# City of Palo Alto

**Department of Planning & Community Environment**  
**California Environmental Quality Act**  
**INITIAL STUDY AND ENVIRONMENTAL CHECKLIST FORM**

1. **Project Title:**  
   City of Palo Alto Public Safety Building (PSB) at 250 Sherman and Parking Structure at 350 Sherman (aka California Avenue Parking Garage)

2. **Lead Agency Name and Address:**  
   City of Palo Alto  
   250 Hamilton Avenue  
   Palo Alto, California 94301

3. **Contact Person and Phone Number:**  
   Matt Raschke, Senior Engineer  
   Department of Public Works  
   Telephone: (650) 329-2151  
   Fax: (650) 329-2154  
   Email: Matt.Raschke@cityofpaloalto.org

4. **Project Location:**  
   250 and 350 Sherman, in the California Avenue Business District, bound by Sherman Avenue to the southeast, Jacaranda Lane to the northwest, Ash Street to the southwest, and Park Boulevard to the northeast, and bisected by Birch Street, within the city of Palo Alto, Santa Clara County, California. See Figures 1 and 2.

5. **Project Sponsor's Name and Address:**  
   City of Palo Alto  
   250 Hamilton Avenue  
   Palo Alto, California 94301

6. **General Plan Designation:**  
   350 Sherman: Regional Community Commercial  
   250 Sherman: Public Facilities

7. **Zoning:**  
   350 Sherman: Public Facilities (PF)  
   250 Sherman: Public Facilities (PF)

8. **Existing Plan Area Land Uses:**  
   The project site is comprised of two city blocks fronting Sherman Avenue. Across Sherman Avenue from the proposed PSB is the Santa Clara County Courthouse and parking lot. Properties fronting Ash Avenue between Grant Avenue and Sherman Avenue include multiple-family residential uses and Sarah Wallis Park. Land uses along Park Boulevard from Grant Avenue to Sherman Avenue include office/commercial uses, including several restaurants.
9. Description of Project:

(a) Proposed Public Safety Building. The City of Palo Alto (City/project applicant) proposes to relocate the City’s Police Department, Fire Administration, Emergency Communications Center (911), Office of Emergency Services, Emergency Operations Center (EOC), and associated parking and other support spaces from their current downtown location at the Palo Alto Civic Center at 275 Forest Avenue, Palo Alto, California, to a new adequately sized Public Safety Building (PSB) facility at 250 Sherman Avenue, designed to meet the operational and essential facility standards for police and emergency service providers. The City also proposes to construct a new public parking garage at 350 Sherman Avenue, to provide 150 to 330 net new public parking stalls for the California Avenue commercial area. The construction of the Public Safety Building and adjacent parking garage comprise the project. (It is assumed that space vacated in the civic center will be backfilled with new City employees, and no substantive change in use will occur at that location.)

The project site is comprised of two City-owned surface parking lots designated as Lot C-6 and Lot C-7 on Sherman
Avenue between Ash Street and Park Boulevard in the California Avenue commercial area in Palo Alto. The construction of the PSB on the 1.2-acre Lot C-6 (250 Sherman Avenue) will displace approximately 160 existing public parking spaces. Redevelopment of the adjoining 0.93-acre surface parking Lot C-7 (350 Sherman Avenue) for a new garage will displace approximately 150 existing parking spaces. The new parking garage will contain 460 to 640 stalls to replace and increase the parking spaces on-site, for a net increase of 150 to 330 public parking stalls. The construction of the new public parking garage must be complete prior to the start of construction of the new PSB in order to minimize construction disruption to the neighborhood and loss of parking to local merchants.

The project includes three primary elements:

- A new three-story PSB ranging in size from 45,500 square feet (SF) to 50,000 SF, over two levels of secure basement parking providing approximately 170 to 190 total secure parking spaces on Lot C-6 (250 Sherman Avenue), and associated site improvements.

- A new three- to four-level public parking garage over one to two basement parking levels, providing 460 to 640 spaces on Lot C-7 (350 Sherman Avenue), and associated site improvements.

- An approximately 4,200 SF to 4,700 SF multi- or single-tenant commercial shell space building fronting Birch Street, to be used as commercial retail space for new or existing businesses. This retail component is an option that would accompany a public parking garage of 460 to 640 spaces. Without the retail component, the parking garage would accommodate 522 to 640 parking spaces.

The principal components of the project are listed below.

- Demolition and Site Preparation: The existing site improvements on parking Lots C-6 and C-7 will be demolished and removed, including all existing landscaping and trees. Combined, approximately 2.13 acres of existing site improvements will be demolished and removed. Both sites will be excavated to allow for basement construction and all excavation spoils off-hauled and legally disposed of. Additional demolition, patching, and repair under all City streets bounding the project will be required for the potential relocation or connection of the project to City utilities.

- Public Safety Building (PSB): The PSB is planned to be a three-story, 45,500 SF to 50,000 SF building, approximately 50 feet tall, over two levels of secure below-grade parking. The PSB will be approximately rectangular in shape with an articulated façade, constructed with an interior light well, and set back from the property line by an approximately 25-foot security standoff distance. Per City zoning guidelines, building equipment penthouse spaces (e.g., for elevators and stairs) may exceed the 50-foot building height limit.

- Public Safety Building Basement Garage: The PSB will include an approximately 101,000 SF secure parking basement with 170 to 190 parking spaces for police and staff. In addition to parking of police and staff vehicles, a variety of programmatic functions associated with police operations will also be located in the basement. The PSB basement will be served by two vehicle ramps. The primary two-way ramp will be located on Sherman Avenue, approximately 85 feet to the center of the ramp from the corner of Park Boulevard. The secondary ramp will be located on Birch Street, approximately 136 feet from the corner of Sherman Avenue. Visitor parking for the PSB will be available in the project's new public parking garage across the street from the main entry on Birch Street.

- Public Safety Building Exterior Operations Yard: The PSB will include an approximately 10,000 SF to 15,000 SF visually screened, secure exterior vehicle parking and staging area and associated one-story site support buildings. The PSB's emergency generator, chiller plant, and other building systems will be located in an accessory structure(s) at this location.

- California Avenue Parking Garage: The approximately 166,200 SF California Avenue Parking Garage will be a three- to four-level parking structure over one to two levels of underground parking, providing an estimated 460 to 640 spaces to replace and increase the approximately 310 parking spaces on-site, for a net increase of
150 to 330 public parking stalls. The overall height of the building will range from approximately 35 to 45 feet including building equipment penthouse spaces (e.g., for elevators and stairs). As currently planned, the garage will require changes to the zoning district (from Public Facilities to another zone) or changes to the text of the zoning ordinance to allow for the planned lot coverage, Floor Area Ratio (FAR), height, and setbacks in the Public Facilities zone. The top level of the garage may include carport shade structures supporting photovoltaic panels (PV) feeding to the PSB’s electrical system. The height of the carport support system above the top parking deck will be approximately 8 feet to 10 feet above finish deck. The garage will have one (1) two-way entry/exit onto Sherman Avenue, approximately 90 feet to center of ramp west from the corner of Birch Street.

- **Commercial Shell Space Building:** A new single- or multi-tenant 16-foot to 24-foot tall, 4,200 SF to 4,700 SF single-story commercial building will be located adjacent to the new parking garage fronting Birch Street. This project element will be used as retail space for new or existing businesses to be leased out by the City of Palo Alto. The retail space will be designed to integrate the public garage façade into the commercial fabric of the neighborhood. This retail component is an option that would accompany a public parking garage of 460 to 640 spaces. Without the retail component, the parking garage would accommodate 522 to 640 parking spaces.

- **Communications Tower:** The PSB will include an approximately 135-feet above finish grade communications tower on which will be mounted a mixed array of whip antennas and parabolic antenna dishes. The communications tower may be attached to the PSB or ground mounted.

- **Site Circulation and On-Street Parking:** The PSB and California Avenue Parking Garage lots are bounded on all sides by City streets. There are no anticipated changes in the existing site’s vehicular or pedestrian circulation except at Jacaranda Lane. Jacaranda Lane is a service alley located on what will be the north edge of both buildings. Vehicular access to the portion of Jacaranda Lane adjacent to the PSB will be restricted to authorized entry and business owners only. Public parking will be prohibited on a portion of Jacaranda Lane and Sherman Avenue directly adjacent to the PSB. Parking spaces for oversized emergency vehicles, including fire engines, will be provided adjacent to the PSB on Sherman Avenue and Jacaranda Lane.

- **Parking and Deliveries:** All public parking will be located in the new public parking garage. All police vehicle and staff parking will be in the PSB basement or in the surface exterior operations yard. PSB trash pick-up and deliveries will be in the operations yard. Trash pick-up for the garage and commercial building will be in a service apron on Sherman Avenue between those two structures. Authorized small truck deliveries could take place in the PSB basement.

- **Architectural Design:** The project features contemporary architectural design carefully focusing on appropriate site planning, context, massing, scale, style, and materials and finishes, and subject to review and a recommendation by the City of Palo Alto Architectural Review Board (ARB). The City Council will receive the ARB’s recommendation and make a final decision on the architectural design of the parking garage, the PSB, and associated landscaping and site improvements.

- **Sustainable LEED Silver or Higher Certified Design:** The PSB portion of the project will be designed and built in conformance with the City’s Green Building Policy, which requires LEED Silver or higher, and will be registered and certified with the United States Green Building Council as LEED Silver or higher.

- **Public Plazas:** The project will include a new exterior public plaza including hardscape, street furniture, and landscape plantings on Birch Street in front of the PSB, and a small public plaza space at the parking garage pedestrian entry on Birch Street on the property corner closest to California Avenue.

- **Landscaping:** The City proposes to provide partial replacement of trees removed from the existing lots on-site and planted landscape areas for both sites. Street tree bulb-outs will be provided for tree planting areas along Sherman Avenue in the current parking zone adjacent to the proposed new parking garage. The street-level roof deck of the PSB basement garage will be landscaped. Planted areas on both sites may function as biofiltration and storm water retention systems for the project.
• Storm Water: The project will remain connected to the City’s storm drain system and may include a system to capture, store, and reuse rainwater to support landscape irrigation.

• Water Supply: Potable water will be provided to the project through the existing City system.

• Sanitary Sewer: Sanitary sewer service will be provided through the existing City system.

• Utilities and Services: Electricity and natural gas will be provided through the City’s grid. Solid waste recycling and trash removal will be provided through City contracted haulers.

(b) Background. The current 25,000 SF Palo Alto Police Department facility was originally constructed in 1970. Numerous City-sponsored studies beginning in 1997, through the City’s 2014 City Council Infrastructure Plan, identified and substantiated the need for a new PSB facility. The current facility is undersized by approximately 20,000 SF and does not meet current seismic, security, survivability, accessibility, and regulatory code requirements applicable to an essential facility. A variety of sites were considered for the project over the past 17 years, including renovating and expanding the current police facilities at the City Hall location. None of these options proved feasible or were completed. The project meets the projected long-term facility requirements of the Palo Alto Police Department.

(c) Objectives. The objectives of the project are to provide 150 to 250 new public parking stalls for the California Avenue commercial area and to relocate the City of Palo Alto Police Department, Fire Administration, Emergency Communications Center (911), Office of Emergency Services, and Emergency Operations Center (EOC) from their current downtown Civic Center location at 275 Forest Avenue. The existing facility’s size, security, and safety have become increasingly inadequate over the past 47 years. The current facility no longer meets the standards for an essential facility and lacks the necessary redundancy, hardening, and survivability necessary to support the mission of the City of Palo Alto’s emergency service providers. The project will provide a new facility designed for Immediate Occupancy (IO) per the California Building Code (CBC).

10. Required Approvals:

The proposed project is within the City’s jurisdiction and will require approval from the City Council. As currently planned, the proposed parking garage will require changes to the zoning district (from Public Facilities to another zone) or changes to the text of the zoning ordinance to allow for the planned lot coverage, Floor Area Ratio (FAR), height, and setbacks in the Public Facilities zone.

11. Tribal Consultation:

Pursuant to Public Resources Code section 21080.3.1, California Native American tribes traditionally and culturally affiliated with the project will be contacted during the EIR preparation process.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- [ ] Aesthetics
- [ ] Agricultural and Forestry Resources
- [ ] Air Quality
- [ ] Biological Resources
- [ ] Cultural Resources
- [ ] Geology/Soils
- [ ] Greenhouse Gas Emissions
- [ ] Hazards & Hazardous Materials
- [ ] Hydrology/Water Quality
- [ ] Land Use/Planning
- [ ] Mineral Resources
- [ ] Noise
- [ ] Population/Housing
- [ ] Public Services
- [ ] Recreation
- [ ] Transportation/Traffic
- [ ] Utilities/Service Systems
- [ ] Energy
- [ ] Mandatory Findings of Significance
DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated impact." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project COULD have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by:

[Signature]
Ray Pendro, CEQA Project Manager
MiG, Inc.

Reviewed by:

[Signature]
Amy French
Chief Planning Official
City of Palo Alto

Date: March 20, 2017
Date: 3/28/17
ENVIRONMENTAL IMPACTS:

I. AESTHETICS. Would the project:

a) Have a substantial adverse effect on a scenic vista?

The project site and immediate vicinity are flat. Existing views are of a built environment that include mixed use/commercial buildings, parking lots, and several residences. There are no views of scenic vistas from the project site. This issue will not be evaluated in the EIR.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no designated or eligible Santa Clara County scenic roads within one mile of the project site. This issue will not be evaluated in the EIR.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Changes associated with the Public Safety Building (PSB) and parking garage could affect the visual character of specific locations and adjacent buildings at the edges of the project site, including the potential for shadow impacts. The EIR will evaluate the impacts of the proposed project on the visual character and quality of the project site and its surroundings, including the presentation of visual simulations.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Existing sources of nighttime light within and around the project site include those common to urban areas, including street lights, parking lot lighting, building lighting, signs, vehicle headlamps, and interior lighting visible through windows. Glare is created by the reflection of sunlight and artificial light off windows, buildings, and other surfaces in the day, and from inadequately shielded and improperly directed light sources at night. Development of the PSB project in
accordance with the City of Palo Alto’s Comprehensive Plan and the California Avenue Concept Plan could cause substantial spill light, glare, and sky glow that may create a nuisance for adjacent sensitive residential uses or adversely affect community character. The EIR will evaluate potential light and glare impacts.

e) Substantially shadow public open space (other than public streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21?

There are no public spaces immediately adjacent to the project site. The nearest public space is Sarah Wallis Park, located at Grant and Ash Streets, approximately one-half block to the south and obscured from the project site by existing buildings. This issue will not be evaluated in the EIR.

II. AGRICULTURAL AND FORESTRY RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.) Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The California Department of Conservation Farmland Mapping and Monitoring Program monitors the conversion of agricultural land to urban uses throughout the state, using classifications of important farmlands. Lands designated as Prime Farmland, Unique
Farmland, or Farmland of Statewide Importance are considered important farmlands for purposes of the California Environmental Quality Act (CEQA). The project site is designated Urban and Built Up Land by the Department of Conservation. The proposed project would have no impact on important farmlands. This issue will not be evaluated in the EIR.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site and the surrounding area are urbanized, not zoned for agricultural use, and do not contain any lands under Williamson Act contracts. The proposed project would have no impact on agricultural zoning or Williamson Act contracts. This issue will not be evaluated in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The project site and the surrounding area are urbanized and not zoned for forest land or timberland. There are no lands in the vicinity of the project site that are planned, used, or managed for forest land or timber production. The proposed project would have no impact on timberland or forest resources. This issue will not be evaluated in the EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

There is no forest land within or near the project site. The proposed project would have no impact on timberland or forest resources. This issue will not be evaluated in the EIR.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

There is no farmland or forest land within or near the project site. The proposed project does not involve any changes which could directly or indirectly result in conversion of
farmland to non-agricultural use or conversion

of forest land to non-forest use. This issue will
not be evaluated in the EIR.

III. AIR QUALITY. (Where available, the significance
criteria established by the applicable air quality
management or air pollution control district may
be relied upon to make the following
determinations.) Would the project:

a) Conflict with or obstruct implementation of the
applicable air quality plan? (such as the Bay
Area Clean Air Plan)

The consistency of the proposed PSB project
with adopted, applicable air quality plans will
be evaluated in the EIR.

b) Violate any air quality standard or contribute
substantially to an existing or projected air
quality violation?

Development of the proposed project could
generate emissions of criteria air pollutants
from mobile sources (increases in motor
vehicle trips and changes in traffic
congestion), area sources (water heaters,
aricultural coatings, landscaping
maintenance equipment) and stationary
sources (boilers, fueling stations) that exceed
Bay Area Air Quality Management District
(BAAQMD) significance thresholds. The
regulated regional air pollutants of greatest
concern and potential impact are fugitive dust
or particulate matter 10 microns or smaller in
diameter (PM$_{10}$) and 2.5 microns or smaller in
diameter (PM$_{2.5}$), and the precursors to
ozone, which are reactive organic gases
(ROG) and nitrogen oxides (NO$_x$).

Construction activities generate dust, exhaust
emissions, and certain construction materials
can evaporate and contribute to urban ozone.

Operational activities could generate
additional vehicle trips relative to use of the
existing PSB at 275 Forest Avenue. This
issue will be evaluated in the EIR.

c) Result in a cumulatively considerable net
increase of any criteria pollutant for which the
project region is non-attainment under an
applicable federal or state ambient air quality
standard (including releasing emissions which
exceed quantitative thresholds for ozone
precursors)?
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See item III.b above.
d) Expose sensitive receptors to substantial pollutant concentrations?

See item III.b above.

e) Create objectionable odors affecting a substantial number of people?

The PSB project is not expected to generate objectionable odors that affect a substantial number of people. There are not any planned uses (e.g., manufacturing processes) that would create objectionable odors. This issue will not be analyzed in the EIR.

IV. BIOLOGICAL RESOURCES. Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special-status species are plants and animals that are legally protected under the State and/or federal Endangered Species Acts or other regulations, as well as other species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration. Species with legal protection under the Endangered Species Acts may represent constraints to development, particularly when they are wide-ranging or highly sensitive to habitat disturbance and where proposed development would result in a "take" of these species. Bird nests in active use are protected under the federal Migratory Bird Treaty Act, and raptor nests are further protected under Section 3503.5 of the California Fish and Game Code when in active use.

There are multiple trees that surround the two surface parking areas that comprise the project site. These trees could provide nesting habitat for raptor species and habitat for sensitive bat species. Some raptor species, like Cooper’s hawk (Accipiter cooperii, a state species of special concern on its nesting sites) are specifically listed as sensitive, and all raptor species are protected while nesting by Fish and Game Code Section 3503.5. Sensitive bat species with potential for occurrence in large trees and groves include
the pallid bat (Antrozous pallidus, a State species of special concern), Townsend's big-eared bat (Plecotus townsendii), and Myotis species. These bat species have no legal protection under federal or State Endangered Species Act, but may meet the criteria of section 15380 of the CEQA Guidelines. Therefore, this issue will be evaluated in the EIR.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The State of California recognizes some plant communities as sensitive natural communities if they are uncommon, regionally declining, or vulnerable. Among these communities are riparian habitat, coast live oak forest, freshwater seeps, freshwater marshes, and coastal salt marsh. However, there is no riparian habitat or other sensitive natural community within or adjacent to the project area. The project would have no impact on riparian habitat or other sensitive natural community. This issue will not be evaluated in the EIR.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Although definitions vary, wetlands are generally considered to be areas that are periodically or permanently inundated by surface or groundwater, and support vegetation adapted to life in saturated soil. Wetlands are recognized as important features on a regional and national level due to their inherent value to fish and wildlife; use as storage areas for storm water and floodwaters; and water recharge, filtration, and purification functions.

The U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) have jurisdiction over modifications to wetlands and other "waters of the United States." Corps jurisdiction is established through provisions of Section 404 of the Clean Water Act, which prohibits the
discharge of dredged or fill material into "waters of the United States" without a permit. RWQCB jurisdiction is established through Section 401 of the Clean Water Act, which requires certification or waiver for water quality whenever a Corps permit is required under Section 404 of the Clean Water Act. CDFW jurisdiction is established under Sections 1600-1607 of the State Fish and Game Code, which pertains to activities that would substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake. Any such activities require a Streambed Alteration Agreement to be issued by CDFW prior to project construction.

According to the U.S. Fish and Wildlife Service Wetlands Mapper, there are no wetlands or jurisdictional waters in or near the project site. There is a creek that bisects John Boulware Park, about one mile southeast of the project site. The proposed project would not involve the direct removal or fill of wetlands or indirectly affect the hydrology, soil, vegetation, or wildlife of wetlands. This issue will not be evaluated in the EIR.

d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Wildlife use on the project site is expected to be relatively low due to the absence of natural habitat, the proximity to streets in a mostly built environment adjacent to the project site, and the lack of protective cover. Birds (e.g., house sparrow, starling, crow) and wildlife such as opossums and small rodents typically associated with developed commercial properties would be expected to occur. The project site is surrounded by the built environment, and therefore is limited as a potential wildlife movement corridor. Trees on the project site could potentially provide nesting habitat for small songbirds; nesting birds are protected by the Migratory Bird Treaty Act and the California Fish and Game Code. The project would have a less-than-significant impact on wildlife movement or native wildlife nursery sites. This issue will not be evaluated in the EIR.
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No portion of the project site is located in the following land use designation categories: Open Space/Controlled Development, Streamside Open Space, or Publicly-owned Conservation Land (Palo Alto Comprehensive Plan, Land Use Designation Map). In addition, the proposed project will be subject to the City’s Heritage Tree Ordinance. The findings of the site-specific tree survey report prepared for the project (David L. Babby, 2016) will be reported and applicable tree preservation/replacement regulations explained.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved, local, regional, or State habitat conservation plan?

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other adopted habitat conservation plan applicable to the project site. This issue will not be evaluated in the EIR.

V. CULTURAL RESOURCES. Would the project:

a) Adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City’s Historic Inventory?

The State Office of Historic Preservation has determined that buildings, structures, and objects 45 years or older may be of historical value. The 1979 Historic Resources Inventory of the City of Palo Alto shows two historic properties on 1795 and 2110 Park Boulevard; these properties are located about one mile north of the project site. One historic property was identified adjacent to the project site in the most recent historic resources survey of 1998; the proposed project will be studied for impacts on this historic resource. Other adjacent buildings constructed in the 1950s have not been studied for potential historic eligibility since the 1998 survey was completed; the EIR will assess the proposed project’s compatibility with these adjacent buildings.
b) Eliminate important examples of major periods of California history or prehistory?

See V.a above regarding historic resources.

At the time of Euro-American contact, Native Americans in the Bay Area typically lived along alluvial terraces and the historic margins of San Francisco Bay. The project site was historically along the San Francisco Bay margin, and is therefore a location of high archaeological sensitivity. Ground-disturbing activities during previous development of the site would likely have disturbed archaeological resources that may have existed. Despite the history of site disturbance, the proposed project could potentially disrupt, alter, or eliminate as-yet undiscovered archaeological sites, potentially including Native American remains. This issue will be evaluated in the EIR.

c) Cause a substantial adverse change in the significant of an archaeological resource pursuant to 15064.5?

See V.a and V.b above.

The Holocene Formation, the geologic formation which underlies the project site, is a relatively recent formation (about 12,000 years old). The Holocene Formation is likely to contain only occasional small marine and non-marine invertebrate fossils. Ground-disturbing activities during previous development of the site would likely have disturbed, altered, or eliminated archaeological resources that may have existed. Despite the history of site disturbance, the proposed project could potentially disrupt, alter, or eliminate as-yet undiscovered archaeological resources. This issue will be evaluated in the EIR.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?

There are no dedicated cemeteries located on the project site. However, the project site was historically along the San Francisco Bay margin, and is therefore a location of high archaeological sensitivity. Despite the history of site disturbance, the project could potentially disrupt, alter, or eliminate as-yet undiscovered archaeological resources, potentially including Native American remains. This issue will be evaluated in the EIR.
e) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The Holocene Formation, the geologic formation which underlies the project site, is a relatively recent formation (about 12,000 years old). The Holocene Formation is likely to contain only occasional small marine and non-marine invertebrate fossils. Ground-disturbing activities during previous development of the site would likely have disturbed, altered, or eliminated paleontological resources that may have existed. Despite the history of disturbance, the proposed project could potentially disrupt, alter, or eliminate as-yet undiscovered paleontological resources. This issue will be evaluated in the EIR.

f) **Directly or indirectly destroy a local cultural resource that is recognized by City Council resolution?**

See V.a and V.b above.

g) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**

1) **Listed or eligible for listing on the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or**

2) **A resource determined by a lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of Public Resource Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

See V.b and V.d above. The proposed project has the potential to impact Tribal Cultural Resources. This issue will be discussed in depth in the EIR. Pursuant to
Public Resources Code section 21080.3.1, California Native American tribes traditionally and culturally affiliated with the project will be contacted during the EIR preparation process.

VI. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)

There are no mapped through-going faults within or adjacent to the project site, nor is the project site within an Alquist-Priolo Fault zone. The closest fault is the San Andreas Fault, located about 5.5 miles southwest of the project site. This issue will not be evaluated in the EIR.

ii) Strong seismic ground shaking?

Ground shaking is the most widespread cause of earthquake damage. Most loss of life and injuries during an earthquake are related to the collapse of buildings and structures. The intensity of the ground shaking at a particular site depends on characteristics of the earthquake source (e.g., magnitude, location, and area of causative fault surface), distance from the fault, and amplification effects of local geologic deposits. Project improvements could be exposed to strong seismic ground shaking and related risk of loss or injury in the event of an earthquake on one of the active or potentially active faults in the region. Potential risks to life and property from these seismic hazards would be adequately mitigated by existing laws, regulations, and polices, including the California Building Code and the City’s development review procedures.

Based on the geotechnical report prepared for the proposed project (Romig Engineers, 2016), the primary geotechnical concerns for the proposed project are: (1) the need for temporary shoring of the basement excavations; (2)
the likelihood that ground water will be present above the depth of the basement excavations, requiring dewatering; (3) the need to design and waterproof the floors and walls of the basement and access tunnel; and (4) the likelihood of severe ground shaking during a major earthquake. The geotechnical report’s site-specific mitigation recommendations will be described.

iii) Seismic-related ground failure, including liquefaction?

Soil liquefaction is a process that occurs in water-saturated, unconsolidated sediment due to ground shaking. During liquefaction, soils lose strength and ground failure may occur, affecting structures and improvements. Soils most susceptible to liquefaction are loose to medium dense, saturated granular soils with poor drainage, including Bay mud and artificial fill.

According to the geotechnical report prepared for the proposed project (Romig Engineers, 2016), some portions (sand and sandy silt strata) of the soil could experience liquefaction during an earthquake. However, risks to life and property from these seismic hazards would be adequately mitigated by existing laws, regulations, and polices, including the California Building Code and the City’s development review procedures, which require a site-specific geotechnical investigation be prepared by a licensed professional for proposed developments for seismic design categories C, D, E, and F. The geotechnical investigation would be reviewed by City staff prior to issuance of building permits to ensure compliance. The geotechnical report’s site-specific mitigation recommendations will be described.

iv) Landslides?

The project site is flat and is not subject to landslides. This issue will not be evaluated in the EIR.

v) Expansive soils?

Expansive soils possess a “shrink-swell” characteristic, the cyclic expansion and contraction that occurs in fine-grained clay
sediments from the process of wetting and drying. Structural damage may result over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils.

Expansive soils are likely to be encountered on the project site, given the underlying Holocene Formation and the presence of clayey soils noted in the geotechnical report prepared for the proposed project (Romig Engineers, 2016). However, review and permitting of specific development projects would involve characterization and consideration of site-specific geologic and soils conditions, and implementation of individual project mitigations, where needed. State and local planning, building, and engineering regulations also address structures, excavation, foundations, retaining walls, and grading activities. The geotechnical report's site-specific mitigation recommendations will be described.

b) Result in substantial soil erosion or the loss of topsoil?

The potential for erosion during construction would be subject to the best management practices routinely implemented by the City and required as a condition of project approval for new development. Project construction would involve grading, excavation, or other activities that could temporarily expose disturbed soils to erosion. Construction erosion and water quality impacts are addressed in item IX.a below. The EIR will evaluate potential soil erosion impacts.

c) Be located on a geologic unit or 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?

The project site is generally underlain by the Holocene Formation, a geologic unit of Pleistocene age. According to the project geotechnical report (Romig Engineers, 2016), the potential for lateral spreading is low, but there is some potential for liquefaction. The geotechnical report's site-specific mitigation recommendations will be described. See
VI.a.iii above.

d) Be located on expansive soil, as defined in Table 10-1-D of the Uniform Building Code (1994), creating substantial risks to life or property?

Expansive soils are likely to be encountered on the project site, given the underlying Holocene Formation and the presence of clayey soils noted in the geotechnical report prepared for the proposed project (Romig Engineers, 2016). The geotechnical report’s site-specific mitigation recommendations will be described.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No use of septic tanks or alternative wastewater disposal systems are proposed for the project site. Therefore, the proposed project would have no impact related to the capacity of local soils to effectively accommodate septic systems. This issue will not be evaluated in the EIR.

f) Expose people or property to major geologic hazards that cannot be mitigated through the use of standard engineering design and seismic safety techniques?

See VI.a.ii, iii, and v; and VI.b, c, and d, above. The geotechnical report’s site-specific mitigation recommendations will be described.

VII. GREENHOUSE GAS EMISSIONS. Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Future development of the proposed project could result in an increase in greenhouse gas emissions due primarily to potential increases in vehicle miles traveled, energy use, consumer product use, and solid waste. The greenhouse gas emissions increase may exceed the BAAQMD significance thresholds. The EIR will evaluate greenhouse gas emissions impacts.
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Future development under the proposed project could result in an increase in greenhouse gas emissions that would conflict with or impede the achievement of the California Global Warming Solutions Act of 2006 (AB 32) greenhouse gas reduction goals. The EIR will evaluate greenhouse gas emissions impacts.

VIII. HAZARDS AND HAZARDOUS MATERIALS.
Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Hazardous substances may be generated, stored, transported, used, or disposed of in association with future activities allowed under the proposed project. The proposed project is to construct a new PSB and public parking garage. Uses of the new PSB could involve use of firearms, explosives, and hazardous chemicals. These uses could result in potentially significant impacts, and therefore this issue will be evaluated in the EIR. Departmental protocols for handling, storing, transporting, and disposing of these substances will be described.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

See VIII.a above.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no schools within one quarter mile of the project site. The EIR will not evaluate this issue.

d) 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 ground soil
and groundwater cleanup goals developed for the site or from the location on listed hazardous materials sites compiled pursuant to Government Code section 65962.5?

Given the long history of development within the project vicinity, there may be locations adjacent to the project site that are included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 (Cortese List).

According to the Phase I ESA, the project site is located within the California-Olive-Emerson (COE) groundwater study area. Groundwater containing releases of Volatile Organic Compounds (VOCs) have migrated into this area from releases from the former Hewlett Packard (HP) site at 640 Page Mill Road. Existing hazardous materials contamination sites could pose a risk to human health or the environment. The EIR will evaluate this potential impact.

e) 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, would the project result in a safety hazard for people residing or working in the project area?

The project site is not located within two miles of the Palo Alto Airport, or within the Palo Alto Airport Land Use Plan area. Impacts to people working on the project site would be less than significant. This issue will not be evaluated in the EIR.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No private airstrip exists in the project vicinity. This issue will not be evaluated in the EIR.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Traffic from future development under the proposed project would shift existing vehicle trips for emergency police calls from 275 Forest Avenue to the new PSB project site. Traffic congestion associated with the new PSB could potentially interfere with an
adopted emergency response plan or evacuation plan. This issue will be more fully evaluated in the EIR.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

According to the Santa Clara County Fire Hazards Map, the City of Palo Alto is not in a moderate, high, or very high fuel hazard zone. Moreover, the project site and vicinity are a built environment largely devoid of wildfire-prone vegetation (e.g., expanses of grasses and shrubs). This issue will not be evaluated in the EIR.

IX. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standards or waste discharge requirements?

Storm water runoff from impervious surfaces on the project site could degrade water quality in downstream receiving waters and San Francisco Bay. The San Francisco Bay Regional Water Quality Control Board (RWQCB) Municipal Regional Permit Provision C.3 requirements apply to projects that create or replace more than 10,000 square feet of impervious area (5,000 square feet for certain types of projects). Project applicants must prepare and implement a Stormwater Control Plan containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the storm water treatment and flow-control facilities are maintained in perpetuity.

Construction activities disturbing more than one acre would be required to submit a Notice of Intent (NOI) to the RWQCB to be covered by the State's General Construction Permit before beginning construction, which would require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) containing Best Management Practices (BMPs) that would be implemented during construction. The EIR will evaluate potential construction and operational water
b) Substantially deplete groundwater supplies 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

According to the City of Palo Alto Urban Water Management Plan, the City does not use groundwater during normal water years. Therefore, impacts to groundwater supplies or recharge would be less-than-significant. The EIR will not evaluate this issue.

c) Substantially alter the existing drainage pattern (increase the rate, volume, or flow duration of storm water runoff) of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in new or increased flooding on or off-site?

The proposed project does not propose changes to existing drainage patterns. The area to be developed consists of two surface parking areas that are impervious surfaces. The proposed project would disturb more than one acre and would be required to submit a Notice of Intent (NOI) to the RWQCB to be covered by the State's General Construction Permit before beginning construction, which would require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) containing Best Management Practices (BMPs) that would be implemented during construction. The EIR will evaluate the potential impacts of needed drainage improvements as well as the potential construction and operational water quality impacts.

d) Result in stream bank instability?

The project site is no located near a stream. The EIR will not evaluate this issue.

e) Significantly alter the existing drainage pattern (increase the rate, volume, or flow duration) of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of
surface runoff in a manner which would result in flooding on- or off-site?

See IX.c above. The EIR will evaluate the potential impacts of needed drainage improvements and potential for on- or off-site flooding. Also see IX.h below.

f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

See IX.a and IX.c above.

g) Provide substantial additional sources of pollutants associated with urban runoff or otherwise substantially degrade water quality?

See IX.a and IX.c above.

h) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Although Palo Alto contains no areas within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, portions of the project area occasionally flood during combined high tides and heavy rain, due to inadequate storm drains, low elevation, and silt and debris obstruction of the storm drain system.

Additionally, regional sea level rise predictions for the San Francisco Bay region predict a 16-inch rise in sea level by mid-century and a 55-inch rise by the end of the century. Portions of the project area are subject to flooding due to sea level rise associated with global climate change. However, for sea level rise to impact the project site, it would have to first inundate most of Palo Alto Airport, and regional mitigation strategies directed at the airport may also protect Palo Alto. The EIR will evaluate potential flood hazard impacts.

i) Place within a 100-year flood hazard area structures which would impede or redirect flood flows

See IX.h above.

j) Expose people or structures to a significant risk of loss, injury or death involving flooding,
including flooding as a result of the failure of a levee or dam?

Based on Figure 7-5: Dam Inundation, from the Palo Alto Comprehensive Plan Update Existing Conditions report, the project area is located within a Dam Inundation Area for Lake Lagunita, and possibly Searsville Lake. This issue will be analyzed in the EIR.

k) Result in inundation by seiche, tsunami, or mudflow?

A seiche is a tidal change in an enclosed or semi-enclosed water body caused by sustained high winds or an earthquake. The project site is not located close enough to San Francisco Bay to be affected by a seiche. A tsunami is a series of waves created when a body of water such as an ocean is rapidly displaced on a massive scale, most commonly as the result of an earthquake. Palo Alto is not in a tsunami/seiche area. The EIR will not address this issue.

X. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?

Development of the proposed project was anticipated in the California Avenue Area Concept Plan (refer to Policy CAP-1.9). The proposed project will need to be integrated into its surrounding environment without disrupting commercial and residential uses. The EIR will evaluate potential impacts on the physical arrangement of the community.

b) Conflict with any applicable City land use plan, policy, or regulation (including but not limited to the Comprehensive Plan, CAP, or the City’s Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

i) Substantially adversely change the type or intensity of existing or planned land use patterns in the area?

ii) Be incompatible with adjacent land uses or with the general character of the surrounding area, including density and building height?

iii) Conflict with established residential, recreational, educational, religious, or scientific uses of an area?
The California Avenue Area Concept Plan (Policy CAP-1.9) anticipated the development of the proposed project. The EIR will evaluate consistency with the Comprehensive Plan, the California Avenue Concept Plan, and other applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No habitat conservation plan or natural community conservation plan is applicable to the project site. The project would have no impact related to conflicts with any applicable habitat conservation plan or natural community conservation plan. The EIR will not evaluate this issue.

XI. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The California Geological Survey (CGS) has classified lands within the San Francisco-Monterey Bay region into Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975. The CGS classified urbanizing lands within the South San Francisco Bay Production-Consumption Region according to the presence or absence of significant sand, gravel, or stone deposits that are suitable as sources of aggregate. Areas classified as MRZ-1 are areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little or no likelihood exists for their presence.

There are no locally important mineral resource recovery sites delineated in the City of Palo Alto. The proposed project would have no impact related to the availability of mineral resources. This issue will not be discussed in the EIR.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?
See XI.a above.

XII. NOISE. Would the project result in:

a) Exposure of persons to or generation of excessive ground borne vibrations or ground borne noise levels?

Demolition and construction activities associated with future development under the proposed project could generate excessive ground borne vibration. During construction, employees that work in the project vicinity could be exposed to excessive ground borne vibration. Employees could also possibly be exposed to ground borne vibration limits exceeding Federal Transit Administration thresholds of significance for frequent events due to Caltrain operations. The EIR will evaluate this issue.

b) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or the municipal code, State standards, or applicable standards of other agencies, including but not limited to:

i) Result in indoor noise levels for residential development to exceed an Ldn of 45 dB?

The proposed project does not involve residential development, so this issue will not be evaluated in the EIR.

ii) Result in instantaneous noise levels of 50dB or more in a bedroom or 55 dB or more measures from other rooms inside a house?

See XII.b.i above.

The EIR will examine if the proposed PSB project would be exposed to other standards relevant to the project – for example, noise standards for outdoor public places, such as the new public plazas proposed by the project.

c) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including:

i) Cause the average 24-hour noise level (Ldn) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the Ldn would remain below 60 dB?
ii) Cause the Ldn to increase by three dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB?

iii) Cause an increase of three dB or more in an existing residential area where the Ldn currently exceeds 60 dB?

Traffic generated by development in accordance with the proposed project could increase traffic noise levels along certain streets and thereby affect residential or other noise-sensitive uses.

The proposed project would generate short-term temporary construction noise. The effects of noise resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive receptors. The EIR will evaluate construction and operation related noise impacts.

d) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Traffic generated by development in accordance with the proposed project could increase traffic noise levels along certain streets and thereby affect residential or other noise-sensitive uses. The EIR will evaluate operations related noise impacts.

e) 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, would the project expose people residing or working in the project area to excessive noise levels?

The project site is not located within two miles of the Palo Alto Airport. The EIR will not evaluate this issue.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No private airstrip exists in the project vicinity. This issue will not be evaluated in the EIR.

XIII. POPULATION AND HOUSING. Would the project:
a) induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The proposed project does not involve new home construction or substantial new business-related construction (as part of the project, approximately 4,200 to 4,700 SF of commercial space is proposed for existing or new businesses). The project would not extend infrastructure to support substantial population growth. The proposed project would relocate and expand the space available for the City’s Police Department, Fire Administration, Emergency Communications Center (911), Office of Emergency Services, and Emergency Operations Center, as well as provide a new public parking garage. No further evaluation is needed.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

The proposed project would be constructed on two lots currently used for surface parking. Existing housing would not be displaced. No further evaluation is needed.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See item XIII.b above.

d) Create a substantial imbalance between employed residents and jobs?

The proposed project would relocate and expand space available for police and emergency services, as well as provide a new public parking garage. The PSB is being designed to support approximately 158 jobs by 2032, a proportion of which could be Palo Alto residents. Since the Census Bureau estimates that Palo Alto's workforce is more than 35,000 people, it is not likely that a substantial imbalance would result between employed residents of Palo Alto and jobs. This issue will not be evaluated in the EIR.

XIV. PUBLIC SERVICES.

Would the project result in substantial adverse
physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a) Result in an adverse physical impact from the construction of additional school facilities in order to maintain acceptable performance standards?

The proposed project is to relocate and expand space available for police and emergency services for the City. Construction and operation of a new PSB and parking garage would not require the construction of new school facilities, parks, recreational facilities, or library facilities. This issue will not be evaluated in the EIR.

The proposed project would include two new public plazas as part of the overall project development and construction.

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

The proposed project would relocate the City’s Police Department, Fire Administration, Emergency Communications Center (911), Office of Emergency Services, Emergency Operations Center (EOC), and associated parking and other support spaces. Construction impacts associated with the project will be described, along with standard City regulations that minimize those impacts (e.g., construction traffic plan) and mitigations already included in other EIR chapters (e.g., construction air quality and noise). These potential impacts will be evaluated in the EIR.

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

See XIV.b above.

d) Result in an adverse physical impact from the construction of additional parks and recreation facilities in order to maintain acceptable performance standards?
See item XIV.a above.

e) Result in an adverse physical impact from the construction of additional library facilities in order to maintain acceptable performance standards?

See item XIV.a above.

XV. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed project would relocate and expand space available for police and emergency services for the City. Since the proposed project would not increase residential uses, it is not expected to noticeably increase use of existing neighborhood or regional parks. The EIR will not evaluate this issue.

The proposed project would include two new public plazas as part of the overall project development and construction.

b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

See XIV.a and XIV.b above.

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a) Cause an intersection to drop below its level of service standard, or if it is already operating at a substandard level of service, deteriorate by more than a specified amount?

Construction and operation of the PSB project could increase traffic congestion and cause intersections to operate below the desired Level of Service (LOS). The EIR will evaluate potential traffic impacts following guidelines of the City Santa Clara Valley Transportation Authority (VTA). Specifically, the EIR will analyze AM and PM peak hour traffic conditions under Existing Conditions, Existing Plus Project Conditions, Background No Project Conditions, Background Plus Project Conditions, Cumulative (2035) No Project
Conditions, and Cumulative Plus Project
Conditions at the following intersections:

1. Park Boulevard / Sherman Avenue*
2. Park Boulevard / Page Mill Road*
3. Birch Street / Sherman Avenue*
4. Birch Street / Grant Street*
5. Birch Street / Sheridan Avenue*
6. Ash Street / California Avenue*
7. El Camino Real / Cambridge Avenue
8. El Camino Real / California Avenue
9. El Camino Real / Page Mill Road
10. Middlefield Road / Oregon Expressway

*Refers to unsignalized intersections.

b) Cause a roadway segment to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service?

See item XVI.a above. Any related impacts on roadway segments also will be evaluated in the EIR.

c) **Cause a freeway segment or ramp to operate at LOS F or contribute traffic in excess of 1 percent of segment capacity to a freeway segment or ramp already operating at LOS F?**

See item XVI.a above. Any related impacts on freeway segments or ramps also will be evaluated in the EIR.

d) **Impede the development or function of planned pedestrian or bicycle facilities.**

The traffic analysis will evaluate the proposed project's impact on existing and any planned pedestrian and bicycle facilities in the project vicinity. This issue will be evaluated in the EIR.

e) **Increase demand for pedestrian and bicycle facilities that cannot be met by current or planned services.**

See item XVI.d above.

f) **Impede the operation of a transit system as a result of congestion or otherwise decrease the performance of safety of such facilities?**

See item XVI.a above. The EIR will evaluate the effects of project-generated traffic on the operation of the transit system.
g) Create demand for transit services that cannot be met by current or planned services?

The EIR will evaluate whether the employees at the new PSB location would create a substantial demand for transit services.

h) Create the potential demand for through traffic to use local residential streets?

The EIR traffic analysis will model changes in LOS at 10 intersections, some of which involve local residential streets. See item XVI.a above.

i) Cause any change in traffic that would increase the Traffic Infusion on Residential Environment (TIRE) index by 0.1 or more?

See item XVI.a above.

j) Create an operational safety hazard?

The proposed project would relocate and provide additional space for police and emergency services for the City. Vehicular circulation on the project site and in relation to the surrounding community is a primary design consideration. The issue will be evaluated in the EIR.

k) Result in inadequate emergency access?

The proposed project would relocate and expand space available for police and emergency services for the City. Depending on how trips are distributed, they could potentially interfere with an existing emergency response plan or an emergency evacuation plan. This issue will be evaluated in the EIR.

l) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The project site is not located within the Palo Alto Airport Land Use Plan area. The project would not generate air travel. This issue will not be evaluated in the EIR.
m) **Cause queuing impacts based on a comparative analysis between the design queue length and the available queue storage capacity?** Queuing impacts include, but are not limited to, spillback queues at project access locations; queues at turn lanes at intersections that block through traffic; queues at lane drops; queues at one intersection that extend back to impact other intersections, and spillback queues on ramps.

See item XVI.a above.

**XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:**

a) **Need new or expanded entitlements to water supply?**

Palo Alto receives 100 percent of its potable water from the San Francisco Public Utilities Commission (SFPUC). The proposed project’s relationship to the City of Palo Alto 2015 Urban Water Management Plan (June 2016) will be evaluated in the EIR.

b) **Result in adverse physical impacts from new or expanded utility facilities due to increased use as a result of the project?**

The utility infrastructure requirements (e.g., water, wastewater, storm drainage), design solutions, and construction protocols of the proposed PSE project will be described in the EIR. Any additional, necessary mitigation will be described.

c) **Result in a substantial physical deterioration of a utility facility due to increased use as a result of the project?**

See item XVII.b above.

d) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

Palo Alto’s wastewater is treated at the Palo Alto Regional Water Quality Control Plant (RWQCP), which also serves the five communities of East Palo Alto, Mountain View, Stanford, Los Altos, and Los Altos Hills. The Long-Range Facilities Plan for the RWQCP, adopted in 2012, found that the existing facilities were operating within normal ranges. The existing secondary and tertiary treatment systems are adequately treating the wastewater to meet the existing discharge...
requirements. Construction and operation of the proposed project will be subject to applicable regional and local water quality standards and regulations. No further evaluation in the EIR is necessary.

e) **Result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?**

See item XVII.d above.

f) **Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

See item XVII.d above.

g) **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The storm water infrastructure requirements, design solutions, and construction protocols of the proposed PSB project will be described in the EIR. Any additional, necessary mitigation will be described.

h) **Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?**

The proposed project would relocate police and emergency services to a new PSB. The new building would generate typical amounts of additional solid waste. Non-recyclable material is transferred to the Kirby Canyon Landfill owned by Waste Management, Inc. Kirby Canyon has sufficient permitted landfill capacity, with a remaining capacity of approximately 21.6 million tons and a total projected capacity of approximately 29 million tons. The project impact would be less-than-significant. The EIR will not evaluate potential impacts related to solid waste disposal capacity.

i) **Comply with federal, state, and local statutes and regulations related to solid waste?**

The proposed project would comply with all federal, State, and local statutes and
regulations related to solid waste. These regulations are described in the Draft EIR for the Comprehensive Plan Update. The final version of the Comprehensive Plan Update is contemplating adding new policies pertaining to the City’s recycling requirements. Should new policies be adopted, the proposed project would need to comply with these additional policies. This issue will not be evaluated in the EIR.

j) Result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities?

The project’s natural gas, electrical, and fuel demands will be evaluated in the EIR, including actions and design solutions for reducing any potential for wasteful, inefficient, and unnecessary consumption of energy, per CEQA Guidelines Appendix F (Energy Conservation).

XVIII. ENERGY

a) Have an energy impact? Energy impacts may include:

i) Impacts resulting from amount and fuel type used for each stage of the project

ii) Impacts on local and regional energy supplies and on requirements for additional capacity

iii) Impacts on peak and base period demands for electricity and other forms of energy

iv) Impacts to energy resources

v) Impacts resulting from the project’s projected transportation energy use requirements

See item XVII.j above.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce
the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Pertaining to the quality of the environment, biological resources, and California history/prehistory, this Initial Study has determined that impacts in the following environmental areas could be significant: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation/traffic, utilities and service systems, and energy.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (*Cumulatively considerable* means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

This Initial Study has determined that some project impacts (e.g., air quality, traffic) could be cumulatively considerable. The EIR will evaluate the potential cumulative impacts of the proposed project in conjunction with other pending and anticipated development in Palo Alto.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Project effects identified in this Initial Study as having possible substantial adverse impacts on human beings, either directly or indirectly, include aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation/traffic, utilities and service systems, and energy.