



CITY OF PALO ALTO CAR FREE RAMONA STREET AND CALIFORNIA AVENUE

**ADDENDUM TO THE COMPREHENSIVE PLAN EIR
(SCH #2014052101)**

LEAD AGENCY:

CITY OF PALO ALTO
PLANNING & DEVELOPMENT SERVICES DEPARTMENT
250 HAMILTON AVENUE
PALO ALTO, CA 94301

CONTACT:

ASHWINI KANTAK, SPECIAL PROJECTS ADVISOR

PREPARED BY:



METROPOLITAN PLANNING GROUP
51 E. CAMPBELL AVE. #1247, CA 95009

DRAFT DECEMBER 2024

[PAGE INTENTIONALLY LEFT BLANK]

CAR FREE RAMONA STREET AND CALIFORNIA AVENUE

Project Summary Information	
Project Title:	Car Free Ramona Street and California Avenue
Lead agency name and address:	City of Palo Alto, Planning and Development Services 285 Hamilton Avenue, Suite 100 Palo Alto, CA 94301
Contact person and phone number:	Ashwini Kantak, Special Projects Advisor ashwini.kantak@cityofpaloalto.org
Project Location:	Ramona Street from the intersection with Hamilton Avenue and 200 feet northwest and California Avenue between Birch St. and El Camino Real. City of Palo Alto, Santa Clara County, California
Project Sponsor/Owner:	City of Palo Alto, Planning and Development Services 285 Hamilton Avenue, Suite 100 Palo Alto, CA 94301
Comprehensive Plan Designations:	Not Applicable, Public Right of Ways.
Zoning:	Not Applicable, Public Right of Ways.
Description of project:	The City is proposing the permanent closure to vehicles of approximately 200 feet of Ramona Street northwest of the intersection with Hamilton Avenue and the permanent closure to vehicles of approximately 935 ft of California Avenue between Birch and El Camino Real. The “closure” of these streets will only affect vehicles, and the streets will still provide pedestrian, bicycle, and emergency vehicle access. The roadway closures will be accomplished through the installation of removable bollards to allow temporary vehicle access during events.
Surrounding land uses and setting:	The proposed Project on Ramona Street and California Avenue are surrounded by parcels zoned for commercial uses within the CD-C (Commercial Downtown-community) and CC-2 (Commercial Community) zone districts, respectively. Existing commercial activities include restaurants, offices, and other retail and office land uses. Additionally, there are residential uses adjacent to California Avenue.
Other public agencies whose approval is required:	Caltrans Santa Clara Valley Transportation Authority California State Historic Preservation Office
California Native American tribes traditionally and culturally affiliated with the project area that have requested consultation:	The City of Palo Alto carried out notification to the Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Coastanoan, the Ohlone Indian Tribe, the Muwekma Ohlone Tribe of the SF Bay Area, Wuksachi Indian Tribe/Eshom Valley Band, and the Tamien Nation in accordance with SB 18 on December 5, 2024. Requests were received from the Muwekma Ohlone Tribe of the SF Bay Area and the Tamien Nation. Consultation was carried out through correspondence and meetings.

[PAGE INTENTIONALLY LEFT BLANK]

CAR FREE RAMONA STREET AND CALIFORNIA AVENUE ADDENDUM TO THE COMPREHENSIVE PLAN 2030 EIR

TABLE OF CONTENTS	PAGE #
1. INTRODUCTION	1
1.1. PURPOSE OF THE ADDENDUM	1
1.2. APPLICABILITY AND USE OF THE ADDENDUM.....	2
2. PROJECT DESCRIPTION.....	2
2.1. PROJECT LOCATION	2
2.2. COMPREHENSIVE PLAN AND ZONING DESIGNATIONS	2
2.3. EXISTING CONDITIONS	3
2.4. PROPOSED IMPROVEMENTS	4
2.5. REQUIRED DISCRETIONARY ACTIONS	6
2.6. OTHER PUBLIC AGENCY REVIEW.....	6
2.7. CALIFORNIA NATIVE AMERICAN TRIBAL CONSULTATION	7
3. RELEVANT CITY PLANNING DOCUMENTS.....	15
3.1. CITY OF PALO ALTO COMPREHENSIVE PLAN	15
3.2. CITY OF PALO ALTO COMPREHENSIVE PLAN ENVIRONMENTAL IMPACT REPORT	18
3.3. CITY OF PALO ALTO BICYCLE AND PEDESTRIAN TRANSPORTATION PLAN	18
3.4. CITY OF PALO ALTO COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY	18
4. FINDINGS OF THE ADDENDUM.....	19
5. ENVIRONMENTAL ANALYSIS	20
5.1. CAR FREE CALIFORNIA AVENUE & RAMONA STREET PROJECT ADDENDUM	20
5.2. AESTHETICS.....	22
5.3. AIR QUALITY & GREENHOUSE GAS EMISSIONS	25
5.4. CULTURAL & TRIBAL RESOURCES	31
5.5. LAND USE AND PLANNING.....	36
5.6. NOISE.....	39
5.7. TRANSPORTATION	42
6. CONCLUSION	48
7. REFERENCE DOCUMENTS.....	51
7.1. APPENDICES	51
7.2. OTHER REFERENCED DOCUMENTS.....	51

LIST OF FIGURES

FIGURE 1: REGIONAL LOCATION MAP	9
FIGURE 2: RAMONA STREET PROJECT LOCATION MAP	10
FIGURE 3: CALIFORNIA AVENUE PROJECT VICINITY MAP	11
FIGURE 4: RAMONA STREET & CALIFORNIA AVENUE COMPREHENSIVE PLAN CONTEXT MAP	12
FIGURE 5: PROJECT LOCATIONS ON MAP T-5 FROM THE TRANSPORTATION ELEMENT IN THE COMPREHENSIVE PLAN	13

LIST OF TABLES

TABLE 4.1: ENVIRONMENTAL DETERMINATION BY IMPACT AREA	19
TABLE 5.1: AIR QUALITY SIGNIFICANCE THRESHOLDS	26
TABLE 5.2: CONSTRUCTION PERIOD EMISSIONS	27
TABLE 5.3: BASIC BEST MANAGEMENT PRACTICES FOR CONSTRUCTION-RELATED FUGITIVE DUST EMISSIONS	28

APPENDICES

- A. *Traffic Impact Analysis for the Car-Free Ramona Street and California Avenue Project* prepared by Hexagon Transportation Consultants on January 23, 2025
- B. *CalEEMod Air Quality Output* prepared by M-Group on November 26, 2024.
- C. *Car Free California Applicability Matrix* prepared by M-Group on December 17, 2024.

LIST OF ACRONYMS

ASSEMBLY BILL	AB
BAY AREA AIR QUALITY MANAGEMENT DISTRICT	BAAQMD
BEST MANAGEMENT PRACTICES	BMP
CALIFORNIA AIR RESOURCES BOARD	CARB
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL	DTSC
CALIFORNIA EMISSIONS ESTIMATOR MODEL	CALEEMOD
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY	ACAL-EPA
CALIFORNIA ENVIRONMENTAL QUALITY ACT	CEQA
CALIFORNIA REGISTER OF HISTORICAL RESOURCE	CRHR
CARBON DIOXIDE EQUIVALENT	CO ₂ E
CARBON MONOXIDE	CO
COMMUNITY NOISE EQUIVALENT LEVEL	CNEL
EMERGENCY VEHICLE ACCESS	EVA
ENVIRONMENTAL IMPACT REPORT	EIR
EXECUTIVE ORDER	EO
GREENHOUSE GASES	GHG
LEVEL OF SERVICE	LOS
LOW IMPACT DEVELOPMENT	LID
METHANE	CH ₃
METRIC TONS	MT
MITIGATED NEGATIVE DECLARATION	MND
MITIGATION MONITORING AND REPORTING PROGRAM	MMRP
MOST LIKELY DESCENDENT	MLD
NATIONAL REGISTER OF HISTORIC PLACES	NRHP
NATIVE AMERICAN HERITAGE COMMISSION	NAHC
NITROGEN OXIDES	NOX
NORTHWEST INFORMATION CENTER	NWIC
NOTICE OF INTENT	NOI
OFFICE OF PLANNING AND RESEARCH	OPR
PARTICULATE MATTER	PM
POUNDS PER DAY	LBS/DAY
PUBLIC RESOURCES CODE	PRC
REACTIVE ORGANIC GASES	ROG
RECOGNIZED ENVIRONMENTAL CONDITIONS	REC
SANTA CLARA VALLEY TRANSIT AUTHORITY	SCVTA
SENATE BILL	SB
TOXIC AIR CONTAMINANTS	TAC
TRAFFIC ANALYSIS ZONE	TAZ
TRAFFIC IMPACT STUDY	TIS
TRIBAL CULTURAL RESOURCES	TCR
VEHICLE MILES TRAVELED	VMT

[PAGE INTENTIONALLY LEFT BLANK]

1. INTRODUCTION

Restrictions on indoor dining and social distance requirements associated with the COVID-19 pandemic had a negative economic effect on many local businesses within the City of Palo Alto. In 2020, the City of Palo Alto closed off portions of Ramona Street and California Avenue to vehicular traffic, to facilitate pedestrian access, outdoor dining, and enhance the retail experience. These street segments have been closed to vehicular traffic since 2020. On November 6, 2023, the City Council provided direction to maintain the closed segments of Ramona Street and California Avenue car free, with current areas of the street closure to be made permanent. In order to facilitate Car-Free areas of the city, a Comprehensive Plan Amendment is proposed to create two additional categories for road types. This document analyzes the potential environmental impacts associated with the Comprehensive Plan Amendment and the permanent closure of segments of Ramona Street and California Avenue to through-vehicular traffic.

1.1. PURPOSE OF THE ADDENDUM

The California Environmental Quality Act (CEQA) recognizes that following approval of an environmental document and prior to project implementation, one or more of the following may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information may arise. Prior to proceeding with project implementation, CEQA requires the Lead Agency to evaluate these changes to determine whether they affect the conclusions in the approved environmental document.

CEQA Guidelines Sections 15162 and 15164 establish criteria to assess the appropriate level of environmental review when a project analyzed in a previously approved IS/MND or EIR has changed, or the environmental setting within which the review was carried out has changed. The Lead Agency is responsible for determining whether an addendum, supplemental, or subsequent environmental document is appropriate. As stated in CEQA Guidelines Section 15162 subdivision (a), a subsequent EIR or MND is not required unless the Lead Agency determines, on the basis of substantial evidence in light of the whole record, that:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects

on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15164 of the CEQA Guidelines specifies that the Lead Agency may prepare an addendum to an adopted Negative Declaration or EIR if only minor technical changes or additions are necessary and none of the conditions described in Section 15162, listed above, have occurred.

1.2. APPLICABILITY AND USE OF THE ADDENDUM

Based on the Project applications and technical studies prepared, the City of Palo Alto has determined that the proposed changes to the previously approved Comprehensive plan EIR will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project (Car-Free California Avenue and Ramona Street) increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan EIR (SCH #2014052101). Furthermore, there are no previously infeasible alternatives that are now considered feasible and no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effects. Lastly, none of the other factors set forth in CEQA Guidelines Section 15162(a)(3) apply to the Project.

As proposed, the Project requires minor alterations to the public record to ensure that the previously adopted Comprehensive Plan EIR accurately reflects the Project as currently proposed. As such, the City of Palo Alto, acting as the Lead Agency, has determined that an addendum to the previously approved EIR is the appropriate level of review to address the Car-Free Ramona Street and California Avenue Project and associated Comprehensive Plan Amendment. Consistent with the requirements of CEQA, this addendum document addresses impact categories that warrant an update to clarify the Project modifications and most recent environmental setting.

2. PROJECT DESCRIPTION

2.1. PROJECT LOCATION

The Project is proposed for two locations in the City of Palo Alto which is located in Santa Clara County (**Figure 1: Regional Location**). The two locations consist of Ramona Street from its intersection with Hamilton Avenue to mid-block west towards University Avenue (~200 feet) and the segment of California Avenue between Birch Street and El Camino Real (~935 feet).

The segment of Ramona Street is within the University Avenue/Downtown Commercial District across the street from Palo Alto City Hall (**Figure 2: Ramona Street Project Vicinity**). The Ramona Street segment is within the Ramona Street Architectural District which is the second oldest historic district in Palo Alto and listed on both the National Register of Historic Places (NRHP), the State Inventory of Historic Places, and Palo Alto's Historic Inventory. The Ramona Street segment is located just over 0.25-mile northeast of the Palo Alto Train Station (95 University Avenue).

The California Avenue segment proposed to be car free is within the California Avenue Commercial District approximately 850 feet southwest of the California Avenue Train Station (101 California Ave) and it is located within the California Avenue Parking Assessment District (**Figure 3: California Avenue Project Vicinity**).

2.2. COMPREHENSIVE PLAN AND ZONING DESIGNATIONS

Comprehensive Plan

Both roadway segments proposed to be Car-Free are located within the public right of way (ROW) and as such do not have Comprehensive Plan or Zoning Designations. Both roadway segments proposed to be Car-Free are adjacent to properties with a Comprehensive Plan Land Use Designation of Regional Community Commercial, which supports a variety of services and commercial uses (**see Figures 4**).

The 2030 Comprehensive Plan Transportation Element addresses transportation and mobility issues and provides a policy framework for implementation of solutions. The Comprehensive Plan classifies streets according to purpose, design and the volume of traffic they carry. Ramona Street and California Avenue are both designated as local collectors on Comprehensive Plan Map T-5 Roadway Network (**see Figure 5**). The Transportation Element includes Program T1.16.2, which encourages *marketing strategies, such as a recurring Palo Alto Open Streets program of events potentially in coordination with local business groups, which would include street closures and programming*. Open Streets is a program that temporarily opens streets to people by closing them to cars.

Zoning

Parcels adjacent to the Ramona Street segment are zoned Planned Community (PC)-3872 and Commercial Downtown-Community (CD-C) with a Ground Floor (GF) Combining District and Pedestrian Shopping (P) Combining District. The CD-CD-C(GF)(P) zone district is intended for mixed-use and commercial development, and intended to promote active, pedestrian-oriented uses with a high level of transparency and visual interest at the ground level and to foster the continuity of retail stores and display windows and to avoid a monotonous pedestrian environment in order to establish and maintain an economically healthy retail district. The PC 3872 zone district allows for the same uses as the CD-C(GF)(P) and is developed with a mixed-use retail and office building. The Project site is surrounded by fully developed sites with mostly two- and three-story buildings, all with commercial retail on the ground floor. As noted above, the Ramona Street segment is within the Ramona Street Architectural District which maintains historical designations at the federal, state, and local levels.

Parcels adjacent to the California Avenue segment are zoned Commercial-Community (CC) with a Retail Shopping (R) Combining District, and Pedestrian Shopping (P) Combining District which is intended to only allow only retail, eating and service-oriented commercial development on the ground floors. Currently the surrounding parcels are fully developed parcels with one-, two-, and three-story commercial buildings.

2.3. EXISTING CONDITIONS

Ramona Street's existing right of way is 36 feet wide, containing one through lane in each direction, curbs, gutters, and 12-foot sidewalks with regularly spaced tree wells on either side of the street. Ramona Street is signalized at its intersection with Hamilton Avenue to the east and University Avenue to the west. The southern side of Ramona Street at its intersection with Hamilton Avenue contains a yellow-striped loading zone. The sidewalk along the northern side of Ramona Street contains three two-bike capacity racks, regularly spaced along the street frontage. Ramona Street also contains 2-hour restricted (from 8:00 am-5:00pm) parallel parking spaces on both sides of the street. Ramona Street does not contain dedicated bicycle lanes nor is it designated as a bikeway on the Comprehensive Plan Map T-3 Bikeways in Palo Alto.

California Avenue's existing public right of way is 90 feet wide and includes a shared bicycle/vehicle through lane in each direction, curb, gutters and sidewalks. On-street angled parking, street lighting, street trees, and landscaping installations are located within the right of way as well as bicycle racks and waste receptacles. Pedestrian seating is provided at the corner of California Avenue at Ash Street, and just north of the El Camino Real intersection, and just before the intersection with Birch Street. Three major intersections are located along this segment including California Avenue/El Camino Real, California Avenue/Ash Street, and California Avenue/Birch Street. Other minor intersections and alleyways are also located along this segment of California

Avenue. The segment's southern terminus with El Camino Real is controlled by a signal with a dedicated left- and right-turn lanes from California Avenue onto El Camino Real. The north and southbound lanes are separated by an eight-foot wide median. There are three bus pullouts located at Birch (Southbound), Ash (southbound) and El Camino Real (northbound) that accommodated the 89 bus route that (prior to closure) ran along California Avenue between El Camino Real and Park Blvd. California Avenue at Ash Street is three-legged and all-way stop-controlled. The segment terminus at Birch Street is a four-way stop-controlled intersection. California Avenue's width varies to accommodate turn lanes, bus pull-outs, angled and parallel parking, bulb-outs for pedestrian crossing, landscaping, and one through lane in each direction. California Avenue is designated as an on-street enhanced bikeway with pavement markings to indicate that the roadway is a shared vehicle/bicycle pathway. Sidewalks are located on both sides of the street with a minimum width of 12 feet.

In 2020, both segments of road were temporarily closed to through-vehicle traffic to provide outdoor walking and dining areas. However, for the purposes of this analysis the Project is analyzed based on pre-temporary closure conditions.

2.4. PROPOSED IMPROVEMENTS

In 2020, the City of Palo Alto closed off approximately 200 feet of Ramona Street from Hamilton Avenue to midblock toward University Ave and approximately 935 feet of California Avenue between Birch and El Camino Real to vehicular traffic. As discussed in the Introduction section of this Addendum, the purpose of the closure was to create a pedestrian area to facilitate outdoor dining and enhance the retail experience, with the intent of supporting economic vitality for businesses during the COVID-19 pandemic. These street segments have been closed to vehicular traffic since 2020 and the City is proposing a Comprehensive Plan Amendment to make these closures permanent. The Comprehensive Plan Amendment would establish a new street classification type to designate roads that prohibit vehicular access.

Comprehensive Plan Amendment

The proposed project includes an amendment to the Comprehensive Plan 2030 to include two new road classifications to the list on Map T-5 on page 67 of the Transportation Element and to show the proposed street segment on Ramona as a Pedestrian Only Street and the proposed street segment on California Avenue as a Community Street. The new classifications will be as follows:

Pedestrian Only Streets – Streets that are restricted to pedestrians, emergency vehicles, and utility and maintenance vehicles only. Outdoor dining and retail displays are encouraged on pedestrian only streets.

Community Streets – Streets that are restricted to pedestrians and bicycles. Emergency, utility and maintenance vehicles are allowed, and commercial vehicles are allowed on a restricted basis. Outdoor dining, retail displays, and community events are encouraged on community streets.

The proposed Amendment includes the following additional rules:

- As determined by the City Manager, emergency vehicles shall be permitted access only during an emergency or if needed during a non-emergency to provide for public health and/or safety. This includes the staging of emergency vehicles during special events or other times when deployment is necessary to ensure public health and/or safety.
- Utility and Maintenance vehicles that are operated by the City, a publicly or privately owned utility, or contractors operating on behalf of the City or such utilities, may be allowed access if there is no other practicable method to access the location needing service. Utility and maintenance vehicles operating on behalf of other parties, including businesses, building owners, tenants, may be granted access by

the City if there is no other practicable method to access the location needing service. Utility and maintenance vehicles do not include vehicles making routine deliveries to companies or persons.

- The City Manager or designee may authorize vehicles to access the closed street for special events.
- The City Manager or designee may promulgate regulations to ensure the orderly and safe functioning of these rules. This includes time, place, and manner restrictions, as well as limiting the number of vehicles on these streets at any given time.

The Comprehensive Plan Amendment will also revise Map T-5 on Page 67 to update the designation of the Project area on Ramona Street to a Pedestrian Only Street and to update the Project area on California Avenue to a Community Street.

Car-Free Ramona Street

On the Ramona Street segment, access by vehicular traffic will be precluded and will accommodate pedestrians only (including full ADA access and emergency vehicle access). To support a safe pedestrian zone, no mounted bicycles will be permitted within the Car-Free area of Ramona Street. The existing left turn lane from Hamilton Avenue to Ramona Street will be re-configured and signage installed indicating no right or left turns from Hamilton Avenue onto Ramona Street. To clearly indicate that a portion of the street is closed to vehicular traffic, removable bollards, planters, and signage will be placed at both ends of the car free portion of Ramona Street. Signage will also be installed at University Avenue and Ramona Street to indicate that there is no outlet via Ramona Street, but that there is access to the existing Ramona/University Parking Garage, located across from 530 Ramona St, approximately midblock between University Avenue and Hamilton Avenue.

The removable bollards will provide access for emergency, utility, and maintenance vehicles on Ramona Street from Hamilton Avenue via a 40-foot-long and 20-foot-wide fire lane that will narrow to 16 feet wide through the remainder of the Car-Free portion of the street (~160 ft). The fire lane will run through the center of the street, allowing eight (8) feet between the fire lane and the edge of the sidewalk for the first 40 feet and ten (10) feet on each side, for the remaining ~160 feet. The space within the public right of way between the fire lane and edge of sidewalk curbs will be available for outdoor dining and retail.

Car-Free California Avenue

As proposed, California Avenue between El Camino Real and Birch Street will be restricted to pedestrian and bicycle traffic with limited access for emergency, utility, and maintenance vehicles and commercial delivery vehicles. At the intersection with El Camino Real, a 25-foot-wide red brick stamped asphalt section will be added just north of the existing crosswalk. Within the 25-foot area, five 72 inch by 72 inch by 36 inch tall fiber glass planters and five 30 inch by 30 inch by 30 inches tall fiberglass planters will be placed above ground. A new monument sign will be installed to replace the existing monument street sign in the existing median. On the north side of the existing street, two five-foot-wide bike lanes (one in each direction) will be added and will be marked by green thermoplastic pavement markings and white bike lane markings. Three retractable bollards will be spaced in between and on either side of the bike lanes. When retracted, the bollards will allow for the passage of emergency, utility, maintenance, and delivery vehicles on a 20-foot-wide opening between the existing curb and the proposed planters. From El Camino Real, new pavement markings will guide eastbound bicyclists to the two-way cycle track on the newly created bike lanes. Additionally, the southbound left turn lane on El Camino Real will be diagonally striped to indicate closure to vehicles. Bicycle loop detectors will be installed for safety and convenience on California Avenue at the El Camino Real intersection

At the existing intersection of Ash Street and California Avenue, the existing crosswalk will remain and 20 feet of Ash Street east of its intersection with California Avenue will be repaved with red brick stamped asphalt which will be further delineated by a 12-inch-wide white thermoplastic band. Within this repaved section, four

40-inch diameter by twenty-inch-tall fiberglass planters and four 60-inch diameter by forty-inch-tall fiberglass planters will be placed above ground to prevent through-vehicle traffic. Two bollards will be installed five and a half feet apart in the middle of Ash Street approximately eight feet from the end of vehicle pavement. When retracted, the bollards will provide a 16-foot-wide fire lane. Two five-foot wheel stops will be installed just outside of the white thermoplastic band. This new section between the end of pavement and the bollards will serve as an ADA drop off area. Signage will be added for wayfinding and to indicate restricted access.

At the intersection of Birch Street and California Avenue, the existing crosswalk will remain in place and an additional 18-foot-long section of red brick stamped asphalt will extend up California Avenue between the existing sidewalks. Two five and a half foot wide and 26-foot-long bike lanes, one on each side of the existing median will be marked by green thermoplastic painting and white lane markings. The street section will be closed off by two retractable and two removable stainless-steel bollards, four 60-inch diameter by 40-inch-tall above ground fiberglass planters and seven 40-inch diameter by 20-inch-tall above ground fiberglass planters. Road signage will be added as needed.

The permanent closure of this section of California Avenue will require permanent relocation of the Santa Clara Valley Transit Route (SCVT) 89 which will operate using an alternative route as it has since 2020 when the temporary closures were initiated.

Construction

Construction associated with the permanent closure of Ramona Street and California Avenue includes minor demolition of existing pavement and re-paving of the existing pavement; minor excavation associated with installation of retractable and removable bollards; application of thermoplastic pavement coloring and markings; and installation of signs. Fiberglass planters will not be permanently installed but will sit on top of the new paved areas.

Each retractable bollard will be installed by boring an approximately 24 inch wide, 96 inch long and 56-inch-deep hole. Conservatively estimated, the total area of disturbance for each bollard will be roughly 24 inches wide by 96 inches long and 56 inches deep. This will include installation of the “stirrup” and supports for the bollard. The Ramona Street segment includes installation of approximately 6 removable bollards. The California Avenue segment includes approximately 9 retractable bollards. Removable bollards have a shallower and narrower support system, but for the purposes of this document, it is assumed all bollards will be retractable. If all 15 bollards are retractable, this would result in less than three cubic yards of soil disturbance per bollard and a less than 45 cubic yards of ground disturbance in total.¹

2.5. REQUIRED DISCRETIONARY ACTIONS

The Project requires a Comprehensive Plan Amendment which is a discretionary action and thus considered a project under CEQA. The City can use judgement in deciding whether and how to carry out the Project and should consider the environmental analysis contained herein as well as any required findings to approve an amendment to the Comprehensive Plan.

2.6. OTHER PUBLIC AGENCY REVIEW

Caltrans
Santa Clara Valley Transportation Authority
California State Historic Preservation Office

¹ In order to conservatively calculate maximum soil removal, we used the maximum depth of 56 inches multiplied by a length of 96 inches and by a depth of 24 inches and then converting to cubic yards: $56 \times 24 \times 96 = 129,024$ cubic inches = 2.76 cubic feet $\times 15 = 41.55$

2.7. CALIFORNIA NATIVE AMERICAN TRIBAL CONSULTATION

SB 18 (GC Section 65352.3) requires lead agencies to contact and consult with California Native American tribes prior to amending or adopting any general plan, specific plan, or designating land as open space. In accordance with SB 18, notification of the proposed Project was mailed to the following tribes on December 5, 2024:

- Amah Mutsun Tribal Band of Mission San Juan Bautista Costanoan Rumsen Carmel Tribe
- Indian Canyon Mutsun Band of Coastanoan
- Ohlone Indian Tribe
- Muwekma Ohlone Tribe of the SF Bay Area
- Wuksachi Indian Tribe/Eshom Valley Band
- Tamien Nation

The City received requests for consultation from Tamien Nation and the Muwekma Ohlone Tribe of the SF Bay Area and carried out consultation including meetings with Tribal representative and correspondence regarding the project.

[PAGE INTENTIONALLY LEFT BLANK]

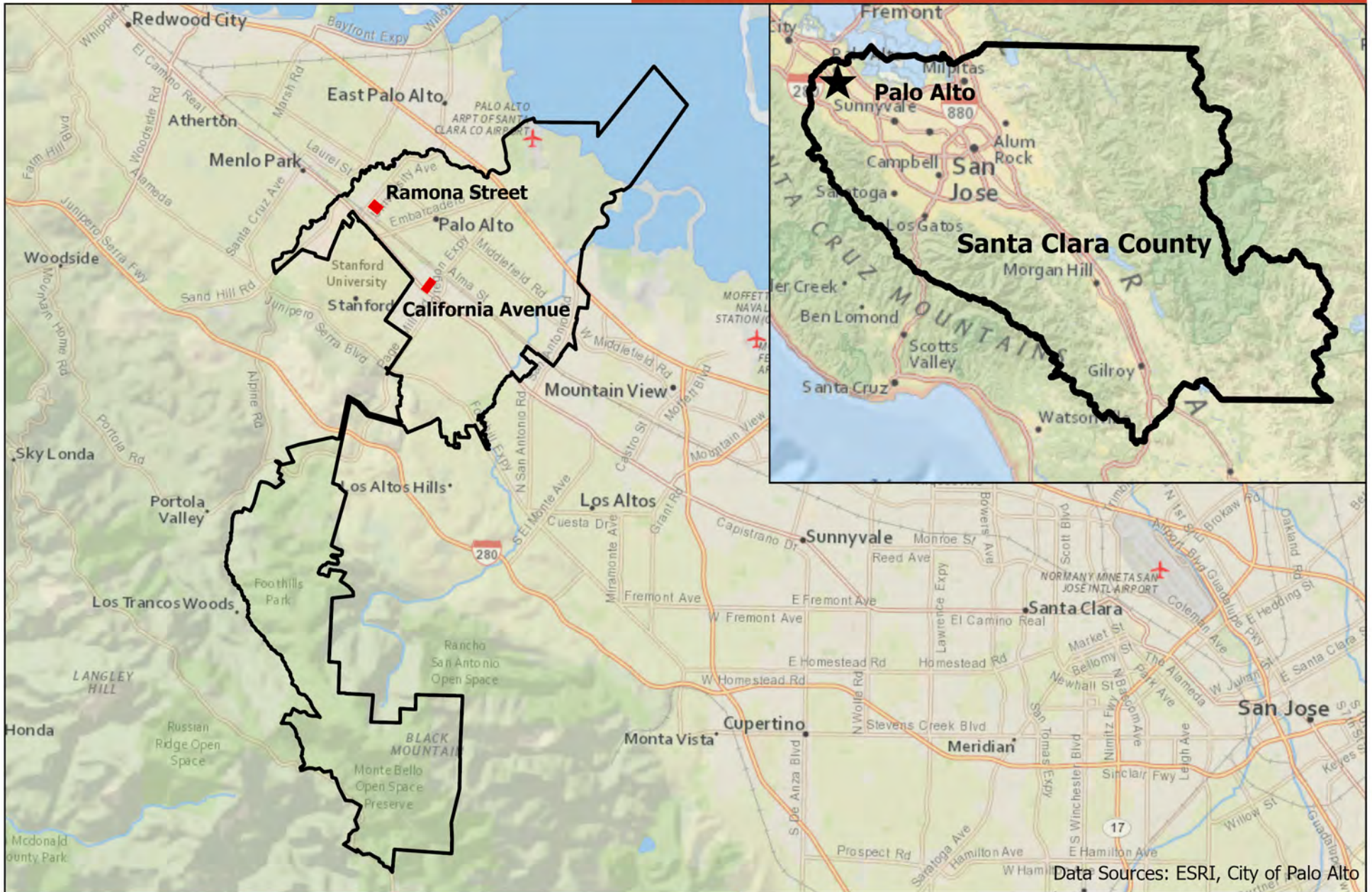


Figure 1: Regional Location Map

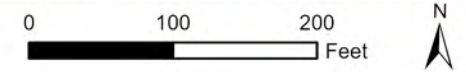
Project Sites

Palo Alto City Limits

Santa Clara County



Figure 2: Ramona Street Project Vicinity Map

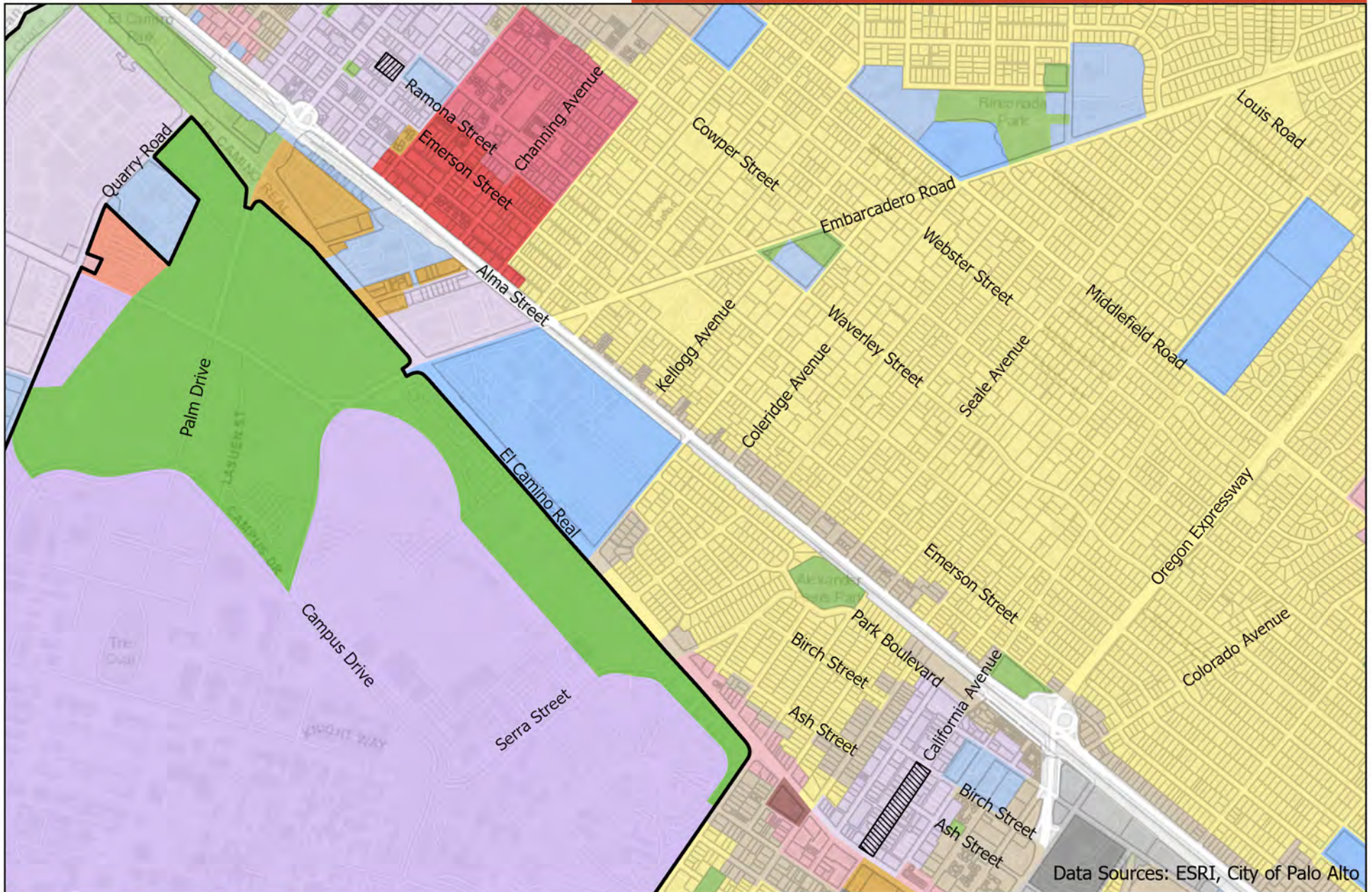


Project Site



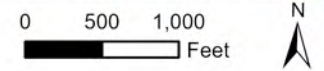
Figure 3: California Avenue Project Vicinity Map

 Project Site  Palo Alto City Limits



Data Sources: ESRI, City of Palo Alto

Figure 4: General Plan Map



- | | | | | | | |
|---------------------------|-------------------------------|----------------------|------------------------------------|----------------------------|----------------------------------|---------------------------------------|
| Single Family Residential | Hotel Commercial | Light Industrial | SOFA I CAP | Public Park | Project Sites | Palo Alto City Limits |
| Multi-Family Residential | Service Commercial | Research/Office Park | SOFA II CAP | Streamside Open Space | MIUL/Campus Educational Facility | Campus Residential - Low Density |
| Mixed Use | Neighborhood Commercial | | School District Land | Open Space/Controlled Dev. | Open Space/Research | Campus Residential - Moderate Density |
| | Regional/Community Commercial | | Major Institution/Special Facility | Public Conservation Land | | |

Car Free Ramona St. & California Ave. | Palo Alto, CA



Figure 5: General Plan Map T-5

Source: City of Palo Alto General Plan T-5 Map



[PAGE INTENTIONALLY LEFT BLANK]

3. RELEVANT CITY PLANNING DOCUMENTS

This section includes a description of the most relevant planning documents and regulations that are applicable to the proposed Project.

3.1. CITY OF PALO ALTO COMPREHENSIVE PLAN

Purpose

The City adopted the Comprehensive Plan 2030 in November 2017 with an overall vision of creating a City with diverse housing opportunities, a sustainable transportation network, where the natural environment is protected, excellent services are provided, and citizens have a say in government. The Plan also seeks to create a City that is economically healthy and a good place to do business. The Plan contains the City's official goals, policies, and programs on land use and community design, transportation, housing, natural environment, safety, business and economics, and community services. Adopted goals, policies, and programs apply to both public and private properties and are focused on the physical form of the city. The Plan is used by the City Council and the Planning and Transportation Commission to evaluate land use changes and to make funding and budget decisions. Goals, policies, and programs included in the Comprehensive Plan that are relevant to the Project are discussed in greater detail below.

Major themes of the Palo Alto Comprehensive Plan relate to Building Community and Neighborhoods, Maintaining and Enhancing Community Character, Reducing Reliance on the Automobile, Meeting Housing Supply Challenges, Protecting and Sustaining the Natural Environment, Keeping Palo Alto Prepared, Meeting Residential and Commercial Needs, and Providing Responsive Governance and Regional Leadership. The Car Free Ramona Street and California Avenue Project implements the theme related to reducing reliance on automobiles by facilitating pedestrians and bikes and the theme related to meeting residential and commercial needs because it will create vibrant and attractive commercial areas.

Street Classifications

The Comprehensive Plan classifies streets according to the purpose they serve, their design, and the volume of traffic they carry. Street classifications are shown on Map T-5 of the Comprehensive Plan and are defined as follows:

- **Local streets** are minor roadways that provide access to adjacent properties only.
- **Collector streets** are roadways that collect and distribute local traffic to and from arterial streets and provide access to adjacent properties.
- **Arterial streets** are major roadways primarily serving through traffic, and take traffic to and from expressways and freeways, along with providing access to adjacent properties.
- **Residential Arterials** are similar to arterial streets except these arterials have residential properties on both sides of the roadway with direct frontages and driveways on that roadway.
- **Expressways** are major roadways with limited access to adjacent properties; devoted almost exclusively to traffic movement, mainly serving through-traffic.

- **Freeways** are major roadways with controlled access; devoted exclusively to traffic movement, mainly of a through or regional nature.

The Ramona Street and California Avenue segments included as part of the Project are both designated as collector streets.² Although Map T-5 of the Comprehensive Plan does not utilize unique symbols to differentiate the local and collector street type, the connection of these segments to arterial roads meets the definition of collector streets.

Roadway Improvements

The Comprehensive Plan identifies future roadway improvements within existing rights-of-way, including improvements to address traffic calming and roadway capacity. Other local and regional transportation investments envisioned in the Plan include:

- Pedestrian and bicycle improvements derived from the 2012 Palo Alto Bicycle + Pedestrian Transportation Plan as amended.
- El Camino Real intersection and pedestrian safety/streetscape improvements.
- Downtown mobility and safety improvements.

Goals, Policies, and Programs

As detailed above, the Comprehensive Plan includes goals, policies, and programs that were established with the intent of achieving the overall vision of the Plan. The following Comprehensive Plan 2030 land use and transportation goals, policies, and programs are directly relevant to the proposed Project and provide an important policy context within which the Comprehensive Plan Amendment and the overall Project should be considered:

Land Use:

- GOAL L-2 An enhanced sense of “community” with development designed to foster public life, meet citywide needs and embrace the principles of sustainability.
 - Policy L-2.2 Enhance connections between commercial and mixed-use centers and the surrounding residential neighborhoods by promoting walkable and bikeable connections and a diverse range of retail and services that caters to the daily needs of residents.
- GOAL L-4 Inviting pedestrian scale centers that offer a variety of retail and commercial services and provide focal points and community gathering places for the city’s residential neighborhoods and employment districts.
 - Policy L-4.1 Encourage the upgrading and revitalization of selected Centers in a manner that is compatible with the character of surrounding neighborhoods, without loss of retail and existing small, local businesses.
 - Policy L-4.2 Preserve ground-floor retail, limit the displacement of existing retail from neighborhood centers and explore opportunities to expand retail.
 - Policy L-4.4 Ensure all Regional Centers and Multi-Neighborhood Centers provide centrally located gathering spaces that create a sense of identity and encourage

² City of Palo Alto Comprehensive Plan 2030, Chapter 3. Transportation, Map T-5 (Roadway Network), Page 67.

economic revitalization. Encourage public amenities such as benches, street trees, kiosks, restrooms and public art.

- Program L4.4.1 Study the feasibility of using public and private funds to provide and maintain landscaping and public spaces such as parks, plazas, sidewalks and public art within commercial areas.
- Program L4.4.4 Identify priority street improvements that could make a substantial contribution to the character of Centers, such as widening sidewalks, narrowing travel lanes, creating medians, restriping to allow diagonal parking and planting trees.
- Policy L-4.8 Ensure that University Avenue/Downtown is pedestrian-friendly and supports bicycle use. Use public art, trees, bicycle racks and other amenities to create an environment that is inviting to pedestrians and bicyclists.
- Policy L-4.10 Maintain the existing scale, character and function of the California Avenue business district as a shopping, service and office center intermediate in function and scale between Downtown and the smaller neighborhood business areas.
- GOAL L-9 Attractive, inviting public spaces and streets that enhance the image and character of the city.
- GOAL T-1 Create a sustainable transportation system, complemented by a mix of land uses, that emphasizes walking, bicycling, use of public transportation and other methods to reduce GHG emissions and the use of single-occupancy motor vehicles.
 - Policy T-1.3 Reduce GHG and pollutant emissions associated with transportation by reducing VMT and per-mile emissions through increasing transit options, supporting biking and walking, and the use of zero-emission vehicle technologies to meet City and State goals for GHG reductions by 2030.
 - Policy T-1.19 Provide facilities that encourage and support bicycling and walking.
 - Program T1.19.5 Improve amenities such as seating, lighting, bicycle parking, street trees, public art and interpretive stations along bicycle and pedestrian paths and in City parks to encourage walking and cycling and enhance the feeling of safety.
- GOAL T-3 Maintain an efficient roadway network for all users.
 - Policy T-3.1 Maintain a hierarchy of streets that includes freeways, expressways, arterials, residential arterials, collector streets and local streets, balancing the needs of all users in a safe and appropriate manner.
 - Policy T-3.5 When constructing or modifying roadways, plan for use of the roadway by all users.
 - Program T3.5.2 Establish procedures for considering the effects of street design on emergency vehicle response time.

3.2. CITY OF PALO ALTO COMPREHENSIVE PLAN ENVIRONMENTAL IMPACT REPORT

The Comprehensive Plan 2030 Environmental Impact Report (EIR) (SCH # 2014052101) was certified by the City of Palo Alto City Council on November 13, 2017, and is the subject of this Addendum. The EIR was prepared to provide an assessment of the potential environmental consequences of adopting and implementing the City of Palo Alto Comprehensive Plan Update 2030 and associated zoning amendments. The EIR reviewed all environmental impacts and effects, identified potentially significant environmental impacts, and developed measures and policies to mitigate impacts. Nonetheless, it was concluded that implementation of the Comprehensive Plan would result in significant and unavoidable impacts. Consistent with the requirements of CEQA, the City adopted a statement of overriding consideration which balances the merits of approving the project despite the potential environmental impacts. The impacts identified as significant and unavoidable are as follows:

- AIR-2: Implementation of the proposed Plan could violate an air quality standard; contribute substantially to an existing or project air quality violation; and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- TRANS-1: Implementation of the project would cause an intersection to drop below its motor vehicle level of service standard or deteriorate operations at representative intersections that already operate at a substandard level of service.
- TRANS-3: Implementation of the project would cause a freeway segment or ramp to drop below its level of service standard or deteriorate operations that already operate at a substandard level of service.
- TRANS-6: Implementation of the project would impede the operation of a transit system as a result of congestion.

3.3. CITY OF PALO ALTO BICYCLE AND PEDESTRIAN TRANSPORTATION PLAN

The City of Palo Alto's most recent Bicycle and Pedestrian Transportation Plan (BPTP) was adopted in July, 2012. The 2012 update built upon the City of Palo Alto's 2003 Bicycle Transportation Plan, Safe Routes to School improvements, and creative land use planning. The Plan was developed through collaboration with the City, the Palo Alto Bicycle Advisory Committee (PABAC), the City/School Traffic Safety Committee (CSTSC), and the community. The plan was written to address the unmet needs of Palo Alto bicyclists and pedestrians by identifying a network for all types of bicycle travel and recommending other key improvements – including education and encouragement programs – to make non-polluting travel a viable, everyday option for more people. The BPTP provides policy vision, design guidance, and specific recommendations to increase walking and biking rates to ambitious (yet achievable levels). The City is in the process of updating this plan and anticipates completion by September 30, 2025. The current plan identifies priority pedestrian areas and treatments by location including the California Avenue Business District. The treatment priority includes festival streets and shared space streets and identify both Ramona Street and California Avenue as potential locations.

3.4. CITY OF PALO ALTO COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY

On August 14, 2023, the City of Palo Alto City Council approved the Comprehensive Economic Development Strategy (CEDS). The CEDS includes three guiding principles, 10 recommendations, and 28 actions intended to guide economic development in the City of Palo Alto. Directly relevant to the

Project is Guiding Principle One, which seeks to reinforce each district's distinct scale and offerings by stabilizing and reinforcing Downtown as a destination, embracing California Avenue as a community and neighborhood serving place, and supporting existing Neighborhood Centers. The proposed Comprehensive Plan Amendment and Car-Free Ramona Street and California Avenue improvements are consistent with Recommendation 1, which directs upgrades of highly used and visible public realms to promote district definition and encourage activation. The proposed amendment and specific improvements also directly implement Action 1.2 under Guiding Principle 1 in the CEDS which directs the continued exploration of the Car-Free Streets Initiative for Ramona Street and California Avenue to optimize a balanced future.

4. FINDINGS OF THE ADDENDUM

As previously stated, this document serves as an addendum to the previously certified EIR for the Comprehensive Plan 2030 Environmental Impact Report (EIR) (SCH # 2014052101). The Environmental Analysis section below, describes the environmental impacts of the proposed Car-Free Ramona Street and California Avenue Project and the associated Comprehensive Plan Amendment as compared to the impacts of the previously approved Comprehensive Plan. Specifically, the following section addresses those areas that could potentially result in new or more severe impacts, discusses the adequacy and applicability of previously adopted mitigation measures to the revised Project, and addresses whether any new or more severe impacts would result from the revised Project.

Table 4.1 below shows that there are no environmental areas determined to have new or substantially more severe significant effects compared to those identified in the Comprehensive Plan EIR.

TABLE 4.1: ENVIRONMENTAL DETERMINATION BY IMPACT AREA

Impact	New Significant or More Severe Impacts	New Circumstances Causing New Significant or More Severe Impacts	No New Information of Substantial Importance, Minor Clarification	No New information of Substantial Importance
Aesthetics			X	
Agricultural/Forestry				X
Air Quality			X	
Biological Resources				X
Cultural Resources			X	
Energy				X
Geology & Soils				X
Greenhouse Gas Emissions			X	
Hazards and Hazardous Materials				X
Hydrology/Water Quality				X

Impact	New Significant or More Severe Impacts	New Circumstances Causing New Significant or More Severe Impacts	No New Information of Substantial Importance, Minor Clarification	No New information of Substantial Importance
Land Use Planning			X	
Mineral Resources				X
Noise			X	
Public Services				X
Recreation				X
Transportation			X	
Tribal Cultural Resources			X	
Utilities				X
Wildfire				X
Mandatory Findings / Cumulative Impacts				X

Therefore, as discussed in this Addendum, the Project will not result in any new or more severe impacts as compared to impacts previously identified for the Comprehensive Plan. As such, no further environmental review beyond this addendum is warranted.

5. ENVIRONMENTAL ANALYSIS

This section includes an analysis of the impacts of the proposed Project, as revised, compared to the environmental analysis prepared for the City of Palo Alto Comprehensive Plan. Section 5.1 below summarizes environmental topics that warrant additional analysis to address whether adoption of the proposed Comprehensive Plan Amendment to add a new street classification as well as construction and operation of a permanent Car-Free Ramona Street and California Avenue will result in new or more severe impacts as compared to what was previously identified in the Comprehensive Plan EIR.

5.1. CAR FREE CALIFORNIA AVENUE & RAMONA STREET PROJECT ADDENDUM

The previously adopted Comprehensive Plan 2030 EIR identified significant impacts and proposed mitigation measures to reduce such impacts to levels below significance related to Aesthetics, Air Quality, Cultural Resources, Greenhouse Gas Emissions, Hydrology/Water Quality, Land Use, Noise, Public Services and Recreation, Transportation and Traffic, and Utilities. Consistent with the CEQA Guidelines, this Addendum only addresses those resource areas that could potentially result in new impacts or impacts of greater severity specific to the Project site as compared to those that were addressed in the Comprehensive Plan EIR. Based on the significance findings, application of site-specific mitigation measures, and requirement that the Project comply with applicable standard

conditions and Best Management Practices (BMPs), further discussion of the following sections are not included in this Addendum to the City of Palo Alto Comprehensive Plan EIR because the prior CEQA analysis sufficiently analyzed the impacts, or rather, the Project would not have any impact to the analysis of these resource areas:

- Agricultural & Forestry Resources
- Biological Resources
- Energy
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Mineral Resources
- Public Services
- Recreation
- Utilities
- Wildfire

All relevant mitigation measures, conditions of approval, and BMPs identified in the Comprehensive Plan 2030 EIR for these resource areas are incorporated by reference and will be required to be implemented as applicable. The Comprehensive Plan EIR MMRP is incorporated by reference hereto. In addition, an Applicability Matrix is included in **Appendix C** to demonstrate the applicability of adopted mitigation measures to the Project.

The following analysis includes a discussion of those resource areas that warrant an update to address the changes to the environmental setting, impacts, and mitigation measures since adoption of the Comprehensive Plan EIR. The following analysis evaluates this resource areas:

- Aesthetics
- Air Quality & Greenhouse Gas Assessment
- Cultural & Tribal Resources
- Land Use Planning
- Noise
- Transportation

5.2. AESTHETICS

The Comprehensive Plan 2030 EIR (EIR) concluded that with the implementation of mitigation measures, the Plan would result in less than significant impacts to aesthetics due to degrading the existing visual character or quality of the area and its surroundings and due to the potential to substantially shadow public open space (other than public open streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21. The EIR concluded that the Comprehensive Plan would have a less than significant impact due to significantly altering public viewsheds or view corridors or scenic resources (such as trees, rocks, outcroppings, or historic buildings along a scenic highway), due to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and from cumulative aesthetic impacts in the area.

The City of Palo Alto 2030 Comprehensive Plan sets forth goals, policies, and programs intended to protect aesthetics. Those particularly relevant to the Car Free Ramona Street and California Avenue Project include the following:

Policy L-4.1 Encourage the upgrading and revitalization of selected Centers in a manner that is compatible with the character of surrounding neighborhoods, without loss of retail and existing small, local businesses.

Policy L-4.8 Ensure that University Avenue/Downtown is pedestrian-friendly and supports bicycle use. Use public art, trees, bicycle racks and other amenities to create an environment that is inviting to pedestrians and bicyclists.

Policy L-4.10 Maintain the existing scale, character and function of the California Avenue business district as a shopping, service and office center intermediate in function and scale between Downtown and the smaller neighborhood business areas.

Policy L-6.1 Promote high-quality design and site planning that is compatible with surrounding development and public spaces.

Comprehensive Plan Amendment

As noted in the Comprehensive Plan, the City designates University Avenue, Embarcadero Road, Oregon Expressway/Page Mill Road, Foothill Expressway, Arastradero Road from Foothill Expressway to Interstate 280, and Interstate 280 as Scenic Routes. The Santa Cruz Mountains are located to the south and west of Palo Alto, reaching a height greater than 3,000 feet, and are viewable from the locally designated scenic routes.

The subject Project proposes to amend the Comprehensive Plan by adding two new street classifications to the City of Palo Alto's network that restrict vehicle access. The proposed Amendment will not result in the construction of any structures or facilities that will impact the view of scenic resources or obstruct view along scenic routes. Rather, the proposed Amendment will establish and formalize non-vehicular street classifications for two street segments along Ramona Street and California Avenue. As such, the proposed Comprehensive Plan Amendment will not have new or substantially more severe significant effects compared to those Identified in the Comprehensive Plan EIR. There are no applicable mitigation measures in the Comprehensive Plan MMRP.

Car-Free Ramona Street

The proposed Car-Free section of Ramona Street is located within the Ramona Street Architectural District in Downtown Palo Alto. The District is composed of contemporary and historic structures of one- to four-stories with commercial, office, and restaurant uses located along tree-lined streets. Parking spaces are located on-street for both directions of vehicle traffic. Historic facades are adorned with red terra cotta-style shingled roofs providing visual continuity between the structures with features emblematic of an improved urban environment with amenities supportive of pedestrian activities. On the street level, there are numerous restaurants featuring outdoor seating arranged towards the sidewalk along with street lighting, waste receptacles, and signage that help define pedestrian spaces. The sidewalks are bound by trees of near uniform distance coupled with clearly marked crosswalks at key intersections.

The Project proposes to incorporate bollards and above ground planters at the intersection of Ramona Street and Hamilton Avenue and on Ramona Street (immediately south of the parking garage entrance), which is consistent with the established aesthetic character of the pedestrian commercial area. The proposed pavement resurfacing and markings and wayfinding signage would be on a section of Ramona Street that is currently asphalt and consistent with the visual character of the neighborhood. There are no other elements of the proposed Project that would alter the aesthetic or visual character of Ramona Street. As such, the Project will not have new or substantially more severe significant effects compared to those Identified in the Comprehensive Plan EIR.

Car-Free California Avenue

The proposed Car-Free section of California Avenue is located near El Camino Real and, as detailed in the City's Comprehensive Plan, is adjacent to parcels designated Regional Community Commercial consisting of one- to three-story retail and office properties with storefronts oriented toward the roadway, creating outdoor spaces conducive to pedestrian activity. Parking spaces are provided on both sides of California Avenue with parallel parking spaces on the east side and right-angle parking spaces provided on the west side of the road.

As noted in the City's Bicycle + Pedestrian Transportation Plan, the California Avenue Business District incorporates pedestrian paths between buildings to support non-automobile mobility between California Avenue and adjacent streets and features curb cuts at key intersections to enhance pedestrian safety.

The section of California Avenue proposed to be car-free, features a variety of buildings of uniform height, the majority of which are single story structures with two-to three-story structures located closer to El Camino Real. Commercial uses are abundant in this section of California Avenue and feature restaurants that incorporate outdoor seating oriented towards the roadway situated along sidewalks that provide pedestrian mobility continuously throughout the Project site. Along the road are various amenities including streetlights, seating, and bicycle racks. California Avenue features shared bike lane markings, landscaped medians and street trees, pedestrian crossings with bulb outs to improve safety, and clearly demarcated bus stops with signage.

The proposed restriction of vehicle traffic on California Avenue will not result in the construction of new facilities with the potential to change the visual character. Permanent improvements proposed by the Project are limited to the installation of bollards, repaving, pavement markings and striping, which are consistent with the visual character of the neighborhood. Above ground planters will be installed to create a barrier to vehicles and are also consistent with the visual aesthetic of the area. There are no other elements of the proposed Project that would alter the aesthetic or visual character of California Avenue. As such, the Project will not have new or substantially more severe significant

effects compared to those Identified in the Comprehensive Plan EIR. There are no applicable mitigation measures in the Comprehensive Plan MMRP.

Conclusion

There is no proposed demolition or construction of facilities or structures that would change the visual environment of the proposed Car-Free sections of Ramona Street and California Avenue. As such, the Project will not have new or substantially more severe significant effects compared to those identified in the Comprehensive Plan EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effect.

Applicable Mitigation Measures

There are no applicable mitigation measures in the Comprehensive Plan MMRP.

Recommendation:

None

5.3. AIR QUALITY & GREENHOUSE GAS EMISSIONS

The Comprehensive Plan 2030 EIR (EIR) concluded that even with the implementation of mitigation measures, the Comprehensive Plan would result in significant and unavoidable impacts to air quality because it could violate an air quality standard; contribute substantially to an existing or project air quality violation; and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). The EIR concluded that with the implementation of policies and mitigation measures, the Comprehensive Plan would have a less than significant impact from conflicting with or obstructing implementation of the applicable air quality plan, by exposing sensitive receptors to substantial concentrations of air pollution, and by creating or exposing a substantial number of people to objectionable odors.

Additionally, the EIR concluded that with the implementation of mitigation measures, the Comprehensive Plan would have a less than significant impact due to exposing people or structures to the physical effects of climate change, including but not limited to flooding, extreme temperatures, public health, wildfire risk, or other impacts resulting from climate change. The EIR also found that the Comprehensive Plan would have a less than significant impact to generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment and that it would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The Comprehensive Plan EIR concluded that implementation of the Plan could result in impacts resulting from a conflict with or obstruction of the implementation of an applicable air quality plan (Impact AIR-1). However, impacts would be mitigated through implementation of Mitigation Measure AIR-1 which require policies that achieve reduction in emissions from automobiles and support alternative travel modes such as transit, bicycling, and walking. Additionally, the EIR concluded that the Plan could result in impacts associated with violating an air quality standard or contributing to a cumulatively considerable net increase in criteria pollutants for which the region is in nonattainment (Impact AIR-2). However, Mitigation Measure AIR-2d requires the reduction of long-term air quality impacts by emphasizing walkable neighborhoods and supporting alternative modes of transportation.

The proposed Project will create two car-free street segments, which is consistent with goals, policies, and programs that emphasize walkable neighborhoods and support alternative modes of transportation, and as such the Project implements Mitigation Measures AIR-1 and AIR-2d.

Additionally, the City of Palo Alto 2030 Comprehensive Plan sets forth goals, policies, and programs intended to improve and enhance air quality. Those particularly relevant to the Car Free Ramona Street and California Avenue Project include the following:

Goal N-5 Clean, healthful air for Palo Alto and the San Francisco Bay Area

Policy N-5.2 Support behavior changes to reduce emissions of particulates from automobiles.

Policy N-5.3 Reduce emissions of particulates from, manufacturing, dry cleaning, construction activity, grading, wood burning, landscape maintenance, including leaf blowers and other sources.

Program N-5.3.4 Explore feasible and cost-effective opportunities to reduce concrete and asphalt use by the City, in parks and other public projects.

Policy N-5.4 All potential sources of odor and/or toxic air contaminants shall be adequately buffered, or mechanically or otherwise mitigated to avoid odor and toxic impacts that violate relevant human health standards.

Policy N-8.2 With guidance from the City's Sustainability and Climate Action Plan (S/CAP) and its subsequent updates and other future planning efforts, reduce greenhouse gas emissions from City operations and from the community.

Comprehensive Plan Amendment Air Quality and Greenhouse Gas Emissions

The Project proposes a Comprehensive Plan Amendment that will add two new street classifications that will restrict vehicle access along roadway segments. The purpose of restricting vehicle access is to create additional dedicated routes for active transportation to promote alternatives to vehicle travel. Walking, biking, and other modes of active transportation produce less emissions than travel by car. Activities that support active transportation are a key strategy to reducing greenhouse gas emissions. The proposed Project is limited to the restriction of vehicles along segments of two roadways. As such, the Project will not result in potentially significant impacts to air quality or greenhouse gas emissions that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free California Avenue & Ramona Street Construction Emissions

The Bay Area Air Quality Management District (BAAQMD) has developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, BAAQMD relies on the planned land uses identified in local general plans. Land use planning affects vehicle travel, which, in turn, affects region-wide emissions of air pollutants and GHGs. The plan includes CEQA Thresholds which are seen below in **Table 5.3.1**. These thresholds determine whether the Project would have construction emissions below the BAAQMD thresholds.

TABLE 5.1: AIR QUALITY SIGNIFICANCE THRESHOLDS

Criteria Air Pollutant	Construction Thresholds
	Average Daily Emissions (lbs/day)
ROG	54
NOx	54
PM ₁₀	82 (Exhaust)
PM _{2.5}	54 (Exhaust)
CO	Not Applicable
Fugitive Dust	Construction Dust Ordinance or other BMP
Health Risks and Hazards	Single Sources Within 1,000-foot Zone of Influence
Excess Cancer Risk	>10 per one million
Hazard Index	>1.0
Incremental annual PM _{2.5}	>0.3 µg/m ³
Source: BAAQMD's April 2022 CEQA Air Quality Guidelines	

Note: BMP = Best Management Practices, ROG = reactive organic gases, NOx = nitrogen oxides, PM₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less;

Construction of the proposed Project would generate temporary air quality emissions associated with operation of equipment needed to remove up to 45 cubic yards of dirt, to install bollards and planters, to mark and restripe the road surface. These construction activities would create temporary emissions of fugitive dust from site grading, and the release of toxic air contaminants, particulate matter, and ozone precursors (ROG and NOx) from combustion of fuel and the operation of heavy-duty construction equipment.

To estimate the emissions from construction of the Project, the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29 was used (**Appendix B**). CalEEMod is a statewide model designed to provide a uniform platform to quantify air quality emissions from land use projects, which allows for projection of emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. The construction build-out scenario including equipment list and schedule, were based on default values in CalEEMod. Emissions are calculated based on the whole Project being completed over the course of 14 full working construction days. **Table 5.2** shows the average daily and annualized construction emissions of ROG, NOx, PM₁₀ exhaust, and PM_{2.5} exhaust during construction of the Project. As shown in Table 5.2, neither the annualized nor daily Project construction emissions would exceed the BAAQMD significance thresholds during construction.

TABLE 5.2: CONSTRUCTION PERIOD EMISSIONS

Year	ROG	NOx	PM₁₀	PM_{2.5}
Construction Emissions Per Year (Tons/yr)				
2025 (Based on 14 construction work days)	<0.1	<0.1	<0.1	<0.1
BAAQMD Threshold (tons/yr)	10	10	15	10
Average Daily Construction Emissions Per Year (pounds/day)				
2025 (based on 14 construction work days)	2	20	0.4	0.3
BAAQMD Threshold (lbs/day)	54	54	82	54
Exceed Threshold?	No	No	No	No

During construction activities, the Project will temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed pavement at the construction site and trucks carrying uncovered loads of fill or soils. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less-than-significant if best management practices are implemented to reduce these emissions. Comprehensive Plan Policy N-5.3 requires that the City reduce emissions of particulates from construction and **Mitigation Measure Air-2a** requires that future development projects comply with basic control measures for reducing construction emissions. In the 2022 CEQA

Guidelines, BAAQMD includes the following basic control measures or best management practices that are applicable to the Project:

TABLE 5.3: BASIC BEST MANAGEMENT PRACTICES FOR CONSTRUCTION-RELATED FUGITIVE DUST EMISSIONS

BMP ID	Best Management Practice
B-1	All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day
B-2	All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
B-3	All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
B-4	All vehicle speeds on unpaved roads shall be limited to 15 mph
B-6	All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
B-8	Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel
B-9	Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

Source: BAAQMD 2022 CEQA Guidelines Chapter 5 Project Level Impacts: Air Quality Table 5.2

Mitigation Measure AIR-2a specifies that the City shall require compliance with the current BAAQMD basic control measures for reducing construction emissions of PM₁₀. To comply with this mitigation measure, the City of Palo Alto adopted Municipal Code Section 18.31.020, which adopts the State CEQA Guidelines, and by reference the significance criteria established by BAAQMD which generally conclude that implementation of BMPs during construction will reduce impacts related to fugitive dust emissions for which the region is in non-attainment, to less than significant.

In compliance with Municipal Code Section 18.31.020, the Project shall implement BMPs during Project construction in order to comply with **Mitigation Measure AIR-2a** of the Comprehensive EIR. As such, construction of the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR

Car-Free Ramona Street & California Avenue Operational Emissions

The proposed Project will restrict vehicle access along sections of Ramona Street and California Avenue, improving the roadway segments for pedestrian and bike facilities. Streets, as linear source emitters, contribute to emissions primarily through vehicle emissions. Based on the results of the Traffic Impact Analysis, average daily traffic volumes on streets in the Project vicinity have either decreased or remained about the same (relative to pre-car closure conditions). The number of vehicles on roadways in the Project vicinity has not increased and therefore, there has not been an increase in vehicle emissions. Further, because the Project is focused on pedestrian/bicycle improvements and will restrict vehicle access to encourage walking and biking, the Project will not result in additional air quality or greenhouse gas emissions at operation. As such, operation of the Project will not create directly or indirectly new emissions and will not result in potentially significant

impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free Ramona Street & California Avenue Greenhouse Gas Emissions

Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. In December 2018, the California Governor's Office of Planning and Research (OPR) published the Technical Advisory on Evaluating Transportation Impacts in CEQA, which provides recommendations for evaluating a project's transportation impact using a vehicle miles traveled (VMT) metric, thresholds of significance, and mitigation measures.³ The Technical Advisory includes a list of projects that should not require an induced travel analysis because they would not be likely to lead to a substantial or measurable increase in vehicle travel and subsequently greenhouse gas emissions. These include:

- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way
- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve nonmotorized travel

The Project implements General Plan EIR **Mitigation Measure AIR-2d** in that it is consistent with policies that seek to create pedestrian and bicycle facilities that encourage active transportation and would therefore reduce vehicle generated greenhouse gas emissions. The results of the Traffic Impact Analysis show that traffic around the Project area is either the same or less than prior to the temporary closure of the Project which would result in either no change or a reduction in greenhouse gas emissions from vehicles (**Appendix A**). Finally, the Project is to establish car-free roadway segments, which will enhance bike and pedestrian facilities consistent with OPR Guidelines thereby reducing VMTs and associated vehicle emissions. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Conclusion

As the Project is in compliance with the Air Quality and Greenhouse Gas Emissions goals, policies, and programs in the Comprehensive Plan, and through the implementation of **Mitigation Measures Air-2a**, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effects.

Applicable Mitigation Measures:

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).

³ Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA. Dec 2018.

Recommendation:

During all Project construction activities, implement applicable BMPs shown above in Table 5.3 in compliance with Mitigation Measure AIR-2a.

5.4. CULTURAL & TRIBAL RESOURCES

The City of Palo Alto contains cultural and historic resources that contribute to the understanding of the region's history and influence the community's identity. As detailed in the Comprehensive Plan, the City contains a rich selection of historic structures and places, with approximately 400 buildings of historic merit listed on the City's Historic Inventory and more than a dozen buildings, three historic districts, and one architectural district listed on the National Register of Historic Places.

The Comprehensive Plan 2030 EIR (EIR) concluded that the Comprehensive Plan, with the implementation of mitigation measures would have a less than significant impact due to adversely affecting a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory, eliminating important examples of major periods of California history or prehistory, causing damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines, or directly or indirectly destroying a unique paleontological resource or site or unique geologic feature. The EIR also concluded that with the implementation of mitigation measures, the Comprehensive Plan would have less than significant cumulative impacts to cultural and tribal resources. The EIR concluded that the Comprehensive Plan would have less than significant impacts due to disturbance of any human remains, including those interred outside of formal cemeteries, nor due to directly or indirectly destroying a local cultural resource that is recognized by City Council resolution.

The City of Palo Alto 2030 Comprehensive Plan sets forth goals, policies, and programs intended to protect cultural resources, those particularly relevant to the Car Free Ramona Street and California Avenue Project include the following:

Policy L-4.7 Maintain and enhance the University Avenue/Downtown area as a major commercial center of the City, with a mix of commercial, civic, cultural, recreational and residential uses. Promote quality design that recognizes the regional and historical importance of the area and reinforces its pedestrian character.

Policy L-7.5 To reinforce the scale and character of University Avenue/Downtown, promote the preservation of significant historic buildings.

Policy L-7.16 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.

Policy L-7.17 Assess the need for archaeological surveys and mitigation plans on a project-by-project basis, consistent with the California Environmental Quality Act and the National Historic Preservation Act.

Policy L-7.18 Require project proponents to meet State codes and regulations regarding the identification and protection of archaeological and paleontological deposits, and unique geologic features.

In accordance with Public Resources Code (PRC) Section 21084.2, lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place, or object, of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such. Senate Bill (SB) 18 require lead agencies to contact and consult with California Native

American tribes prior to amending and adopting a general plan. In accordance with SB 18, the City of Palo Alto carried out notification to the Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Coastanoan, the Ohlone Indian Tribe, the Muwekma Ohlone Tribe of the SF Bay Area, Wuksachi Indian Tribe/Eshom Valley Band, and the Tamien Nation on December 5, 2024.

The City received requests for consultation from Tamien Nation and the Muwekma Ohlone Tribe of the SF Bay Area.

Comprehensive Plan Amendment

The Project proposes the addition of two new street classifications that restrict vehicle access along segments of existing roadways. There are no activities proposed by the Project would result in a direct and indirect adverse environmental impact on cultural or historic resources. Therefore, the Project will not result in potentially significant impacts to cultural resources that were not previously identified or analyzed, nor will the Project increase the severity of impacts to cultural resources previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free Ramona Street

The Car-Free Ramona Street segment is located within the Ramona Street Architectural District in downtown Palo Alto. The Ramona Street Architectural District is listed on both the National Register of Historic Places and Palo Alto's Historic Inventory. There are eight contributing structures in the district that were all constructed between 1924 until 1938 and compose of the commercial block. The district maintains uniform and unaltered examples of Monterey Colonial and Spanish Colonial Revival buildings that share common materials, building features, and interior courtyards.

The proposed Project will formalize the restriction of vehicle access on Ramona Street from its intersection with Hamilton Avenue to mid-block ending approximately 200 feet east of University Avenue. The Project proposes the installation of bollards at either end of the car-free street section with above ground planters and appropriate signage. Ground disturbance associated with Project construction would be limited to approximately 45 cubic yards of soil with a maximum depth of 56 inches for the installation of up to 15 retracting bollards. No new structures will be built as part of the Project, and no existing structures will be demolished as part of the Project. As such, the Project will not change the context of historic resources within the Ramona Street Architectural District.

While ground disturbance associated with the proposed Project is limited, there remains a potential that significant historic, prehistoric archaeological artifacts, or unique paleontological features may be encountered. However, Mitigation Measure CULT-1 and CULT-3 of the Comprehensive Plan call for the inclusion of policies that protect cultural and tribal resources. These Mitigation Measures are imposed on the Project and have been implemented through the adoption of Policy L-7.18, which requires compliance with State codes and regulations regarding the identification and protection of archaeological and paleontological deposits, and unique geologic features, Policy L-7.16, which requires consultation with tribes in accordance with California Government Code Section 65352.3, and Policy L-7.17, which requires assessing the need for archaeological surveys and mitigation plans on a project-by-project basis.

The City of Palo Alto imposes standard conditions of approval on projects to implement Mitigation Measures CULT-1 and CULT-3. Through the implementation of these standard conditions of approval, the i Project must comply with all state codes and regulations related to the protection of

archaeological, paleontological, and geological resources (Policy L-7.18), tribal notification has been provided and consultation completed (Policy L-7.16), and it was determined that the minimal ground disturbance of the Project did not necessitate preparation of archaeological surveys or mitigation plans (Policy L-7.17). Therefore, the Project will not result in potentially significant impacts to cultural resources that were not previously identified or analyzed, nor will the Project increase the severity of impacts to cultural resources previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free California Avenue

There are no historic structures listed or eligible for listing on California Avenue between El Camino Real and Birch Street. The street is currently paved with two center medians, one that extends approximately 100 feet from the intersection of El Camino Real and one that extends approximately 125 feet from the intersection at Birch Street. Project construction includes resurfacing up to 935 linear feet of California Avenue, installation of bollards, pavement stamping, road painting and striping, and potential installation of public art. These construction activities require very limited ground disturbance, and as discussed above, Mitigation Measure CULT-1 and CULT-3 are implemented by Comprehensive Plan Policy L-7.18 and the standard conditions of approval which requires compliance with State codes and regulations regarding the identification and protection of archaeological and paleontological deposits, and unique geologic features. As noted in the EIR, this includes following appropriate procedures in the event of the discovery of historic or archeological artifacts or unique paleontological features.

Through compliance with the standard conditions of approval which implement Policy L-7.18 and Mitigation Measures CULT-1 and CULT-3, the Project will not result in potentially significant impacts to cultural resources that were not previously identified or analyzed, nor will the Project increase the severity of impacts to cultural resources previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Tribal Cultural Resources

In compliance with Mitigation Measure CUL-1 and SB 18, the City contacted the Native American Heritage Commission and requested an updated list of tribes affiliated with Palo Alto. A letter was sent to the Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Coastanoan, the Ohlone Indian Tribe, the Muwekma Ohlone Tribe of the SF Bay Area, Wuksachi Indian Tribe/Eshom Valley Band, and the Tamien Nation on December 5, 2024, informing them of the Project and providing the tribes with an opportunity to request consultation on the Project. The City received requests for consultation from Tamien Nation and the Muwekma Ohlone Tribe of the SF Bay Area and carried out consultation including meetings and correspondence.

The existing site is fully developed, and ground disturbance will be limited to an estimated 45 cubic yards of soil. Nevertheless, there is potential for unknown tribal cultural resources or human remains to be present within the areas of ground disturbance. Comprehensive Plan EIR Mitigation Measures CULT-3 requires compliance with applicable regulations regarding the identification and protection of archaeological and paleontological deposits, and unique geologic features. This includes inadvertent discovery. Further, policies related to the protection of tribal resources are included in the Comprehensive Plan including Policies L-7.16, L-7.17 and L-7.18. In particular, Policy L-7.18 requires that Project proponents meet State codes and regulations regarding the identification and protection of archaeological and paleontological deposits, and unique geologic features. The Project is consistent

with Policy L-7.16 and L-7.17 as tribal consultation has been carried out and the need for an archaeological survey has been assessed. It is recommended that the Project implement applicable Mitigation Measures CULT-1 and CULT-3 and Policy L-7.18 to ensure the Project will not result in potentially significant impacts to tribal cultural resources that were not previously identified or analyzed, nor will the Project increase the severity of impacts to tribal cultural resources previously identified in the Palo Alto Comprehensive Plan 2030 EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effects.

Conclusion

Through compliance with applicable Comprehensive Plan policies that implement **Mitigation Measures CULT-1 and CULT-3**, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effect.

Applicable Mitigation Measures:

CULT-1: To ensure the protection of potentially historic resources, the proposed Plan shall include policies that achieve the following:

- Process for reviewing proposed demolition or alteration of potentially historic buildings
- Protection of archaeological resources.

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 achieve the following:

- 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.
- Adequate Appropriate tribal consultation and consideration of tribal concerns.

Recommendation:

The Project shall comply with the following standard conditions of approval imposed by the City of Palo Alto:

1. UNANTICIPATED DISCOVERY OF BURIED ARCHAEOLOGICAL, PALEONTOLOGICAL, AND TRIBAL CULTURAL RESOURCES. No known archeological or paleontological resources are present on or within the immediate vicinity of the site. However, in the unlikely event that an archeological resource or paleontological resource is unearthed during ground disturbing activities, work in the immediate area must be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the find is Native American in origin, then a Native American representative must also be contacted to participate in the evaluation of the find. The qualified archaeologist, and, if applicable, the Native American representative, shall examine the

find and make recommendations regarding additional work necessary to evaluate the significance of the find and the appropriate treatment of the resource. Recommendations could include, but are not limited to, invasive or non-invasive testing, sampling, laboratory analysis, preservation in place, or data recovery. A report of findings documenting any data recovered during monitoring shall be prepared by a qualified archaeologist and submitted to the Director of Planning prior to final planning inspection.

Prior to commencement of any project-related construction activities, a qualified Archaeologist hired by the applicant shall provide a worker environmental awareness training to all site personnel that addresses cultural and tribal cultural resources. The training shall discuss the appearance of resources that may be encountered during construction as well as the procedures and notification process in the event of discovery.

2. **DISCOVERY OF HUMAN REMAINS.** Pursuant to Section 7050.5 of the Health and Safety Code, and Section 5097.94 of the Public Resources Code of the State of California in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission (NAHC) who shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner shall reinter the human remains, and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. If the Director of Planning, in consultation with the archaeologist and Native American representative, finds that the archaeological find is not a significant resource, work would resume only after the submittal of a preliminary archaeological report and after provisions for reburial and ongoing monitoring are accepted by the Director of Planning.

5.5. LAND USE AND PLANNING

The Comprehensive Plan 2030 EIR (EIR) concluded that the Comprehensive Plan, with the implementation of mitigation measures would have a less than significant impact due to adversely changing the type or intensity of existing or planned land use patterns in the area, by allowing development that could be incompatible with adjacent land uses or with the general character of the surrounding area, including density and building height, or as a result of physically dividing an established community. The EIR also concluded that the Comprehensive Plan would have a less than significant impact due to allowing development that could conflict with established residential, recreational, educational, religious, or scientific uses of an area, due to allowing new development that could conflict with any applicable City land use plan, policy or regulation (including, but not limited to the Comprehensive Plan, coordinated area plan, or the City's Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, due to conflicting with an applicable habitat conservation plan or natural community plan, and due to cumulative impacts.

Comprehensive Plan Amendment

The Project proposes a Comprehensive Plan Amendment that will provide a policy tool to implement existing goals and policies within the Comprehensive Plan that are intended to improve pedestrian and bicycle access and reduce greenhouse gas emissions. These include the policies noted above as well as the following:

GOAL T-1 Create a sustainable transportation system, complemented by a mix of land uses, that emphasizes walking, bicycling, use of public transportation and other methods to reduce GHG emissions and the use of single-occupancy motor vehicles.

Policy T-1.1 Take a comprehensive approach to reducing single-occupant vehicle trips by involving those who live, work and shop in Palo Alto in developing strategies that make it easier and more convenient not to drive.

Policy T-1.3 Reduce GHG and pollutant emissions associated with transportation by reducing VMT and per-mile emissions through increasing transit options, supporting biking and walking, and the use of zero-emission vehicle technologies to meet City and State goals for GHG reductions by 2030.

As noted in other sections of this document, the proposed creation of two new road classification types (car-free) is consistent with the goals and policies in the Comprehensive Plan and does not conflict with goals, policies, or programs in the plan. Because the proposed road classifications apply to the public right of way, and provide for car-free roadways, the Project does not introduce a conflict with land use designations. Therefore, the Project will not result in potentially significant impacts to land use planning due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, that were not previously identified or analyzed, nor will the Project increase the severity of impacts to land use planning previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Additionally, the Project proposes roadway classifications that will restrict vehicle use on Ramona Street and California Avenue roadway segment but will increase pedestrian connectivity and would not result in a new potentially significant impact resulting from physically dividing a community nor increase the severity of impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free Ramona Street & Car-Free California Avenue

Comprehensive Plan 2030

Both roadway sections proposed to be Car-Free are located within the public right of way (ROW) and as such do not have Land Use or Zoning Designations. However, they are both surrounded by properties with a Comprehensive Plan Land Use Designation of Regional Community Commercial, which supports a variety of services and commercial uses.

Public streets are addressed in the 2030 Comprehensive Plan Transportation Element which includes goals, policies, and programs to address transportation and mobility. The Comprehensive Plan classifies streets according to purpose, design and the volume of traffic they carry. Ramona Street and California Avenue are both designated as collector streets as they serve the purpose of collecting and distributing local traffic to and from arterial streets and provide access to adjacent properties as shown on Comprehensive Plan Map T-5 Roadway Network. The Transportation Element includes Program T1.16.2 *Consider marketing strategies, such as a recurring Palo Alto Open Streets program of events potentially in coordination with local business groups, which would include street closures and programming.* Open Streets is a program that temporarily opens streets to people by closing them to cars.

The City of Palo Alto 2030 Comprehensive Plan sets forth goals, policies, and programs related to land use. Those particularly relevant to the Car Free Ramona Street and California Avenue Project include the following:

Policy L-4.1. Encourage the upgrading and revitalization of selected Centers in a manner that is compatible with the character of surrounding neighborhoods, without loss of retail and existing small, local businesses.

Policy L-4.4. Ensure all Regional Centers and Multi-Neighborhood Centers provide centrally located gathering spaces that create a sense of identity and encourage economic revitalization. Encourage public amenities such as benches, street trees, kiosks, restrooms and public art.

Policy L-8.4: Create facilities for civic and intellectual life, such as better urban public spaces for civic programs and speakers, cultural, musical and artistic events.

Zoning

The Ramona Street segment is within the public right of way and is not zoned but is located adjacent to parcels zoned as Downtown Commercial and is located within Ground Floor Combining District and Pedestrian Shopping Combining District. The Project site is surrounded by fully developed sites with mostly two- and three-story buildings, all with commercial retail on the ground floor. It is located in the Ramona Street Architectural District which is on the National Register of Historic Places and Palo Alto's Historic Inventory.

The surrounding zoning designation for the California Avenue segment is Community Commercial District and Retail Shopping Combining District and Pedestrian Shopping Combining District (**see Figure 5**). The properties abutting the Project are fully developed one-, two-, and three-story commercial buildings.

The Project is consistent with the applicable policies in the Comprehensive Plan 2030 and does not conflict with the zoning. As such, the Project will not result in potentially significant impacts to land use planning due to a conflict with any land use plan, policy, or regulation adopted for the purpose of

avoiding or mitigating an environmental effect, that were not previously identified or analyzed, nor will the Project increase the severity of impacts to land use planning previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Additionally, the Project will restrict vehicle access to two street segments. However, multiple vehicle routes will continue to connect the neighborhoods on adjacent streets to the north and south of the proposed car-free street segments. Because there will be continued connectivity for pedestrians at both locations and alternate vehicle routes exist to accommodate vehicle circulation, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Conclusion

The Project will not result in potentially significant impacts to land use planning that were not previously identified or analyzed, nor will the Project increase the severity of impacts to land use planning previously identified in the Palo Alto Comprehensive Plan 2030 EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effects.

Applicable Mitigation Measures:

There are no applicable mitigation measures.

Recommendation:

None

5.6. NOISE

The Comprehensive Plan 2030 EIR (EIR) concluded that the Comprehensive Plan, with the implementation of mitigation measures would have less than significant impacts due to the following:

- Causing the average 24-hour noise level (Ldn) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the Ldn would remain below 60 dB.
- Causing the Ldn to increase by 3 dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB.
- Causing an increase of 3 dB or more in an existing residential area where the Ldn currently exceeds 60 dB.
- Indoor noise levels for residential developments that exceed an Ldn of 45 dB.
- Exposing persons to or generate excessive ground-borne vibration or ground-borne noise levels.
- Exposing people to noise levels in excess of established State standards.
- The exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies.
- Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- Cumulative impacts.

The EIR also concluded that the Comprehensive Plan would have less than significant impacts for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not expose people residing or working in the project area to excessive noise levels and for a project within the vicinity of a private airstrip, the project would not expose people residing or working in the project area to excessive noise levels.

The City of Palo Alto 2030 Comprehensive Plan sets forth goals, policies, and programs intended to address noise. Those particularly relevant to the Car Free Ramona Street and California Avenue Project include the following:

Policy N-6.4 Minimize roadway noise through prudent street, flow and right-of-way design.

Policy N-6.11 Continue to prioritize construction noise limits around sensitive receptors, including through limiting construction hours and individual and cumulative noise from construction equipment.

Comprehensive Plan Amendment

Transportation noise is caused by vehicular movement. The higher the number of vehicles and speeds, the greater the noise impacts. The proposed Project will amend the Comprehensive Plan by introducing two new street classifications for car-free street segments. Roadway segments that are car-free will have a lower noise intensity than the existing street classifications with cars, as the operation of motor

vehicles generates noise. Construction of the proposed Project would result in temporary noise associated with construction equipment, workers, and car-free roadway improvements. As noted below, construction activities of the proposed Project are subject to review as well as compliance with uniformly applied standards, including restrictions on the hours of operation for construction. As such, the Comprehensive Plan Amendment will not result in potentially significant impacts to noise that were not previously identified or analyzed, nor will the Project increase the severity of noise impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free Ramona Street & Car-Free California Avenue

Construction

Project construction is limited to excavation of approximately 45 cubic yards of soil, installation of bollards, pavement resurfacing, and pavement markings and striping. **Mitigation Measures Noise-5A and Noise-8** mitigate construction noise and vibration impacts. They are implemented by Palo Alto Municipal Code Section 9.10 Noise, which includes limitations on construction noise to Monday through Friday from 9:00 am - 6:00 pm and Saturday from 9:00 am to 6:00 pm as well as limitations on noise levels at a distance of 25 feet to no more than 110 dBA.⁴ Through compliance with the uniformly applied standards in Palo Alto Municipal Code Chapter 9.10, Project construction will not result in potentially significant impacts to noise that were not previously identified or analyzed, nor increase the severity of noise impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Operation

Most noise within Palo Alto's urban environment comes from traffic, trains, airports, construction and yard maintenance. Existing and future noise contours within Palo Alto are shown on Maps N-5 and N-6, respectively in the Comprehensive Plan 2030.

The Ramona Street portion of the Project is outside of the area of the city that is considered to be impacted by road noise (60 dBA or greater). The segment of California Avenue between El Camino Real and Ash Street, is within the 60 dBA contour. Restricting vehicle traffic on California Avenue will reduce noise levels from traffic. Further, Table N-1 Land Use Compatibility for Community Noise Environment in the Comprehensive Plan 2030 indicates that normally acceptable noise levels for office buildings, business commercial, and professional uses are allowable up to 70 dBA.

The pre-pandemic environment for both Ramona Street and California Avenue are characterized as busy pedestrian oriented commercial areas. Further, as shown in the Traffic Impact Analysis (**Appendix A**), overall vehicle traffic has gone down since the car-free roadway segments were temporarily installed, which would result in a reduction of noise from traffic. Therefore, by restricting automobile traffic and creating pedestrian and pedestrian- and bike-oriented street segments, the Project will not result in potentially significant impacts to noise that were not previously identified or analyzed, nor will the Project increase the severity of noise impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

⁴ City of Palo Alto Municipal Code Chapter 9.10 Section 9.10.060 Special Provisions.

https://codelibrary.amlegal.com/codes/paloalto/latest/paloalto_ca/0-0-0-66214#JD_9.10.050 accessed December 17, 2024

Conclusion

The Project will not result in potentially significant impacts to noise that were not previously identified or analyzed, nor will the Project increase the severity of noise impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effects.

Applicable Mitigation Measure(s):

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.

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.

Recommendation

To implement Mitigation Measures NOISE-5a and Noise-8, all Project construction shall comply with Palo Alto Municipal Code Chapter 9.10 Noise including the following provisions:

- Construction hours shall be limited to Monday through Friday, eight a.m. to six p.m. and Saturday nine a.m. to six p.m.
- No individual piece of equipment shall produce a noise level exceeding one hundred ten dBA at a distance of twenty-five feet. If the device is housed within a structure on the property, the measurement shall be made out-side the structure at a distance as close to twenty-five feet from the equipment as possible.
- The noise level at any point outside of the property plane of the Project shall not exceed one hundred ten dBA.
- A sign in compliance with Section 9.10.060(b)(3) shall be posted at all entrances to the construction site upon commencement of construction.

5.7. TRANSPORTATION

The Comprehensive Plan 2030 EIR (EIR) concluded that implementation of the Comprehensive Plan 2030 (the Plan) would result in significant and unavoidable impacts by causing intersections to drop below the motor vehicle level of service standard, or deteriorate operations at representative intersections that already operate a substandard level of service. Mitigation Measures Trans-1a, Trans-1b, Trans-1c, Trans-1d, and Trans-1e were added but did not mitigate project impacts to a less than significant level. Additionally, the EIR found that the Plan would have a significant and unavoidable impact because it would cause a freeway segment or ramp to drop below its level of service standard or deteriorate operations that already operate at a substandard level of service. Mitigation Measure Trans-3a was added but did not mitigate the project impacts to less than significant levels. The EIR also found that the Plan would have a significant and unavoidable impact by impeding the operation of a transit system as a result of congestion. Mitigation Measure Trans-6 was added but did not mitigate the impacts of the project to less than significant levels.

The EIR also concluded that implementation of the Plan, with the implementation of mitigation, would have less than significant impacts by creating the potential demand for through-traffic to use local residential streets, and by creating an operational safety hazard.

The EIR concluded that implementation of the Plan would have a less than significant impact by causing a roadway segment to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service, impeding the function of planned bicycle or pedestrian facilities, increasing demand for pedestrian and bicycle facilities that cannot be met by existing or planned facilities, creating demand for transit services that cannot be met by current or planned services, or by resulting in inadequate emergency access.

Level of service (LOS) was historically used as a standard measure of environmental impacts, using vehicle delay as an indicator. The LOS approach was utilized in the Comprehensive Plan EIR. Following adoption of the Comprehensive Plan and certification of the associated EIR, Senate Bill (SB) 743 was adopted and requires lead agencies to evaluate transportation impacts of a project using a vehicle miles traveled (VMT) metric, which focuses on balancing the needs of congestion management with statewide goals related to infill development, promotion of public health through increased active transportation facilitated by closer proximity to alternative travel modes and reduces greenhouse gas emissions.

In December 2018, the California Governor's Office of Planning and Research (OPR) published the Technical Advisory on Evaluating Transportation Impacts in CEQA, which provides recommendations for evaluating a project's transportation impact using a VMT metric, thresholds of significance, and mitigation measures. Pursuant to Government Code Section 15064.3(b), lead agencies have discretion to select the most appropriate methodology for evaluating a project's VMT impacts. In the Technical Advisory on Evaluating Transportation Impact in CEQA (2018), the California Office of Planning and Research provides guidelines for evaluating a transportation project's VMT impacts. The Technical Advisory includes a list of projects that should not require an induced travel analysis because they would not be likely to lead to a substantial or measurable increase in vehicle travel. These include:

- Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or within existing public rights-of-way

- Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve nonmotorized travel

Comprehensive Plan Amendment

The Comprehensive Plan Amendment will create two new road classifications for restricted vehicle traffic on roadway segments along Ramona Street and California Avenue.

Pedestrian Only Street - Streets that are restricted to pedestrians, emergency vehicles, and utility and maintenance vehicles only. Outdoor dining and retail displays are encouraged on Pedestrian Only Streets.

Community Street - Streets that are restricted to pedestrians and bicycles. Emergency, utility and maintenance vehicles are allowed, and commercial vehicles are allowed on a restricted basis. Outdoor dining, retail displays, and community events are encouraged on community streets.

Restricting vehicle traffic is intended to create safer and more vibrant pedestrian and bicycle streets, and a public realm for outdoor dining. The addition of these car-free classifications is consistent with the City of Palo Alto 2012 Bicycle and Pedestrian Transportation Plan and the following Comprehensive Plan 2030 policies:

GOAL T-1 Create a sustainable transportation system, complemented by a mix of land uses, that emphasizes walking, bicycling, use of public transportation and other methods to reduce GHG emissions and the use of single-occupancy motor vehicles.

Policy T-1.3 Reduce GHG and pollutant emissions associated with transportation by reducing VMT and per-mile emissions through increasing transit options, supporting biking and walking, and the use of zero-emission vehicle technologies to meet City and State goals for GHG reductions by 2030.

Policy T-1.16 Promote personal transportation vehicles as an alternative to cars (e.g. bicycles, skateboards, roller blades) to get to work, school, shopping, recreational facilities and transit stops.

Policy T-1.19 Provide facilities that encourage and support bicycling and walking.

Policy T-3.5 When constructing or modifying roadways, plan for use of the roadway by all users.

Policy T-3.6 Consider pedestrians, bicyclists, e-bikes and motorcycles when designing road surfaces, curbs, crossings, signage, landscaping and sight lines.

Because the amendment is consistent with the above noted policies as well as the policy vision, design guidance, and specific recommendations of the City of Palo Alto Bicycle and Pedestrian Plan (see section 3.2), the Project would not result in conflicts with a program, plan, ordinance or policy addressing the circulation system.

Additionally, the California Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA identifies projects that enhance pedestrian facilities and the addition of facilities that serve non-motorized travel as project types that would not likely lead to a substantial or measurable increase in vehicle travel.⁵ Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free Ramona Street

A Traffic Study was completed to determine whether the proposed Project including the permanent restriction of vehicle access on Ramona Street and California Avenue would result in new impacts or increase the severity of an identified impact. The Palo Alto Street Closure Study was completed by Hexagon Transportation Consultants on January 23, 2025 (**Appendix A**).

Traffic Volumes

Street closures typically divert traffic from the closed streets to the surrounding streets and intersections. The evaluation was based on traffic volumes at the intersections adjacent to the closed streets. To determine how traffic was diverted, where available, traffic counts were obtained from historical data to understand pre-closure conditions. Post-closure conditions were determined through counts collected in November 2024.

To understand the impacts on traffic from the restricted vehicle access on Ramona Street, Hexagon used previous traffic counts for the intersection of Ramona Street and University Avenue. New traffic counts were taken at:

- Ramona Street and University Avenue (signalized)
- Emerson Street and Hamilton Avenue (signalized)
- Ramona Street and Hamilton Avenue (signalized)
- Bryant Street and Hamilton Avenue (signalized)

In 2018, the Average Daily Traffic on Ramona Street was 415 vehicles per day. Following the closure, the closed section of the road now has zero vehicles per day and the portion of Ramona Street between University Avenue and the closure has an ADT of 690 vehicles per day. While this appears to be an increase, prior to closure, most vehicles using this section of road would likely pass through one time. Now, the open section is used mainly to access the parking garage across from 530 Ramona Street. Closure of the eastern portion of Ramona Street means that each car must return through the intersection with University Avenue. So, while ADT has increased by 275 vehicles, this is likely because all vehicles now have to return the same way that they came and are therefore being counted twice. This means that the vehicle shift would be from Hamilton Avenue to University Avenue. Because University Avenue has a capacity of approximately 17,000 vehicles, an additional 275 vehicles on University Avenue would be insignificant. This determination is supported by the Level of Service Analysis at the Project intersections.

The Traffic Analysis examined the Level of Service at the following intersections:

⁵ Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, pp 17-18. April, 2018.

- Hamilton Avenue and Bryant Street
- Hamilton Avenue and Ramona Street
- Hamilton Avenue and Emerson Street
- University Avenue and Ramona Street

While no longer a measure applicable for CEQA purposes in determining a significant environmental impact, LOS provides information about the flow of traffic at key intersections. Additionally, because LOS was utilized as a measure for environmental impacts in the Comprehensive Plan EIR, a comparative analysis is included in this Addendum to document whether the Project would result in new or more severe impacts as compared to what was previously identified in the EIR. Based on traffic counts taken in November 2024, the above noted intersections have a level of service of A in the morning and a level of service of A or B in the afternoon, which confirms that the street closure has not significantly increased vehicle movement at intersections including the University Avenue and Ramona Street intersection which operates LOS A in both evening and afternoon. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Vehicle Miles Traveled

The conversion of the eastern portion of Ramona Street to a Car-Free segment is intended to increase pedestrian activity and reduce the use of automobiles by creating thriving mixed-use urban centers. As noted above, OPR's Technical Advisory includes screening criteria for projects that serve non-motorized travel, concluding that projects of this type would not likely lead to a substantial or measurable increase in vehicle travel and the Project does not require an induced travel analysis. As the subject Project is to formalize the establishment of a Car-Free Ramona Street segment, it qualifies as a project that serves non-motorized travel. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Design Hazards and Incompatible Uses

The Project will be designed and implemented following the City of Palo Alto Municipal Code Chapter 12.08 which regulates the maintenance and construction of streets, sidewalks, driveways, and driveway approaches to ensure public safety. Through the implementation of the uniform standards, the Car-Free Ramona Street will not substantially increase hazards due to a geometric design feature. The surrounding land uses are ground floor retail and commercial activities. The conversion of Ramona Street to a car-free street will support these uses and is compatible with them. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Emergency Access

The Project will install bollards and above ground planters to prohibit through-traffic from using Ramona Street. The design will provide for the removal of the bollards to permit emergency vehicle and utility/maintenance vehicle access along the car-free section of Ramona Street. Because emergency vehicle access will be maintained, the Project will not result in inadequate emergency access. Therefore, the Project will not result in potentially significant impacts that were not

previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Car-Free California Avenue

In order to understand the impacts on traffic from the restricted vehicle access on California Avenue, historic traffic counts from 2018 were provided by the City. These included counts for the intersections at:

1. Birch Street and Sherman Avenue
2. El Camino Real and California Avenue
3. El Camino Real and Cambridge Avenue
3. Ash Street and California Avenue

New traffic counts were collected to analyze impacts of the proposed Project at:

1. Birch Street and Cambridge Avenue (all-way stop-controlled)
2. Birch Street and California Avenue (all-way stop-controlled)
3. Birch Street and Sherman Avenue (all-way stop-controlled)
4. Ash Street and Sherman Avenue (all-way stop-controlled)
5. El Camino Real and Sherman Avenue (side-street-stop controlled)
6. El Camino Real and California Avenue (signalized)
7. El Camino Real and Cambridge Avenue (signalized)

Although a limited supply of “before” (pre-pandemic) counts were available, enough data was available to identify changes in traffic patterns which were based on comparisons of the average daily traffic (ADT) on California Avenue between El Camino Real and Ash Street, California Avenue between Ash Street and Birch Street, Birch Street between California Avenue and Sherman Avenue, Ash Street between California Avenue and Sherman Avenue, Sherman Avenue between Ash Street and Birch Street, and Cambridge Avenue between El Camino Real and Birch Street. These changes showed a decrease in ADT. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Transit

The temporary closure of California Avenue required the rerouting of Santa Clara Valley Transportation Authority (VTA) Bus Route 89. Prior to the temporary closure, the bus would leave the VA Center traveling along Miranda Ave to Hillview Avenue to Hanover Street, turning right onto California Avenue on which it would continue to the Caltrain Station at California Avenue and Park Blvd. Following the temporary closure, the bus Route 89 was rerouted. Currently, the bus leaves the VA Hospital using Miranda Avenue to Hillview Avenue to Hanover Street to California Avenue where it then turns right onto El Camino Real and left onto Page Mill Road and left onto Park Blvd to the Caltrain station. During peak hours, extra stops are available along the “Hillview/Arastradero Loop” south of the VA Hospital. A route modification is proposed for 2025 that will remove the California Avenue portion of the route. The proposed route will travel along Miranda Avenue to Hillview Avenue to Hanover Street and turn directly to Page Mill Road following it all the way to Park Blvd and the Caltrain Station. All routes follow the same pattern in reverse. According to Santa Clara VTA, the

change in the routing has increased the overall run time of the route by 5%. Current travel time for the route is approximately 12 minutes from the VA to Caltrain (non-peak/ without Hillview/Arastradero Loop). As such, the 5% increase in run time (36 seconds) is negligible, and therefore, does not result in a conflict with City or regional policy to improve access to transit. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Design Hazards and Incompatible Uses

The Project will be designed and implemented following City of Palo Alto Municipal Code Chapter 12.08 which regulates the maintenance and construction of streets, sidewalks, driveways, and driveway approaches to ensure public safety. The intersection with El Camino Real will also comply with the Caltrans Highway Design Manual Standards. Through the implementation of the uniform standards in the MC Chapter 12.08 and the Highway Design Manual, the Car-Free California Avenue will not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Emergency Access

Each intersection with the Project area on California Avenue will be closed to vehicle through-traffic through the placement of above ground planters and retractable bollards. As designed, three retractable bollards will be installed at the intersection of El Camino Real and California Avenue. Two retractable bollards will be installed at Ash Street, and four bollards (two removable, two retractable) will be installed at the intersection with Birch Street to allow access for emergency vehicles as well as maintenance vehicles, utility vehicles, and limited commercial vehicles. As designed the Project will not result in inadequate emergency access. Therefore, the Project will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR.

Conclusion

The Project implements Comprehensive Plan Policies T-1.3, Policy T-1.16, and T-1.19, and as proposed will not result in potentially significant impacts that were not previously identified or analyzed, nor will the Project increase the severity of any impacts previously identified in the Palo Alto Comprehensive Plan 2030 EIR. Furthermore, there are no new mitigation measures considerably different than those previously analyzed that would reduce one or more significant effect.

Applicable Mitigation Measures:

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.

Recommendation:

To implement TRANS-6, the City shall coordinate with Santa Clara VTA and Caltrans in the final design and implementation of the Project.

6. CONCLUSION

As described above, the Project will not result in new or more severe environmental impacts beyond those identified in the Comprehensive Plan 2030 EIR (EIR), approved in 2017. The Car-Free Ramona Street and California Avenue Project (the Project) will be subject to all applicable mitigation measures identified in the MMRP adopted for the approved Comprehensive Plan 2030, summarized below and fully detailed in the MMRP Applicability Matrix included as **Appendix C** to this Addendum.

The Project does not propose substantial changes which will require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

There have been no substantial changes with respect to the circumstances under which the Comprehensive Plan 2030 EIR (EIR) was undertaken which would require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified as complete, shows any of the following:

- a. The project will have one or more significant effect not discussed in the EIR;
- b. Significant effects previously examined are more severe than shown in the EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Therefore, the Car-Free Ramona Street and California Avenue Project will not result in any new or more severe impacts as compared to impacts previously identified for the Comprehensive Plan. As such, no further environmental review beyond this addendum is warranted.

In accordance with Section 15164 of the CEQA Guidelines only minor technical changes or additions are necessary and none of the conditions described above have occurred. Therefore, the proposed Project, which includes the Addendum to the Comprehensive General Plan, is eligible for an Amendment to the Comprehensive General Plan EIR.

Applicable Mitigation Measures:

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).

CULT-1,2, & 7: To ensure the protection of potentially historic resources, the proposed Plan shall include policies that achieve the following:

- Process for reviewing proposed demolition or alteration of potentially historic buildings
- Protection of archaeological resources.

CULT-3, 5, & 7: Implement Mitigation Measure CULT-1. In addition, to ensure that future development would not damage archaeological resources, the proposed Plan shall include policies that achieve the following:

- 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.
- Adequate Appropriate tribal consultation and consideration of tribal concerns.

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.

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.

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.

Recommendations:

- During all Project construction activities, implement applicable BMPs shown above in Table 5.3 in compliance with Mitigation Measure AIR-2a.
- The Project shall comply with the following standard conditions of approval imposed by the City of Palo Alto:
 1. **UNANTICIPATED DISCOVERY OF BURIED ARCHAEOLOGICAL, PALEONTOLOGICAL, AND TRIBAL CULTURAL RESOURCES.** No known archeological or paleontological resources are present on or within the immediate vicinity of the site. However, in the unlikely event that an archeological resource or paleontological resource is unearthed during ground disturbing activities, work in the immediate area must be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archeology (National Park Service 1983) shall be contacted immediately to evaluate the find. If the find is Native American in origin, then a Native American representative must also be contacted to participate in the evaluation of the find. The qualified archaeologist, and, if applicable, the Native American representative, shall examine the find and make recommendations regarding additional work necessary to evaluate the significance of the find and the appropriate treatment of the resource. Recommendations could include, but are not limited to, invasive or non-invasive testing, sampling, laboratory analysis, preservation in place, or data recovery. A report of findings documenting any data

recovered during monitoring shall be prepared by a qualified archaeologist and submitted to the Director of Planning prior to final planning inspection.

Prior to commencement of any project-related construction activities, a qualified Archaeologist hired by the applicant shall provide a worker environmental awareness training to all site personnel that addresses cultural and tribal cultural resources. The training shall discuss the appearance of resources that may be encountered during construction as well as the procedures and notification process in the event of discovery.

2. DISCOVERY OF HUMAN REMAINS. Pursuant to Section 7050.5 of the Health and Safety Code, and Section 5097.94 of the Public Resources Code of the State of California in the event of the discovery of human remains during construction, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent remains. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are Native American. If the Coroner determines that the remains are not subject to his authority, he shall notify the Native American Heritage Commission (NAHC) who shall attempt to identify descendants of the deceased Native American. If no satisfactory agreement can be reached as to the disposition of the remains pursuant to this State law, then the landowner shall reinter the human remains, and items associated with Native American burials on the property in a location not subject to further subsurface disturbance. If the Director of Planning, in consultation with the archaeologist and Native American representative, finds that the archaeological find is not a significant resource, work would resume only after the submittal of a preliminary archaeological report and after provisions for reburial and ongoing monitoring are accepted by the Director of Planning.
- To implement Mitigation Measures NOISE-5a and Noise-8, all Project construction shall comply with Palo Alto Municipal Code Chapter 9.10 Noise including the following provisions:
 - o Construction hours shall be limited to Monday through Friday, eight a.m. to six p.m. and Saturday nine a.m. to six p.m.
 - o No individual piece of equipment shall produce a noise level exceeding one hundred ten dBA at a distance of twenty-five feet. If the device is housed within a structure on the property, the measurement shall be made out-side the structure at a distance as close to twenty-five feet from the equipment as possible.
 - o The noise level at any point outside of the property plane of the project shall not exceed one hundred ten dBA.
 - o A sign in compliance with Section 9.10.060(b)(3) shall be posted at all entrances to the construction site upon commencement of construction.
 - To implement TRANS-6, coordinate with Santa Clara VTA and Caltrans in the final design and implementation of the Project.

7. REFERENCE DOCUMENTS

7.1. APPENDICES

- A. *Traffic Impact Analysis for the Car-Free Ramona Street and California Avenue Project* prepared by Hexagon Transportation Consultants on January 23, 2025.
- B. *CalEEMod Air Quality Output* prepared by M-Group on November 26, 2024.
- C. *Car Free California Applicability Matrix* prepared by M-Group on December 17, 2024.

7.2. OTHER REFERENCED DOCUMENTS

- 1. *Project Description for Car-Free Ramona Street* prepared by Ashwini Kantak on October 26, 2024.
- 2. *Project Description and Preliminary Plans for Car-Free California Avenue* prepared by the City of Palo Alto and provided on November 19, 2024.
- 3. *City of Palo Alto Comprehensive Plan 2030*. Adopted on November 13, 2017 and amended on December 19, 2022.
- 4. *City of Palo Alto Comprehensive Plan 2030 EIR*. Certified on August 30, 2017.
- 5. *City of Palo Alto Comprehensive Plan 2030 Environmental Impact Report Mitigation Monitoring and Reporting Program* certified on August 30, 2017.
- 6. *City of Palo Alto Municipal Code Chapter 9.10 Noise*. Accessed on December 17, 2024.
https://codelibrary.amlegal.com/codes/paloalto/latest/paloalto_ca/0-0-0-66179
- 7. *City of Palo Alto Municipal Code Title 18 Zoning*. Accessed November - December 2024.
https://codelibrary.amlegal.com/codes/paloalto/latest/paloalto_ca/0-0-0-76269
- 8. *Santa Clara Valley VTA Electronic Communication Regarding Bus Route 89* with Janice Soriano-Ramos on November 22, 2024
- 9. *BAAQMD 2017 Bay Area Clean Air Plan*, prepared by the Bay Area Air Quality Management District, April 2017.
- 10. *BAAQMD CEQA Guidelines*, April 2022.
- 11. *Our Coast Our Futures Hazard Map*. Website: <https://ourcoastourfuture.org/hazard-map/> Accessed on December 4, 2024.
- 12. *California Code, Public Resources Code Section 21084.2*, accessed November 2024.
- 13. *California Code, Government Code Section 65352.3*, accessed in November 2024.
- 14. *The City of Palo Alto Bicycle and Pedestrian Transportation Plan (BPTP)* adopted in July 2012.
- 15. *The City of Palo Alto Comprehensive Economic Development Strategy (CEDS)* approved on August 14, 2023
- 16. *Technical Advisory on Evaluating Transportation Impact in CEQA*, prepared by the California Office of Planning and Research, December 2018.

17. *EnviroStor*, managed by the Department of Toxic Substances Control, accessed December 17, 2024.
18. *GeoTracker*, managed by the State Water Resources Control Board, accessed December 17, 2024.
19. *California Department of Conservation Farmland Mapping and Monitoring Program*, accessed on October 17, 2024.
20. *Mines Online*, managed by California Department of Conservation Division of Mine Reclamation, accessed on October 17, 2024.