Appendix C: Mitigation, Monitoring, and Reporting Program Applicability

Mitigation Measure	Applicability to Project
AES-1: To ensure that increased residential densities would not degrade the visual character or quality of the area, the proposed Plan shall include policies that achieve the following: • High-quality building and site design. • Compatibility with the neighborhood and adjacent structures. • Enhancement of existing commercial centers. • Requirements for landscaping and street trees. • Preservation and creation of a safe and inviting pedestrian environment. • Appropriate building form, massing, and setbacks.	Not Applicable. The project does not include development that would increase residential densities that could degrade the visual character or quality of the area.
AES-4: The City shall amend its local CEQA guidelines to require development projects of a certain size or location to prepare an analysis of potential shade/shadow impacts. The analysis shall focus on potential impacts to public open spaces (other than public streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21. The analysis shall identify whether the project would shadow open spaces during these times, explain how the project meets City design requirements and other City policy goals, and describe ways to mitigate substantial shade and shadow impacts through feasible building and site design features.	Not Applicable. The Project does not include construction of structures that could cast a shadow.
AIR-1: To ensure consistency with the *2010 Bay Area Clean Air Plan*, the proposed Plan shall include policies that achieve the following: • Reduction in emissions of particulates from automobiles, manufacturing, construction activity, and other sources (e.g., dry cleaning, wood burning, landscape maintenance). • Support for regional, State, and federal programs that improve air quality. • Support for transit, bicycling, and walking. • Mix of uses (e.g., housing near employment centers) and development types (e.g., infill) to reduce the need to drive.	Applicable. Policies adopted to ensure consistency with the Clean Air Plan are implemented by the project.
AIR-2a: The City shall amend its local CEQA Guidelines and Municipal Code to require, as part of the City's development approval process, that future development projects comply with the current BAAQMD basic control measures for reducing construction emissions of PM10 (Table 8-21, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).	Applicable. All BMPs will be implemented throughout Project construction.
AIR-2b: The City shall amend its local CEQA Guidelines to require that, prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening- criteria listed in the BAAQMD CEQA Guidelines 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 8-3, Additional Construction Mitigation Measures Recommended for Projects with Construction	Not applicable. Project construction is minimal and does not exceed screening criteria identified in the BAAQMD CEQA Guidelines.

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.	
AIR-2c: To ensure that development projects that have the potential to exceed the BAAQMD screening criteria air pollutants listed in the BAAQMD CEQA Guidelines reduce regional air pollutant emissions below the BAAQMD thresholds of significance, the proposed Plan shall include policies that require compliance with BAAQMD requirements, including BAAQMD CEQA Guidelines.	Not Applicable. Project operation is limited to outdoor dining at established uses and encourages alternative transportation modes that would not exceed BAAQMD thresholds.
AIR-2d: Implement Mitigation Measures TRANS-1a and TRANS-1b. In addition, to reduce long-term air quality impacts by emphasizing walkable neighborhoods and supporting alternative modes of transportation, the proposed Plan shall include policies that achieve the following: • Enhanced pedestrian and bicycle connections between commercial and mixed-use centers	Applicable. Policies adopted to enhance pedestrian and bicycle connections are implemented by the project.
AIR-3a: The City of Palo Alto shall updates its CEQA Procedures to require that future non-residential projects within the city that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Palo Alto prior to future discretionary project approval or shall comply with best practices recommended for implementation by the BAAQMD. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds the BAAQMD significance thresholds, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. 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.	Not Applicable. The project would not generate 100 or more diesel trucks nor more than 40 diesel-powered TRUs per day.
AIR-3b: To ensure that new industrial and warehousing projects with the potential to generate new stationary and mobile sources of air toxics that exceed the BAAQMD project-level and/or cumulative significance thresholds for toxic air contaminants and PM2.5 listed in the BAAQMD CEQA Guidelines reduce emissions below the BAAQMD thresholds of significance, the proposed Plan amend the City's CEQA guidelines to require compliance with BAAQMD requirements.	Not applicable. The project is does not propose new industrial nor warehousing uses.

AIR-3c: The proposed Plan shall include policies to mitigate potential sources of toxic air contaminants through siting or other means to reduce human health risks and meet the Bay Area Air Quality Management District's applicable threshold of significance. Policies shall also require that new sensitive land use projects (e.g., residences, schools, hospitals, nursing homes, parks or playgrounds, and daycare centers) within 1,000 feet of a major stationary source of TACs and roadways with traffic volumes over 10,000 vehicles per day consider potential health risks and incorporate adequate precautions, such as high-efficiency air filtration, into project design.	Not applicable. The project will not be a source of TACs.
AIR-4: To reduce odor impacts, the proposed Plan shall include policies requiring: • Buffers, mechanical, and other mitigation methods to avoid creating a nuisance.	Not applicable. The project will not create new odors.
CULT-1: To ensure the protection of potentially historic resources the proposed Plan shall include policies that achieve the following: • The effectiveness of the Historic Preservation Ordinance in preserving. • Periodic updates to and maintenance of the City's Historic Resource. • Process for reviewing proposed demolition or alteration of potentially historic buildings. • Protection of archaeological resources.	Applicable. Policies adopted to ensure protection of archaeological resources during construction are implemented by the project and the project will comply with state laws related to the protection of archaeological resources.
CULT-2: Implement Mitigation Measure CULT-1.	Applicable. See CULT-1 above.
CULT-3: Implement Mitigation Measure CULT-1. In addition, to ensure that future development would not damage archaeological resources, the proposed Plan shall include policies that address achieve the following topics: • Archaeological surveys and mitigation plans for future development projects. • Developer compliance with applicable regulations regarding the identification and protection of archaeological and paleontological deposits, and unique geologic features. • Appropriate tribal consultation and consideration of tribal concerns.	Applicable. Tribal consultation was conducted consistent with SB 18 and the project will comply with state laws related to the protection of archeological, paleontological, and geological resources through the implementation of the City's standard conditions of approval.
CULT-5: Implement Mitigation Measure CULT-3.	Applicable. See CULT-3 above.
CULT-7: Implement Mitigation Measures CULT-1 and CULT-3.	Applicable. See CULT-1 and CULT-3 above.
GHG-3: To address the potential impacts associated with exposing people to the effects of climate change, the proposed Plan shall include policies that achieve the following: • Monitoring and response to flooding risks caused by climate change-related changes to precipitation patterns, groundwater levels, sea level rise, tides, and storm surges. • Cooperative planning with federal, State, regional, and local public agencies on issues related to climate change (including sea level rise and extreme storms).	Not applicable. The project area is well beyond the boundaries of the areas of Palo Alto that might experience flooding under sea level rise conditions (6.6 feet, 100 year storm event). [1]

[1] Our Coast Our Future Hazard Map. https://ourcoastourfuture.org/hazard-map/ accessed on: December 4, 2024.

• Preparation of response strategies to address sea level rise, increased flooding, landslides, soil erosion, storm events, and other events related to climate change. • Implementation of adaptive strategies to address impacts of sea level rise on Palo Alto's levee system.	
HYD-2: To reduce potential impacts associated with construction dewatering the proposed Plan shall include policies that achieve the following: • Avoidance of the impacts of basement construction for single-family homes on the natural environment and safety. • Conservation of subsurface water resources. • Construction techniques and recharge strategies to reduce subsurface and surface water impacts. • Monitoring of dewatering and excavation projects. • Cooperation with other jurisdictions and regional agencies to protect groundwater. • Protection of groundwater as a natural resource.	Not applicable. No dewatering is anticipated because construction excavation will be limited to a cumulative and conservative estimate of 45 cubic yards and a depth of less than 5 feet for bollard installation.
LAND-1: To ensure that the intensity of future development would not adversely change the land use patterns or affect the livability of Palo Alto neighborhoods, the proposed Plan shall include policies that achieve the following: • Strengthening of residential neighborhoods. • Vitality of commercial areas and public facilities. • High-quality building and site design. • Architectural compatibility of new development. • Compatible infill development. • Avoidance of abrupt changes in the scale of development where residential districts abut more intense uses.	Applicable. Policies adopted to improve the vitality of commercial areas and public facilities are implemented by the project.
LAND-2: Implement Mitigation Measure LAND-1. In addition, to further reduce potential impacts to visual character and ensure compatibility with adjacent land uses, the proposed Plan shall include policies that achieve the follow: • Use of City procedures, plans, and requirements to ensure high-quality building design and architectural compatibility.	Not applicable. The project will not construct new buildings that could impact the visual character of the area.
LAND-5: To avoid potential impacts from physically dividing an established community, the proposed Plan shall include policies that achieve the following: • Enhanced connections to and from parks, schools, and community facilities for all users. • Safe and convenient pedestrian, bicycle, and transit connections between residential areas and commercial centers. • Cooperation with other agencies to improve circulation connections. • Grade separation of rail crossings.	Not applicable. The project will convert two roads to car-free streets and will not physically divide an established community.
NOISE-1a: To ensure that average 24-hour noise levels associated with long- term operational noise would not increase by 5.0 decibels (dB) or more in an existing residential area, the proposed Plan shall include policies that achieve the following: • Location of land uses in areas with compatible noise environments.	Not applicable. The project is not located within a residential area.

• Use of the guidelines in the "Land Use Compatibility for Community Noise Environment" table in the proposed Plan to evaluate the compatibility of proposed land uses with existing noise environments. • Clear guidelines for maximum outdoor noise levels in residential areas. • Adherence to the interior noise requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25). • Inclusion of a noise contour map in the proposed Plan. • Reduction of noise impacts of development on adjacent properties. • Updating for clarity the Noise Ordinance to make enforcement easier. • Evaluation of noise impacts on existing residential, open space, and conservation land. • Requirement for new projects in the Multiple Family, Commercial, Manufacturing, or Planned Community districts to demonstrate compliance with the Noise Ordinance.	
NOISE-1b: To reduce potential impacts to new land uses from aircraft noise, the proposed Plan shall include policies that achieve the following: • Compliance with the airport-related land use compatibility standards for community noise environments. • Prohibition of incompatible land use development within the 60 dBA CNEL noise contours of the Palo Alto airport, as established in the adopted County of Santa Clara Airport Land Use Commission Comprehensive Land Use Plan (CLUP) for the Palo Alto Airport.	Not applicable. The project is not within two miles of an airport.
NOISE-1c: To reduce potential impacts to new land uses from railway noise, the proposed Plan shall include policies that achieve the following: • Minimization of noise spillover from rail-related activities into adjacent residential or noise-sensitive areas. • Building design that reduces impacts from noise and ground borne vibrations associated with rail operations. • Guidelines for interior noise levels.	Not applicable. The project will not result in new construction of residences or commercial buildings in areas of elevated noise associated with railway activities.
NOISE-2: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.	Not applicable. See NOISE-1c above.
NOISE-3: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.	Not applicable. See NOISE-1c above.
NOISE-4a: Implement Mitigation Measure NOISE-1a.	Not applicable. See NOISE-1c above.
NOISE-4b: The Land Use Noise Compatibility Guidelines established in the current 1998 Comprehensive Plan shall be maintained.	Not applicable. The project will not result in new development with the potential to create new sources of noise that would be incompatible.

NOISE-5a: To ensure that future development would not result in significant construction-related vibration impacts, the proposed Plan shall include policies that limit the hours of construction around sensitive receptors, and require formal, ongoing monitoring and reporting throughout the construction process for larger development projects, as well as the use of pertinent industry standards and City guidelines to avoid significant vibration impacts during construction or operations.	Applicable. Project construction will occur within the established permitted hours of operation.
NOISE-5b: Implement Mitigation Measure NOISE-1c.	Not applicable. See NOISE-1c above.
NOISE-6: Implement Mitigation Measures NOISE-4a and NOISE-4b.	Not applicable. See NOISE-4a and NOISE-4b above.
NOISE-7: Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a, and NOISE-4b.	Not applicable. See NOISE-1a through NOISE-1c and NOISE-4a and NOISE-4b above.
NOISE-8: To ensure that future development would not result in significant impacts to sensitive receptors from construction noise, the proposed Plan shall include policies that achieve the following: • Construction noise limits around sensitive receptors. • Monitoring and reporting plans for construction noise levels of larger development projects. • Noise control measures to ensure compliance with the noise ordinance.	Applicable. Policies adopted to address noise during construction are implemented by the project.
NOISE-11a: Implement Mitigation Measure NOISE-1c.	Not applicable. See NOISE-1c above.
NOISE-11b: To address overall community noise impact from train noise to the extent such noise is within the City's control and in excess of established State and/or City standards, the proposed Plan shall include policies that achieve the following: • Efforts to develop and implement technological methods to reduce train whistle noise from Caltrain • Evaluation of at-grade rail crossings as potential Quiet Zones based on Federal Railroad Administration (FRA) rules and guidelines. • Grade separation of rail crossings as a City priority.	Not applicable. The project will not be located within the noise contours of the train and will not result in new construction.
PS-7: To address the potential physical impacts of park construction/improvement, the Comprehensive Plan Update shall include policies that achieve the following: • Evaluation and mitigation of the construction impacts associated with park and recreational facility creation and expansion.	Not applicable. The street closure does not involve construction of a park.
PS-8: Implement Mitigation Measure PS-7.	Not applicable. See PS-7 above.
TRANS-1a: Adopt a programmatic approach to reducing motor vehicle traffic, with the goal of achieving no net increase in peak-hour 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 above a specific size threshold to prepare and implement a Transportation Demand Management (TDM) Plan to achieve the following reduction in peak-hour period motor vehicle trips from the rates included in the Institute of Transportation Engineers' Trip Generation Manual for the appropriate land use category and size. These reductions are deemed aggressive, yet feasible, for the districts indicated.	Not applicable. The project will not create new development, it is the conversion of two roads to car-free streets, and therefore does not require preparation and implementation of a TDM Plan.

• 45 percent reduction in the Downtown district • 35 percent reduction in the California Avenue area • 30 percent reduction in the Stanford Research Park • 30 percent reduction in the El Camino Real Corridor • 20 percent reduction in other areas of the city TDM Plans must be approved by the City and monitored by the property owner or the project proponent on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets are not met and may achieve reductions by contributing to citywide or employment district shuttles or other proven transportation programs that are not directly under the property owner's control.	
TRANS-1b: Require new development projects to pay a Transportation Impact Fee for all those peak-hour motor vehicle trips that cannot be reduced via TDM measures. Fees collected would be used for capital improvements aimed at reducing motor vehicle trips and motor vehicle traffic congestion.	Not applicable. The project is not new development, it is the conversion of two roads to car-free streets, and therefore does not require payment of a Transportation Impact Fee.
TRANS-1c: The proposed Plan shall include policies to ensure collaboration with regional agencies and neighboring jurisdictions, and identification and pursuit of funding for rail corridor improvements and grade separation. Policies shall support grade separation of rail crossings along the rail corridor as a City priority, and encourage the undertaking of studies and outreach necessary to advance grade separation of Caltrain to become a "shovel ready" project.	Not applicable. Policies related to rail corridor improvements do not apply to the project as it is not within the rail corridor.
TRANS-1d: Consistent with State requirements, the City shall adopt a Multimodal Improvement Plan to address impacts to Congestion Management Program facilities. In addition, the proposed Plan shall include policies to engage in regional transportation planning and advocate for specific transit improvements and investments, such as Caltrain service enhancements and grade separations, Dumbarton Express service, enhanced bus service on El Camino Real with queue-jump lanes and curbside platforms, high- occupancy vehicle (HOV)/high-occupancy toll (HOT) lanes, and additional VTA bus service.	Not applicable. The project involves improvements to local streets, none of which are identified for improvement in the Congestion Management Program.
TRANS-1e: The proposed Plan shall include policies to encourage the PAUSD to analyze decisions regarding school assignments to reduce peak-period motor vehicle trips to and from school sites.	Not applicable. The project is not located within the vicinity of a school.
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	Not applicable. The project is not a new development project that would require preparation and implementation of a TDM Plan.
TRANS-3b: The proposed Comprehensive Plan shall include policies that advocate for efforts by Caltrans and the Valley Transportation Authority to reduce congestion and improve traffic flow on existing freeway facilities consistent with Statewide GHG emissions reduction initiatives. Policies shall support the application of emerging freeway information, monitoring, and control systems that provide non-intrusive driver assistance and reduce congestion.	Not applicable. The project is not on or near a freeway.

Policies shall support, where appropriate, the conversion of existing traffic lanes to exclusive bus and high-occupancy vehicle (HOV)/high-occupancy toll (HOT) lanes on freeways and expressways, including the Dumbarton Bridge, and the continuation of an HOV lane from Redwood City to San Francisco.	
TRANS-6: The proposed Comprehensive Plan shall include policies to collaborate with transit agencies in planning for and implementing convenient, efficient, coordinated, and effective bus service.	Applicable. The City collaborated with VTA to ensure consistency with Policy T-1.12 which calls for collaboration with transit agencies in planning and implementing convenient, efficient, coordinated and effective bus service.
TRANS-8: The proposed Comprehensive Plan shall include policies to identify specific improvements that can be used to discourage non- local drivers from using local, neighborhood streets to bypass traffic congestion on arterials.	Applicable. The project involves the permanent closure of portions of local streets, which implements policies related to discouraging non-local drivers from utilizing local streets.
TRANS-9: Implement Mitigation Measure TRANS-8.	Applicable. See TRANS-8 above.
UTIL-15: To ensure that future development would comply with applicable solid waste regulations, the proposed Plan shall include policies that achieve the following: • Ninety-five percent landfill diversion by 2030, and ultimately zero waste. • Reduced solid waste generation. • Use of reusable, returnable, recyclable, and repairable goods, through enforcement of the 2016 Plastic Foam Ordinance expansion. • Enhanced recycling and composting programs for all waste generators.	Not Applicable. The project is not new development that would generate new solid waste.
UTIL-17: To ensure that future development would maximize energy efficiency and conservation the proposed Plan shall include policies that achieve the following: • Maximized conservation and efficient use of energy. • Continued procurement of carbon-neutral energy. • Investment in cost-effective energy efficiency and energy conservation programs. • Provision of public education programs addressing energy conservation and efficiency. • Use of cost-effective energy conservation measures in City projects and practices. • Adherence to State and federal energy efficiency standards and policies. • Consideration of a transition to a carbon-neutral natural gas supply.	Not Applicable. The project is not new development that would require implementation of policies that seek to maximize energy efficiency.