



Architectural Review Board/ Historic Resources Board

Staff Report (ID # 6735)

Report Type: Study Session **Meeting Date:** 4/21/2016

Summary Title: Comprehensive Plan Draft EIR

Title: Meeting To Accept Public Comments on the Draft EIR for the Comprehensive Plan Update

From: Hillary Gitelman

Lead Department: Planning and Community Environment

RECOMMENDATION

Staff recommends that the Architectural Review Board (ARB) and Historic Resources Board (HRB) hold a public hearing and review the Draft Environmental Impact Report (DEIR) for the Comprehensive Plan Update and provide questions and comments regarding environmental issues and alternatives for inclusion in the Final EIR.

EXECUTIVE SUMMARY

The ARB and HRB are requested to review and provide comments regarding the program DEIR for the Comprehensive Plan Update for inclusion in the Final EIR. The DEIR analyzes four high level scenarios to assess potential impacts of the Updates. The four scenarios were designed to represent a range, testing the potential policy choices that will have to be made as the Comprehensive Plan Update planning process moves forward. Pending feedback from City Council, the DEIR will be supplemented with analysis of a fifth scenario prior to preparation of the Final EIR. The fifth scenario will be further defined by the City Council after the close of the public comment period on the DEIR, and is expected to include slower job growth than any of the other scenarios, as well as implementation of sustainability measures included in the Sustainability and Climate Action Plan (SCAP) that is currently being prepared in parallel to the Comprehensive Plan Update. The Final EIR will include written responses to all substantive comments received on the DEIR and the subsequent analysis of a fifth scenario. The Final EIR must be certified prior to any final decision on the Comprehensive Plan Update. A copy of the DEIR is available for review online at <http://www.paloaltocompplan.org/eir/>.

BACKGROUND

The 1998-2010 Palo Alto Comprehensive Plan (Comp Plan) contains the City's official policies on land use and community design, transportation, housing, the natural environment, business

and economics, community services, and governance. Its policies apply to both public and private properties. Its focus is on the physical form of the City. The Plan is used by the City Council and PTC to evaluate land use changes and to inform funding and budget decisions. It is used by City Staff to regulate building and development and to make recommendations on projects. It is used by citizens and neighborhood groups to understand the City's long-range plans and proposals for different geographic areas. The Plan provides the basis for the City's development regulations and the foundation for its capital improvements program.

A Comprehensive Plan update was initiated by the City Council in 2006 to focus on preservation of commercial land uses, preservation of retail and community services to support new residential growth, incorporate sustainability concepts, update the housing element and prepare concept area plans for East Meadow Circle and California Avenue/Fry's areas. The PTC began work on the Comprehensive Plan Update in 2008 and provided their draft recommendations to the City Council in early 2014. Later in 2014 the Council endorsed a new framework and directed staff to re-frame the ongoing update to the Comprehensive Plan to include broad community engagement, discussion and analysis of alternative futures, cumulative impacts, and mitigation strategies. A "Summit" was held in mid-2015 and a Citizens Advisory Committee (CAC) was appointed to develop recommendations for the City Council's consideration. Based on the current project schedule, the CAC is expected to conclude their work at the end of the year, and the PTC and City Council will review and adopt the updated plan in mid-2017. Later in 2014 the Council endorsed a new framework and directed staff to re-frame the ongoing update to the Comprehensive Plan to include broad community engagement, discussion and analysis of alternative futures, cumulative impacts, and mitigation strategies. A "Summit" was held in mid-2015 and a Citizens Advisory Committee (CAC) was appointed to develop recommendations for the City Council's consideration. Based on the current project schedule, the CAC is expected to conclude their work at the end of the year, and the PTC and City Council will review and adopt the updated plan in mid-2017.

Purpose of the April 21, 2016 Meeting

The purpose of this public hearing is to receive public testimony and to allow the community and the Board, individually and/or as a group, to provide comments and questions regarding the environmental issues and alternatives to be evaluated and responded to in the EIR. A public hearing has already been held before the Planning and Transportation Commission on April 13, 2016.

The California Environmental Quality Act (CEQA) is a state law that requires California agencies to identify the significant environmental impacts of their actions and describe feasible measures that can be taken to avoid or mitigate those impacts. An Environmental Impact Report (EIR) is required by CEQA when an agency determines that a project may have a significant effect on the environment. An EIR evaluates a proposed project's potential impacts on the environment, and recommends mitigation measures or alternatives to reduce or eliminate those impacts. Decision-makers use information in an EIR to help determine whether or not to approve a project. The most common type of EIR assesses potential impacts associated with a specific development project. The Comprehensive Plan Update is not a

specific development project, and instead constitutes an effort by the City of Palo Alto to determine comprehensive land uses, policies, and programs that will guide public and private decision making regarding land use and development issues over the next 15 years.

The City has prepared what is referred to as a Program EIR, which assesses the potential cumulative impacts of development that may occur during the life of the plan, considers potential alternatives, and identifies mitigation measures that should be adopted to reduce or avoid significant impacts. This is the same level of environmental analysis that was prepared for the exiting Palo Alto 1998-2010 Comprehensive Plan. Preparing a Program level EIR for citywide growth allows the City to better identify –and mitigate—cumulative impacts of overall growth that may otherwise be missed in a more focused project specific environmental analysis.

CEQA specifically requires that a program EIR be prepared for plans that govern a continuing program. Although the legally required contents of a program EIR are the same as project specific EIR, such as the one prepared for the golf course project, a program EIR is more conceptual, with a more general discussion of impacts, alternatives and mitigations. Preparation of the program EIR parallels the development of the Comprehensive Plan. This allows the Council and community to be informed on the full range of environmental consequences associated with all critical policy decisions. The final Comprehensive Plan Update cannot legally be approved until the Council certifies the final program EIR. CEQA clearance for subsequent projects can tier off the program EIR. Depending on the complexity of the project, such CEQA clearances can include Negative Declarations and Supplement EIRs.

An EIR describes the objectives for a proposed project, the location of the project and actions proposed. It evaluates how the existing environment would be changed if the project was approved and provides feasible mitigation measures or alternatives to avoid or reduce significant adverse changes to existing conditions.

The Draft EIR was prepared for the Comprehensive Plan Update to examine four alternatives at an equal level of detail, allowing for an informed decision to adopt one of these alternatives at the end of the process, or potentially a blend of the alternatives if desired. The EIR describes and defines the alternatives in sufficient detail to permit an analysis of their potential impacts, and to permit meaningful public input. While this approach is not typical for a project level EIR, a robust analysis of four separate alternatives is warranted for a Comprehensive Plan program level EIR and allows for a more data driven and informed comparison between different growth scenarios. The alternatives assess a variety of land use and infrastructure options, and collectively present a range of possible outcomes to inform a final decision about the future of Palo Alto. A fiscal study on the impacts of the Comp Plan Update has also been prepared.

Notice of Preparation and Notice of Availability

The Notice of Preparation (NOP) was circulated for the Comprehensive Plan Update on May 30, 2014 (http://www.paloaltocomplan.org/wp-content/uploads/2016/02/AppendixA_NOP-NOPComments.pdf). The end of the NOP public review period was specified a June 30 for

public agencies and August 6, 2014 for the general public. All of the input received during the NOP period have been considered during the preparation of the EIR. Five public scoping meetings were held in the form of three public workshops, one PTC meeting and a City Council hearing. Staff received multiple scoping comments from the public via letters and comments during public hearings, and also received three agency comment letters from the Valley Transportation Agency (VTA), the Bay Area Air Quality Management District (BAAQMD) and the California Department of Transportation (Caltrans). All of these comments have been used in preparation of the Draft EIR.

The City prepared a DEIR to provide the public and responsible agencies information about potential adverse effects on the local and regional environment associated with the proposed project. A Notice of Availability/Completion (Attachment A) was prepared and published on February 5, 2016. The DEIR is available for review online on the project website (<http://www.paloaltocompplan.org/eir/>). The extended 90 day public comment period on the DEIR began on February 5, 2016 and runs through May 5, 2016. The public is invited to comment on the DEIR at this time. All substantive comments received during the comment period will be responded to in a Final EIR. An orientation brochure for the DEIR (Attachment C) and the planning process is also available on the Comp Plan website at this following location: <http://paloaltocompplan.org/OurPA2030/index.html>.

DISCUSSION

As noted above, public agencies are required by CEQA to conduct environmental review to identify significant environmental impacts and adopt feasible mitigation prior to making a final decision on a proposed project. This law ensures that decision-makers and the public understand the implications of agency decisions in advance. CEQA was recently referred to as “the tail that wags the planning dog in California”¹ and is an important part of any complex, long-range planning project. Knowing this, the City Council agreed to use the CEQA process to help advance the Comprehensive Plan Update by assessing high-level planning scenarios that illustrate or test various possible policy decisions in the DEIR as described further below.

Like other EIR’s, the Comprehensive Plan DEIR will have a prescribed structure and terminology for conveying its findings. All EIR’s are required to provide detailed analysis for the environmental resources defined in Appendix G of the State CEQA Guidelines. The topics range from aesthetics and cultural resources to greenhouse gas emissions and transportation. Each of these resource topics is evaluated against significance thresholds to judge the severity of the impact on a scale from no impact to significant unavoidable impact, and to determine when mitigation measures are needed to reduce the severity of the impact.

¹Page 14 of “CEQA at 45; Will California Reform its Unique – and Entrenched – Environmental Review Law?” In Planning Magazine, Volume 81, Number 9, October 2015, by William Fulton. Mr. Fulton, who has written the book on planning in California, also notes that CEQA “is wound around every planning process and every planning decision” that is made in the State.

The Comp Plan Update DEIR differs from most EIR's in that it assesses four planning scenarios that are intended to illustrate potential impacts of policy decisions that will have to be made as the Comprehensive Plan Update planning process is completed. By using this innovative approach and going the extra mile to analyze alternatives at an equal level of detail, the Draft EIR is intended to advance and inform the planning process, and not to dictate what its outcome will be.

The Planning Scenarios

At the core the forthcoming Draft EIR are four high level planning scenarios that were designed to test a range of possible land-use, transportation, jobs and housing choices that must be made before the Comprehensive Plan Update is completed, and to show what the impacts of those possible choices would be. It is expected that after review of the data from these four scenarios the City Council may "pick and choose" elements from each scenario, incorporate new concepts not envisioned, or reject other ideas outright to create a new blueprint for future land-use decisions. If the preferred plan that is ultimately considered for adoption clearly falls within the ideas and impacts described in this DEIR, this will be explained in the Final EIR and reflected in the CEQA findings that appear in the resolution adopting the final plan. If the preferred plan falls outside the range that's analyzed in the Draft EIR or is substantially different than what is described, then a supplement to the Draft EIR will precede preparation of the Final EIR. As discussed above, the City Council has already requested a supplement to the Draft EIR to analyze a fifth scenario.

The four scenarios analyzed at equal level of detail in the Draft EIR are:

1. "Business As Usual" – the "business as usual" scenario shows the results if the City continued to operate under the existing Comprehensive Plan with no changes to goals, policies and programs. Any new housing built would be constructed under existing zoning and no innovations in housing or new approaches to address the high cost of housing would be explored. No new growth management measures are anticipated, and any transit or traffic improvements would come from the existing infrastructure plan for the City. This scenario uses a local forecast of housing growth based on the City's past performance (a long term average of about 145 new dwelling units per year), and ABAG's 2013 projection of job growth.²
2. Scenario Two, or the "Growth Slowed" Scenario, would slow the pace of job growth when compared with Scenario One by moderating the pace of office/R&D development throughout the city. Scenario Two would also ensure that the modest amount of housing growth expected under Scenario One would be built-out as small units and other housing types appropriate for seniors and the Palo Alto workforce. Transportation investments in this scenario would include implementation of the County's expressway plan.

² The City does not have the basis for a local forecast of job growth, and will have to rely on ABAG's forecast until the new business registry provides useful trend data.

3. Scenario Three, or the “Housing Reconsidered” Scenario, would implement a growth management regime similar to the interim annual limit on office/R&D adopted by the City Council in 2015 for the fastest changing areas of the City and would eliminate housing sites along San Antonio and South El Camino. In place of these housing sites, Scenario 3 would increase housing densities on sites Downtown, near California Avenue, and in other locations in the City close to transit and services. Policies, regulations, and incentives would be designed to ensure smaller units for the working professional and senior populations of the City. Transportation investments would include grade separating the Caltrain crossings at Meadow and Charleston by placing the railroad tracks in a trench.
4. Scenario Four, or the “Sustainability Tested” Scenario, assumes the most growth in housing and employment, consistent with ABAG projections. Rather than moderating the pace of development, this scenario would seek to limit the impacts of development. Potential policies and regulations would be enacted to advance sustainability objectives, including free transit passes for residents in transit-served areas, achieving LEED platinum certification for new development, maximizing local solar energy production, foregoing new natural gas hookups, and utilizing drought-tolerant landscaping. Transportation investments would include grade separating the Caltrain crossings at Meadow and Charleston by placing the railroad tracks in a trench, and incorporating mix flow bus rapid transit on El Camino Real (with curbside stations and queue jumping for transit vehicles).

In keeping with the requirements of CEQA, the Draft EIR analyzes potential environmental impacts and mitigation measures in the following resource categories:

- Aesthetics
- Air Quality and Community Health Risk
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Housing and Employment
- Public Services
- Parks and Recreation

- Transportation and Traffic
- Utilities and Service Systems
- Alternatives Analysis
- CEQA Mandated Assessment

The DEIR identifies potentially significant environmental effects, including those that are considered significant and unavoidable even with mitigation measures. A detailed table of environmental impacts and mitigation measures is provided as Attachment B. Board and public comments on the mitigation measures would be particularly helpful at the current juncture, since they could help to define the fifth scenario.

There were five impacts that could not be mitigated to a less than significant level due to a variety of reasons. If they cannot be mitigated to a less than significant level, a statement of overriding considerations must be adopted in order for the City Council to adopt the Comprehensive Plan Update.

1. Greenhouse Gas Emissions and Climate Change
 - Consistency with State's long-term goals This remains significant and unavoidable because even with the City's track record and commitment to reducing GHG emissions, there are measures outside the City's control that will be needed to achieve the State's goal of 80% below 1990 levels by 2050.]
2. Air Quality
 - Violation of air quality standard, contribute substantially to existing violation and/or result in cumulative increase for nonattainment areas [This remains significant and unavoidable because cumulative air emissions would contribute to the Bay Area's non-attainment status for ozone and particulate matter (PM).]
3. Transportation
 - Cause an intersection to drop below its level of service standards or deteriorate below already substandard level of service
 - Cause freeway segment or ramp to drop below level of service or deteriorate below already substandard level of service
 - Impede operation of a transit system as result of congestion[These transportation impacts would remain significant and unavoidable because feasible mitigation has not been identified to adequately address all of the impacts of cumulative traffic growth projected over the next 15 years.]

NEXT STEPS

The ARB's and HRB's comments will be forwarded to the City Council for a public hearing on the DEIR to be held on April 25, 2016, along with public input received before that date. All public

and agency comments on the Draft EIR must be received by the close of business on May 5, 2016. Following the close of the comment period, Staff will return to the Council for a discussion regarding specific components of the fifth scenario and will prepare and circulate an analysis of that scenario for public comment prior to preparation of the Final EIR. All substantive comments and questions on the Draft EIR and the supplemental analysis of a fifth scenario will be responded to in the Final EIR.

Attachments:

- Attachment A: Notice of Availability/Completion (PDF)
- Attachment B: Mitigation Measures Table (DOCX)
- Attachment C: Orientation Document Link (DOCX)

**NOTICE OF AVAILABILITY AND COMPLETION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
COMPREHENSIVE PLAN UPDATE (SCH#2014052101)**

NOTICE IS HEREBY GIVEN that a Draft Environmental Impact Report (EIR) has been prepared to assess the environmental impacts of the following project:

COMPREHENSIVE PLAN UPDATE

LEAD AGENCY: City of Palo Alto, 250 Hamilton Avenue, Palo Alto, CA 94301

Project Description:

The Palo Alto Comprehensive Plan is the City's governing document for land use and development decisions. The City is undertaking a Comprehensive Plan Update in order to establish a shared vision for the future of the community through to the year 2030. The Project will update goals, policies, programs, narrative, maps and diagrams throughout the Comprehensive Plan. Given the long-term horizon of the proposed Plan and the permitting, planning and development actions that are related both geographically and as logical parts in the chain of contemplated actions for implementation, this draft EIR has been prepared as a program EIR, pursuant to the CEQA Guidelines.

This Program EIR analyzes four planning scenarios at an equal level of detail within the body of the Draft EIR, thereby illuminating potential environmental impacts of a range of alternatives designed to address the proposed Plan objectives. Scenario 1 is a "Business as Usual" scenario and assumes the proposed Plan would not be adopted, and change and development in Palo Alto through 2030 would occur under the existing Comp Plan. Scenarios 2, 3, and 4 each include different strategies related to the pace of non-residential development and job growth, the placement of housing sites and densities, desired transportation investments, and sustainability measures.

Probable Environmental Effects of the Project:

The EIR will evaluate potentially significant environmental impacts associated with the adoption and implementation of the Comprehensive Plan Update, consistent with the State California Environmental Quality Act (CEQA). The proposed project will have potentially significant environmental effects with regard to Air Quality, Greenhouse Gas Emissions and Climate Change, Land Use, Transportation and Traffic, Population and Housing, Noise, Utilities and Service Systems, Cultural Resources, and Hydrology and Water Quality. CEQA requires this notice to disclose whether any listed toxic sites are present at the project location. This is a citywide project, and there are sites within the city that are contained in the Cortese List of toxic sites.

The Draft EIR is on file and may be reviewed at the Palo Alto Planning Division, 250 Hamilton Avenue, 5th floor, during business hours. The EIR will also be available for review on the City's project website--<http://www.paloaltocompplan.org>, and at the following public libraries: Rinconada Library, 1213 Newell Rd., Palo Alto, CA 94303, and Palo Alto Downtown Library, 270 Forest Ave., Palo Alto, CA 94301.

The public review for this Draft EIR begins on February 5, 2016 and ends on May 5, 2016. If you wish to provide written comments on the EIR, please submit these to Elena Lee, Department of Planning and Community Environment, 250 Hamilton Avenue, Palo Alto, CA 94301, or Elena.Lee@CityofPaloAlto.org, no later than **May 5, 2016, at 5:00 p.m.** During the public review period, both the Planning & Transportation Commission and the City Council will hold public meetings to take public testimony on the Draft EIR. The public meetings are tentatively scheduled for April 13, 2016 at 6:00 p.m. (Planning & Transportation Commission) and April 25, 2016 at 7:00 p.m. (City Council). Both meetings will occur in the Council Chambers, 1st Floor City Hall, 250 Hamilton Avenue and all persons may appear and be heard at these meetings. Substantive public comments received at these meetings and in writing will be responded to in a Final EIR before there is any decision to adopt The Comprehensive Plan Update. Members of the public are also encouraged to attend meetings of the Citizens Advisory Committee to offer their comments and

suggestions regarding the development of policy language for the updated plan. Visit PaloAltoCompPlan.org for more information.

If any person challenges this item in court, that person may be limited to raising only those issues the person or someone else raised at the public hearings described in this notice, or in written correspondence delivered at, or prior to, the public hearings. In compliance with the Americans with Disabilities Act, those requiring accommodation for these meetings should notify the City of Palo Alto 24 hours prior to the meetings at (650) 329-2496.

HILLARY GITELMAN, DIRECTOR OF PLANNING AND COMMUNITY ENVIRONMENT

City of Palo Alto Comprehensive Plan Update Draft EIR Mitigation Measures

Aesthetics and Visual Resources

AES-1: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under Scenarios 3 and 4 would not degrade the visual character or quality of the area:

- Policy: Promote high quality, creative design, and site planning that is compatible with surrounding development and public spaces.
- Policy: Preserve the character of residential neighborhoods by encouraging new or remodeled structures to be compatible with the neighborhood and adjacent structures.
- Policy: Maintain and enhance the University/Downtown area as the central business district of the City, with a mix of commercial, civic, cultural, recreational, and residential uses. Promote quality design that recognizes the regional and historic importance of the area and reinforces its pedestrian character.
- Program: Review and revise as needed the Downtown, El Camino Real, and South of El Camino Real Design Guidelines to support and enhance the existing visual character of these neighborhoods with building forms and massing that relate to the street and the pedestrian, whether through traditional architectural forms or innovative new designs.
- Program: In areas of the City having a historic or consistent design character, design new development to maintain and support the existing character.

AES-4: The City shall develop an ordinance that will require development projects of a certain size or location to prepare an analysis of potential shade/shadow impacts. The ordinance shall focus on potential impacts to public open spaces (other than public streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21. Projects that are shown to shadow open spaces during these times shall mitigate these impacts through building and site design features.

Air Quality

AIR-1: The policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that it is consistent with the *2010 Bay Area Clean Air Plan*:

- Policy: Make land use decisions that encourage walking, bicycling, and public transit use.
- Policy: Reduce emission of particulates from wood burning stoves, construction activity, automobiles, and other sources.
- Program: Locate higher density development near transit corridors and near multimodal transit stations. Support regional, State, and federal programs that improve air quality in the Bay Area.
- Program: Encourage infill, redevelopment, and re-use of vacant or underutilized parcels employing minimum density requirements that are appropriate to support transit, bicycling, and walking.
- Program: Promote mixed-use development to provide housing and commercial services near employment centers, thereby reducing the necessity of driving.

AIR-2a: As part of the City's development approval process, the City shall require applicants for future development projects to comply with the current BAAQMD basic control measures for reducing construction emissions of PM₁₀ (Table 8-1, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).

AIR-2b: Prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening-criteria listed in the BAAQMD CEQA Guidelines shall prepare and submit to the City of Palo Alto a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the City of Palo Alto shall require that applicants for new development projects incorporate mitigation measures (Table 8-2, Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold, of the BAAQMD CEQA Guidelines or applicable construction mitigation measures subsequently approved by BAAQMD) to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning and Community Environment Department.

AIR-2c: Prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening-criteria listed in the BAAQMD CEQA Guidelines shall prepare and submit to the City of Palo Alto a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If operational-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the City of Palo Alto Planning and Community Environment Department shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities.

AIR-2d: Implement Mitigation Measure TRANS-1a. In addition, the following policy and program, or equally effective language, shall be included in the proposed Plan to reduce long-term air quality impacts by emphasizing walkable neighborhoods and supporting alternative modes of transportation.

- Policy: Encourage new residential, commercial and mixed-use development around transit stations, locations with bicycle and pedestrian connectivity, neighborhood-serving retail, and city services to allow residents and employees to meet daily needs without the use of the private automobile.
- Program: Promote mixed-use development to provide housing and commercial services near employment centers, thereby reducing the necessity of driving.

City of Palo Alto Comprehensive Plan Update Draft EIR Mitigation Measures

AIR-3a: Applicants for future non-residential land uses within the city that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Palo Alto prior to future discretionary Project approval or shall comply with best practices recommended for implementation by the BAAQMD.

The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), PM_{2.5} concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms.

Mitigation measures and best practices may include but are not limited to:

- Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.
- Electrifying warehousing docks.
- Requiring use of newer equipment and/or vehicles.
- Restricting off-site truck travel through the creation of truck routes.

Mitigation measures identified in the project-specific HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of a proposed project.

AIR-3b: Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, and day care centers) that are subject to CEQA within 1,000 feet of a major sources of TACs (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Palo Alto prior to future discretionary Project approval or shall comply with best practices recommended by the BAAQMD.

The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age zero to 16 years. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), PM_{2.5} concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below 10 in one million or a hazard index of 1.0), including appropriate enforcement mechanisms.

Measures and/or best practices to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized Maximum Efficiency Rating Value (MERV) filters.

Mitigation measures identified in the HRA and best practices shall be incorporated into the site development plan as a condition of approval. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning and Community Environment Department.

AIR-4: The following policy, or equally effective language, shall be included in the proposed Plan to reduce odor impacts:

- Policy: All potential sources of odor and/or toxic air contaminants should be adequately buffered, mechanically or otherwise mitigated, to avoid odor and toxic impacts that violate human health standards.

Biological Resources

None

Cultural Resources

CULT-1a: The City shall prepare and adopt an ordinance that would regulate the demolition or alteration of a historic resource listed on the National and/or California Register, or listed on the City's Historic Inventory, if alterations would significantly alter the historic value and/or character defining features of the historic resource.

CULT-1b: Include a program in the Comprehensive Plan Update requiring the City to update and maintain the City's Historic Resource Inventory to determine all historic resources that are eligible for the California Register as well as important examples of California history or prehistory. Historic resources may consist of a single building or structure or a district.

City of Palo Alto Comprehensive Plan Update Draft EIR Mitigation Measures

Include a policy in the Comprehensive Plan requiring an evaluation prior to the issuance of a demolition or alterations permit, where proposed development would affect a potential historic resource that has not been evaluated for inclusion into the City's Historic Resources Inventory.

CULT-1c: The following policy and program, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not 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:

- Policy: Protect Palo Alto's archaeological resources, including natural land formations, sacred sites, the historical landscape, historic habitats, and remains of settlements here before the founding of Palo Alto in the nineteenth century.
- Program: Require that a records search of the California Historical Resources Information System be conducted and reviewed by a cultural resources professional for proposed new development to determine whether the site contains known prehistoric or historic cultural resources and the potential for as-yet-undiscovered cultural resources.

CULT-2: Implement Mitigation Measures CULT-1a, CULT-1b, and CULT-1c.

CULT-3: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not damage archaeological resources:

- Policy: Protect Palo Alto's archaeological resources, including natural land formations, sacred sites, the historical landscape, historic habitats, and remains of settlements here before the founding of Palo Alto in the nineteenth century.
- Policy: Require that a records search of the California Historical Resources Information System be conducted and reviewed by a cultural resources professional for proposed new development to determine whether the site contains known prehistoric or historic cultural resources and to determine the potential presence of as-yet-undiscovered cultural resources.
- Policy: Require that areas found to contain significant prehistoric artifacts be examined by a qualified consulting archaeologist for appropriate protection and preservation.
- Policy: Require that if cultural resources, including archaeological or paleontological resources, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented.
- Policy: Require that any archaeological or paleontological resources on a development project site, as a condition of project approval, be either preserved at their location or adequately documented as a condition of removal. When a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies a superior mitigation. If resources are documented, their preservation should be coordinated with descendants and/or stakeholder groups, as warranted.
- Policy: Continue to consult with tribes as required by California Government Code Section 65352.3. In doing so, use appropriate procedures to accommodate tribal concerns when a tribe has a religious prohibition against revealing precise information about the location or previous practice at a particular sacred site.

No mitigation necessary.

CULT-5: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not damage paleontological resources:

- Policy: Require that areas found to contain significant prehistoric artifacts be examined by a qualified consulting archaeologist for appropriate protection and preservation.
- Policy: Require that if cultural resources, including archaeological or paleontological resources and unique geologic features, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented.
- Policy: Require that any archaeological or paleontological resources on a development project site, as a condition of project approval, be either preserved at their location or adequately documented as a condition of removal. When a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies a superior mitigation. If resources are documented, their preservation should be coordinated with descendants and/or stakeholder groups, as warranted.

CULT-6: Implement Mitigation Measures CULT-1a, CULT-1b, and CULT-1c.

CULT-7: Implement Mitigation Measures CULT-1a, CULT-1b, CULT-1c, CULT-3, and CULT-5.

Geology, Soils, and Seismicity

None

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Greenhouse Gas Emissions and Climate Change

GHG-2: To ensure that Palo Alto's GHG emissions are reduced consistent with the State's long-term goals, the proposed Plan should contain the following policy and program, or equally effective language, articulating these goals and ensuring steady progress towards their achievement:

- Policy: Strive to achieve and exceed target reductions in greenhouse gas emission levels set forth by Executive Order S-03-05.
- Program: Adopt an updated GHG emission reduction plan as part of the S/CAP aimed at achieving or exceeding the State's goals, and monitor the City's progress on an annual basis.

GHG reduction policies included in the S/CAP, which is being prepared in conjunction with proposed Plan, would ensure substantial progress toward the long-term GHG reduction goals of Executive Order S-03-05. However, at this time, additional State and federal actions, as well as advances in technology, are necessary to achieve the deep cuts required to meet the 2050 emissions target. These actions are beyond the jurisdiction of the City of Palo Alto and therefore it is unclear whether the City alone can mitigate this impact to a less-than-significant level.

GHG-3: To address the potential impacts associated with exposing additional people to the effects of climate change, the proposed Plan should include the following policies and programs, or equally effective language, to ensure that future development would address potential risks and that the City would work with other agencies to coordinate strategies for minimizing risk, ensuring appropriate response/recovery, and planning for resiliency:

- Policy: Monitor and respond to the risk of flooding caused by climate change that may result in changes to precipitation patterns, sea level rise, and storm surges.
- Policy: Promote and participate in cooperative planning with other public agencies and regional and adjacent jurisdictions, especially regarding issues related to climate change, such as water supply, sea level rise, fire protection services, emergency medical services, and emergency response planning.
- Program: Develop and implement "green infrastructure" practices to mitigate flooding through improved permeability or paved areas, and storm water capture and storage.
- Program: Regularly coordinate with regional, State, and federal agencies on rising sea levels in the San Francisco Bay and major tributaries to determine if additional adaptation strategies should be adopted to address flooding hazards from increased sea levels for existing or new development and infrastructure. This includes monitoring Federal Emergency Management Agency flood map updates to identify areas in the city susceptible to sea level rise, addressing changes to State and regional sea and bay level rise estimates, and coordinating with adjacent municipalities on flood control improvements as appropriate.
- Program: Prepare response strategies that address sea level rise and increased flooding, and other events related to climate change, such as increased flooding, landslides, soil erosion, wildfires, and storm events. Include response strategies to address sea level rise on Palo Alto's levee system.
- Program: Develop new development requirements for shoreline development to ensure that new development is designed and located to provide protection from potential impacts of flooding resulting from sea level rise and significant flood events. Requirements may include: new setbacks to ensure structures are set back far enough inland that they will not be endangered by erosion; limits on subdivisions and lot line adjustments in areas vulnerable to sea level rise to avoid the creation of new shoreline lots; incentive or transfer of development rights (TDR) programs to relocate existing development away from high risk areas; and/or triggers for relocation or removal of existing structures based on changing site conditions and other factors.

Hazards and Hazardous Materials

None

Hydrology and Water Quality

HYD-2: The City shall continue to investigate the potential impacts of basement construction dewatering and update standard conditions of approval to contain the following or equally effective measures:

- Prohibit dewatering during the rainy season.
- Encouraging greater fill station use by distributing more door-hangers and enlisting other public outreach regarding dewatering, fill stations, and trees.
- Strengthening outreach on the water cycle and value of fresh water flows to storm drains, creeks, and the Bay.
- Refining requirements for contractor Use Plans, including maximizing on-site water use, one day/week water truck hauling service for neighbors, and City landscaping and piping to nearby parks or major users where feasible.
- Expanding fill station specifications to address water pressure issues resulting from multiple concurrent users, including separate pumps for neighbors where needed and sidewalk bridges for hoses to prevent tripping hazards.

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- Broadening the City's Basement Pumping Guidelines to require a determination of the impacts of groundwater pumping on adjacent buildings, infrastructure, and trees or landscaping. Applicants would determine the size of the temporary cone of depression caused by pumping and avoidance measures would be required if impacts are anticipated. The Urban Forestry staff may develop guidelines for soil enhancement and supplemental watering (by project applicant) for neighboring landscaping. Additional measures could include adjusting the location, depth, or duration of pumping or altering construction methods.

Land Use and Planning

LAND-1: Include policies and programs in the proposed Plan to ensure that the intensity of future development under Scenarios 3 and 4 would not adversely change the land use patterns or affect the quality of life in Palo Alto neighborhoods. This could be accomplished by maintaining existing Comp Plan policies related to compatibility and quality of life in the area:

- Policy: Maintain Palo Alto's varied residential neighborhoods while sustaining the vitality of its commercial areas and public facilities. Use the Zoning Ordinance as a tool to enhance Palo Alto's desirable qualities.
- Policy: Evaluate changes in land use in the context of regional needs, overall city welfare and objectives, and the desires of surrounding neighborhoods.
- Policy: Promote increased compatibility, interdependence, and support between commercial and mixed-use centers and the surrounding residential neighborhoods.
- Program: Encourage greater use of allowed density within zoning regulations through smaller housing units near multimodal transit stations to take advantage of transit availability.

LAND-2: The following policies and programs, or equally effective language, should be included in the proposed Plan to further reduce potential impacts to visual character and ensure compatibility with adjacent land uses:

- Policy: Where possible, avoid abrupt changes in scale and density between residential and non-residential areas and between residential areas of different densities. To promote compatibility and gradual transitions between land uses, place zoning district boundaries at mid-block locations rather than along streets wherever possible.
- Policy: Preserve the character of residential neighborhoods by encouraging new or remodeled structures to be compatible with the neighborhood and adjacent structures.
- Policy: Promote high quality, creative design and site planning that is compatible with surrounding development and public spaces.
- Program: Maintain and periodically review height and density limits to discourage single uses that are inappropriate in size and scale to the surrounding uses.
- Program: Review and change zoning regulations to promote gradual transitions in the scale of development where residential districts abut more intense uses.
- Program: Use the Zoning Ordinance, design review process, design guidelines, and Coordinated Area Plans to ensure high-quality residential and commercial design.

LAND-5: To avoid potential impacts from physically dividing an established community, the proposed Plan shall include the following policies, or equally effective policies:

- Policy: Design future transportation projects (including roadway, bicycle, pedestrian, and transit projects) to improve connections between and within neighborhoods, rather than divide neighborhoods.
- Policy: Pursue a below-grade alignment and not an elevated alignment for regional fixed rail in Palo Alto, including both high speed rail and Caltrain.
- Policy: Ensure that future grade separation projects include a community participation and review process, and undergo environmental review. Future grade separation improvement projects would have the potential to cause environmental impacts, such as impacts associated with construction-related emissions, noise, and traffic, and aesthetics and land use impacts. These impacts, and alternatives to these grade separation projects, would be evaluated in detail when the projects are more clearly defined.

Noise

NOISE-1a: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that long-term operational noise under Scenarios 2, 3, and 4 would not result in significant increases in average 24-hour noise levels.

- Policy: Encourage the location of land uses in areas with compatible noise environments. Use the guidelines in the table "Land Use Compatibility for Community Noise Environment" to determine compatibility.
 - For exterior noise, the guideline for "normally acceptable" noise levels in residential areas is an L_{dn} of 60 dBA. This level is a guideline for the design and location of future development and a goal for the reduction of noise in existing development. However, 60 dBA L_{dn} is a guideline which cannot necessarily be reached in all residential areas within the constraints of economic or aesthetic feasibility. This guideline will be primarily applied where outdoor use is a major consideration (e.g., backyards in single-family housing developments and recreational areas in multiple-family housing projects). Where the City determines that providing an L_{dn} of 60 dBA or lower outdoors is not feasible, the noise level in outdoor areas intended for recreational use should be reduced to as close to the standard as feasible through project design.
 - For interior noise, the requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25) are extended to all new

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dwelling units in Palo Alto. Specifically, interior levels for all habitable rooms must not exceed an Ldn of 45 dBA in all new dwelling units in Palo Alto.

- Noise exposure(s) should be determined from a) more detailed noise exposure studies, or b) area-specific or project-specific noise measurements, as appropriate. Noise contour maps in this plan can be used as a preliminary screening tool in determining approximate noise exposure.
- Prior to the initial development application for future developments near noise-sensitive land uses, the applicant shall submit an acoustical analysis by an acoustical engineer demonstrating projected compliance with the Comprehensive Plan, the Noise Ordinance, and the State building code. The analysis shall be based on acoustical readings, equipment specifications, architectural designs (even if preliminary), and any proposed sound reduction/insulation measures, such that the pertinent land use compatibility, interior environments, and project-related noise emissions can be demonstrated to comply with prescribed city, county, and state noise standards.
- Policy: The City may require proposals to reduce noise impacts of development on adjacent properties through appropriate means including, but not limited to, the following:
 - Construct noise walls when compatible with aesthetic concerns.
 - Screen and control noise sources such as parking, outdoor activities, and mechanical equipment.
 - Increase setbacks for noise sources from adjacent dwellings.
 - Whenever possible, retain fences, walls, or landscaping that serve as noise buffers although design, safety, and other impacts must be addressed.
 - Use soundproofing materials and double-glazed windows.
 - Control hours of operation, including deliveries and trash pickup, to minimize noise impacts.

Program: Update the Noise Ordinance to provide for clear interpretation of the regulations, and to review the appropriateness of existing standards. Strictly enforce the Noise Ordinance.

NOISE-1b: The following policy, or equally effective language, shall be included in the proposed Plan to ensure that aircraft noise under all four scenarios would not result in significant increases in average 24-hour noise levels.

The following new policy shall be adopted as part of the proposed Plan. The wording of this policy may change as long as the revised policy is equally effective in mitigating potential aircraft noise impacts:

- Policy: Ensure compliance with the 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.

NOISE-1c: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that railway noise under all four scenarios would not result in significant increases in average 24-hour noise levels.

- Policy: Minimize noise spillover from rail related activities into adjacent residential or noise-sensitive areas.
- Policy: Reduce impacts from noise and ground borne vibrations associated with rail operations by requiring that future development of habitable buildings address the following:
 - Be sited at least 100 feet from the centerline of the tracks whenever feasible.
 - Interior noise level of up to 45 dBA Ldn, with windows closed must be ensured through structural design. For habitable buildings located within 100 feet from the centerline of railroad tracks, developments shall provide a detailed noise impact analysis, prepared by a qualified acoustical consultant technician, demonstrating that noise and ground borne vibration issues associated with rail operations have been adequately addressed (i.e., by building siting or construction techniques). This study must demonstrate that an interior noise level of 45 dBA Ldn will not be exceeded with windows closed.
 - Provide a detailed vibration impact analysis, prepared by a qualified acoustical consultant, demonstrating that ground-borne vibration levels will not exceed 72 VdB (relative to one microinch/sec) at residential buildings or 65 VdB at buildings with vibration-sensitive uses.

NOISE-2: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.

NOISE-3: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.

NOISE-4a: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not result in indoor noise levels that exceed acceptable levels in residential development.

- Policy: Encourage the location of land uses in areas with compatible noise environments. Use the guidelines in the table “Land Use Compatibility for Community Noise Environment” to determine compatibility.

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- For exterior noise, the guideline for “normally acceptable” noise levels in residential areas is an L_{dn} of 60 dBA. This level is a guideline for the design and location of future development and a goal for the reduction of noise in existing development. However, 60 dBA L_{dn} is a guideline which cannot necessarily be reached in all residential areas within the constraints of economic or aesthetic feasibility. This guideline will be primarily applied where outdoor use is a major consideration (e.g., backyards in single family housing developments and recreational areas in multiple family housing projects). Where the City determines that providing an L_{dn} of 60 dBA or lower outdoors is not feasible, the noise level in outdoor areas intended for recreational use should be reduced to as close to the standard as feasible through project design.
- For interior noise, the requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25) are extended to all new dwelling units in Palo Alto. Specifically, interior levels for all habitable rooms must not exceed an L_{dn} of 45 dBA in all new dwelling units in Palo Alto.
- Noise exposure(s) should be determined from (a) more detailed noise exposure studies, or (b) on area-specific or project-specific noise measurements, as appropriate. Noise contour maps in this plan can be used as a preliminary screening tool in determining approximate noise exposure.
- Prior to the initial development application for future developments near noise-sensitive land uses, the applicant shall submit an acoustical analysis by an acoustical engineer demonstrating projected compliance with the Comprehensive Plan, the Noise Ordinance, and the State building code. The analysis shall be based on acoustical readings, equipment specifications, architectural designs (even if preliminary), and any proposed sound reduction/insulation measures, such that the pertinent land use compatibility, interior environments, and project-related noise emissions can be demonstrated to comply with prescribed city, county, and state noise standards.
- Policy: For all future residential projects greater than four dwelling units that are proposed to be within the 65 dBA L_{dn} noise contours, as depicted on current Comprehensive Plan mapping, an acoustical analysis prepared by a qualified acoustical consultant shall be submitted to the City as part of the entitlement review application. As part of the above acoustical analysis, require that projects include appropriate layout, structural, and/or architectural design features to ensure meeting the interior noise standards of the City and State codes.

NOISE-4b: The Land Use Noise Compatibility Guidelines established in the current Comprehensive Plan shall be maintained under all four scenarios.

NOISE-5a: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not result in significant construction-related vibration impacts.

- Policy: Require a detailed construction noise impact analysis, prepared by a qualified acoustical consultant, for all projects that require discretionary approval and that are located within 100 feet of any noise sensitive land uses. If impacts are identified, require a noise monitoring plan to be prepared and submitted prior to the issuance of construction permits. This plan shall identify the monitoring locations, durations and regularity, the instrumentation to be used, and the appropriate noise control measures that will be incorporated to ensure compliance with the noise ordinance.
- Policy: Continue to prioritize construction noise limits around sensitive receptors.

NOISE-5b: Implement Mitigation Measure NOISE-1c.

NOISE-6: Implement Mitigation Measures NOISE-4a and NOISE-4b.

NOISE-7: Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a, and NOISE-4b.

NOISE-8: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not result in significant impacts to sensitive receptors from construction noise and vibration.

- Policy: Require a detailed construction noise and vibration impact analysis, prepared by a qualified acoustical consultant, for all projects that require discretionary approval and that are located within 100 feet of any noise- and/or vibration-sensitive land uses.
 - If noise impacts are identified, require a noise monitoring plan to be prepared and submitted prior to the issuance of construction permits. This plan shall identify the noise monitoring locations, durations and regularity, the instrumentation to be used, and the appropriate noise control/mitigation measures that will be incorporated to ensure compliance with the noise ordinance.
 - If projected daytime vibration levels exceed 90 VdB (relative to one microinch/sec) at workshop uses, 84 VdB at offices uses, 78 VdB at residential uses, or the limits for VC-A through VC-E uses shown in the FTA manual, a vibration mitigation plan is to be prepared and submitted prior to the issuance of construction permits.
- Policy: Continue to prioritize construction noise and vibration limits around sensitive receptors.

NOISE-11a: Implement Mitigation Measure NOISE-1c.

NOISE-11b: The following programs, or equally effective language, shall be included in the proposed Plan to preclude overall community noise impacts that are in excess of

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established State and/or City standards.

- Program: Encourage the Joint Powers Board to pursue technologies to reduce train whistle noise in communities served by Caltrain.
- Program: Evaluate changing at-grade rail crossings so that they qualify as Quiet Zones based on Federal Railroad Administration (FRA) rules and guidelines in order to mitigate the effects of train horn noise without adversely affecting safety at railroad crossings.

NOISE-11c: City of Palo Alto staff and officials shall participate in and contribute to the environmental impact assessment of future Caltrain and HSR development programs for railway operations within the city's SOI.

Population and Housing

POP-4a: Conduct a nexus study and update the City's affordable housing linkage fee for commercial development to ensure that new job-generating development adequately mitigates the costs of its impacts on housing affordability in Palo Alto.

POP-4b: Continue to increase the supply of housing in the city through implementation of the adopted Housing Element policies and programs, and/or slow the rate of job growth in the city. Possible zoning adjustments to accomplish more housing and/or fewer jobs could include changes to allow more residential density by right in areas that are well-served by services and transit, somewhat reducing commercial FAR and replacing it with residential FAR, and/or implementing an annual limit on new office and R&D development.

Public Services and Recreation

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

- Continue to collect park impact and park dedication (in lieu) fees from new development to ensure there is funding to add and improve parklands during the life of the Comprehensive Plan. Reevaluate the fees on a regular basis.
- Consider integrating new pocket parks within existing neighborhoods where this is possible by acquiring small parcels or conditioning new development.
- Where there is publicly owned land that could be improved for public use, consider designating this land as parkland when improvements occur.
- Pursue reliable and sustainable mechanisms to address a growing gap in maintenance funding as park and community services facilities uses increase.
- Monitor the health of the parks and the effectiveness of recreation facilities in the face of growing demand and use; evaluate services to respond to growing and changing demographic patterns.
- Monitor impacts on habitat and ecosystems and develop conservation plans to preserve and protect them.
- Ensure that new parks and park improvements are developed with ample community input and assessed to ensure that significant environmental impacts are avoided or mitigated to be less than significant.
- Consider utilizing park impact and park dedication (in lieu) fees to rehabilitate, expand, or otherwise increase utilization of existing parks and recreation facilities.

In addition to these measures, the City would require permitting and review of new parks in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development. With mitigation, the impact is less than significant.

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

Transportation and Traffic

TRANS-1a: Adopt a programmatic approach to reducing traffic with the goal of achieving no net increase in peak period motor vehicle trips from new development, with an exception for uses that directly contribute to the neighborhood character and diversity of Palo Alto (such as ground floor retail and below market rate housing). The program should, at a minimum:

- Require new development projects to prepare and implement a Transportation Demand Management (TDM) Plan to achieve the following reduction in peak period motor vehicle trips from the rates included in the Institute of Transportation Engineers' *Trip Generation Manual* for the appropriate land use category. These reductions are deemed aggressive, yet feasible, for the districts indicated.
 - 45 percent reduction in the Downtown district

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- 35 percent reduction in the California Avenue area
- 30 percent reduction in the Stanford Research Park
- 30 percent reduction in the El Camino Real Corridor
- 20 percent reduction in other areas of the city

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.

- Require new development projects to offset remaining peak period motor vehicle trips through one of the following methods:
 - By directly contracting with another property owner or organization to reduce trips generated from another site; or
 - By paying an annual fee to the City for use in reducing motor vehicle trips to the extent feasible through the provision of transit services, carpool/rideshare incentives, bicycle lanes, and other similar programs and improvements.

TRANS-1b: Establish and implement a policy that eliminates (“unbundles”) free or subsidized parking in new commercial and residential development (i.e. requiring employees and residents to pay separately for parking).

TRANS-1c: Work to advance plans for grade separation at intersections along the Caltrain tracks to reduce traffic congestion/delay and improve safety; seek funding for design and implementation from local, regional, State, and federal sources. Ensure that future grade separation projects include a community participation and review process, and undergo environmental review. Future grade separation improvement projects would have the potential to cause environmental impacts, such as impacts associated with construction-related emissions, noise, and traffic, and aesthetics and land use impacts. These impacts, and alternatives to these grade separation projects, would be evaluated in detail when the projects are more clearly defined.

TRANS-1d: Take a leadership role in regional transportation planning and advocating for specific transit improvements and investments, such as Caltrain service enhancements, Dumbarton Express service, enhanced bus service on El Camino Real with queue jumping and curbside platforms, and additional VTA bus service.

TRANS-1e: Work with the PAUSD to ensure that decisions regarding school assignments are analyzed to reduce peak period motor vehicle trips to and from school sites.

TRANS-3a: The City shall require new development projects to prepare and implement TDM programs, as described in TRANS-1a. TDM programs for worksites may include measures such as private bus services and free shuttle services to transit stations geared towards commuters.

TRANS-3b: 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.

TRANS-6: 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.

In concert with Mitigation Measure TRANS-6, Mitigation Measures TRANS-1a, TRANS-1b, and TRANS-3 would eliminate the impact on transit at the following intersections, which are projected to operate at a substandard level of service and are used by at least one bus route:

- Middlefield Road and East Charleston Road (#2) under Scenarios 1 and 4
- El Camino Real (SR 82) and San Antonio Road (#8) under Scenarios 1, 2, 3, and 4
- Foothill Expressway and Page Mill Road (#9) under Scenarios 1, 3, and 4
- Foothill Expressway and Arastradero Road (#10) under Scenarios 1, 3, and 4
- Alma Street and East/West Charleston Road (#4) under Scenarios 1 and 2

VTA Route 88 runs on East/West Charleston Road and crosses the Caltrain tracks and Alma Street. The intersection of Alma Street and East/West Charleston Road (#4), is one of the impacted intersections under Scenarios 1 and 2, but signal *pre-emption* for VTA’s bus service would not be possible at this location, due to the railroad crossing and the need for Caltrain to have signal pre-emption capabilities. However, signal *priority* for VTA buses should be possible at this intersection, and would provide sufficient mitigation to eliminate the impact on transit at this intersection. However, impacts on transit at all intersections and segments where buses operate would not be eliminated.

No further feasible mitigation measures have been identified. Thus, all four scenarios would have a significant impact on transit operations by increasing congestion. These impacts are considered *significant and unavoidable*.

TRANS-8: 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.

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TRANS-9: Implement Mitigation Measure TRANS-8.

Utilities and Service Systems

UTIL-15: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under Scenarios 2, 3, and 4 would comply with applicable solid waste regulations:

- Policy: Reduce the amount of solid waste disposed in the City's landfill by reducing the amount of waste generated and promoting the cost-effective reuse of materials that would otherwise be placed in a landfill.
 - Policy: Reduce solid waste generation through salvage and reuse of building materials, including architecturally and historically significant materials.
 - Policy: Encourage the use of reusable, returnable, recyclable, and repairable goods through incentives, educational displays and activities, and through City purchasing policies and practices.
 - Policy: Increase program participation to maximize recycling and composting from all residents, businesses, and institutions, and consider ways to expand recycling and composting programs.
-

UTIL-17: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under Scenarios 2, 3, and 4 maximize energy efficiency and conservation:

- Policy: Optimize energy conservation and efficiency in new and existing residences, businesses, and industries in Palo Alto.
 - Policy: Maintain Palo Alto's long-term supply of electricity and natural gas while transitioning to renewable energy and energy conservation.
 - Program: Encourage establishment of public education programs addressing energy conservation and efficiency.
 - Program: Incorporate cost-effective energy conservation measures into construction, maintenance, and City operation and procurement practices.
 - Program: Incorporate State and federal energy efficiency and renewable energy standards and policies in relevant City codes, regulations, and procedures for both privately-owned and City-owned projects and properties.
 - Program: Evaluate the merits of electrification strategies and implement suitable programs to switch from gasoline/natural gas to electricity to achieve deep carbon emission reduction.
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Attachment C

Hard copies provided for ARB/HRB and Libraries only.

Document can be reviewed at:

<http://palaltocompplan.org/OurPA2030/index.html>