved an ADU Ordinance that has not been analyzed in the EIR. It essentially is like a zoning change. Some people would say it basically changes much of Palo Alto to R-2 and allows a lot more housing density. Should that be included in analysis in the DEIR?	The 2030 buildout considered in the EIR includes a modest amount of new housing in Palo Alto's existing residential neighborhoods. It is assumed that most of this new growth would occur through accessory dwelling units. In this way, the EIR's growth projections consider potential development of accessory dwelling units at a general level, although their precise location

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		and design cannot be predicted with accuracy. The Comprehensive Plan does not prescribe specific changes to the regulations for secondary units; the accessory dwelling unit regulations were considered and adopted through a separate process.
SUPP-PH1-02	Council Member Fine: [...] One, a number of cities nearby us have recently adopted amendments or new General Plans. I'm wondering if you can give us—I should have asked you this last week; my apologies—some ballpark figures on what some of our nearby colleague cities have done in terms of new housing numbers, new job targets in their Comp Plans.	Please see Master Response 3, which discusses recent cumulative development projects that have been approved or adopted since the NOP for this EIR was issued.
SUPP-PH1-03	Council Member Fine: [...] One that stood out to me is Scenario 6, which has the lowest SOV trips, kind of the highest percentage of folks not driving alone. I'm wondering if you can figure out or explain why that is, what's helping to move folks away from cars in that scenario.	Page 4.13-25 of the Supplement to the Draft EIR states, "As shown in Table 4.13-15, all six scenarios are projected to result in a lower mode share for both of the Automobile modes (Drive Alone and Ridesharing) in comparison to existing conditions. [...] Scenarios 4 and 6 would result in the greatest increase in the non-auto modes, with a total of 19.6 percent of travelers choosing to use transit, ride a bike, or walk. The significant increase in transit's mode share under Scenarios 4 and 6 is consistent with the transit-supportive sustainability measures in those scenarios, such as implementing BRT, providing free transit passes to Palo Alto residents who live near transit, and charging for parking in the Downtown and California Avenue areas. [...] Scenario 6 results in more total trips than Scenario 5, which is consistent with the fact that it includes the same number of new jobs as Scenario 5, but more housing than any of the other scenarios. Scenario 6 would result in a mode split that is almost identical to the mode split under Scenario 4, which is consistent with their similar sustainability measures. "
SUPP-PH1-04	Council Member Filseth: Thank you. When we do the Final EIR, there is some stuff going on with Stanford during the same timeframe, both the existing 2,000 graduate student expansion and the GUP expansion. What's the interaction between that and the EIR? Is the EIR going to consider that as well or how is that going to work? Ms. Gitelman: I'm going to start the response, and then I'll let Joanna Jensen, who's joined us, maybe polish up. There are really two responses to that. First, it's hard to—EIRs take a long to prepare. The rule basically is when you begin, when you issue your Notice of	Please see Master Response 3, which discusses recent cumulative development projects, including Stanford University's expansion that have been approved or proposed since the NOP for this EIR was issued.

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	Preparation and start the process, you're required to use the information that is known at that time about the future. We did that. As you say, things have transpired since then, the additional housing units at Escondido Village and now the new GUP proposal. We do talk about cumulative impacts in this EIR in a non-quantified way. We've tried to draw a broad-enough net that we have some coverage for this additional development. Joanna, did you want to add anything? Joanna Jensen, PlaceWorks: I think that's accurate. We'll be able to provide more specific quantification in the Final EIR about what is included in the cumulative impact analysis for the Stanford area. Council Member Filseth: The Stanford expansion is like 4 million square feet or something like that. It's a lot. It's as big as another Downtown in Palo Alto. It's an outlier. It's a fairly material case. If we don't factor it in, the odds of us being off and skewed are pretty high. I understand the issue.	
SUPP-PH1-05	Vice Mayor Kniss: Earlier today Ms. Gitelman, we had a conversation about numbers. I thought if we looked at the past briefly, that might help us predict the future. My recollection is in 1970 we had around 55,000 people, as we did in 2000. By 2012, we had about 65,000 people. We've had one period where we've jumped ahead almost 10,000 people. My question back to you was how many houses were built during that time that accommodated an extra 10,000 people. Roughly, I know it doesn't quite go in 10-year increments. Ms. Gitelman: I'm not going to be able to answer with specificity. We do have a range of assumptions here. Scenarios 1 and 2 reflect our long-term average in terms of producing housing units. There have been some periods in Palo Alto where we've produced housing units at a faster rate. The period from 1998 to 2006, we produced over 200 units per year; 214 was the number. Overall in this period that we look back on, it was about 180 units per year. Again, the scenarios reflect that; although, some of the higher scenarios go beyond our historic average by quite a bit. Vice Mayor Kniss: My point being that even in that period of time—I know in 2008 or 2009, somewhere in that period of time, it was perceived that we built a great deal of housing in Palo Alto. Yet, it doesn't sound as though it ever averaged over about 200 houses a year. Is that right? As we look at this tonight, I know there's a lot of hope about more housing. I'm delighted we've added the ADUs. Unless things change dramatically—we'll probably	The comment does not raise a specific concerns regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR.

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	discuss that during the evening—it's difficult to find the land, the permits and so forth to go over that 200, I think you said. Maybe one year there was actually 241 homes built. That was probably an unusual year. I've run out of my time. Thanks.	
SUPP-PH1-06	Council Member Kou: […] My question is mainly how much interaction and communication have you had with the schools in terms of looking at all these numbers that are coming up with the growth rate.	The City consulted with PAUSD representatives during the preparation of the February 2016 Draft EIR, Supplement to the Draft EIR, and Final EIR, to ensure that the EIR preparers properly understood the District's student generation rates. Please also see Master Response 2, which provides a detailed description of the analysis of impacts to schools.
SUPP-PH1-07	Council Member Kou: I just want to ensure that with Palo Alto's rate of growth we have to also take into consideration the Stanford GUP, where they have a whole bunch of housing coming up as well. That's a large number for the schools to accommodate.	Please see Master Response 3, which discusses recent cumulative development projects, including Stanford University's expansion, that have been proposed since the NOP for this EIR was issued.
SUPP-PH1-08	Council Member DuBois: Several questions, so short answers are appreciated. How will significant impacts in the EIR be determined when we're mixing and matching? There are several that say they have significant impacts. If we pick the largest jobs growth and the largest population growth, how will we know if that triggers unmitigable impacts?	Please see Chapter 2 of this Final EIR, which describes the preferred scenario and provides evidence that the impacts of the preferred scenario fall within the range of impacts analyzed for Scenarios 1 through 6.
SUPP-PH1-09	Council Member DuBois: You kind of touched on this, but it's still not clear. We had this 2014 Notice of Preparation. We've included some updates. How are you deciding what to include, things that have changed? We added the S/CAP impact, I think. What are we including, not including as we update?	The Supplement to the Draft EIR identifies revisions to the environmental setting in strikethrough and underline formatting. Please also see Master Response 3, which discusses cumulative development projects that have been approved or proposed since the NOP was issued.
SUPP-PH1-10	Herb Borock: […] In regards to the housing allocation set by the State and by ABAG, we'll essentially have a check-in point somewhere in the middle of the current Comprehensive Plan, in 2023. Perhaps the EIR can be looking at how that time point can be used in determining decisions to go forward rather than having a firm number of units past that date. ...	The City monitors development on an annual basis as part of meeting its State housing planning requirements. The City will continue to monitor development and will consider growth in the context of the amount of growth that was considered in this EIR. It is also expected that the Comp Plan will be updated, at least in part, prior to the 2030 horizon year of the proposed Plan, at which point the City will reevaluate its growth assumptions and plans.
SUPP-PH1-11	Hamilton Hitchings: The following are my personal comments. Many people have expressed the desire to focus on housing rather than office. Housing is the primary limiting factor for regional job growth. New office development removes sites and square footage that could be used for housing. San Jose continues to remain a better-suited place for job growth because of its superior transportation infrastructure and location to support it in a way that Palo Alto will never be able to match. Every time you allow more office growth, such as by removing the limit on office growth Downtown or watering down an office cap	The opinion of the commenter is noted. As stated in Mitigation Measure TRANS-1a, these reductions are "deemed aggressive, yet feasible." Nevertheless, this impact remains significant and unavoidable because all of the scenarios would still result in some impacted intersections, both because of growth in Palo Alto and regional growth.

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	with multiyear rollovers, you're reducing the rate and amount of housing that will be built in Palo Alto. The EIR makes optimistic assumptions about transportation infrastructure, such as a 45 percent reduction in peak car trips Downtown via a TDM. Let's not base growth plans on best case scenario assumptions to support a 21 percent population growth in 15 years.	
SUPP-PH1-12	Robert Moss: [...] The traffic counts. You look at the table, and it talks about a lower increase in traffic with 6,000 units than 4,000 units. The only way that happens is if the new process that's being worked on secretly by Google really works, teleportation. The actual number of housing units is going to increase the number of car trips by at least eight car trips per unit per day. That's a real number. If they're single-family housing units, it'll be ten car trips per day. That's not taken into account. You have letters from School Board Members about the impacts on the schools. That is also going to have an impact on traffic. That's not taken into account. This study needs to go back for an awful lot more work.	The traffic levels projected for Scenario 6 reflect the sustainability measures included in the scenario. Scenario 6 also includes fewer jobs than Scenario 4. Regarding housing type assumptions, due to the built out nature of the city and the policy directives considered in the scenarios, the EIR assumes that the net new housing units will be multi-family units, and that new single-family development will occur through redevelopment. Please also see Master Response 2, which explains that school-related trips are included in the traffic analysis in this EIR.
SUPP-PH1-13	Mark Mollineaux: [...] The basic task here is to allocate the land of Palo Alto and allocate something which is intangible, which is the right to build something that doesn't exist but is just given by the Council to create a functioning community. You have to look at how well this works. There's a lot of different ways we could be doing this. The way Palo Alto does it, we have a Comprehensive Plan, and then you have an approval process. I would just say it doesn't work. If you look at the basic ways you can score how this works, what do you need out of a city? You need a city that has affordable housing, that funds its own infrastructure, that allocates scarce resources such as water, that doesn't have too much congestion, that is functioning economically. In some of these, Palo Alto does very well. In most of these, especially housing, Palo Alto is one of the biggest failures in the country. This is showing some ability to change, but I would say not nearly enough. I would just say the overall system just makes it so. Bob Moss a few seconds ago saying that new housing won't fund its own infrastructure, that's not really true. The overall average includes the fact that so many residents are subsidized through Prop 13. New houses pay for more than their share. He does a make case. Prop 13 limits how much every bit we allocate land can fund itself. This is large, structural changes that really we need to work with Sacramento to fix. I appreciate the challenge to all of us, but I just think we have to look at new solutions. Thank you for your time. Option 6 is obviously the best of what we have here, but it is clearly not enough. Thank you very much.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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SUPP-PH1-14	Grant Dasher: […] On the substance of the policy here tonight, even though we are addressing a descriptive question, the question here is not how many housing units should we build, but rather how many housing units do we think the policies that we're setting out will build. I do think it has a normative component to it that can't be overlooked, which is to say these Comp Plan policies are pretty vague, like everyone will use them to justify whatever their preconceived growth plans are regardless of what they say. The assumptions that we state, that we are purporting to believe in, in the EIR demonstrate what we want the Comp Plan to mean. I would strongly encourage the Council to adopt at least the 6,000 unit growth proposal from Scenario 6. To Vice Mayor Kniss' point that maybe it's over overly aggressive, that's probably true historically. If we really are serious about densifying Cal. Ave. and the Downtown areas to support housing growth, it's a pretty reasonable number, especially compared with, say, North Bayshore in Mountain View, where I work, which is proposing 10,000 units over their planning window. There is a normative impact to what we choose in the EIR, even though it's just a descriptive decision. I would encourage the Council to support going big on housing since we've said politically that's what we want to do, but the details matter.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-15	Tiffany Griego: Good evening. My name is Tiffany Griego; I'm Managing Director of Stanford Research Park. We have now thoroughly reviewed the preferred scenario as described in tonight's Staff Report. As we discussed on January 30th, Stanford and the Council have a shared vision of encouraging a mix of uses in the Stanford Research Park. Where we see great opportunity in the preferred scenario is the encouragement of housing in the Stanford Research Park in close proximity to jobs and to transit. We are further encouraged by the fact that the proposed scenario does not include certain regulations or policies that I fear would have been detrimental to the economic vitality of Stanford Research Park. As several of the Research Park employers and as I said to you on June 6th of 2016, last year, the Research Park employers and I were concerned about Conditional Use Permits and other similar mechanisms, regulations, and fees designed to control the number of employees a business can hire in Palo Alto or to control the proportion of office versus R&D uses in the Stanford Research Park. Stanford expressed our concerns that proposed employee headcount caps would have had unintended consequences of undermining the ability to attract the employers that support long-term economic vitality and stability in our Palo Alto. Predictable Comp Plan policies and zoning Ordinances have attracted newcomers like Tesla, Ford, and Jazz Pharmaceuticals and have been Palo Alto's vital contribution to the success of the Research Park. One additional item that I did want to bring to your attention tonight in the proposed scenario is language that supports the conversion of nonresidential FAR to residential FAR. When discussing our	The comment is noted. The City appreciates Stanford University's continued input in the Comp Plan Update planning process. The preferred scenario chosen for the proposed Plan is described in Chapter 2 of this Final EIR.

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	shared vision for the diverse mix of uses in the Research Park, it was our intention to express additional or supplemental housing growth on top of commercial growth. I wanted to make sure to make that clear to you. We ask that you take an action to make that clear, that any housing in the Research Park would add to and not subtract from any commercial growth that is currently available under current zoning. We will also submit some additional comments in writing by the deadline. Thank you very much.	
SUPP-PH1-16	Greg Schmid: Good evening. It is a great opportunity for the Council who's now beginning to look across the elements, looking for consistency. It's important to be explicit in that consistency. I'd like to just spend my time talking about the 3 million job growth in the new Comp Plan. Three million is a lot; 1.3 is already voted on, but that doesn't mean that the impacts have been felt yet. They will be felt during the course of the new Comp Plan. The 1.7 by itself is twice as high a growth rate in new commercial square footage as was true between 1989 and 2015, twice the rate of growth. Already you have spent time in the last few weeks looking at TMAs, RPPs. How do we deal with the existing problem of traffic and congestion? The City themselves have been monitoring in the Downtown area congestion, and they admit there are 770 spaces needed in the residential areas to fully park. When they asked for commercial permits in the residential area, they asked for 1,400. Even dealing with the current situation costs money. Where does the money come from? The only effective TMA in the City is the SUMC, in which Stanford Medical Center has pledge $2.5 million per year to make it work, to get one-third of the people out of cars.	Please see Response PUBB6-02. The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-17	Bill Ross: Good evening. My comments focus on the proposed draft supplement to the DEIR, which on Page 4 incorporates the reference to that document. A review of that document would indicate that it does not contain a current, accurate project description reflecting your actions of January 30th. For example, in looking at the Action Minutes, Attachment F to the Staff Report, at Page 11, there's no indication of the action required by a Board majority of Wolbach, Kniss, Scharff, Fine, and Tanaka, directing Staff to remove from the final draft of the Comprehensive Plan all programs from the Land Use Element not required by State law and to take them up at a later time. There are four other substantive Council actions that affect the project description, that is the substantive content of the Comprehensive Plan. I would also ask—I think there's another person that has yielded their time to me. If you examine the substantive sections of this supplement, those project changes aren't set forth. This is true with respect to the executive summary, the introduction, the project description particularly. If the project description is not accurate, then the alternative sections, .6, .1, is also inaccurate because you have no way to determine what's a reasonable alternative. The same is obviously true with respect to the traffic section. I would respectfully suggest that the appropriate action is to get a	The February 2016 Draft EIR and Supplement to the Draft EIR evaluate the potential environmental impacts of six scenarios for the proposed Comp Plan update. The six scenarios represent not one, but six stable and finite project descriptions for analysis in the EIR. Chapter 2 of this Final EIR provides the project description of the preferred scenario, which is similar to the other six scenarios and represents a “hybrid” scenario. Chapter 2 of this Final EIR contains an analysis that shows that the components of the preferred scenario are similar to those of the other scenarios, and that an additional draft EIR is not required as the impacts for the preferred scenario fall within the range of impacts identified for Scenarios 1 through 6.

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	proper project description in the supplement to the Draft EIR for the project before you proceed. Right now, those substantive changes aren't reflected there. How can any member of the public much less members of your Council comment on that supplement to the DEIR?. Thank you.	
SUPP-PH1-18	Arthur Keller: […] First, I have a concern about the impacts on schools and that we're not really taking into account how many additional schools we'd need, how much crowding we'd have on these schools. As I long say, we can build two-story school buildings, but we can't build two-story playing fields.	Please see Master Response 2, which provides a detailed description of the analysis of impacts to schools.
SUPP-PH1-19	Arthur Keller. […] I have concerns about adding more jobs and increasing the employed residents under the various scenarios. I actually have concerns about choosing a scenario before all the comments of the DEIR have been in, which isn't until about 10 days from now. I didn't hear it, but I read the comments and the reports of the State of the City address, where Mayor Scharff promised that single-family residential neighborhoods would stay the same. That won't be the case with the increases in FAR and lot coverage and reductions in setbacks that were proposed by certain Council Members for accessory dwelling units.	Please see Response SUPP-PH1-01.
SUPP-PH1-20	Arthur Keller. […] I also have concerns about overly optimistic and unproven traffic reduction predictions and our predictions in terms of vehicle miles traveled. Our predictions—I didn't see in terms of LOS—in terms of this, were based on a Downtown TMA that has not proven itself, of TDM programs where we haven't enforced them ever except for the Stanford Medical Center. Therefore, essentially we need to prove and show that these work before we can rely on them. Thank you.	The Supplement to the EIR analyzes post-mitigation conditions for Scenarios 5 and 6 to test the effectiveness of implementation of the transportation-related mitigation measures, including the TDM targets included in Mitigation Measure TRANS-1a. The downtown TMA's efforts to reduce trips related to existing development were not included in the post-mitigation conditions analyses. The analyses of post-mitigation conditions for Scenarios 5 and 6 demonstrate that the transportation-related mitigation measures would be effective in reducing traffic, but they would not eliminate the projected impacts. Thus, the February 2016 Draft EIR and Supplement to the Draft EIR do not rely on the mitigation measures to reduce impacts to a less-than-significant level and state that there would still be significant and unavoidable traffic impacts even under post-mitigation conditions.
SUPP-PH1-21	Andrew Granato: Hello. My name's Andrew Granato. I'm an undergraduate student, who has been writing about housing politics and policy in Palo Alto and the Bay area for the past year. I'd like to speak strongly in favor of Scenario 6. If anything, I would go further in increasing the number of housing units in the Palo Alto area. As has been said before, Mountain View is adding about 10,000 housing units in North Bayshore. I certainly think it's	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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	feasible for Palo Alto to add 6,000 units, especially given the height limit and the opportunities, including in the Stanford Shopping Center. This year, me and my fellow seniors are going on our first job hunts. What I hear from a lot of people is that they would love to be able to join local Bay area communities and become part of those communities and support them, but they simply cannot afford to stay in the Bay area. The only exceptions being people who are going to be making extremely high salaries just out of undergrad, salaries that are way up on the tail of salaries in the United States, and that a vast majority of people do not have. Because housing prices are after all at the end of the day just a function of housing supply and housing demand, the cumulative effect of the Bay area's housing restrictions has been the kinds of prices that we've seen in Palo Alto and across the South Bay in particular, which also has the effect of disproportionately locking out Black and Latino citizens who elect to contribute to these communities as well. I do think it's very important that Palo Alto and other South Bay communities do their part to make these places more accessible and affordable. I urge Palo Alto to adopt Scenario 6. Thank you.	
SUPP-PH1-22	Stephen Levy: I'd like first to respond to Liz's question about how could we build so many more units than we did in the past. Both Tiffany Griego and Hillary laid that out. We have so many different areas and policies now, the Research Park, the Medical Center, El Camino, your action on accessory dwelling units, and the idea of converting not in the Research Park but in Downtown and Cal. Ave. some commercial FAR to housing and mixed use. We can do a whole lot better. Can we do 6,000? I don't know. Some number between 4,500 and 6,000 certainly seems possible if we want to do it.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-23	Stephen Levy: […] Jim, after hearing that school discussion, I went on my iPad. When you sit down with them, they need to know that DOF is projecting that this County will add 300,000 people between 2015 and 2030 and have 100,000 fewer students. I think the idea is they only looked at the added units; they didn't look at the reduced number of children that would be in the existing units from aging and falling birth rates. I just tell you that that finding is way different then what is projected for this County.	Please see Master Response 2, which provides a detailed description of the analysis of impacts to schools, including different approaches to developing student generation rate assumptions.
SUPP-PH1-24	Penny Ellson: […] I first of all want to say I'm glad to hear that a lot of people are thinking about school impacts. That's a good thing.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-25	Penny Ellson: […]. I also have some concerns about overly-optimistic projections on TDM opportunity. I think we should really look carefully at that.	Please see Response SUPP-PH1-11.
SUPP-PH1-26	Jeff Levinsky: Good evening, Mayor Scharff and Council Members. Just a few years ago, the Council and City Staff sent a letter to ABAG that pointed out adding 2,860 units was "completely unachievable." It called such a goal "an exercise in futility," citing impacts on neighborhoods and infrastructure. It said the effect on our schools "cannot be	The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR.

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	accommodated." Why tonight are we even talking about such growth or more? You can look at my neighborhood as a good example of what happens when the City believes it can ignore these realities. We were promised for the Edgewood Shopping Center that putting in new housing in the parking lot would not impact parking. Yet, it has. Even with the center half occupied, parking there is so bad that it turns out the owner, Sand Hill Properties, secretly asked the City to let them put cars onto neighborhood streets without, by the way, notifying neighbors. We were told traffic wouldn't be a problem, but the neighbors all point out how bad it's become. Most ironically, we were told that adding housing would help, but it turns out the houses that were added sold for about $3 million each, more than the cost of the single-family homes around them. It actually made affordability worse. In summary, the City in the past did not think we could grow much. When we were promised growth that wouldn't impact parking, traffic, or affordability, the City was wrong on all three counts. Please remember that tonight. Thank you.	
SUPP-PH1-27	Katie Talbot: Good evening. More and more people want to live in Palo Alto because it is beautiful, it is filled with interesting people, it is a home of innovation. Some people want to live here because it's home. For whatever reason, Palo Alto needs a lot of housing, a lot more housing. When you're planning for that housing, I am going to ask you to keep in mind the needs of your most vulnerable population, the developmentally disabled. They grew up here. They're members of the community, and they add lots of diversity and vibrancy to the community. Palo Alto has a persistent problem with housing the developmentally disabled. I hope that you will consider that when you are looking into your housing discussion here. Thank you very much.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-28	Amy Sung: Good evening, Mayor, Vice Mayor, and the members of Council. Thank you. My name is Amy Sung. I am here to speak before you. I am very excited to see that Scenario 6 is calling for at least 6,000 units to be built. Let's be honest about housing. Housing is short. There is a severe housing shortage up and down the Peninsula. Looking at San Francisco all the way down to San Jose, all our neighboring cities are doing something to try to address this issue. There is growing pain, and the pain it is. We are looking to the Council for leadership. (Inaudible) taking us to the moon, and anything could happen. That is one. How are we going to address this sound like a lot of units. Six thousand units in 10, 15 years really is not that many in a per year. There's a range of housing types that can be imagined between single-family homes and apartments. There's duplex, condos and townhouses and multiplexes. [...]	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-29	Annette Ross: Good evening. Council Members Filseth and Kou covered my concerns about what Stanford is doing. I hope that you will factor that into your decisions tonight. I think Greg Schmid's comments were right on point. I urge practicality. I think there's no question	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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	that Scenario 6 is what we need, but we messed things up over the last several years and took away some of our opportunities to do it land-wise. We have to be practical; we have to fix some of our problems before we proceed and make decisions that will make our problems worse. You'll end up back in this same place in 10 years trying to fix bigger issues. That's really all I have to say tonight. Thank you.	
SUPP-PH1-30	Diane Morin: Mayor Scharff, Vice Mayor Kniss, and Honorable Council Members, I ask the Council to support a goal of 6,000 new homes in the Comp Plan scenario as a minimum in this case. For me, it's a matter of—a gentleman spoke before about normative. I believe it's what people are doing largely in this City at this point. The culture so far has been let's look at traffic and safety, but let's not focus on people's needs. First, you can focus on people's needs, and then you can creatively deal with transportation solutions, which work to the advantage of both. Tonight, I implore you to support the addition of more housing in Palo Alto. Serving on the Human Relations Commission for 3 years recently, I came to understand there's a serious need for more housing in Palo Alto. I'm particularly interested in seniors, as you know. The issue of housing is widespread, however, among all sorts of members of our community. I feel that the population of over 50-year-olds would greatly benefit from scenarios that would allow them to live in smaller units in communities of many, close-knit, and more-densely living together groups. This would allow them to be nearer to stores and walkable areas and to benefit from shared services, including shared transportation. I support the concept of converting commercial FAR to residential units. This would benefit mixed-use projects Downtown. All of the above, if done respectfully, could reduce the demand for cars and transportation. The culture of our community could be redirected towards the use of public transportation, particularly if the City creates different kinds of transportation alternatives such as small buses or cars, etc. We need to have diverse housing for the diverse community that has come to Palo Alto and also to help regional needs. As an anecdote, as a defense attorney I have to deal with old people living alone in the residential houses here. They were losing their driver's license, and this was a shame. I ask for more housing and different kinds of housing. Thank you.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-31	Deb Goldeen: I'm here to speak in favor of the 6,000 housing units. In my opinion, it's not whether or not; it's how. If they're well planned and implemented, it's not going to be a problem. Fortunately, on this Council we have some brilliant planning minds. Thank you, Greg. I feel confident that that's possible. As for your—it's just a drop in the bucket. Lives are being crushed from lack of housing. It's been horrible. I've watched it all my life. This is just a drop in the bucket, but we owe to the greater community to provide our little drop. [...]	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-32	Ms. Lovercheck: [...] My name is Trina Lovercheck. I'm reading this letter on behalf of the	The comment does not address the adequacy of the February

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	League of Women Voters of Palo Alto. Dear Mayor Scharff and City Council Members, the League of Women Voters of Palo Alto has longstanding positions in support of diverse housing opportunities for all, particularly for very-low, low, and moderate-income people, and in support of an efficient and effective transportation system to serve all, particularly those who are transit-dependent. Accordingly, we take this opportunity to make the following points regarding the supplement to the Draft Environmental Impact Report, EIR, on the update to the Comprehensive Plan and on the draft Plan itself. There are many policies in the draft Comprehensive Plan, which if implemented could result in a large number of additional housing units. The existing housing crisis will most likely not go away over the life of this draft Comprehensive Plan. Thus, we urge you to support these policies and to include in the Draft EIR preferred scenario the number of housing units denoted in Scenario Number 6, 6,000. Including this high number of housing units in the preferred scenario would provide you with the information you need regarding the environmental impacts of these housing policies. There are a number of policies in the Transportation Element of the draft Comprehensive Plan regarding adequate transit options for all. [...]	2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-33	Judy Kleinberg: [...] I want to congratulate you on your vote to add accessory dwelling units, not granny units. Now that I'm a granny, I don't like that term. Thank you for adding housing in the residential areas and doing it in the way that you did, which was thoughtful, so that it's not compressed and adding problems in the neighborhoods. Now, you have another opportunity, a bold opportunity to add housing in transit-oriented areas, where it can be built conveniently, effectively, and where developers can make it work. They can do mixed use and have retail on the bottom, housing on the top, and some offices in the middle. I support having the housing, not have as much parking because we hope those people will be self-selected, and they will be taking public transit or biking or walking to work. It is the retailers and the office people who actually need some place to park. As a matter of fact, it's the old buildings where there isn't any place for retail to have parking that really have been creating a problem. Thank you for taking this up tonight. We support Scenario 6. Be bold, go for it. Let's get the housing Downtown and in areas where there's transit. Let's help solve some of this housing/jobs imbalance. Thanks.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-34	John Kelley: […] I can start off by saying I support everything that she just told you. The one thing I'd really like to add, however, is how the Resolution that you adopted previously concerning ADUs impacts your decision tonight. I too would like to commend you and congratulate you on making the proper decision about accessory dwelling units. That's a really important step forward for the community. What I've found over the last couple of years, ever since the Comp Plan's been going, however, is that too little attention has been paid to the impact that accessory dwelling units can have on the overall housing count,	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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	especially on the housing diversity issue. It's been mentioned before that we don't just have a housing crisis, we have a housing diversity crisis. ADUs are going to be an important step. I think, given your prior decision on the ADU issue, not only can you go with Scenario 6 but I would encourage you to go a step further. Maybe it was a year ago, someone was asking at one of these earlier Comp Plan review meetings how many units. I got up here and told you 10,000, which probably sounded absurd. I'm going to repeat that tonight. I actually think 10,000 is the correct number that our community is going to need over the lifetime of the Comp Plan revision. If you think about it, over that period of time, more than a decade, ADUs can contribute a substantial amount. Given what you've already decided, I would encourage you not only to adopt Scenario 6 but to consider going further. Maybe you're not going to see 10,000 being the right number. Maybe something closer to 7,500 would be appropriate in your judgment. In my mind, 10,000 units is what we really need in this community. We need many, many more smaller units. We need something that's going to accommodate seniors, young people, young families so that we don't lose what's really vital about Palo Alto. It's not parking, and it's not traffic-free movement from Point A to Point B. It's the people that really constitutes the most important thing we have in our City. Thank you.	
SUPP-PH1-35	Lisa Van Dusen: [...] I echo the 6,000 or greater number of Scenario 6 in the Comprehensive Plan. I hope that you will make the most of what you've already started with the accessory dwelling unit initiative that was voted on recently. Congratulations on that. I just wanted to share a couple of brief stories that have stuck with me. The battery in my Prius has died a couple of times recently. Both times recently, the people who came to help me from AAA brought up, without me mentioning it, that they were moving away because of housing costs. They were already living in pretty compromised circumstances. I'm just seeing the people that are part of our community and part of helping us live our lives, cars or no cars, are getting squeezed out. I'm just wondering who's going to be doing a lot of the jobs that we need to survive. I think it's interesting to think about that. In addition, I hope we can continue to be really creative about both transit and transportation and about our housing. Many people can live and want to live actually in very small spaces. Don't forget about micro units in addition to ADUs. I personally would love to be able to ride my bike not with cars but away from cars on bike paths and places like by the creeks and other off-road areas. I just urge you—a lot of people have talked about the planning minds up there and the creativity. I'd urge you to be as creative and out-of-the-box in the way that you think about how we might achieve these goals. Thank you, and thanks to the Comprehensive Plan for all their work.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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SUPP-PH1-36	David Fudenberg: Mayor Scharff, City Council, over the past 10 years, traffic and congestion in Palo Alto have become significantly worse. This is a major problem for residents and employees. Rather than discussing mitigating effects of jobs and housing on traffic, we should require a net decrease in traffic, not a reduction in rate of increase, as a condition to approving any more large-scale growth. My request to you, the Council, please ensure we have in place an effective, net traffic reduction program in place before approving any major new additions. Thank you.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-37	Stephanie Munoz: Good evening, Mayor Scharff and City Council. I'm delighted to see so many people mentioning the word small, smaller units. I think that's where we got off the track a long time ago, thinking that luxurious and nice and beautiful had to be large or at least medium-sized. I'd like to be able to show you that small is beautiful. I'd like to approach it starting with a different point. The Council has done a lot to punish people for riding in their cars. We slug-a-beds, we slackers, we unfit, it's just awful. I would like to suggest that instead you do something positive for people who don't want to use cars or can't use cars. Their licenses have been taken away. They have glaucoma. They have whatever. I'd like to suggest that you start by having on El Camino—that would be the 22 and the 522—the same FAR, the same net square footage but divided up into small, like hotel residential homes. They could be beautiful. You could be the Fairmont Hotel. They could have marble showers, but they could still be very affordable because you could put a lot of them, twice as many, three times as many, as you could put, for instance, in 600 square feet apartments. I would like to suggest that one way that would make them elegant would be if they were built like 101 Alma with room-size balconies straight across. That's my contribution to this. Good luck.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-38	Bruce Chen: Good evening. I strongly object to Scenario 6. The City needs to take an approach to look at our sustainable growth. Everybody looking at this, how we can grow, but you have to look at not only the road but also how we can build the City infrastructure to support this additional 600 unit. You are talking about 20,000 people that could live in, that the City's water facility can support this.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-39	Bruce Chen: […] Not to mention whether the school have the resources to support the next generation of the City. I have two kids in the school. Right now, Palo Alto school has very good teacher and student ratio at around 22 for elementary school student. If you think about this additional people moving into the City, how we can solve that, how we can let them (inaudible) the high quality of the City's education without sacrificing the quality of our education for the next generation. I also want to say that City needs to proceed with caution with this Motion, whatever. You guys need to listen to more. I talk with my neighborhood about this scenario. It seems don't have enough information yet. They really	The comment does not raise a specific concern regarding the adequacy of the analysis in the February 2016 Draft EIR or Supplement to the Draft EIR. Please see Master Response 2, which provides a detailed description of the analysis of impacts to schools.

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	want to know more. I trust you guys' instinct and experience, but I think the City's residents need to have more say in these different scenarios. Not to mention, there's a State investigation going on. I highly doubt some of the motivation behind the scenario proposals. That's from me.	
SUPP-PH1-40	Becky Sanders: [...] Listening to the debate tonight, we have had an interesting marriage between the disparate voices for housing. May I ask housing for whom? Will this housing be made available to the developmentally disabled or the most vulnerable, the low-wage workers, seniors, or to the most privileged, to the people that can afford? Developers understandably seek to maximize the profits. You see the disconnect between cravers of rabid growth and seekers for social justice. I challenge you to how can you solve that disconnect. So much money has been thrown into lobbying for pro-growth in this town. Those of us without the money or the lobbying access are left blowing in the wind. Therefore, I can't in good conscious support Scenario 6 because I believe the housing will go to serve the most privileged.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-41	Council Member DuBois: [...] I was at Barron Park Elementary this weekend. Dr. McGee spoke. I guess there were some recent rankings. Barron Park Elementary has been one of our lower elementary schools. A recent ranking actually ranked it Number 12 in the State. Palo Alto elementary schools are ranked 1-12. Gunn High School is ranked Number 1 in the State. Pretty impressive. We're a community that's very proud of our schools. This body recently discussed over 3 million, close to 4 million square feet of development. I bring this up because I'm concerned that the EIR doesn't accurately capture those impacts to our schools. I did see a couple of letters come in today from the School District. I think it's something we need to be aware of. It looked like there was a need potentially for land for eight new schools.	Please see Master Response 2, which provides a detailed description of the analysis of impacts to schools. At the City Council's direction the Draft Plan has also been amended to include a policy regarding school impacts (see Policy T-2.6).
SUPP-PH1-42	Council Member DuBois: [...] I would also just say as I look at the assumptions, I hope we will take a balanced approach tonight. We need to manage growth in a way that pays attention to the social impacts, the economic impacts. We should be asking ourselves as we look at these scenarios who do they benefit. We've heard a little bit about kind of affordable housing and serving the disabled. I am concerned that with the current scenario outline based on the January 30th meeting without breaks on office development, we may say that we're looking at 6,000 units of housing, but they'll never get built competing with also unfettered office growth.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-43	Council Member DuBois: [...] I'm concerned that we're looking at a scenario with a lot of job growth and a lot of housing growth, and none of our transportation elements are dealing with road capacity. In the EIR, there's significant impacts mostly in the transportation section. If you look at the end, the unavoidable impacts are almost all	Regarding traffic impacts without grade-separated crossings or with only some grade-separated crossings, the February 2016 Draft EIR and Supplement to the Draft EIR consider a range of scenarios in terms of grade-separated crossings, as follows:

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	transportation. I'm concerned about transportation eight, creating demand on our local streets. We may even need to consider increasing capacity in our arterials if we're going to keep traffic away from impacting the local streets. I'd like to understand—the assumption here is that we're going to have grade crossings. I'd like to understand the impacts if we don't have grade crossings or if we only have a subset of grade crossings. It seems to be the most major transportation assumption in the list currently. In terms of land use impacts, there were significant impacts for Scenarios 5 and 6. Again, we've included some recent changes like the S/CAP, but we need to consider future housing in the sphere of influence and the new GUP request that we're getting.	Scenarios 1 and 2 do not include any grade-separated crossings; Scenarios 3 and 4 include grade separations at Meadow Road and Charleston Road; Scenarios 5 and 5 include grade separation at all crossings. Clearly, more specific analysis will be needed once the proposed design of grade separations are better known. Regarding future growth in the SOI and on Stanford lands, please see Master Response 3, which describes recent cumulative development, including under the Stanford General Use Permit, that has been proposed or approved since the NOP for this EIR was issued.
SUPP-PH1-44	Council Member Kou: Let me see here. With regards to the Bay Area Clean Air Plan, I see that it's from 2010. We measure air quality here based on that plan. Do we have our own thresholds? Ms. Gitelman: We have thresholds of significance. One of them is consistency with the Air Plan for the region. We find a significant impact there primarily because it hasn't been updated and it didn't anticipate what we're doing with this General Plan. It's just one of several thresholds we use. Council Member Kou: With the growth in the entire Bay area, if they haven't updated it, then there is a concern there. Is there any way to address that? Ms. Jensen: The Bay Area Air Quality Management District, as I understand it, is in the process of updating the Clean Air Plan right now. They have not adopted an update at this time. That is in process. Certainly if it's available at the Final EIR and if Staff wants to direct us to look at that, we'd be happy to. I will just note that the analysis—there is also a cumulative quantitative analysis in the air quality chapter that includes development outside of Palo Alto. It's not only limited to the City. Council Member Kou: I'm just still very concerned because it's been 6 years since they updated it, and we've been growing substantially. Measuring it based on the past numbers doesn't seem to be right. I hope that we can get answers to that for this EIR.	BAAQMD adopted the 2017 Clean Air Plan, *Spare the Air, Cool the Climate*, on April 19, 2017. The 2017 Plan serves as an update to the adopted Bay Area 2010 Clean Air Plan and continues in providing the framework for SFBAAB to achieve attainment of the California and National AAQS. Similar to the Bay Area 2010 Clean Air Plan, the 2017 Clean Air Plan updates the Bay Area's ozone plan, which is based on the "all feasible measures" approach to meet the requirements of the California CAA. Additionally, it sets a goal of reducing health risk impacts to local communities by 20 percent by 2020. Furthermore, the 2017 Clean Air Plan also lays the groundwork for reducing GHG emissions in the Bay Area to meet the state's 2030 GHG reduction target and 2050 GHG reduction goal. Mitigation Measure AIR-1 states the proposed Plan includes policies to support walking, bicycling, and transit use, as well as policies to reduce emissions, improve air quality, and encourage mixed-use development. These policies are consistent with the goals of both the 2010 and 2017 Clean Air Plans. The analysis and mitigation measures included in the Air Quality section of the February 2016 Draft EIR and Supplement to the Draft EIR are based on the most recently adopted air quality management plan at the time of Notice of Preparation (May 2014) and the latest public draft (the Supplement to the Draft EIR was published in February 2017), which was the 2010 Clean Air Plan. Overall the updated 2017 Clean Air Plan would not affect the EIR's air quality analysis, which is based on current data and 2030

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		projections and compatibility with the goals and control measures of the 2010 Clean Air Plan, which are continued in the 2017 Clean Air Plan.
SUPP-PH1-45	Council Member Kou: […] In terms of the hazardous materials and hazards, I see that the level is not significant. I also know that there are issues with hazards and matters that are close to College Terrace. I'd like to see that those are some of the things that we are addressing as well, especially contamination that's going underground towards a neighborhood. I'd like to see that more addressed and not be a low level of significance.	Please see Response PUB15-06.
SUPP-PH1-46	Council Member Kou: […] As Tom had mentioned about schools, I really do have great concerns that the EIR has not taken into account trying to coordinate the growth of Stanford and growth of MPA and the terms of the impacts. Also, I just want to bring up a development from the past which is Arbor Real. It was estimated that they would have no—it was built based on the assumption that there will be virtually no kids coming out of that development. That was based on national standards at the time. As you know, the minute it was built there were so many kids that did go to our schools and actually overflowed the schools. What Todd Collins wrote in his letter to us, it's really important to note that while you're on this EIR, it's using multifamily apartment unit student generation rate. We really need to look at it differently and add in the single families and the rest of them.	Please see Master Response 2, which provides a detailed discussion of the analysis of impacts to schools. Please also see Master Response 3, which describes recent cumulative development projects that have been proposed or approved since the NOP for this EIR was issued.
SUPP-PH1-47	Mr. Keene: [...] There's certainly going to be the possibility for whether it's actually a mitigation, if it rose to that level, or just policy choices to try to design housing options that actually suppress, if that's what we want to achieve, the impact on schools as far as school-age children. We've talked about micro housing or other sorts of units that could support a different demographic. I'm not saying you would automatically do that, but this idea that there is not going to be policy direction on the type of housing that we're going to build with the concern for the impacts is something that's certainly—whether it's 3,000 units or 4,000 or 2,000 or 6,000, I'm sure the Council will be discussing what the nature of that housing should be.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-48	Council Member Kou: What type of housing. I guess in a way we're not in the position to build housing. These are private property owners or landowners that are going to come in with their proposals. At the end of the day, we have to look at worst case scenario. When you're discussing with the Stanford folks as well as with the school folks, I'd love to also have you bring in the teacher housing. It's not just students; it's also the teacher. I hope that we can learn from the Stanford Medical—the hospital situation where there's no housing provided for their nursing staff. Please take that into consideration as well.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-49	Council Member Kou: […] In terms of hydrology, on paper we have plenty of water. Palo	The City has an Individual Supply Guarantee (ISG) of 19,118 AFY

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	Alto has a large allocation from Hetch Hetchy. When we're in a drought, Palo Alto is told to cut back as well. The water allocation is based on every year being a wet year. We have seen in a drought that we have mandatory cutbacks. All this water supposedly that we have on paper is just a paper commitment. Actual allocations will leave us at the mercy of San Francisco and the State. Consequently, water for new residents and companies would come from cutbacks to current residents and companies. We have to achieve much in terms of conservation of water. I'm concerned about whether the additional measures would generate enough savings to accommodate the proposed levels of growth. I hope the EIR can take this into consideration as well.	from SFPUC. Palo Alto's 2015 UWMP projects the water supply of SFPUC (i.e., the ISG) to be in excess of the City demand for SFPUC water through 2035 (see Table 4-14.3 of the Supplement to the Draft EIR). In particular, the SFPUC supply exceeds City demand by about 65 percent, in all years. Table 4.14-2 of the EIR illustrates that the proposed Plan results in water demand over the 2014 CEQA baseline by up to 785 AFY, or about six percent of the baseline water demand. Thus, the percentage by which the guaranteed water supply (ISG; or supply "on paper") exceeds projected demand (approximately 65 percent) is a factor of ten greater than the additional demand of the proposed Plan (approximately 6 percent). The City's 2015 UWMP notes, "During a severe drought the City could utilize groundwater to supplement SFPUC supplies, but the City anticipates that even in dire circumstances only a small amount of groundwater would be served (e.g., < 10% of overall demand). In response to a severe drought the City would work with residents and businesses to significantly reduce water use, and groundwater from City wells would be considered a supplemental resource." The analysis in the EIR relies in part on the UWMP, which by design and regulation makes reasonable assumptions about drought while comparing supply and demand. The impact of drought conditions on the City will depend on how the shortage is applied to the City. For water shortages up to 20 percent, the Tier One water shortage plan will be applied. For system-wide shortages greater than 20 percent, the SFPUC will follow the Tier One plan up to the 20 percent reduction, and meet and discuss incremental reductions above the Tier One plan with the wholesale customers. The SFPUC has the authority to make final allocation decision for the portion above 20 percent, though the wholesale customers have the contractual right to challenge the proposed approach. The Supplemental EIR concludes that all six scenarios would result in a less-than-significant impact with respect to water supply. This conclusion includes consideration of the underlying problem of water scarcity in combination with increased demand for water. In addition, this conclusion considers the potential impact of

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		growth of jobs and housing during an extended period of limited supply of water.
SUPP-PH1-50	Council Member Kou: […] With regards to transportation, there is some optimism in terms of funding for Caltrain electrification. My colleagues came back from Washington, D.C., and said that they had some good talks with some of the Senators and so forth over there, the bigwigs. Has the EIR taken into consideration the worst case scenario, which means we're not getting the funding for the next 4-8 years? You know why.	All six of the planning scenarios included in the February 2016 Draft EIR and Supplement to the Draft EIR assume the implementation of the Caltrain electrification and modernization project by the horizon year of 2030. The February 2016 Draft EIR and Supplement to the Draft EIR do not evaluate traffic conditions four to eight years from now and, accordingly, do not take into consideration the possibility that the project would not be funded in that time frame. Also, the assumption at the time that the Notice of Preparation was prepared was that the project would move forward and be completed by 2030. Although the near-term prospects for this funding are now uncertain, it is still reasonable to assume that the project will be funded and constructed by 2030.
SUPP-PH1-51	Council Member Kou: […] Also, I would love to see discussion with the Stanford folks for a comprehensive pedestrian/bicycle pathway that is east to west or west to east, basically from the campus to the ballpark trails. That's another thing to discuss.	All six of the planning scenarios include the implementation of the City's Bicycle + Pedestrian Transportation Plan by the horizon year of 2030. If the pathway referred to in this comment is included in that plan, then it is also included in the Comprehensive Plan Update's preferred scenario.
SUPP-PH1-52	Council Member Kou: […] Also, what the impacts and the studies of the ADUs and the JADUs that Council Member Holman had brought up earlier, I would really like to see that analyzed as well. Thank you.	Please see Response SUPP-PH1-01.
SUPP-PH1-53	Council Member Holman: [...] A lot of comments have been made about school impacts; I won't repeat those other than to say in addition to the impacts on the schools themselves, they also imply traffic impacts and additional costs which, to this point in time, the City incurs as opposed to the School District, like crossing guards and any number of other things that the City covers. When looking at the impacts on schools, please consider those other aspects of it.	Please see Master Response 2, which provides a detailed discussion of the analysis of impacts to schools. Master Response 2 also describes the way in which school-related trips were accounted for in the traffic analysis. The purpose of the EIR is to identify potential physical impacts associated with the proposed project and therefore does not address service or staffing issues such as the need for new crossing guards.
SUPP-PH1-54	Council Member Holman: [...] Question about the prior Stanford GUP. Doing an EIR, you're looking at existing conditions. They have 750,000 square feet that still hasn't been built from the prior GUP. I couldn't tell; was that considered in analyzing this, these scenarios?	The EIR includes existing development "on the ground" in 2014 and the analysis of future (2030) conditions includes development projected to occur by 2030. Please see Master Response 3, which addresses cumulative development proposed or approved since the NOP for this EIR was issued.

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SUPP-PH1-55	Council Member Holman: I'll just put this out there. I know what's required is to look at existing conditions and what's foreseen. I agree with a couple of others who have mentioned the new Stanford GUP. I just don't know how we can ignore there's 3 or 4 million square feet likely to come as a result of the newly proposed Stanford GUP. I just don't know how we can possibly ignore that and not account for it.	Please see Master Response 3, which discussed cumulative development, including the Stanford General Use Permit amendment that has been proposed or approved since the NOP for this EIR was issued.
SUPP-PH1-56	Council Member Holman: [...] As I heard at least one of the Council Members say, the ADU Ordinance that the Council has passed could have the potential of a very significant impact depending on who takes up the banner. We can't anticipate that. All we can know is here's how the zoning has changed. That zoning change is what we have to analyze and potential impacts.	Please see Response SUPP-PH1-01.
SUPP-PH1-57	Council Member Holman: […] One other one that the Council has done a little bit inconsistently in one place. I've forgotten; I was reading a lot. One place the Council had voted to consider increasing hotel floor area ratio from 2 to 3, and then 2 to 3 in the Downtown area, and 2 to 2 1/2 in the outside Downtown areas. That was a consideration at one point in time, and then it actually got passed recently. I don't know that there's going to be enough of that to have an impact, but I leave that to Staff.	The February 2016 Draft EIR and Supplement to the Draft EIR analyze a range of development scenarios, including scenarios that include increased heights and densities (Scenarios 3 through 6) as well as increase jobs. While these scenarios did not assume increases in hotel FAR specifically, the physical impacts associated with the height, density, and employment increases would fall within the projections used as the basis of the EIR's evaluation.
SUPP-PH1-58	Council Member Holman: […] Other council members have mentioned too great a reliance—members of the public did as well—on a TMA that is not only unfunded for the most part to this point in time, it's not even proven itself to be—we're hopeful. To this point in time, I don't think we can rely on it like here's our solution. I don't think we can do that. TDM, if we're going to rely on TDM, obviously they have to be enforceable TDMs. Whether it's TMA or TDM, whatever we add in terms of a workforce, if it's a 30 percent reduction in trips, there's still the 70 percent that's traveling by other means that aren't public transit or carpool or however you want to address that.	The Supplement to the Draft EIR analyses post-mitigation conditions for Scenarios 5 and 6 to test the effectiveness of implementation of the transportation-related mitigation measures, including the TDM targets included in Mitigation Measure TRANS-1a. The downtown TMA's efforts to reduce trips related to existing development were not included in the post-mitigation condition analyses. The analyses of post-mitigation conditions for Scenarios 5 and 6 demonstrate that the transportation-related mitigation measures would be effective in reducing traffic, but they would not eliminate the projected impacts. Thus, the EIR does not rely on the mitigation measures to reduce impacts to a less-than-significant level and states that there would still be significant and unavoidable traffic impacts even under post-mitigation conditions.
SUPP-PH1-59	Council Member Holman: […] The physical character, some of the scenarios also talk about considerable changes that could occur to the physical character of the town. It's another reason why I want the ADU recently adopted Ordinance to change. There's a lot of that that, I think, could have a quite significant effect on the physical character. A member of the public mentioned something about—one or two members of the public talked about	Regarding accessory dwelling units, please see Response SUPP-PH1-01. Regarding potential economic and social impacts, please see Response PUB14-09.

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	housing units and for whom. That is a really good point. That could affect both the economics and the environmental impacts.	
SUPP-PH1-60	Council Member Holman: […] While it isn't a in looking at the embodied energy in existing buildings and what it takes to construct new buildings. It goes a little bit beyond—it's more in the LEED category. It's not just the embodied energy, but it's also the energy it takes to recycle materials and the energy it takes to produce the new construction materials and transport them to the site. The last time I read it, it's before a construction product gets from the manufacturing site to the construction site it's transported seven times. These are not insignificant. I don't want to make you regret what you put in your email, Mr. Friend. If the City even looks at its purchasing practices, its greenhouse gas impacts go up quite a bit too. Those are things we all need to consider. We cannot afford to bury our heads in the sand anymore about those kinds of things.	As stated in the EIR, pursuant to guidance from the Governor's Office of Planning and Research and the California Air Pollution Control Officer's Association, lifecycle emissions are not included in the quantification of a project's GHG emissions impacts for CEQA because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known; therefore, calculation of lifecycle emissions would be speculative. The California Natural Resource Agency's Final Statement of Reason (FSOR) for adoption of the amendments to the CEQA Guidelines as a result of Senate Bill 97 (SB 97) states:"As a general matter, the term [life-cycle] could refer to emissions beyond those that could be considered —indirect effects of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials. (CAPCOA White Paper, at pp. 50-51.) CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration. (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be —caused by the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process. Mitigation can only be required for emissions that are actually caused by the project. (State CEQA Guidelines, § 15126.4(a)(4).)"Additionally, the U.S. national GHG inventory, the California state GHG inventory, and the inventory of nearly every city and county in California that has prepared a climate action plan to date have all used the "activity-based" approach for estimating GHG emissions. Of note, the CARB's

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		Scoping Plan pursuant to Assembly Bill 32 and Senate Bill 32, which is the current statewide GHG emissions reduction plan, does not include "consumption-based" emissions outside of California. Thus, in order to put the efforts of Palo Alto's local government in State and regional context, and to support statewide GHG reduction goals and legislation (like AB 32 and SB 32), the GHG inventory used in the EIR is an appropriate basis for evaluation. By estimating GHG emissions using the widely accepted ICLEI Community Protocol, and including the GHG emissions commonly included in GHG inventories for communities across California and the state as a whole, the City is preparing an inventory that can be compared to those other communities, using a common standard, and thus comparing GHG emissions in the city on a common basis with other communities in California. While the S/CAP may address lifecycle pre-consumer emissions embodied in purchase of consumer goods, the proposed Plan and this EIR are not required to do so.
SUPP-PH1-61	Council Member Holman: […] When looking at jobs, we need to be realistic. Like I say, the number of jobs—I don't think we need to be encouraging more office workers. When it comes to housing, what we want and what we can do realistically are not necessarily the same thing. Thank you.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-62	Council Member Fine: [...] I'm taken by the fact that we are talking about future growth scenarios for Palo Alto, and the main thing we're focused on is impacts. I wonder if we can step back for a moment and flip that on its head. In some ways, growth is also a benefit. When we were at this conference at the National League of Cities last week, a few of us were joking that the sessions on economic development were packed. I mean filled up with people from Mississippi and Maine and Pennsylvania and parts of Central California and Washington state. Us Palo Altans and our friends in Menlo Park and Mountain View just laughed them off. That's a privileged place to be. We shouldn't cook our golden goose. I completely agree with Council Member Holman that there is concern about office growth in the City, and we need to do it smartly in a way that supports our community. We shouldn't be cutting off future job growth and development because we rely on it. As a 30-year-old in this community, I hope there are jobs for me here in the future. I would hate to see us restrict those opportunities because I do think it's important to our community and to our residents. Second, on the issue of housing, housing has impacts. So do current residents. There's also enormous benefits of housing. The benefits of housing include	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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	opportunities to access jobs and schools, accessibility for people of different abilities or disabilities. New housing in the right places, smart growth, is the sustainable option going forward. Finally, it contributes to a vibrant, inclusive, and multigenerational community, a diversity of students to fill our schools, and ways to support longtime residents, renters, and seniors who might otherwise be displaced. In a funny way, the primary benefit of housing is the housing itself and the families which will live in it. Let's keep that in mind too. I wish our EIR could measure those things. I know we can't, but maybe next round.	
SUPP-PH1-63	Council Member Wolbach: [...] When it comes to water use, new infill development tends to have much more efficient water use than most current structures and development. The same thing with energy use. ….	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-64	Council Member Wolbach: [...] On the question of schools, I really appreciate the responses from Staff and also from the consultants to the letter, which I found quite puzzling, from School Board Member Collins. Certainly on the City/School Liaison Committee, which I was on with Council Member DuBois last year, the issue of this Comp Plan, the growth scenarios, the EIR, potential for impact for schools came up quite clearly, and it was clearly discussed. If the School Board has not yet agendized a discussion about that, that is not our responsibility, but something they need to do. I'm glad to hear that Staff will continue the collaboration they've already done and are looking forward in the next fortnight to working with the School District staff again. I'm glad to hear that the numbers that we're using for our projections of how many students will be associated with new housing are the numbers—in fact, the higher numbers that we got from the School District themselves. For those who are concerned that future development will be like previous development in that it was not all small units, that's the reason we need to emphasize having more small units. I agree with that. That should be our priority. I think we've all been really clear and the public's been clear that future development of housing in Palo Alto ought to focus on smaller places which, according to the School District, is less likely to create a large impact on the schools. For those who are concerned that we do not have enough school sites, it is certainly unfortunate that the schools sold off or leased off many of its sites many years ago. That doesn't mean that we can't work together, put our heads together, and find future new school sites if that does become a necessity. One of the ways to do that is through coordinated area plans, where you could incorporate a school site along with new housing, places like Fry's or even potentially the Stanford Research Park. In the future, those are options that we ought to explore. The phrasing in the policies and the programs in this Comprehensive Plan point us in that direction and enable us to have those conversations, so that future housing development along with schools and park space can all go together. Back in the fall, there was an email I saw	Please see Master Response 2, which provides a detailed discussion of the analysis of impacts to schools.

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	from—somebody had forwarded to me—School Board Member Collins where he said you can potentially turn it around. Instead of more housing being a threat to the schools, you can make demographic hollowing out, which is what they call it in the rust belt cities, a threat. The kindergarten enrollment decline is a good stat for that. Even School Board Member Collins has indicated that there's a real danger from—as he said, people may say lower enrollment is okay, but if you play it out, we end up losing our identify as a family-oriented school-centric community. Though there is a preference to have more folks being able to live in Palo Alto, those who are already part of our community being able to sleep here at night, the impact to the schools expressed in School Board Member Collins' letter, I would call hyperbolic and inaccurate.	
SUPP-PH1-65	Council Member Filseth: Most of my concerns or comments have already been hit by multiple people. I'm really glad that the EIR is going the direction it is. I'm really glad that it's broader than—when we first said we were going to do this many months ago, I was like, "An EIR is really—but yeah." I think it's broadened beyond air quality and water quality to a lot of things that people in town really care about even though they don't fit the classical profile of an Environmental Impact Report. That's good because at the end of the day we've all got to be asking the question—the things we do, particularly the Comp Plan where it's so long term—why is this good for Palo Alto residents. The EIR, we're covering a lot of that. That's a good thing.	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.
SUPP-PH1-66	Council Member Filseth: [...] Let's see. You know the school thing. I'm really glad that the School Board and the School District communication lines are open. That's really important. We haven't been as close with those guys on this kind of stuff for whatever reason in the past. I'm really glad to see this happening. They're weighing in on the Stanford GUP expansion. Some of the scenarios in our expansion are much, much bigger than the Stanford GUP expansion, so they should weigh in on that too. In this town, the City Council elections are the under-card to School Board elections. That's a really good thing. Glad to see the loop closed and active dialog. The one thing I would say about the EIR is that—Todd Collins, who is a member of the enrollment committee, points out in his letter that the EIR uses K-6 and 7-8 and 9-12, and the School District uses K-5, 6-8. If that could get rationalized, that'd be great. I'm glad the time period is still open. Maybe I'll comment on it later.	Please see Master Response 2, which provides a detailed discussion of the analysis of impacts to schools. Please also see Master Response 3, which describes cumulative development, including under the Stanford General Use Permit that has been proposed since the NOP for this EIR was issued.
SUPP-PH1-67	Mayor Scharff: [...] First of all, I also wanted to say I thought the EIR and the Draft EIR, the supplemental part, were really done well. They dealt with all of the issues for the most part. In fact, I couldn't think of any you didn't deal with. I thought you did an excellent job on that. The EIR is well done and well crafted. I would associate my comments in some ways with Council Member Filseth, who talked about how it was great we went through all	The comment does not address the adequacy of the February 2016 Draft EIR or Supplement to the Draft EIR.

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	of these different things. In fact, I thought we were far more in-depth and thoughtful than a lot of EIRs I've read. I want to tell Staff I thought it was great.	
SUPP-PH2	Planning and Transportation Commission Meeting, March 29, 2017	
SUPP-PH2-1	There are three important variables that impact how housing impacts school capacity. One is the student generation rate from new housing, the second is students from existing housing, and the third is the actual capacity of the schools. So let's talk about each one in turn. The student generation rate for new housing in the DEIR was plugged at a very precise 0.5 students per unit generated. So in each one of those scenarios where there were certain number of housing units generated it was assumed that 0.5 student distributed pro rata across grades K through 12 would eventually be in the system. I probably spent more time with the enrollment forecasting data in Palo Alto Unified than anyone else and I wasn't sure where that 0.5 came from so I went and looked. It comes from this document which is called the Residential Research Summary by a group called Decision Insight who are our demographer forecasters over at the District. And if you look up and it's mentioned multifamily 0.5 it refers you to Appendix B for the source of that. This is Appendix B in its entirety. It's a list of six I'll be happy to give this to you guys. It's a list of six housing developments since 2011 two of which are multifamily. One is Tree House, student generation rate 0.03 per unit and Alma Housing which is 801 Alma, student generation rate 0.7. I think it's a weighted average by which they get to the 0.5, but this is a good example of where the a mean is not a great representative of the population especially when the population consists of two data points. So I think it would be wise to think more broadly about student generation rates. This is something certainly we did in our enrollment planning where we looked at we developed and this is by the way the list from 2009 from our former demographers, I'll give you this too, that shows there really aren't the truth is there really are not many multifamily developments in Palo Alto to look at to figure out what the student generation rates are. So there's definitely guesswork here and I think what the District will recommend is that we that the City use scenarios and or try to use a range of student generation rates to get a better sense of what could happen here. The biggest fear I think it should be that if we guess low and more students show up, significantly more students show up then forecast we will not know what to do. The second piece is the student gen… and I guess just to put a number on it by my calculations if you used the higher end of the actual data points that	The comment states that the source of the student generation rates used in the Supplement to the Draft EIR is unclear. As noted on pages 4.12-3 through 4.12-7 of the Supplement to the Draft EIR, "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 commenter correctly notes that these rates are contained within a report entitled Residential Research Summary that is included in the 2015 Enrollment Project report. As noted in Master Response 3, these rates were chosen for use in the EIR based on consultation with the PAUSD. The comment states that student generation rates are based on a small sample of housing development projects and recommends calculating a range of student generation numbers due to the small number of development projects. Master Response 3 applies PAUSD's moderate 2015 student generation rates for the low and high ends of the housing range for the preferred scenario using PAUSD's lowest (i.e., multi-family) and highest (i.e., single-family detached) generation rates to show a range of the potential student generation under the preferred scenario. Please see Master Response 3 for a comprehensive response to several comments received on the schools analysis in the February 2016 Draft EIR and Supplement to the Draft EIR.

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	we saw the student generation rates in the report are 30 to 40 percent lower than what we might actually see. 0.5 versus 0.7 is forty percent; forty percent higher.	
SUPP-PH2-2	Second is students from existing housing. This is incredibly hard to forecast because students from existing housing we do 10 year forecasts from the same group called Decision Insight. We don't look at it past five years because our experience is they have no idea, we have no idea, and they are frequently wrong even within five years. So their ability to forecast out 10 years is very speculative. So I would urge starting at where we are today rather than trying to guess where we're going to be 10 years from now.	The analysis in the February 2016 Draft EIR and Supplement to the Draft EIR evaluate whether development allowed under the proposed Plan would exceed school capacity by calculating the net increase in student enrollment associated with the project net increase in housing under the proposed Plan and comparing that increase to the existing remaining capacity in PAUSD schools under existing conditions. The analysis does not compare projected student enrollment to current enrollment projections.
SUPP-PH2-3	Finally the actual capacity of the schools, the capacity of schools is the capacity of the buildings we already have which is pretty easily known. We've got a certain number of rooms and we know how many kids are in each class, but there's also the amount of land that we have. Because the gating factor in our ability to have schools is to have land to put them on. At our existing schools it takes 5 acres to build an elementary school site, 25 acres to build a middle school site, and 50 acres to build a high school site of the types that we have today. Now it's funny because when I, we sat down with Ms. Gitelman I was pleased and mildly hopeful that when we told her those numbers she was like wow that's a lot of land. And it is! It is very hard when we think about where we can go get sites like that to build more schools if we had to do it we do not know where to get it. We don't know where it will come from. The School District does have an inventory of sites available to it that we've hoarded over the years. As you guys probably all know a whole bunch was sold off, but we've also hoarded a bunch. We have about five sites. One is good for an elementary school actually two are good for elementary schools, one is good for a middle school, one is good for maybe a combination of a middle school and elementary school, none of them are big enough for a high school that's comparable to the high schools that we have today. So there's a finite capacity of both 1 classrooms and land where we can build the kind of schools that are of the size and type that we have today. We can always build different kinds of schools. I think this is worth considering, but I think it shows how impactful these kind of things can become. As someone pointed out in San Francisco you don't have to look very far to find a four-story, you can find many four-story	Master Response 3 acknowledges that PAUSD has identified five sites that could be used for future schools. As noted in Master Response 2, it would be speculative to analyze the impacts of potential future school construction projects in this EIR. The traffic model does, however, account for an increase in school-related vehicle trips and therefore potential associated impacts, such as those related to increased air pollutant, greenhouse gas (GHG) emission, and noise levels, are accounted for in this EIR. Because it is unknown where future school facility expansions may occur, the allocation of those trips within the EIR study area may not match future plans for school improvements. There will be future opportunities to assess the environmental impacts of school expansion or construction projects. The environmental impact of specific school expansion or construction projects would be undertaken by PAUSD as the lead agency when they are proposed.

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	buildings all enclosed with playgrounds on the rooftops built on one or one and a half acre sites. We could do that too. In Los Altos they were looking at doing that. They were going to pay $50 million for a piece of land on El Camino to build a four-story school. They decided not to do it because their next smallest site would be is nine acres, but if we wanted to go to a different type of school site: multi-story, enclosed limited play area, limited open grounds we could do that and we could accommodate virtually any number of kids as we build up and up. So the question is, I mean this is the question for you guys, not for us, the schools will do whatever they have to do. But I think the question for the planners and for the ultimately the City Council is: is that within the vision of what you have for Palo Alto and how do you think that affects the quality of life and the future of Palo Alto if we went to schools that look like that? So I think that there's some work to be done on the student generation rates. There's work to be done in the existing housing, and there's work to be done to think about the capacity. There are a couple other of considerations that I'll just mention quickly.	
SUPP-PH2-4	One is what we call the bubble effect and we are very sensitive to this because we've been living it. When students show up from large developments they don't show up neatly spread out K through 12. They show up in highly concentrated doses in the early grades and we're living this right now from the from the growth of housing that was that came on line between 2008 and 2011 which we officially now call the bubble years. Those students are right now in 7th through 10th grade and they stretched the existing PAUSD capacity to the absolute limit beyond a 100 percent actually for the grades that they're in. And what we've had to do is significantly expand our capacity with portables and teachers moving around to accommodate those grades and then when they leave we have lots of extra space afterwards. So it doesn't show up evenly distributed, it shows up highly concentrated and that creates a real operational challenge for the District.	Master Response 3 discusses the "bubble effect" and acknowledges these concerns. However, as noted in Master Response 3, since the proposed Plan is a citywide, program-level document, it is unknown precisely when and where future development under the Plan will occur, and what the scale of future development projects will be. Therefore, it would be speculative to attempt to provide a quantitative enrollment projection that takes this bubble effect into account. Nevertheless, the City is committed to working collaboratively with PAUSD to ensure that the District is informed on an ongoing basis regarding pipeline development and the proposed Plan includes a policy to ensure regular coordination with PAUSD.
SUPP-PH2-5	The last thing is and I think I know the planners will incorporate this in their next draft is the impact of Stanford expansion on the General Use Permit (GUP). We believe based on our preliminary read of the GUP that the housing built at Stanford 550 single, 550 family housing and over 900 graduate student housing will generate somewhere between 500 and 1,000 students for PAUSD. Just to put it in context 500 students is larger than the size of a single elementary school. 1,000 students it's the size of an entire middle school. So that's a very large population for us to swallow and that's above and beyond and separate	Stanford University's proposed expansion plans are discussed in Master Response 2 (Recent Cumulative Development Projects) and Master Response 3 (Analysis of Impacts to Schools). Stanford's proposal to add 3,150 or more additional housing units/beds, if approved by the County, would enable the university to add a mix of housing types, some percentage of which could accommodate families with school-aged children. The

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	from every number that comes out of the EIR. So I think that's very important to take into consideration as you go forward.	City's traffic model accounts for an increase in school-related vehicle trips and includes assumptions about future growth in the region. Therefore, potential associated impacts are accounted for in this EIR. However, because it is unknown where future school facility expansions may occur, the allocation of those trips within the EIR Study Area may not match future plans for school improvements. The City acknowledges this challenge and looks forward to working with the school district, the University, and the County on this issue as future school facility locations or expansions become known.
SUPP-PH2-6	Commissioner Summa: Ok. And then just a few quick comments, I did find there were three letters there was the one from School Board Member Collins, also one from Superintendent McGee, and one from Penny Elson who's very involved, a citizen advocate with the school for years. And they were all basically the same that they were concerned that the wrong generation rates were being used, etcetera and that might be really lowballing. And that was a concern for me. I'm glad that the staff is has entered in more a more of a conversation about that. I just think we have to… I mean I think the school system is one of the jewels in Palo Alto's crown for sure and I don't think the public would be… I don't think to be palatable to the public to have a scenario that really diminished the quality of our schools. So I think that would really 1 get the room full. So that was one thing.	The comment expresses concern regarding potential impacts to schools, and states that the student generation rates used in the EIR analysis may be too low. As noted in Master Response 3, these rates were chosen for use in the EIR based on consultation with the PAUSD. In its comments on the Supplement to the Draft EIR, PAUSD recommends calculating a range of student generation numbers due to the small number of development projects. Master Response 3 applies PAUSD's moderate 2015 student generation rates for the low and high ends of the housing range for the preferred scenario using PAUSD's lowest (i.e., multi-family) and highest (i.e., single-family detached) generation rates to show a range of the potential student generation under the preferred scenario. Please see Master Response 3 for a comprehensive response to several comments received on the schools analysis in the February 2016 Draft EIR and Supplement to the Draft EIR.
SUPP-PH2-7	The other area where I had questions was in the transportation section and Table 4 point, I mean Page 4.1346 and basically these are the assumptions that rely on Caltrain electrification and Bus Rapid Transit (BRT). I have a concern in general that too many cities up and down and institutions up and down the whole Caltrain corridor are relying on a capacity that will never be there even with electrification. In other words so many people are claiming, so many cities are claiming we'll get people out, we'll give free passes, we'll get people off and I'm just on the train and out of their cars and I'm just really concerned	The Caltrain electrification project was included in the modeling process by including more frequent service during peak hours and faster travel times for passengers. By increasing frequency and reducing travel times, transit was assumed to become a more attractive option and the model assigned more riders to Caltrain. Caltrain has posted an updated chart regarding capacity

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	that that capacity has been wildly overestimated. So there's electrification who knows what the status is of that now because of what's going on in Washington. My understanding is that electrification will only increase capacity by about 20 percent and that lately the annual rate of ridership has been increasing annually 10 percent so we're already kind of behind the eight ball even if electrification happens.	improvements with the electrification project on its website (see www.Caltrain.com/projectsplans/CaltrainModernization/Modernization/PeninsulaCorridorElectrificationProject/Capacity.html). The chart shows a 31 percent increase in system capacity by 2021. Longer term, when the fleet is 100 percent electrified and can run eight-car trains, the system capacity will increase by 57 percent. Based on this information, the capacity increase is expected to be greater than the commenter's estimate of 20 percent. Please also note that the Federal Transit Administration has approved the Caltrain electrification project. Therefore, it is reasonable to assume that the capacity increase from electrification will be available by Comp Plan's horizon year of 2030.
SUPP-PH2-8	And I'm also concerned about the uncertainties with regards to the blended system with high speed rail and I know that Caltrain has already a Memorandum of Understanding (MOU) to have that blended system work. And so is that actually going to then diminish the capacity for Caltrain use? So the idea I think was to have in peak hours, rush hours was to have six, but who knows if this is ever going to happen and this is why I think relying on Caltrain is pretty overly optimistic. So I think the peak hours it was understood in the blended system there'd be six trains for Caltrain and four for high speed rail which might even be a reduction if high speed rail ever comes up the Peninsula which might even be a reduction of our increase. I'm just very concerned that there are too many unknowns and an oversubscribed, overly optimistic, unrealistic dependence on a capacity that really doesn't exist in Caltrain.	Please see Response SUPP-PH2-7. In addition, the City notes that the timing of the Caltrain electrification and high speed rail projects are not yet certain; the assumption at the time that the Notice of Preparation was prepared was that these projects would move forward and be completed by 2030. The City believes it is reasonable to assume that these projects will be funded and constructed by 2030.
SUPP-PH2-9	The other thing on the same in the same page is about BRT. So I'm concerned about that too because BRT to me so the City Council and maybe they'll be a change in the City Council's opinion on this, but they said no to BRT in Palo Alto not too long ago. And I'm also concerned that bus we don't I didn't see in here and I could have missed it because it's a pretty big document. I didn't see ridership, Santa Clara Valley Transportation Authority (VTA) ridership numbers in here and the VTA is currently cutting bus service to the north county because of a lack of ridership. So I'm worried we'll never get BRT and I'm also worried that the BRT does what the 522 bus already does. It's an express system that goes in the same, on same exact, in the same place. So I don't think that any additional capacity	The commenter is correct that the BRT service as included in the model used for the EIR analysis is fairly similar to the existing Route 522: Express bus service on the El Camino Real corridor. The analysis includes queue jump lanes (which allow the buses to get through signals more quickly) in modeling Scenarios 4 and 6, and the preferred scenario, but does not include exclusive lanes for buses. VTA bus ridership estimates for each scenario are included in the

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	of transit has been added here and I think what we're relying on to as improvements are very unreliable so that concerns me.	Supplemental TIA (see TIA Table 4). The commenter also notes that VTA has proposed (as of the March meeting date) to cut service in north county. The VTA Board has now approved those service changes, which include increased service in some areas, but reduced service in low ridership areas. Please see VTA comments (Letter GOV5) on the Draft EIR for their supportive comments about the ideas articulated in the EIR and the Draft Plan.
SUPP-PH2-10	So it's a schools and transportation oh, and in the hazardous materials area recently because of a lot of the replacement of the original buildings in the Stanford Research Park (SRP) I think there's been a more complete understanding of the nature of the toxic plume under the Research Park. Higher intensities have been found and it's even been found to be drifting off into adjacent neighborhoods. All of that is very up in the air, but I would think it would be appropriate for this EIR to recommend a real comprehensive study of the plume and where it's going. I mean I know that you guys know this has come up in where I live in College Terrace and some it's still under California Department of Toxic Substances Control (DTSC). They're still they haven't made a final determination, but it just seems like it would be good especially since those old buildings are being torn down and repurposed in the Research Park to have a understanding of where that toxic plume is really going and if and then follow up with mitigations if necessary.	The comment is noted. The proposed Plan does not include any policies or actions that would exacerbate existing hazards. As noted in Chapter 4.7, Hazards and Hazardous Materials, compliance with applicable existing laws and regulations regarding cleanup and reuse of a listed hazardous material sites would ensure that no impacts would occur as new development is allowed under the proposed Plan. The proposed Plan includes policies intended to address concerns regarding existing hazards, including Policies S-3.2 and S-3.3. Under Policy S-3.2, the City will continue working with appropriate agencies to identify and clean up hazardous waste sites and contaminated groundwater. Under Policy S-3.3, the City will require, as part of development review, property owners and private entities to disclose the presence of contaminated soil or groundwater, identify potential health impacts, prevent vapor intrusion, and remediate contamination.