INITIAL STUDY CHECKLIST TO DETERMINE CONSISTENCY WITH THE 2030 COMPREHENSIVE PLAN ENVIRONMENTAL IMPACT REPORT (SCH #2014052101)

2100-2400 Geng Road Residential Project

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INTRODUCTION

This document is an Initial Study (IS) Checklist to determine consistency with the Environmental Impact Report (EIR) (State Clearinghouse [SCH] #2014052101) certified in 2017 ("2017 EIR") for the City of Palo Alto's 2030 Comprehensive Plan. Pursuant to CEQA Guidelines Section 15183, a project consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified does not require additional review unless it would result in project-specific significant effects that are peculiar to the project or site that were not adequately addressed in the EIR for the general plan. In approving a project meeting the requirements of Section 15183 of the CEQA Guidelines, a public agency must limit its examination of environmental effects to those the agency determines in an Initial Study or other analysis:

1. Are peculiar to the project or the parcel on which the project would be located;
2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;
3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or
4. Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for the project solely on the basis of that impact.

The purpose of this checklist is to assess consistency between the proposed project and the 2030 Comprehensive Plan, and to compare the environmental effects of the proposed project with those identified in the 2017 EIR to determine if additional environmental review is required under CEQA, in accordance with CEQA Guidelines Section 15183.

BACKGROUND AND PURPOSE OF THE INITIAL STUDY CHECKLIST

2017 EIR BACKGROUND

The City of Palo Alto prepared and certified the Comprehensive Plan Update EIR (State Clearinghouse #2014052101) on February 5, 2016. The EIR analyzed four scenarios (scenarios 1, 2, 3, and 4) and their environmental impacts. The City then prepared and certified the Comprehensive Plan Update Supplement to the Draft EIR (State Clearinghouse #2014052101) on February 10, 2017, which analyzed two more scenarios (scenarios 5 and 6) with higher buildouts compared to scenarios 1 through 4. The City also prepared and adopted a Mitigation, Monitoring and Reporting Program (MMRP); CEQA findings; and a Statement of Overriding Considerations in 2017.

CONSISTENCY OF THE PROJECT WITH THE 2030 COMPREHENSIVE PLAN AND PALO ALTO MUNICIPAL CODE

CITY OF PALO ALTO 2030 COMPREHENSIVE PLAN

The project would be located entirely in the City of Palo Alto. The 2030 Comprehensive Plan is the fundamental document that governs land use development. It includes goals and policies relating to economic vitality, land use, growth management, transportation, parks, open space, conservation, safety, noise, public facilities, and utilities. The project would be required to abide by all applicable goals and policies in the 2030 Comprehensive Plan. The 2030 Comprehensive Plan land use designation for the site is Research/Office Park, which allows multi-family housing in specific locations, consistent with the 2030 Comprehensive Plan's encouragement of housing near transit centers. The proposed project would be located within a 0.7-mile walk of SamTrans bus stops for bus routes 81 and 280 along Bayshore Road and Stanford Transportation AE-F line along Embarcadero Road. Consistent with 2030 Comprehensive Plan policies L-1.3 and L-1.4, the project would add affordable residential housing – 19 affordable for-sale units, or 13 percent of total units – at an underutilized site.

CITY OF PALO ALTO MUNICIPAL CODE

The existing zoning is Research, Office and Limited Manufacturing (ROLM(E)(D)(AD)), in which multifamily development is permitted subject to the RM-20 district development standards. The proposed project would include 19 affordable for-sale units (13 percent of total units), restricted to low-income households. As such, the project is entitled to the provisions of the State Density Bonus Law (Government Code Section 65915), including waivers of development standards that would physically preclude construction at the permitted density, and up to three incentives/concessions: one under State Density Bonus Law and two under the Housing Accountability Act. The project would not conflict with the Municipal Code zoning requirements.

PROJECT IN RELATION TO THE 2017 EIR

The 2030 Comprehensive Plan Supplement to the Draft EIR analyzed six scenarios for development under the 2030 Comprehensive Plan. Scenario 6 of the 2030 Comprehensive Plan Supplement to the Draft EIR, which analyzed the maximum allowable development for residential uses under the 2030 Comprehensive Plan, assumed a buildout of 6,000 residential units and 14,080 residents. Therefore, the CEQA baseline for this analysis is Scenario 6. The proposed project would include construction of 145 new residential units and addition of 361 new residents,[1] which would be within the citywide buildout projections assumed in the 2017 EIR.

[1] Based on Palo Alto's person per household of 2.49 x 145 units = 361 new residents. (DOF 2024)

CEQA GUIDELINES UPDATE

Since the time the City of Palo Alto Comprehensive Plan EIR was certified, the *CEQA Guidelines* have been updated by the State of California; the revised *Guidelines* are in effect as of December 2018. Therefore, this report is based on the current 2023 Appendix G checklist questions in the updated *CEQA Guidelines.* The current CEQA Guidelines Appendix G checklist questions provide the basis for this analysis.

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PROJECT DESCRIPTION

PROJECT TITLE

2100-2400 Geng Road Residential Project

LEAD AGENCY NAME, ADDRESS, AND CONTACT

City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301

Contact: Steven Switzer, Senior Historic Planner, steven.switzer@paloalto.gov
650-329-2321

PROJECT LOCATION

The 11-acre (480,230 square-foot) project site is located at 2100 to 2400 Geng Road (Assessor's Parcel Numbers 008-02-035 and 008-02-036) in the northeastern portion of the city of Palo Alto in Santa Clara County. The parcel at 2100-2200 Geng Road totals five acres, while the parcel at 2300-2400 Geng Road totals six acres. The project site is on the western side of Geng Road, north of East Bayshore Road. The regional location of the project site is shown on Figure 1 and the project site location in its local context is shown on Figure 2.

COMPREHENSIVE PLAN DESIGNATION

The project site has a 2030 Comprehensive Plan land use designation of Research/Office Park. As described in the City of Palo Alto's 2030 Comprehensive Plan, the Research/Office Park land use designation plans for:

> "Office, research and manufacturing establishments whose operations are buffered from adjacent residential uses. Stanford Research Park is an example. Other uses that may be included are educational institutions and child care facilities. Compatible commercial service uses such as banks and restaurants and residential or mixed-uses that would benefit from the proximity to employment centers, will also be allowed. Additional uses, including retail services, commercial recreation, churches and private clubs may also be located in Research/Office Park areas, but only if they are found to be compatible with the surrounding area through the conditional use permit process. In some locations, residential and mixed-use projects may also locate in this category. Maximum allowable FAR ranges from 0.3 to 0.5, depending on site conditions. Consistent with the Comprehensive Plan, multi-family housing may be allowed in specific locations…"

Figure 1 Regional Location

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25-17274 EPS
Fig 1 Regional Location

★ Project Location

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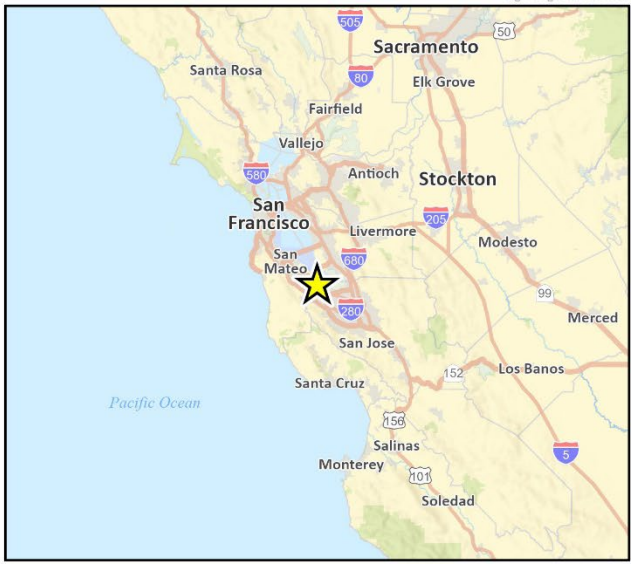

Figure 2 Project Location

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Fig 2 Project Location

ZONING

The project site is zoned Research, Office and Limited Manufacturing (ROLM(E)(D)(AD)) District. The PAMC, Section 18.20 states the intent of the ROLM(E) District:

> "The ROLM research, office and limited manufacturing district provides for a limited group of office, research and manufacturing uses in a manufacturing/research park environment, where uses requiring larger sites and available natural light and air can locate. Office uses can be accommodated, but should not predominate in the district. The ROLM district is primarily intended for land designated for research and office park use by the Palo Alto Comprehensive Plan and located east of El Camino Real."

PROJECT SITE SETTING AND BACKGROUND

The project site is currently developed with four two-story office buildings totaling 193,000 square feet and surface parking. There is also an existing Pacific Gas and Electric (PG&E) utility easement and power lines that traverse the eastern portion of the project site in a north to south alignment. There is a total of 270 trees within and along the boundaries of the project site. The site is located in in 100-year flood zone and elevation ranges from one to five feet around the boundaries of the site to approximately 65 feet above mean sea level around the center of the site.

The project vicinity is characterized primarily by commercial, residential, educational, institutional, and recreational uses. Specifically, the project site is immediately adjacent to the Fusion Academy Palo Alto, United States Postal Service, Deep Map, and Graeham Watts Realtor to the west; the Baylands Athletic Center to the north; Mattermost and Jones Day and Geng Road to the east; and Rabbit Product Design, DeLeon Realty, Cookman Law, and Warner Brothers Chimney Sweep to the south. San Francisquito Creek is located approximately 220 feet north of the project site.

Figure 3 and Figure 4 shows photographs of the project site.

Figure 3 Project Site Photographs 1 and 2

Photograph 1. View of the project site's frontage on Geng Road, looking east from across Geng Road.

Photograph 2. View looking east from the project site's southwest corner along the site's southern boundary.

Figure 4 Project Site Photographs 3 and 4

Photograph 3. View looking northeast to the interior of the project site from the site's southern boundary.

Photograph 4. View looking southwest to the interior of the project site from the site's western boundary.

DESCRIPTION OF PROJECT

The proposed project would involve merging the two parcels, demolition of the four existing two-story office buildings and surface parking, and construction of 145 multifamily townhome units in 65 buildings comprised of seven different townhome unit types. The project would include 22 detached townhomes along the northern boundary of the site, adjacent to the Baylands Athletic Center, which would include backyards that abut the parkland to create a buffer between the development and the park. The project would include 26 more detached townhomes across the street from these units. The remaining units would consist of attached townhomes arranged in clustered buildings of five, six, and eight units. The townhomes would be arranged around shared green spaces and connected by pedestrian paseos. The project design includes a circulation loop road, landscaped pedestrian pathways, and centrally located open spaces.

The project is proposed under the provisions of California Government Code 65589.5(d)(5), which is commonly referred to as "Builder's Remedy." The Builder's Remedy is a provision of California's Housing Accountability Act that prevents jurisdictions without a substantially compliant housing element from denying certain housing projects, including housing projects that have submitted a preliminary application under SB330, even if such projects do not comply with the jurisdiction's zoning. The project submitted a preliminary application under SB330 on July 3, 2024, vesting it as a Builder's Remedy project ahead of the certification of Palo Alto's housing element on August 20, 2024. As discussed in California Government Code 65589.5(f)(6)(D)(iii), "Any project that complies with this paragraph shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, redevelopment plan and implementing instruments, or other similar provision for all purposes, and shall not be considered or treated as a nonconforming lot, use, or structure for any purpose." The project would include 19 affordable units (13 percent of total units) restricted to low-income households, which meets the requirements of the Housing Accountability Act as amended by AB 1893 (Government Code Section 65589.5(h)(3)(C)(i)(III)). Because the project meets the definition of a Builder's Remedy project as described above, it is entitled to utilize this reduced affordability percentage along with other associated provisions of the amended Housing Accountability Act (Government Code Section 65589.5(f)(7)(A)). The project would also be subject to the State Density Bonus Law and is entitled to waivers to exceed the maximum FAR, exceed height, change location of mobility infrastructure, decrease side yard width, be exempt from height limits on rooftop garden fixtures, and decrease private street width. The project would also be entitled to three concessions pursuant to the State Density Bonus Law and Housing Accountability Act. The applicant is requesting a concession regarding the distribution of affordable units under the Palo Alto Municipal Code (PAMC) Section 16.65.075, as current below-market-rate units are not incorporated within the detached townhouses and therefore would be inconsistent with PAMC Section 16.65.075.

Table 1 lists the proposed project characteristics. Figure 5 shows the proposed site plan.

Table 1 Proposed Project Characteristics

Feature	Proposed Project Details
Site/Building Features	
Gross Site Area	480,230 sf (11 ac)
Total Building Area	347,877 sf
Total Units	145
Floor Area Ratio (FAR)	1.0
Building Height	43 ft (at roof height)
Front Setback (along Geng Road)	16.5 ft
Side Setback (Northern and Southern Boundaries)	15 ft
Rear Setback (Western Property Boundary)	10 ft
Unit Types	
Alley Loaded Detached Townhomes	26
Front Loaded Detached Townhomes	22
Row Townhomes (Attached)	97
Total	**145**
Landscaping	
Proposed Site Total	171,741 sf
Total Existing On-Site Trees	270 trees
Total Trees to be Removed	209 trees (83 protected)
Total Trees to be Preserved	61 trees
Open Space	
Usable Open Space	91,555 sf[1]
Vehicle Parking	
Vehicle Parking	333 spaces[2]
Bicycle Parking Spaces	145 long-term spaces, 16 short-term spaces

sf = square feet; ft = feet; ac = acres; in = inches

[1] Includes 28,150 sf of common open space and 63,405 sf of private open space.

[2] Includes 290 parking spaces in garages (2 spaces per unit) and 43 surface parking spaces. Every garage will be Level 2 EV Ready.

Figure 5 Proposed Site Plan

Source: Dahlin Group, April 11, 2025.

SITE ACCESS, CIRCULATION, AND PARKING

Vehicle access to the project site would be provided via Geng Road, with a clearly defined primary circulation loop offering access to all areas of the site. Secondary vehicular access would be available from East Bayshore Road through an adjacent property. The project also includes a fully landscaped pedestrian network that connects the townhomes to the central open space, promoting walkability throughout the site.

A total of 43 surface parking spaces would be distributed along the circulation loop for guest use. Each residential garage would be equipped with two Level 2 electric vehicle (EV) Ready parking spaces, resulting in a total of 290 EV Ready spaces.

The project would also provide 145 long-term bicycle parking spaces, accommodated through wall-mounted racks within each garage, and 16 short-term bicycle parking spaces located throughout the site

SUSTAINABILITY

The project would be all-electric and would not utilize natural gas. The project would include solar photovoltaic (PV) panels on building roofs, cool roofs, energy-efficient fixtures and appliances, low-waste use fixtures, and low-volatile organic compound (VOC) materials. Each garage would also include two Level 2 EV Ready charging spaces.

Project design also incorporates lighting reduction design features to reduce the spillover of lighting or glare/increased luminance perceived by birds and other wildlife, all of which follow recommendations by the International Dark-Sky Association.

LANDSCAPING, TREES, AND STORMWATER

As outlined in the Preliminary Arborist Report prepared by HortScience and Bartlett Consulting in November 2024, attached as Appendix A1, the project site currently contains 270 trees: 12 Blackwood acacia (*Acacia melanoxylon*), 4 Japanese maple (*Acer palmatum*), two African fern-pine (*Afrocarpus falcatus*), one Black alder (*Alnus glutinosaI*), six European white birch (*Betula pendula*), 43 River she-oak (*Casuarina cunninghamiana*), one Western redbud (*Cercis occidentalis*), 16 River red gum (*Eucalyptus camaldulensis*), 49 Blue gum (*Eucalyptus globulus*), 13 Raywood ash (*Fraxinus angustifolia* 'Raywood'), one Evergreen ash (*Fraxinus uhdei*), one Ginkgo (*Ginkgo biloba*), five Silk oak (*Grevillea robusta*), one Chinese flame tree (*Koelreuteria bipinnata*), six Glossy privet (*Ligustrum lucidum*), 23 Sweetgum (*Liquidambar styraciflua*), two Southern magnolia (*Magnolia grandiflora*), nine Crabapple (*Malus sylvestris*), one Mayten (*Maytenus boaria*), two Canary Island date palm (*Phoenix canariensis*), two Cherry (*Prunus* sp), nine Coast live oak (*Quercus agrifolia*), two Holly oak (*Quercus ilex*), one Yellow willow (*Salix lasiandra*), 33 Coast redwood (*Sequoia sempervirens*), and 25 Water gum (*Tristaniopsis laurina*).

To meet both FEMA's and the City's local flood plain requirements, the project would be required to raise the grade of the site by approximately one to six feet, which would impact trees and result in the removal of trees on-site. As outlined in the Revised Preliminary

Arborist Report prepared by HortScience and Bartlett Consulting in August 2025, attached as Appendix A2, the project would require the removal of 209 trees, of which 83 are protected trees, and potentially preserve 61 trees. Pursuant to Section 8.10.055 of the PAMC, 357 24-inch box trees would be required to be planted as replacement trees. The project would plant 651 24-inch box trees, which would exceed the City's tree replacement requirement. Of the 651 new trees to be planted, over 50 percent would be California native species, and 57 would be coast live oaks and valley oaks. Project landscaping would incorporate native and drought tolerant plant species. The landscaping plan emphasizes the use of native and drought-tolerant plant materials, selected from the Water Use Classification of Landscape Species (WUCOLS) Plant Database. To enhance water efficiency, low- and medium-water-use plants would be grouped into separate hydrozones. The planting design does not utilize any invasive plant species. Overall, the project would result in a net increase of approximately 58,908 square feet in landscaped areas and impervious surfaces.

Irrigation would include the use sprays and bubblers. Landscaping and irrigation would comply with the City's Bay-Friendly Water Efficient Landscape Ordinance pursuant to PAMC Section 12.32.040. The project would include bioretention areas on the eastern portion of the site adjacent to Buildings 65 and 66 as well as silva cells[2] adjacent to the southern boundary of the central open space.

OPEN SPACE AND AMENITIES

The project site would include a 28,150 square-foot communal central open space that would be within walking distance for all residents. The central open space would include seating areas and outdoor cooking and dining areas.

Private open space would be provided in individual balconies, roof decks, and backyards.

CONSTRUCTION

The project would involve demolition of existing on-site structures totaling approximately 193,000 square feet. Construction is anticipated to last a total duration of approximately 33 months.

Demolition activities would require the export of approximately 6,690 cubic yards of soil. Site preparation would involve the import of approximately 92,000 cubic yards of soil to raise the site's grade and minimize potential for flooding, while grading clean-up would require the export of an additional 49,000 cubic yards. Ground disturbing activities would involve excavation to approximately one foot below current grade for foundations, three feet for site preparation, including tree removal/planting, and a maximum depth of eight to 10 feet below current grade for the installation/removal of utilities and wall trenches. The existing PG&E utility easement and power lines would remain in place.

[2] Silva cells are a type of suspended pavement preventing soil from getting compacted around tree roots.

Construction activities would occur Monday through Friday from 8:00 a.m. to 6:00 p.m., in accordance with PAMC Section 9.10.060, and may also occur on Saturdays during the same hours if necessary.

PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (E.G., PERMITS, FINANCING APPROVAL, OR PARTICIPATION AGREEMENT)

The City of Palo Alto is the lead agency with responsibility for approving the project. The project would require the following discretionary approvals from the City of Palo Alto:

- Site & Design Review
- Conditional Use Permit (2400 Geng Rd only)
- Tentative Map/Subdivision

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

This Project would potentially affect the environmental factors checked below, involving at least one impact that is peculiar to the project or site and "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resource
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION

Based on this initial evaluation:

■ I find that the proposed Project WOULD NOT result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time of the prior EIR. Pursuant to *CEQA Guidelines* section 15183, the Project is consistent with a Community Plan or Zoning. New effects would be substantially mitigated under uniformly applicable development policies or standards. NO FURTHER REVIEW is required.

DETERMINATION

☐ I find that the proposed Project WOULD result in: 1) a peculiar impact that was not identified as a significant impact under the prior EIR; 2) a significant impact that was not analyzed as significant in the prior EIR; 3) a potentially significant offsite impact or cumulative impact not discussed in the prior EIR; or 4) a more severe impact due to substantial new information that was not known at the time of the prior EIR. I find that FURTHER ENVIRONMENTAL REVIEW is necessary to analyze those effects that are subject to CEQA, and therefore, this Project is not consistent with a Community Plan or Zoning pursuant to *CEQA Guidelines* Section 15183.

Signed by: Steven Switzer DC4138EEBE754E7...	12/2/2025
Signature	Date
Steven Switzer	Senior Planner
Printed Name	Title

This report follows a checklist format for projects eligible for streamlined review under the California Environmental Quality Act (CEQA). (Pub. Res. Code, § 21083.3; *CEQA Guidelines*, § 15183. A consistency checklist is prepared by a lead agency to streamline the environmental review process for eligible Projects by limiting the topics subject to review for all projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified. For such projects, *CEQA Guidelines* Section 15183 requires the lead agency to limit its examination of environmental impacts to those which are (1) "peculiar to the project or the parcel on which the project would be located"; (2) were not analyzed in the prior EIR that established the development density; (3) are potentially significant off-site impacts and cumulative impacts that were not analyzed in the prior EIR that established the development density; or (4) are previously identified significant impact which, as a result of substantial new information which was not known at the time the prior EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Furthermore, *CEQA Guidelines* Section 15183 mandates that the lead agency not consider an impact to be significant if uniformly applicable development policies or standards would substantially mitigate such effects. With respect to the effects that are subject to additional CEQA review, the lead agency is to prepare an EIR if the written checklist shows that the effects of the Project would be potentially significant.

The checklist concludes that the Project would not have any significant effects on the environment that either have not already been analyzed in a prior EIR or are more significant than previously analyzed, or that uniformly applicable development policies would not substantially mitigate.

This *CEQA Guidelines* Section 15183 Consistency Checklist has been prepared in accordance with Public Resources Code Section 21000 et seq. and the *CEQA Guidelines*, California Code of Regulations Section 15000 et seq.

1 Aesthetics

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Except as provided in Public Resources Code Section 21099, would the project:					
a. Have a substantial adverse effect on a scenic vista?	☐	■	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	■	☐	■	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	■	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENT

Section 4.1, *Aesthetics*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to aesthetics. The 2017 EIR determined that the 2030 Comprehensive Plan would have significant but mitigable impacts related to aesthetics. The 2017 EIR states that buildout of the Comprehensive Plan could potentially substantially degrade the existing visual character or quality of the affected areas of the city and their surroundings since it would introduce housing on sites previously used for non-residential purposes and increase the scale of development on existing housing sites. Therefore, Mitigation Measure AES-1 would be required and would reduce impacts to a less than significant level.

The 2017 EIR found that the 2030 Comprehensive Plan would not significantly alter public viewsheds, view corridors, or scenic resources, and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. These impacts were found to be less than significant.

Table 2 lists the mitigation measure from the 2017 EIR related to aesthetics.

Table 2 2017 EIR Mitigation Measures: Aesthetics

Mitigation Measure #	Mitigation Text
Impact AES-1: Implementation of the proposed Plan would have the potential to substantially degrade the existing visual character or quality of the area and its surroundings. (Potentially Significant and Mitigable)	
AES-1	To ensure that increased residential densities would not degrade the visual character or quality of the area, the proposed Plan shall include policies that achieve the following: ▪ High-quality building and site design. ▪ Compatibility with the neighborhood and adjacent structures. ▪ Enhancement of existing commercial centers. ▪ Requirements for landscaping and street trees. ▪ Preservation and creation of a safe and inviting pedestrian environment. ▪ Appropriate building form, massing, and setbacks.

Source: City of Palo Alto 2017

PROJECT-SPECIFIC IMPACTS

a. Would the project have a substantial adverse effect on a scenic vista?

An adverse effect would occur if a proposed plan or project would block or otherwise damage a scenic vista upon implementation. Palo Alto does not contain designated scenic views or vistas. However, Palo Alto identifies the backdrop of forested hills to the southwest and San Francisco Bay to the northeast as views that are character-defining features of the city, including the East Bay hills and the Santa Cruz Mountains (City of Palo Alto 2016).

The proposed project would have a maximum height of 43 feet and a floor area ratio (FAR) of 1.0:1. Although the project site is located within the Baylands, the project is located within the area of the Baylands identified as developed area. Views of the Baylands are not visible through the site due to the presence of intervening development and mature vegetation, including buildings and trees that obstruct direct lines of sight. Additionally, there are no public viewpoints through the site that offer views of distant hills or mountains. Therefore, the proposed project would not block or result in a substantial adverse effect on a scenic vista. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

While there are no officially designated State scenic highways in Palo Alto, the City identifies several scenic routes, including Sand Hill Road, University Avenue, Embarcadero Road, Page Mill Road, Oregon Expressway, I-280, Arastradero Road (west of Foothill Expressway), Junipero Serra Boulevard/Foothill Expressway, and Skyline Boulevard as having high scenic value (City of Palo Alto 2016).

The proposed project would be located near Embarcadero Road. However, the project site is situated within a developed urban setting and is not directly visible from Embarcadero

Road due to existing development and vegetation that limit public views. In addition, the project site is not located along or in proximity to a California State Officially Designated Scenic Highway and does not contain scenic resources such as rock outcroppings or historic buildings. The closest State designated scenic highway is I-280, which is located more than five miles from the project site. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

c. *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The proposed project would include construction of 145 townhome units on a site currently developed with office buildings and surface parking. The project is located within an urbanized area of Palo Alto, surrounded by a mix of institutional, recreational, and commercial uses. Public views of the site are primarily limited to those from Geng Road and nearby East Bayshore Road, both of which are developed corridors not identified as scenic routes by the City. The surrounding area includes the Baylands Athletic Center to the north, commercial offices to the south and east, and institutional facilities to the west.

The project would replace existing commercial development with contemporary three-story townhomes arranged around shared open spaces, with architectural design and landscaping features intended to integrate with the existing urban fabric. The project includes a mix of materials, rooflines, and façade treatments that are consistent with modern residential development in the area. In addition, the project would incorporate landscaping, native plantings, and private and common open spaces, which would improve the site's visual quality compared to the current surface parking and office buildings.

The proposed project would require the removal of approximately 209 trees, which would result in temporary visual impacts during construction and early operation of the site. However, in compliance with the City's Tree Preservation Management Ordinance and Section 8.10.055 of the PAMC, the project would include the planting of 651 new trees as part of a comprehensive landscaping plan. Over time, as these trees mature, they would enhance the visual character of the site, increase greenery, and improve overall aesthetics. The long-term benefits of the new tree plantings would help offset the initial impacts associated with tree removal.

The project would not conflict with applicable zoning or design regulations governing scenic quality. Although the site is currently zoned ROLM(E), multifamily residential development is permitted subject to RM-20 standards, and the project qualifies as a Builder's Remedy project with entitlements for waivers and concessions under the State Density Bonus Law and Housing Accountability Act. Architectural design, setbacks, and building massing are being reviewed through the City's planning and design review process to ensure compatibility with community character and visual expectations. Furthermore, although the proposed project would have a maximum height of 43 feet and a floor area ratio(FAR) of

1.0:1, which would exceed the ROLM (E) zoning district maximum height requirement of 30 feet and FAR requirement of 0.5:1, it would be required to comply with Mitigation Measure AES-1 from the 2017 EIR which would ensure that increased building massing would not significantly degrade the visual character or quality of the area. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, impacts related to visual character and quality would be less than significant and would not be substantially greater than those identified in the 2017 EIR with completion of the Planned Community Rezoning process.

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The project site is located in an urbanized area with relatively high levels of existing lighting. Primary sources of light adjacent to the project site include lighting associated with the existing commercial buildings, including building-mounted and perimeter lighting as well as interior lighting visible through windows; streetlights; and headlights from vehicles on nearby streets. Sources of light on the project site include interior lighting visible through windows, headlights from vehicles, and exterior building lights to illuminate signage and parking areas. The primary source of glare adjacent to the project site is the sun's reflection from metallic and glass surfaces on buildings and on vehicles parked on adjacent streets and in adjacent parking areas. Vehicles parked on the project site are the primary source of daytime glare on the project site. The proposed project would incorporate exterior lighting in the form of pedestrian walkway lighting and other safety-related lighting. Interior lighting would also be visible through the proposed building's windows. These light sources would not have a significant impact on the night sky, as they would only incrementally add to the existing background light levels already present as a result of the surrounding street lighting and urban development. Furthermore, in recognition of the project site's proximity to the San Francisquito Creek and Baylands Nature Preserve and Shoreline Park, the project design also incorporates lighting reduction design features to reduce the spillover of lighting or glare/increased luminance perceived by birds and other wildlife, all of which follow recommendations by the International Dark-Sky Association. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, impacts related to light and glare would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

With implementation of Mitigation Measure AES-1 from the 2017 EIR, the project would have less than significant impacts on aesthetics, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

2 Agriculture and Forestry Resources

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	■	■	☐
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	■	■	☐
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	■	■	☐
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	■	■	☐
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

The 2017 EIR addresses agricultural and forestry resources in Chapter 7, CEQA-Mandated Sections. The 2017 EIR found that the implementation of the 2030 Comprehensive Plan would have no impacts related to agricultural and forestry resources.

PROJECT-SPECIFIC IMPACTS

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

b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

e. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

According to the California Department of Conservation, the project site is located on Urban and Built-Up Land (DOC 2025a). The project site is not identified as farmland, not enrolled in Williamson Act contracts, and does not support forest land or resources. The project site is not located on or adjacent to agricultural land or forest land and the proposed project would not involve development that could result in the conversion of farmland to non-agricultural uses. For these reasons, the project would have no impact with respect to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use; would not conflict with existing agricultural zoning or Williamson Act contracts; and would not result in the loss of forest land or conversion of forest land to non-forest use or other conversion of farmland to non-agricultural use. Impacts related to agricultural and forestry resources would be less than those identified in the 2017 EIR.

CONCLUSION

The project would have no impact on agriculture or forestry resources, which is less than those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

3 Air Quality

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	■	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	■	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	■	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.2, *Air Quality,* of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to air quality. The 2017 EIR found that implementation of the 2030 Comprehensive Plan could conflict with or obstruct the implementation of the 2010 Bay Area Clean Air Plan. Although the 2030 Comprehensive Plan was found to result in a lower vehicle miles traveled (VMT) per capita and a lower VMT per service population than under existing conditions at the time, it could not be verified whether the 2030 Comprehensive Plan would aid or hinder implementation of control measures outlined in the 2010 Bay Area Clean Air Plan. Therefore, Mitigation Measure AIR-1 would be required to reduce impacts to a less than significant level.

The 2017 EIR also found that the 2030 Comprehensive 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, resulting in significant and unavoidable impacts. Even with implementation of mitigation measures AIR-2a through 2d, impacts would be significant since future development projects would contribute to increases in concentrations of air pollutants.

The 2017 EIR found that implementation of the 2030 Comprehensive Plan could expose sensitive receptors to substantial concentrations of Toxic Air Contaminants (TACs), and mitigation measures AIR-3a through 3d would be required to reduce impacts to a less than significant level. Additionally, the implementation of the 2030 Comprehensive Plan could

expose a substantial number of people to objectionable odors. Therefore, mitigation measure AIR-4 would be required to reduce odor impacts to a less than significant level.

Table 3 lists the mitigation measures from the 2017 EIR related to air quality.

Table 3 2017 EIR Mitigation Measures: Air Quality

Mitigation Measure #	Mitigation Text
Impact AIR-1: Without inclusion of air quality policies, implementation of the proposed Plan could conflict with or obstruct implementation of the applicable air quality plan. (Significant and Mitigable)	
AIR-1	To ensure consistency with the 2010 Bay Area Clean Air Plan, the proposed Plan shall include policies that achieve the following: ▪ Reduction in emissions of particulates from automobiles, manufacturing, construction activity, and other sources (e.g., dry cleaning, wood burning, landscape maintenance). ▪ Support for regional, State, and federal programs that improve air quality. ▪ Support for transit, bicycling, and walking. ▪ Mix of uses (e.g., housing near employment centers) and development types (e.g., infill) to reduce the need to drive.
Impact 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). (Significant and Unavoidable)	
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 applicants for future development projects comply with the current BAAQMD basic control measures for reducing construction emissions of PM10 (Table 8-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).
AIR-2b	The City shall amend its local CEQA Guidelines to require that, prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening-criteria listed in the BAAQMD CEQA Guidelines shall prepare and submit to the City of Palo Alto a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the City of Palo Alto shall require that applicants for new development projects incorporate mitigation measures (Table 8-32, Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold, of the BAAQMD CEQA Guidelines or applicable construction mitigation measures subsequently approved by BAAQMD) to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City.
AIR-2c	To ensure that development projects that have the potential to exceed the BAAQMD screening criteria air pollutants listed in the BAAQMD CEQA Guidelines reduce regional air pollutant emissions below the BAAQMD thresholds of significance, the proposed Plan shall include policies that require compliance with BAAQMD requirements, including BAAQMD CEQA Guidelines.
AIR-2d	Implement Mitigation Measure TRANS-1a and TRANS-1b. In addition, to reduce long-term air quality impacts by emphasizing walkable neighborhoods and supporting alternative modes of transportation, the proposed Plan shall include policies that achieve the following topic: ▪ Enhanced pedestrian and bicycle connections between commercial and mixed-use centers.

Mitigation Measure #	Mitigation Text
Impact AIR-3: Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution. (Significant and Mitigable)	
AIR-3a	The City of Palo Alto shall update its CEQA Procedures to require that future non-residential projects within the city that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Palo Alto prior to future discretionary Project approval or shall comply with best practices recommended for implementation by the BAAQMD. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds the BAAQMD significance thresholds, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. Mitigation measures and best practices may include but are not limited to: ▪ Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. ▪ Electrifying warehousing docks. ▪ Requiring use of newer equipment and/or vehicles. ▪ Restricting off-site truck travel through the creation of truck routes. Mitigation measures identified in the project-specific HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of a proposed project.
AIR-3b	To ensure that new industrial and warehousing projects with the potential to generate new stationary and mobile sources of air toxics that exceed the BAAQMD project-level and/or cumulative significance thresholds for toxic air contaminants and PM2.5 listed in the BAAQMD CEQA Guidelines reduce emissions below the BAAQMD thresholds of significance, amend the City's CEQA guidelines to require compliance with BAAQMD requirements.
AIR-3c	The proposed Plan shall include policies to mitigate potential sources of toxic air contaminants through siting or other means to reduce human health risks and meet the Bay Area Air Quality Management District's applicable threshold of significance. Policies shall also require that new sensitive land use projects (e.g., residences, schools, hospitals, nursing homes, parks or playgrounds, and day care centers) within 1,000 feet of a major stationary sources of TACs and roadways with traffic volumes over 10,000 vehicles per day consider potential health risks and incorporate adequate precautions, such as high-efficiency air filtration, into project design.
Impact AIR-4: Implementation of the proposed Plan could create or expose a substantial number of people to objectionable odors unless policies are integrated into the proposed Plan. (Significant and Mitigable)	
AIR-4	To reduce odor impacts, the proposed Plan shall include policies requiring: ▪ Buffers, mechanical, and other mitigation methods to avoid creating a nuisance.

Source: City of Palo Alto 2017

BAAQMD SIGNIFICANCE THRESHOLDS

This analysis relies on Bay Area Air District's (Air District) *2022 CEQA Air Quality Guidelines* to evaluate air quality (Air District 2023).

The Air District developed screening criteria in the 2022 *CEQA Air Quality Guidelines* to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. The screening criteria for residential land uses are shown in Table 4.

Table 4 Air District Criteria Air Pollutant Screening Levels

Land Use Type	Construction Criteria Pollutant Screening Size (du)	Operation Criteria Pollutant Screening Size (du)
Apartments	416 (ROG)	638 (ROG)
Condo-Townhouse	416 (ROG)	637 (ROG)
Mobile Home Park	377 (ROG)	721 (ROG)
Congregate Care/Retirement Community	416 (ROG)	1,008 (ROG)
Single Family Housing	254 (ROG)	421 (ROG)

du = dwelling unit; NOX = oxides of nitrogen; ROG = reactive organic gases

Source: Air District 2023

If a project meets the screening criteria, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (Air District 2023).

In addition to the screening levels above, several additional factors are outlined in the 2022 *CEQA Air Quality Guidelines* that construction activities must satisfy for a project to meet the construction screening criteria:

- All best management practices (see Table 5-2 in Chapter 5, "Project-Level Air Quality Impacts") are included in the project design and implemented during construction.
- Construction-related activities would not overlap with operational activities.
- Construction-related activities would not include:
  - demolition,
  - simultaneous occurrence of two or more construction phases (e.g., paving and building construction would occur simultaneously),
  - extensive site preparation (e.g., grading, cut and fill, or earth movement)
  - extensive material transport (e.g., soil import and export requiring a considerable amount of haul truck activity), or
  - stationary sources (e.g., backup generators) subject to Air District rules and regulations.

For projects that do not meet the screening criteria above, the Air District's construction significance thresholds for criteria air pollutants, shown in Table 5, are used to evaluate a project's potential air quality impacts.

Table 5 Air Quality Thresholds of Significance

Pollutant/Precursor	Construction-Related Thresholds	Operation-Related Thresholds	
	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tpy)	Average Daily Emissions (lbs/day)
ROG	54	10	54
NO_X	54	10	54
PM_{10}	82 (exhaust)	15	82
$PM_{2.5}$	54 (exhaust)	10	54

tpy = tons per year; lbs/day = pounds per day; NOX = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases.
Source: Air District 2023

For determining operational impacts, in addition to the screening levels outlined in Table 4, several additional factors are outlined in the 2022 *CEQA Air Quality Guidelines* that operational activities must satisfy for a project to meet the construction screening criteria:

- Operational activities would not include stationary engines (e.g., backup generators) and industrial sources subject to Air District rules and regulations.
- Operational activities would not overlap with construction-related activities.

For projects that do not meet the screening criteria above, the Air District's operational significance thresholds for criteria air pollutants, shown in Table 5, are used to evaluate a project's potential air quality impacts.

CONSISTENCY WITH AIR QUALITY PLAN

The Air District adopted the 2017 Clean Air Plan (2017 Plan) as an update to the 2010 Clean Air Plan. The 2017 Plan provides a regional strategy to protect public health and protect the climate, which would apply to proposed projects in the SFBAAB. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_X—and reduce transport of ozone and its precursors to neighboring air basins, such as: stationary-source control measures to be implemented through the Air District regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. In addition, the 2017 Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and toxic air contaminants. The 2017 Plan also represents the Bay Area's most recent triennial assessment of the Region's strategy to attain the State 1-hour ozone standard (Air District 2017).

The 2017 Plan focuses on two goals:

- Protect air quality and health at the regional and local scale by attaining all national and state air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TACs, and
- Protect the climate by reducing Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050

Under Air District's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

1. Supports the primary goals of the 2017 Clean Air Plan
2. Includes applicable control measures from the 2017 Clean Air Plan
3. Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures

CARBON MONOXIDE HOTSPOTS

According to Air District Chapter 4, *Screening for Criteria Air Pollutants and Precursors*, a project would have less than significant CO impacts if:

1. The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
2. Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. The entire Basin is in conformance with state and federal CO standards (Air District 2023). There are no current exceedances of CO standards within the Air District's jurisdiction and have not had a CO exceedance in the Bay Area since before 1994.[3] For 2019, the Bay Area's reported maximum 1-hour and average daily concentrations of CO were 5.6 ppm and 1.7 ppm, respectively (Air District 2019).[4] These are well below the respective 1-hour and 8-hour standards of 20 ppm and 9 ppm. Given the ambient concentrations, which include mobile as well as stationary sources, a project in the Bay Area would need to emit concentrations three times the hourly maximum ambient emissions for all sources before project emissions would exceed the 1-hour standard. Additionally, the project would need to emit seven times the daily average for ambient concentrations to

[3] BAAQMD only has records for annual air quality summaries dating back to 1994.
[4] Data for 2019 was used as the data for 2020 and 2021 are not currently available.

exceed the 8-hour standards. Typical development projects, even plan level growth, would not emit the levels of CO necessary to result in a localized hot spot.

TOXIC AIR CONTAMINANTS

For health risks associated with TAC and $PM_{2.5}$ emissions, the Air District May 2022 CEQA *Air Quality Guidelines* state a project would result in a significant impact if any of the following thresholds are exceeded (Air District 2023):

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 100 in a million;
- Increased non-cancer risk of > 100.0 Hazard Index (Chronic or Acute); or
- Ambient $PM_{2.5}$ increase of > 0.8 µg/m^3 annual average

ODORS

The Air District provides minimum distances for siting of new odor sources shown in Table 6. A significant impact would occur if the project would result in other emissions (such as odors) affecting substantial numbers of people or would site a new odor source as shown in Table 6 within the specified distances of existing receptors.

Table 6 Air District Odor Source Thresholds

Odor Source	Minimum Distance for Less than Significant Odor Impacts (in miles)
Wastewater Treatment Plant	2
Wastewater Pumping Facilities	1
Sanitary Landfill	2
Transfer Station	1
Composting Facility	1
Petroleum Refinery	2
Asphalt Batch Plant	2
Chemical Manufacturing	2
Fiberglass Manufacturing	1
Painting/Coating Operations	1
Rendering Plant	2
Coffee Roaster	1
Food Processing Facility	1
Confined Animal Facility/Feed Lot/Dairy	1
Green Waste and Recycling Operations	1
Metal Smelting Plants	2

Source: Air District 2023

METHODOLOGY

CONSTRUCTION EMISSIONS

Construction-related emissions are temporary but may still result in adverse air quality impacts. Construction of development facilitated by the project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

The proposed project would include demolition and would not satisfy the Air District's construction screening criteria. Therefore, construction emissions are quantified using the California Emissions Estimator Model (CalEEMod), version 2022.1 and compared to the construction project-level thresholds. CalEEMod uses project-specific information, including the project's land uses, square footages for different uses (e.g., multi-family residential), and location to model a project's construction and operational emissions. The analysis reflects the construction and operation of the project as described under *Project Description*.

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. CalEEMod estimates construction emissions by multiplying the amount of time equipment is in operation by emission factors. Construction of the proposed project was analyzed based on the applicant-provided construction schedule and equipment for each construction phase. The project would include demolition of existing structures totaling 193,000 square feet. Construction would occur for five days a week with the possibility of Saturday construction for approximately 32 months from January 2027 to September 2029, and approximately 92,000 cubic yards (CY) of soil would be imported from off-site sources and 55,690 CY of soil would be exported. It is assumed that all construction equipment used would be diesel-powered. This analysis assumes that the project would be all-electric and would comply with all applicable regulatory standards. In particular, the project would comply with the Air District Regulation 6 Rule 3 for wood burning devices and Regulation 8 Rule 3 for architectural coatings.

OPERATION EMISSIONS

Operational emissions modeled include mobile source emissions (i.e., vehicle emissions), energy emissions, and area source emissions. Mobile source emissions are generated by vehicle trips to and from the project site, and trip generation rates provided in the Local Transportation Analysis prepared by W-Trans on September 19, 2025 were used in the modeling (Appendix B). Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings. Energy sources for regional air quality emissions are not included since the project would include an all-electric design and would not utilize natural gas; therefore, emissions from energy sources would not be generated on-site.

PROJECT-SPECIFIC IMPACT ANALYSIS

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The most recently adopted air quality plan is the Air District's 2017 Plan. The 2017 Plan updates the most recent Bay Area plan, the 2010 Clean Air Plan, pursuant to air quality planning requirements defined in the California Health and Safety Code. To fulfill State ozone planning requirements, the 2017 control strategy includes all feasible measures to reduce emissions of ozone precursors—ROG and NO_X—and reduce transport of ozone and its precursors to neighboring air basins. The Clean Air Plan builds upon and enhances the Air District's efforts to reduce emissions of fine particulate matter and Toxic Air Contaminants (TAC). The 2017 Plan does not include control measures that apply directly to individual development projects. Instead, the control strategy includes control measures related to stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-greenhouse gas (GHG) pollutants[5].

Under the Air District's methodology, a determination of consistency with the 2017 Plan should demonstrate that a project:

- Supports the primary goals of the air quality plan
- Includes applicable control measures from the air quality plan
- Does not disrupt or hinder implementation of any air quality plan control measures

A project that would not support the 2017 Plan's goals would not be considered consistent with the 2017 Plan. On an individual project basis, consistency with the Air District's quantitative thresholds is interpreted as demonstrating compliance with the clean air plan's goals. As discussed under criterion (b) below, the project would not exceed the Air District's significance thresholds related to air quality emission, the project would not result in exceedances of the Air District's thresholds for criteria air pollutants, and thus would not conflict with the 2017 Plan's goal to attain air quality standards.

The 2017 Plan includes 85 control measures under the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Many of these measures are industry-specific and would not be applicable to development facilitated by the project (e.g., stationary sources, agriculture, and natural and working lands). Measures from transportation, energy, building, water, waste, and super-GHG pollutants sectors are focused on larger-scale planning efforts (e.g., transit funding, utility energy procurement, regional energy plans) and would not directly apply to the project. Applicable 2017 Plan goals and control measures includes increasing the use of bicycle and pedestrian facilities (Control Measure TR9: Bicycle and Pedestrian Access and Facilities), promoting the use of renewable energy (Control Measure BL1: Green Buildings), encouraging energy efficiency

[5] Super GHG pollutants such as methane, black carbon, and hydrofluorocarbons remain in the atmosphere for less time than carbon dioxide but have a more potent impact on near-term global warming.

(Control Measure EN2: Decrease Electricity Demand), and supporting water conservation (Control Measure WR2: Support Water Conservation). The project includes features that are consistent with these goals and control measures, including meeting California Green Building Standards (CALGreen) requirements, full electrification of the residences, incorporating energy efficient appliances and lighting, providing water-efficient appliances and fixtures, providing PV solar panels on the rooftop, providing two Level 2 EV Ready charging spaces in each garage, and including 145 long-term bicycle parking spaces accommodated through wall-mounted racks within each garage and 16 short-term bicycle parking spaces located throughout the site. Additionally, the project site is located within a 0.7-mile walk from San Mateo County Transit District (SamTrans) Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F, which would encourage the use of alternative transportation, reduce reliance on single-occupancy vehicles, and reduce VMT. Therefore, the project would not conflict with or obstruct the implementation of an applicable air quality plan. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

CONSTRUCTION EMISSIONS

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles, in addition to ROG emissions that would be released during the drying phase of architectural coating. Table 7 shows and compares estimated construction emissions for each construction phase to the Air District's significance thresholds.

Table 7 Estimated Construction Emissions

	Average Daily Emissions (lbs/day)					
Sources	**ROG**	**NO_X**	**CO**	**PM_{10} (Exhaust)**	**$PM_{2.5}$ (Exhaust)**	**SO_X**
Average Daily Construction Emissions	13	23	23	1	1	<1
Air District Thresholds	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

N/A = not applicable; lbs/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = Carbon Monoxide; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; SO_x = oxides of sulfur.

No Air District threshold for CO or SO_X

See Appendix C for AQ CalEEMod worksheets.

As shown in Table 7, construction-related emissions would not exceed the Air District's thresholds. Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

The Air District has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMPs) for fugitive dust control during construction would have a less than significant impact related to fugitive dust emissions. The Air District has identified nine feasible fugitive dust control measures for construction activities. The Basic Best Management Practices for Construction-Related Fugitive Dust Emissions are recommended for all projects. In addition, the Air District and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aerially disbursed during demolition activities. Air District rules and regulations address both the handling and transport of these contaminants. The proposed project would be required to comply with Air District and CARB regulations, as well as Mitigation Measure AIR-2a of the 2017 EIR that would require compliance with the Air District's Basic Best Management Practices for Construction-Related Fugitive Dust Emissions. Therefore, impacts associated with construction would be less than significant.

OPERATIONAL EMISSIONS

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment) and mobile sources (i.e., vehicle trips to and from the project site). The proposed project would not generate air pollutant emissions associated with energy since the project would not use natural gas as the building would be all electric. Table 8 compares estimated operational emissions to the Air District's significance thresholds.

Table 8 Estimated Operational Emissions

	Emissions (lbs/day)					
Sources	**ROG**	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Average Daily Operational Emissions						
Mobile	3	2	19	5	1	<1
Area	9	<1	4	<1	<1	<1
Total Average Daily Operational Emissions	**12**	**2**	**23**	**5**	**1**	**<1**
Air District Thresholds (average daily emissions)	54	54	N/A	82	54	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**No**	**No**	**N/A**

N/A = not applicable; lbs/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; SO_x = oxides of sulfur.

Notes: All numbers have been rounded to the nearest tenth.

See Appendix C for CalEEMod worksheets.

As shown in Table 8, operational emissions would not exceed the Air District's regional thresholds for criteria pollutants. Project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be less than significant.

Overall, impacts would not be substantially greater than those identified in the 2017 EIR.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

CARBON MONOXIDE HOTSPOTS

As discussed above under Air District the Air District'sSignificance Thresholds, typical development projects do not emit the levels of CO necessary to result in a localized hotspot. Therefore, CO hotspots are not discussed further in this analysis. Impacts to CO hotspots would be less than significant and would be generally the same as the impact analyzed in the 2017 EIR for the 2030 Comprehensive Plan. Because there would be no new or substantially more severe significant impacts than what was analyzed in the 2017 EIR, further analysis is not warranted.

TOXIC AIR CONTAMINANTS

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the project's potential to result in impacts related to TAC emissions during construction and operation.

CONSTRUCTION

Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998 (CARB 2021).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 32 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of proposed construction activities (i.e., 32 months) is approximately nine percent of the total exposure period used for 30-year health risk calculations. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not correlate well with the temporary

and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (Air District 2017).

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during site preparation and grading activities. These activities would last for approximately 157 days. PM emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent approximately one percent of the total 30-year exposure period for health risk calculation. In addition, the proposed project would be required to comply with the Air District's Basic Best Management Practices for Construction-Related Fugitive Dust Emissions pursuant to Mitigation Measure AIR-2a of the 2017 EIR. Given the aforementioned discussion, DPM generated by project construction would not create conditions where the probability is greater than one in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Therefore, project construction would not expose sensitive receptors to substantial TAC concentrations, and this impact would be less than significant.

OPERATION

Sources of operational TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The project does not include construction of new gas stations, dry cleaners, highways, roadways, or other sources that could be considered new permitted or non-permitted source of TAC or $PM_{2.5}$ in proximity to receivers. In addition, the project would not introduce a new stationary source of emissions and the mobile emissions generated from the project would be minimal due to the project size and spread over a broad geographical area. Therefore, project operation would not expose sensitive receptors to substantial TAC concentrations. The project would be within the type of use and density assumed for the site in the 2017 EIR, and this impact would be less than significant.

SITING OF SENSITIVE RECEPTORS

Pursuant to the December 2015 ruling in the California Building Industry Association (CBIA) v Air District, impacts of the environment on the project are not considered impacts under CEQA. However, this analysis has been incorporated into the environmental assessment in order for the City to consider potential health and welfare implications from siting new sensitive receptors. The proposed project would include construction of a six-story, 55-unit residential building within 1,000 feet of U.S. 101 and Embarcadero Road, both high-volume roadways with traffic volumes over 10,000 vehicles per day. In addition, two permitted sources within 1,000 feet of the project site were identified using the Air District's

Stationary Source Screening Analysis Tool (Air District 2022; Appendix D). There are no railways within 1,000 feet of the project site.

Table 9 lists the permitted sources and major roadway and railway risk within 1,000 feet of the project site. As shown in Table 9, the Air District's individual source screening threshold for cancer risk and $PM_{2.5}$ would be exceeded at the project site.

Table 9 Risk and Hazard Screening Data

Source	Type	Distance to Site (feet)	Cancer Risk (in 1 million)	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Mobile	Major Roadways[1]	300	13.9	0.36
Air District Individual Source Screening Threshold			10	0.3
Individual Threshold Exceeded?			**Yes**	**Yes**
BAAQMD-Permitted Source ID[2]				
21078	Stanford University Medical Center - Generator	600	3.93	0.01
Air District Individual Source Screening Threshold			10	0.3
Individual Threshold Exceeded?			**No**	**No**
Combined Total (Major Roadways + Permitted Sources)			17.83	0.37
Air District Cumulative Screening Threshold			100	0.8
Cumulative Threshold Exceeded?			**No**	**No**

[1] Major roadways nearest to the project site include U.S. 101 (Bayshore Freeway) and Embarcadero Road.

[2] As shown in the Air District's Stationary Source Screening Analysis Tool, there are two permitted sources associated with the project. However, only Source 21078 is included because Source 2628 is located over 1,000 feet away from the project and has 0 cancer risk and $PM_{2.5}$ concentration.

Source: Air District 2022 (Appendix D)

The risk and hazard impacts in the the Air District's screening tools are based on reasonable worst-case scenarios to determine whether or not a refined modeling analysis is required. The calculations used in the screening analysis do not include source-specific exhaust information such as stack height, exhaust gas exit velocity, exhaust gas temperature, nor do they account for actual distances from receptors. A more refined analysis using source-specific exhaust parameters, site-specific meteorological data, site-specific building dimensions and locations, and actual location of source and receptors would be expected to result in lower and more accurate values than the conservative values from the screening tools (Air District 2012). Thus, this is a conservative approach to determination of potential impacts related to TACs.

Based on a conservative screening analysis following Air District methodology, as shown in Table 9, on-site sensitive receptors may be exposed to levels of TACs in excess of the Air District's screening thresholds that could impact human health. [6] As outlined under Section 160.2 of the 2022 Building Energy Efficiency Standards as well as Mitigation Measure AIR-3c of the 2017 EIR and Policy N-5.6 of the 2030 Comprehensive Plan, the proposed project would be required to include high-efficiency air filtration with a Minimum Efficiency Reporting Value (MERV) 13 rating or similar to be installed on outside air intake ducts on all residential units. MERV 13 filter screens are capable of removing 90 percent of particulate matter, including fine particulate matter when residents are indoors. Table 10 shows the health risks after incorporation of MERV 13 filters; calculations of the risk reduction are provided in Appendix D.

Table 10 Health Risks After Including MERV-13

Source	Type	Distance to Site (feet)	Cancer Risk (in 1 million)	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Mobile	Major Roadways[1]	300	4.95	0.07
Air District Individual Source Screening Threshold			10	0.3
Individual Threshold Exceeded?			**No**	**No**
BAAQMD-Permitted Source ID[2]				
21078	Stanford University Medical Center - Generator	600	1.40	0
Air District Individual Source Screening Threshold			10	0.3
Individual Threshold Exceeded?			**No**	**No**
Combined Total (Major Roadways + Permitted Sources)			6.35	0.07
Air District Cumulative Screening Threshold			100	0.8
Cumulative Threshold Exceeded?			**No**	**No**

[1] Major roadways nearest to the project site include U.S. 101 (Bayshore Freeway) and Embarcadero Road.

[2] As shown in the Air District's Stationary Source Screening Analysis Tool, there are two permitted sources associated with the project. However, only Source 21078 is included because Source 2628 is located over 1,000 feet away from the project and has 0 cancer risk and $PM_{2.5}$ concentration.

Source: Air District Stationary Source Screening Analysis Tool (Appendix D)

[6] In March 2012, the California Supreme Court denied the petition for review and requests for de-publication of the Second District Court of Appeal's opinion in Ballona Wetlands Land Trust et al. v. City of Los Angeles (2011) 201 Cal.App.4th 455. This case held that CEQA does not require analysis of the environment's effects on a proposed project (reverse-CEQA analysis), a determination that would place a number of impacts historically analyzed in CEQA documents outside CEQA's statutory authority. For example, a number of questions from the CEQA Guidelines Appendix G checklist may no longer apply, including questions related to such issues as air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, and noise. Therefore, analysis of these effects is not necessarily required to be analyzed under CEQA, but included as supplemental environmental information.

As shown in Table 10, with incorporation of MERV 13 filters, neither the cumulative threshold nor the individual source threshold would be exceeded. The project includes a 28,292 square-foot communal central open space and 63,380 square feet of balconies for a total of 91,672 square feet of open space where people would be exposed to pollutants without the use of the filter. The adjustments for the MERV filtration are adjusted to account for time that would be spent outdoors by the residents. Further, as a conservative risk estimate, the analysis assumes that individuals are home 24 hours per day for 350 days per year, which overestimates the potential exposure from nearby sources as children would be attending school and adults would have work and other activities outside the home. Therefore, impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust both during normal use and when idling. However, these odors would be temporary and transitory and would cease upon completion. Therefore, construction activities would not generate objectionable odors affecting a substantial number of people.

The Air District includes odor screening distances for land uses with the potential to generate substantial odor complaints. Those uses include wastewater treatment plants, landfills or transfer stations, refineries, recycling or composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants. The project does not propose, nor would locate, new sensitive receptors in proximity to, odor-emitting uses as identified in the Air District's 2022 *CEQA Air Quality Guidelines* or the 2030 Comprehensive Plan EIR. The proposed residential uses would not generate objectionable odors that would affect a substantial number of people. Therefore, the project would not substantially cause new sources of odors and would not significantly expose sensitive receptors to existing odors, and impacts would be less than significant. Overall, impacts would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

With implementation of Mitigation Measure AIR-2a from the 2017 EIR, the project would have less than significant impacts on air quality, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

4 Biological Resources

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	■	■
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	■	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	■	☐	■	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	■	☐	■	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	■	☐	■	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.3, *Biological Resources,* of the 2017 EIR found that the 2030 Comprehensive Plan would not have a substantial adverse effect on special-status species; riparian habitats; sensitive natural communities identified in local or regional plans, policies, or regulations; federally protected wetlands; or the movement of any native resident or migratory fish or wildlife species. Additionally, the 2030 Comprehensive Plan would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy, or an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

PROJECT-SPECIFIC IMPACTS

The following analysis is based on the Biological Resources Report (BRR) prepared for the proposed project by H.T. Harvey & Associates on April 14, 2025, attached as Appendix E. The BRR was peer reviewed by Rincon Consultants on May 13, 2025.

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

As discussed in the Biological Resources Report (Appendix E), there are 64 potentially occurring special-status plant species, of which 12 have historically occurred in the project vicinity according to the CNDDB. However, all 64 species were determined to be absent from the site.

Nine special-status animal species were either present in specialized habitats in the project vicinity or historically occurred on or near the site, but were found to be absent from the project site due to the lack of suitable habitat or effects of urbanization. These include the western bumble bee (*Bombus occidentalis*), Crotch's bumble bee (*Bombus crotchii*), California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), American badger (*Taxidea taxus*), and pallid bat (*Antrozous pallidus*). A number of special-status animal species are associated with tidal marsh habitats located north of the site along San Francisquito Creek or at the Don Edwards National Wildlife Refuge to the northeast, but do not occur close enough to the site to be affected by the project. These include the California Ridgway's rail (*Rallus obsoletus obsoletus*), California black rail (*Laterallus jamaicensis coturniculus*), western snowy plover (*Anarhynchus nivosus nivosus*), California least tern (*Sternula antillarum browni*), northern harrier (*Circus hudsonius*), salt marsh harvest mouse (*Reithrodontomys raviventris*), and salt marsh wandering shrew (*Sorex vagrans paludivagus*). Aquatic habitat in San Francisquito Creek also supports the Central California Coast steelhead (*Oncorhynchus mykiss*) and potentially the green sturgeon (*Acipenser medirostris*), longfin smelt (*Spirinchus thaleichthys*), Pacific lamprey (*Entosphenus tridentatus*), and Chinook salmon (*Oncorhynchus tshawytscha*). In addition, the San Francisco common yellowthroat, Alameda song sparrow, and Bryant's savannah sparrow

(*Passerculus sandwichensis alaudinus*) nest and forage along San Francisquito Creek, but do not occur close enough to the project site to be affected by the project. These special-status species would not be directly or indirectly affected by project activities due to the intervening distance between the site and the creek and the Don Edwards National Wildlife Refuge (Appendix E).

Suitable habitat for the northwestern pond turtle (*Actinemys marmorata*), a species proposed for listing as threatened under the Federal Endangered Species Act (FESA), is present along San Francisquito Creek and in ponds to the north associated with the golf course. However, no suitable habitat for this species occurs on the site itself, and the site is separated from suitable habitats nearby by a chain-link fence that connects into the ground, which would prevent pond turtles from dispersing to the site (Appendix E).

The monarch butterfly (*Danaus plexippus*), which is proposed for listing under FESA, has the potential to forage on the project site. However, this species is not expected to roost or breed on or immediately adjacent to the project site due to a lack of suitable habitat (Appendix E).

Common bat species, such as the Yuma myotis (*Myotis yumanensis*) and Mexican free-tailed bat (*Tadarida brasiliensis*), can potentially roost in small numbers in trees or buildings on the project site. However, the trees and buildings present on the site only provide marginal habitat for roosting bats, and the site survey concluded that if common species of roosting bats were to roost in these structures, they would occur only in small numbers. Therefore, the loss of the marginal habitat or a small number of individuals of common bat species would not have a substantial adverse effect on local and regional populations of these species.

The white-tailed kite (*Elanus leucurus*), a State fully protected species, may nest in landscape trees on and adjacent to the project site. According to the BRR (Appendix E), it is likely that no more than one pair of white-tailed kites could potentially nest on or immediately adjacent to the project site. In addition, the project would require the removal of 209 trees which may support white-tailed kites and other nesting birds protected under the Migratory Bird Treaty Act. The removal of trees and general construction activity may affect protected nesting birds. This impact is potentially significant. However, incorporation of the following City of Palo Alto Standard Condition of Approval (COA) would ensure that no violations of California Fish and Game Code (CFGC) occur as a result of project development. With implementation of the Standard COA outlined below, impacts to nesting birds would be substantially mitigated by uniformly applicable development policies.

STANDARD CONDITION OF APPROVAL – STANDARD REQUIREMENTS FOR THE PROTECTION OF NESTING BIRDS

As detailed in the project description and per the City's standard conditions, vegetation or tree removal shall be prohibited during the general avian nesting season (February 1 – August 31), if feasible. If nesting season avoidance is not feasible, the applicant shall retain a qualified biologist, as approved by the City of Palo Alto, to conduct a

preconstruction nesting bird survey to determine the presence/absence, location, and activity status of any active nests on or adjacent to the project site no more than 14 days prior to scheduled vegetation clearance and/or demolition activities. If nesting birds are found to be present, a suitable buffer (typically a minimum buffer of 50 feet for passerines and a minimum buffer of 250 feet for raptors) as determined appropriate by the biologist, shall be established around such active nests and no construction shall be allowed within the buffer areas until a qualified biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). A report documenting any data recovered during monitoring shall be prepared by a qualified biologist and submitted to the Director of Planning prior to final planning inspection.

Additionally, the proposed project would include the construction of 145 multifamily townhome units in 65 buildings which could potentially increase the amount of lighting spilling into nearby natural areas such as San Francisquito Creek, which is approximately 128 feet north of the project site and the Baylands Nature Preserve approximately one mile northeast of the project site. However, as discussed under the Project Description, the project design would incorporate lighting reduction design features to reduce the spillover of lighting or glare/increased luminance perceived by birds and other wildlife, in compliance with recommendations by the International Dark-Sky Association.

Therefore, the proposed project would not have a substantial adverse effect on any candidate, sensitive, or special status species, and impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

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

No wetlands or other waters of the U.S. or State occur on the project site. The site has two ornamental water features, but they are entirely enclosed within concrete-lined basins with no connection to groundwater. San Francisquito Creek is located approximately 128 feet north of the project site. However, it does not extend onto the project site and would not be directly or indirectly impacted by construction or operation of the project. Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

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

The San Francisquito Creek corridor is located approximately 128 feet north of the project site. The proposed project would not involve the direct removal, filling, hydrological interruption, or other means to the bed, bank, or channel of the creek. The project design

also avoids direct and indirect impacts to wetlands and aquatic habitats due to the site's distance from San Francisquito Creek and location on the far side of the Creek Trail away from habitats along the creek. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site is currently developed with four two-story office buildings and does not provide important movement habitat for wildlife in the Palo Alto area. San Francisquito Creek approximately 128 feet to the north provides an important movement pathway for both aquatic and terrestrial wildlife species, connecting the associated wetlands to the San Francisco Bay. Common, urban-adapted species such as raccoons, skunks, and certain species of reptiles and amphibians are expected to move along this corridor. However, the proposed project would not result in any loss of aquatic, wetland, or marsh habitat along San Francisquito Creek or in any substantial reduction in the value of the creek corridor for wildlife movement.

The proposed project would include the removal of 209 trees, which could provide foraging habitat for native birds. However, this represents only a small portion of habitats that support these species regionally. Landscaped areas and parking lot trees surrounding the site would support many of the same species, and some species would be displaced into nearby areas. In addition, there are large street trees along Geng Road, at the adjacent Baylands Athletic Center, along Embarcadero Road, and along East Bayshore Road that provide additional foraging opportunities for migrant birds. The proposed project would also include the planting of 651 trees, which would gradually replace the existing foraging habitat on the site for native migratory birds as these trees gradually mature. The increase in the number of trees on site would also provide valuable foraging resources for migrating birds. Thus, in the long term, the project will continue to support foraging habitat for migrating birds along the San Francisco Bay.

Therefore, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and impacts would be less than significant. Impacts would not be substantially greater than those identified in the 2017 EIR.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or as defined by the City of Palo Alto's Tree Preservation Ordinance (Municipal Code Section 8.10)?

As outlined in the Revised Preliminary Arborist Report prepared by HortScience and Bartlett Consulting in August 2025 (Appendix A2), the project site currently contains 270 trees. The project would require the removal of 209 trees, of which 83 are protected trees. The City's Tree Preservation Management Ordinance (PAMC Section 8.10) would require the project

applicant to obtain a Tree Removal Permit prior to removal and to replace the canopy of all the removed trees on the site either through on-site planting or through the payment of in-lieu fees. The proposed project would also be subject to the tree protection regulations in the Tree Technical Manual, which includes requirements for protecting trees during construction activities, such as preparation of a Tree Protection and Preservation Report and identification of construction guidelines intended to protect the trees during all phases of project implementation. Furthermore, the proposed project would be subject to the City's Park Improvement Ordinance and review by the Parks and Recreation Commission pursuant to PAMC Section 22.08.005 due to the removal of up to 50 trees. The proposed project would also be required to obtain an encroachment permit from the City's Public Works department for temporary access to City-owned parkland during construction activities.

Pursuant to Section 8.10.055 of the PAMC, 357 24-inch box trees would be required to be planted as replacement trees. The project would plant 651 24-inch box trees, which would exceed the City's tree replacement requirement. Of the 651 new trees to be planted, over 50 percent would be California native species, and 57 would be coast live oaks and valley oaks. With compliance with all regulations in the Tree Technical Manual and Tree Preservation and Management Ordinance, impacts related to conflicts with ordinances would be less than significant, and would not be substantially greater than those identified in the 2017 EIR.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The City of Palo Alto is not located within the Santa Clara Valley Habitat Conservation Plan (HCP)/Natural Community Conservation Plan (NCCP) or other approved local, regional, or State habitat conservation plan. There would be no impact. Impacts would be the same as those identified in the 2017 EIR.

CONCLUSION

With incorporation of the Standard COA described in this section, the project would have less than significant impacts on biological resources, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

5 Cultural Resources

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	■	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?	☐	■	☐	■	■
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	■	☐	■	■

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.4, *Cultural Resources,* of the 2017 EIR analyzes the 2030 Comprehensive Plan's impacts related to cultural resources. The 2017 EIR found that the 2030 Comprehensive Plan could adversely affect a historical resource listed or eligible for listing on the National and/or California Register or listed on the City's Historic Inventory since the City's historical resource inventory is out of date and the City's ordinance does not explicitly prohibit demolition of historical resources. Therefore, mitigation measure CULT-1 was required and was found to reduce impacts to a less than significant level.

The 2017 EIR also found that the 2030 Comprehensive Plan could eliminate important examples of major periods of California history or prehistory since it could result in the demolition or modification of an historical resource; permittance of inappropriate new construction adjacent to an historical resource; or result in the demolition, relocation, or alteration of an archaeological or paleontological resource. Therefore, mitigation measure CULT-2 was required and was found to reduce impacts to a less than significant level.

The 2017 EIR also found that buildout in accordance with the 2030 Comprehensive Plan could cause damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines without mitigation to address unknown resources that could be uncovered. Mitigation Measure CULT-3 was required and was found to reduce impacts to a less than significant level.

The 2017 EIR found that the 2030 Comprehensive Plan would not disturb any human remains, including those interred outside of formal cemeteries.

Table 11 lists the mitigation measures from the 2017 EIR related to cultural resources.

Table 11 2017 EIR Mitigation Measures: Cultural Resources

Mitigation Measure #	Mitigation Text
Impact CULT-1: Implementation of the proposed Plan could adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory. (Significant and Mitigable)	
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.
Impact CULT-2: Implementation of the proposed Plan could eliminate important examples of major periods of California history or prehistory. (Significant and Mitigable)	
CULT-2	▪ Implement Mitigation Measure CULT-1.
Impact CULT-3: Implementation of the proposed Plan could cause damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines. (Significant and Mitigable)	
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. ▪ Appropriate tribal consultation and consideration of tribal concerns.

Source: City of Palo Alto 2017

PROJECT-SPECIFIC IMPACTS

The following analysis is based on the Cultural Resources Technical Report prepared by Rincon Consultants, Inc. on October 2, 2024, attached as Appendix F.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

As discussed in the Cultural Resources Technical Report prepared by Rincon Consultants (Appendix F), the project site contains no historical resources, and the proposed project would not result in the substantial adverse change to the significance of an historical resource. Therefore, there would be no impact. Impacts would be reduced compared to the impact analyzed in the 2017 EIR for the 2030 Comprehensive Plan. Because there would be no new or substantially more severe significant impacts than what was analyzed in the 2017 EIR, further analysis is not warranted.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

As discussed in the Cultural Resources Technical Report prepared by Rincon Consultants (Appendix F), no previously recorded archaeological resources were identified within the project site and he project site is considered to have a low potential at surface. However, archaeological sensitivity at the site increases at depth and has the potential to support the presence of intact subsurface archaeological resources. As a result, at the proposed maximum depths of disturbance during installation/removal of utilities and wall trenches of

eight to 10 feet, the project still has potential to encounter archaeological and geoarchaeological resources. Nonetheless, policies L-7.15 and L-7.17 of the 2030 Comprehensive Plan, as well as Mitigation Measure CUL-3 of the 2017 EIR, require tailored approaches to mitigate impacts on archaeological resources based on sensitivity. As discussed in the Cultural Resources Technical Report (Appendix F), Workers Environmental Awareness Program (WEAP) and archaeological monitoring are recommended since there is potential to encounter buried archaeological resources, and the City would apply a condition of approval accordingly to ensure Comprehensive Plan consistency and as required by 2017 EIR Mitigation Measure CUL-3.

RETENTION OF A QUALIFIED ARCHAEOLOGIST AND ARCHAEOLOGICAL MONITORING CONDITION OF APPROVAL

Prior to the start of ground-disturbing activities, the Applicant and/or subsequent responsible parties shall retain an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (NPS 2020a) (Qualified Archaeologist) to carry out all cultural resources related work associated with the project and to oversee the implementation of all cultural resources mitigation measures. The Qualified Archaeologist shall possess experience and familiarity with historic-period and prehistoric archaeological resources in the region.

The Qualified Archaeologist or other designated archaeologist working under the direction of the Qualified Archaeologist shall conduct full-time monitoring within native sediments to the project's proposed maximum depths of disturbance. In general, archaeological monitoring shall be limited to initial ground disturbance which is defined as construction-related earthmoving of sediments from their native place of deposition and does not include any secondary movement of sediment that might be required for the project. The Qualified Archaeologist may adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter archaeological deposits. The archaeological monitor shall maintain daily monitoring logs. Following the completion of construction, the Qualified Archaeologist shall prepare an archaeological monitoring report for submittal to the lead agency and the NWIC with the results of the archaeological monitoring program.

In addition, the proposed project would be required to incorporate the following City of Palo Alto COAs, which would ensure protection of archaeological, paleontological, and tribal cultural resources.

STANDARD CONDITION OF APPROVAL – 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.

With implementation of the Standard COA as well as recommendations outlined in the Cultural Resources Technical Report (Appendix F) and included as a COA above, this impact would be less than significant and would not be greater than those identified in the 2017 EIR.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Similar to what was assumed in the 2017 EIR, although development would occur on a vacant site in a previously disturbed area, ground-disturbing activities such as earthmoving and excavation could still potentially disturb human remains. However, the proposed project would be required to comply with the California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, the California Code of Regulations Section 15064.5(e) (CEQA), and incorporate the following City of Palo Alto COA, which state the mandated procedures of conduct following the discovery of human remains.

STANDARD CONDITION OF APPROVAL – 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.

Therefore, compliance with the mandatory regulatory procedures would ensure a less than significant impact related to the potential discovery or disturbance of any human remains accidentally unearthed during construction activities. Impacts would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

With incorporation of the Standard COA described in this section, the project would have less than significant impacts on cultural resources, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

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6 Energy

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	■	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.14, *Utilities and Service Systems*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to energy. At the time the 2017 EIR was prepared, there were no separate adopted thresholds for energy use under CEQA, although Guidelines Section 15126.4 required that an "EIR shall describe feasible mitigation measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy," and Appendix F provided criteria for consideration of energy conservation. Checklist questions (a) and (b) in this section are now included in CEQA Guidelines Appendix G. Lead agencies that use Appendix G as a basis for environmental analysis, including the City of Palo Alto, now consider energy impacts more explicitly during the initial study of a project. Changes to the CEQA thresholds subsequent to certification of an EIR do not in themselves constitute a substantial change or new information of substantial importance that requires major revisions to the EIR unless new significant impacts or a substantial increase in the severity of a significant impact would occur.

The 2017 EIR concluded that the 2030 Comprehensive Plan would not substantially increase electrical or natural gas demands to the extent that new local electrical and natural gas supply facilities would be required. Additionally, future development would be required to comply with the California Building Standards Code, Chapters 16.14 and 16.17 of the PAMC, and utilize modern appliances and equipment, in accordance with the 2012 Appliance Efficiency Regulations, which would conserve energy. Nonetheless, mitigation measure UTIL-17 would be required to reduce impacts to a less than significant level.

Table 12 lists the mitigation measure from the 2017 EIR related to energy.

Table 12 2017 EIR Mitigation Measures: Energy

Mitigation Measure #	Mitigation Text
Impact UTIL-17: The proposed Plan would not result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities. However, without the adoption of policies in support of energy efficiency and conservation, the proposed Plan would result in a potentially significant impact, requiring mitigation. (Potentially Significant and Mitigable)	
UTIL-17	To ensure that future development would maximize energy efficiency and conservation the proposed Plan shall include policies that address the following topics: ▪ Maximized conservation and efficient use of energy. ▪ Continued procurement of carbon-neutral energy. ▪ Investment in cost-effective energy efficiency and energy conservation programs. ▪ Provision of public education programs addressing energy conservation and efficiency. ▪ Use of cost-effective energy conservation measures in City projects and practices. ▪ Adherence to State and federal energy efficiency standards and policies. ▪ Consideration of a transition to a carbon-neutral natural gas supply.

Source: City of Palo Alto 2017

PROJECT-SPECIFIC IMPACT ANALYSIS

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

CONSTRUCTION

Energy use during construction activities would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Energy use during construction would be temporary in nature, and equipment used would be typical of construction projects in the region. Construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would be required to utilize fuel-efficient equipment consistent with federal and State regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, the proposed project would be required to comply with construction waste management practices to divert at least 80 percent of construction and demolition debris pursuant to PAMC Section 16.14.260. These practices would result in efficient use of energy during construction. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, construction activities associated with the project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

OPERATIONAL

The proposed project would be required to comply with California State regulations for energy conservation including the California Energy Code and CALGreen, along with the City's Green Building Standards. The proposed project is an all-electric design and would not include natural gas usage. City of Palo Alto Utilities (CPAU), which currently provides 100 percent carbon neutral electricity and purchases carbon offsets to offset the GHG emissions from natural gas usage in the City, would supply electricity for the project. The project site is located within a 0.7-mile walk from San Mateo County Transit District (SamTrans) Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F, which would encourage the use of public transit, thereby reducing fuel consumption. The proposed project would also comply with the PAMC Section 16.17, which mandates the implementation of the Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6), by including two Level 2 EV Ready parking spaces in each garage and rooftop PV solar panels. As a result, operation of the proposed project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would result in a potentially significant impact if it would conflict with or obstruct the implementation of the City of Palo Alto Sustainability and Climate Action Plan (S/CAP) or the City of Palo Alto 2030 Comprehensive Plan, which is a local plan with policies related to energy efficiency. Table 13 provides an evaluation of project consistency with applicable renewable energy and energy efficiency measures in the 2030 Comprehensive Plan. As shown in Table 13, the project would be consistent with applicable energy efficiency policies in the 2030 Comprehensive Plan. Impacts would be less than significant. A full discussion of the proposed project's consistency with GHG reduction plans is included in Section 8, *Greenhouse Gas Emissions*.

Table 13 Project Consistency with City of Palo Alto 2030 Comprehensive Plan

Measure	Project Consistency
Land Use	
Policy L-1.12 Hold new development to the highest development standards in order to maintain Palo Alto's livability and achieve the highest quality development with the least impacts.	**Consistent**. The project would be required to comply with the Palo Alto Green Building Ordinance and applicable State and City regulations, and would also include an all-electric design.
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.	**Consistent**. The project would be a residential development in an area with existing commercial and office uses that would allow for walking and cycling between the project and these uses. Sidewalks exist on all streets in the project vicinity and the closest bicycle lanes are on East Bayshore Road and Geng Road. The project would not conflict with any future bike lanes on these roads. The project would also include 145 long-term bicycle parking spaces, accommodated through wall-mounted racks within each garage, and 16 short-term bicycle parking spaces located throughout the site.
Policy T-1.17 Require new office, commercial and multi-family residential developments to provide improvements that improve bicycle and pedestrian connectivity as called for in the 2012 Palo Alto Bicycle + Pedestrian Transportation Plan.	**Consistent**. The project would include 145 long-term bicycle parking spaces and 16 short-term bicycle parking spaces. The project site is located near Class II and III bicycle lanes along East Bayshore Road and Embarcadero Road, and residents would also be able to utilize pedestrian connections such as sidewalks, crosswalks, and curb ramps in order to access transit options.
Policy T-4.7 Require new residential development projects to implement best practices for street design, stormwater management and green infrastructure.	**Consistent**. The project would be required to comply with the stormwater pollution prevention measures in the Palo Alto Green Building Ordinance and would include bioretention areas on the eastern portion of the site adjacent to Buildings 65 and 66 as well as silva cells adjacent to the southern boundary of the central open space to reduce pollutants from stormwater runoff.
Policy N-7.4 Maximize the conservation and efficient use of energy in new and existing residences and other buildings in Palo Alto. **Policy N-7.5** Encourage energy efficient lighting that protects dark skies and promotes energy conservation by minimizing light and glare from development while ensuring public health and safety.	**Consistent**. The project would include an all-electric design, and would include energy efficient appliances, water efficient fixtures and irrigation, and energy-efficient lighting that minimizes light trespass and glare.

Source: City of Palo Alto 2017

In addition, the proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on energy, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

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7 Geology and Soils

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	■	☐	■	☐
2. Strong seismic ground shaking?	☐	■	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	■	☐	■	☐
4. Landslides?	☐	☐	■	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	■	☐	■	☐
c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	■	☐	■	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	■	☐	■	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	■	■	☐
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	■	☐	■	■

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.5, *Geology, Soils, and Seismicity*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to geology and soils. The 2017 EIR found that implementation of the 2030 Comprehensive Plan would result in less than significant impacts associated with risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides, and expansive soils. The 2017 EIR also found that implementation of the 2030 Comprehensive Plan would not result in development located on a geologic unit or on soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The 2030 Comprehensive Plan also determined that there would be less than significant impacts related to erosion or siltation.

PROJECT-SPECIFIC IMPACTS

The following analysis is based on the Preliminary Geotechnical Report prepared for the proposed project by ENGEO Incorporated on December 17, 2024, attached as Appendix G.

a1. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Alquist-Priolo Earthquake Fault Zone associated with the San Andreas Fault is located near the crest of the Santa Cruz Mountains and extends just east of the intersection of Page Mill Road and State Route 35. The project site is not located near the Alquist-Priolo Earthquake Fault Zone associated with the San Andreas Fault (City of Palo Alto 2016), which is approximately 14 miles southwest of the project site. As a result, the likelihood of surface rupture occurring from active faulting that would affect the project remote. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

a2. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

As with any site in the Bay Area region, the project site is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby faults include the San Andreas Fault, the Monte Vista Fault, the Hayward Fault and the Calaveras Fault. These faults are capable of producing strong seismic ground shaking in the city.

The proposed project would be required to comply with standards established by PAMC sections 16.04 and 16.06, which adopt the California Building Code (CBC) and the California Residential Code, respectively. The requirements of the CBC ensure that new habitable structures are engineered to withstand the expected ground acceleration at a given

location. Further, CBC Chapter 18 requires that actions recommended in a site-specific soil investigation are incorporated into the construction of each structure. Future development would also be required to comply with PAMC Section 16.28.150, which would require detailed engineering geology reports in areas of suspected geological hazards and implementation of recommendations and mitigations to reduce hazards from ground shaking or rupture. Additionally, the project would include 65 new buildings, built to current seismic standards, that could withstand the adverse effects of strong ground shaking. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

a3. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is a condition that occurs when unconsolidated, saturated soils change to a near-liquid state during groundshaking. As discussed in the Preliminary Geotechnical Report (Appendix G), the project site is located in a liquefaction zone, and this impact could be potentially significant. However, modern construction and adherence to geology and soil provisions of the California Building Code (CBC), which sets forth seismic design standards (Chapter 16, 18) and geohazard study requirements (Chapter 18), would reduce impacts to a less than significant level. In addition, the project would be required to adhere to Palo Alto's Seismic Hazards Identification Program (PAMC Section 16.42) in its design and construction elements, and would be required to incorporate recommendations from the Preliminary Geotechnical Report pursuant to PAMC Sections 16.28.140 and 16.28.150. The Preliminary Geotechnical Report includes recommendations for grading such as surficial soil and existing fill removal, surcharge and wick drains, lightweight fill, and other ground improvement techniques (deep soil mixing and rigid inclusions); and for foundations such as shallow foundation with ground improvement and deep foundations (Appendix G). With adherence to State and local regulations and recommendations from the Preliminary Geotechnical Report, impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

a4. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Earthquakes can trigger landslides that may cause injuries and structural damage. Landslides are typically a hazard on or near slopes or hillside areas, rather than generally level areas such as where the project site is located. According to the DOC, the project site is not located within a landslide zone (DOC 2025b). There would be no impact and impacts would not be substantially greater than those identified in the 2017 EIR.

b. Would the project result in substantial soil erosion or the loss of topsoil?

The project site would be largely developed with the proposed project, which limits the potential for substantial soil erosion during operation. The grading and excavation phase when soils are exposed has the highest potential for erosion. Ground-disturbing activities that would occur with implementation of the proposed project would include grading foundations, building pads, access roads, and utility trenches. Temporary erosion could occur during project construction. The project would be required to comply with Section 16.28.120 of the PAMC, which states that an estimate of the cost of implementing and maintaining all interim erosion and sediment control measures must be submitted in a form acceptable to the city engineer. The applicant may propose the use of any erosion and sediment control techniques in the interim plan provided such techniques are proven to be as or more effective than the equivalent best management practices contained in the Manual of Standards. The proposed project would also be required to incorporate recommendations of the Preliminary Geotechnical Report pursuant to PAMC Sections 16.28.140 and 16.28.150, which would further reduce soil erosion or the loss of topsoil. In addition, the proposed project would be required to comply with erosion control standards administered by the San Francisco Bay Regional Water Quality Control Board (RWQCB) through the National Pollutant Discharge Elimination System (NPDES) permit process, which requires implementation of nonpoint source control of stormwater runoff. Such controls would be included as best management practices (BMPs) identified in Stormwater Pollution Prevention Plans (SWPPP) for future development at the project site.

Furthermore, as discussed in Section 3, *Air Quality,* the Air District specifies measures that are aimed at air quality control but also address the minimization or avoidance of erosion and topsoil loss. Pursuant to Mitigation Measure AIR-2a of the 2017 EIR, construction of the project must comply with the current Air District basic control measures for reducing fugitive dust.

The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. With compliance with above listed requirements, impacts related to soil erosion would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The potential for failure from lateral spreading is highest in areas where the groundwater table is high and where soil is relatively soft, where recent alluvial deposits exist, and in areas with liquefaction risks. As discussed in the Preliminary Geotechnical Report, the risk of lateral spreading at the site is low to moderate (Appendix G). The project would be required to comply with applicable provisions for construction related to potential soils hazards in the most recently adopted version of the CBC and the City's building regulations (CBC seismic design standards, Chapters 16 and 18), as well as recommendations outlined the Preliminary Geotechnical Report pursuant to PAMC Sections 16.28.140 and 16.28.150.

Therefore, impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

In compliance with PAMC Section 21.12.070, a Preliminary Geotechnical Report was prepared for the site to document expansive soils and other geotechnical issues. As discussed in the Preliminary Geotechnical Report, the project site is generally underlain by artificial fill over Young Bay Mud and over alluvial deposits and Old Bay Clay. Young Bay Mud is estimated to be highly expansive, which could result in potentially significant impacts (Appendix G). However, CBC Section 1808.6 requires special foundation design for buildings constructed on expansive soils. If the soil is not removed or stabilized, then foundations must be designed to prevent uplift of the supported structure or to resist forces exerted on the foundation due to soil volume changes or shall be isolated from the expansive soil. In addition, pursuant to PAMC Sections 16.28.140 and 16.28.150, the project would be required to comply with grading and foundation recommendations outlined the Preliminary Geotechnical Report. Compliance with CBC requirements and recommendations in the Preliminary Geotechnical Report would ensure protection of structures and occupants from impacts related to expansive soils. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Palo Alto is served by the City's established wastewater system. The proposed project would be served by the City's wastewater system. The project would not include the use of septic tanks or alternative wastewater disposal systems. There would be no impact and impacts would not be substantially greater than those identified in the 2017 EIR.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

As discussed in the Comprehensive Plan Draft EIR, geologic units in Palo Alto are part of an alluvial deposit that consists of 12 to 15 feet of moderately well sorted, unconsolidated, fine sandy silt and clayey silt overlying at least six feet of silty clay. Below this, the Santa Clara formation is an older alluvium made up of partially consolidated clay, silt, sand, and gravel deposited more than 11,000 years ago (City of Palo Alto 2016). The proposed project would include a maximum depth of excavation of 6.5 feet on most areas of the site and a maximum depth of 8 to 10 feet in very limited areas on site, which would reduce the likelihood of discovering or impacting a unique paleontological resource. In addition, the proposed project would be required to comply with Mitigation Measure CULT-3 of the 2017

EIR, which would require developer compliance with applicable regulations regarding the identification and protection of paleontological deposits. Nonetheless, paleontological resources could still potentially be discovered during construction activities. However, the proposed project would be required to comply with the Standard COA outlined under Section 5, *Cultural Resources*, which would ensure protection of paleontological resources. Therefore, impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

With incorporation of the Standard COA described under Section 5, *Cultural Resources*, as well as mitigation measures AIR-2a and CULT-3 of the 2017 EIR, the project would have less than significant impacts on geology and soils, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

8 Greenhouse Gas Emissions

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	■	☐	■	☐
b. Conflict with any applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.6, *Greenhouse Gas Emissions and Climate Change*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to greenhouse gas emissions. The 2017 EIR concluded that the 2030 Comprehensive Plan would not directly or indirectly generate GHG emissions that may have a significant impact on the environment since the 2030 Comprehensive Plan would result in a decrease in emissions from existing conditions and would achieve the 2030 performance criteria that would ensure the City is on a trajectory to achieve the GHG reductions targets of SB 32 for year 2030. Additionally, the 2030 Comprehensive Plan would not conflict with CARB's Scoping Plan or Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission's (MTC) Plan Bay Area. However, the 2017 EIR found that the 2030 Comprehensive Plan would expose people or structures to the physical effects of climate change, including but not limited to flooding, extreme temperatures, public health, wildfire risk, or other impacts resulting from climate change, and mitigation measure GHG-3 would be required to reduce impacts to a less than significant level.

Table 14 lists the mitigation measure from the 2017 EIR related to greenhouse gas emissions.

Table 14 2017 EIR Mitigation Measures: Greenhouse Gas Emissions

Mitigation Measure #	Mitigation Text
Impact GHG-3: The proposed Plan would expose people or structures to the physical effects of climate change, including but not limited to flooding, extreme temperatures, public health, wildfire risk, or other impacts resulting from climate change, requiring mitigation. (Significant and Mitigable)	
GHG-3	To address the potential impacts associated with exposing people to the effects of climate change, the proposed Plan shall include policies that achieve the following: ▪ Monitoring and response to flooding risks caused by climate change-related changes to precipitation patterns, groundwater levels, sea level rise, tides, and storm surges. ▪ Cooperative planning with federal, State, regional, and local public agencies on issues related to climate change (including sea level rise and extreme storms). ▪ Preparation of response strategies to address sea level rise, increased flooding, landslides, soil erosion, storm events, and other events related to climate change. ▪ Implementation of adaptive strategies to address impacts of sea level rise on Palo Alto's levee system.

Source: City of Palo Alto 2017

THRESHOLDS

In response to climate change, California implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 requires the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) by 2020 and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the Governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On September 10, 2018, the Governor signed Executive Order (EO) B-55-18, which identifies a new goal of carbon neutrality by 2045 and supersedes the goal established by EO S-3-05.[7] CARB adopted the 2022 Scoping Plan on November 16, 2022, which provides a framework for achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan extends and expands upon the three earlier versions of scoping plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.

According to the *CEQA Guidelines*, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016). The City recently adopted its 2022 S/CAP in June 2023 following a public

[7] Executive Order (EO) S-3-05, signed by Governor Arnold Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the EO established total GHG emission targets for the state. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

environmental review process, and therefore the 2022 S/CAP constitutes as a qualified CAP under CEQA Guidelines 15183.5(b)(1).

Nonetheless, since the proposed project would tier from the 2017 EIR, the Air District GHG 2030 efficiency target applied in the 2017 EIR would be used to inform the threshold for this analysis. However, to take into account the new State goal of carbon neutrality by 2045 and the project buildout year of 2031, the Air District GHG 2030 efficiency target was interpolated to get an adjusted 2031 threshold of 3.74 $MTCO_2e$ per service population per year.[8] Therefore, the proposed project's GHG emissions would be significant if they would exceed the 2031 interpolated threshold of 3.74 $MTCO_2e$ per service population per year, consistent with EO B-55-18.

PALO ALTO SUSTAINABILITY AND CLIMATE ACTION PLAN

The City of Palo Alto launched its S/CAP in August 2014. In 2020, the city launched an update to the S/CAP to develop strategies needed to meet their goal of reducing GHG emissions 80 percent below 1990 levels by 2030 (the "80 x 30" goal). In October 2022, the Palo Alto City Council approved the updated S/CAP Goals and Key Actions that will serve as the City's roadmap to meeting the "80 x 30" goal and most recent Carbon Neutral by 2030 goal. The S/CAP Goals and Key Actions includes goals and actions in seven areas: Energy, Mobility, Electric Vehicles, Water, Climate Adaptation and Sea Level Rise, Natural Environment, and Zero Waste. In June 2023, the City adopted its 2022 S/CAP and certified the S/CAP Comprehensive Plan Environmental Impact Report Addendum. As discussed above under Thresholds, the 2022 S/CAP constitutes as a qualified CAP under CEQA Guidelines 15183.5(b)(1).

METHODOLOGY

OPERATIONAL EMISSIONS

Long-term emissions relate to area sources, energy use, solid waste, water use, and transportation. Operational emissions for the proposed project were modeled using the California Emissions Estimator Model (CalEEMod) version 2022.1 and compared to the adjusted Air District efficiency thresholds used in the 2017 EIR. CalEEMod default settings were used to estimate emissions associated with the proposed project to apply a high-level and conservative analysis.

AREA SOURCE EMISSIONS

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod and utilized default standard emission rates from CARB, U.S. EPA, and emission factor values provided by the

[8] 4.0 $MTCO_2e$ (2030 Comprehensive Plan EIR threshold) / 15 years (2030 to 2045 for carbon neutrality) = 0.26 $MTCO_2e$. To find the 2031 interpolated threshold, 4.0 $MTCO_2e$ - 0.26 $MTCO_2e$ = 3.74 $MTCO_2e$.

local air district (CAPCOA 2017). Architectural coatings were calculated pursuant to Air District Regulation 8 Rule 3.

ENERGY USE EMISSIONS

CalEEMod provides operational emissions of CO_2, N_2O, and CH_4. Emissions from energy use include electricity and natural gas use. The emissions factors for natural gas combustion are based on EPA's AP-42 (Compilation of Air Pollutant Emissions Factors) and CCAR. Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour (CAPCOA 2017). Pursuant to the City's All-Electric Ordinance, the proposed project would include an all-electric design, and it was assumed that the natural gas demand estimated for the project would instead be supplied by electricity to account for increased electricity usage. Total annual consumption for natural gas (kBTU/year) was converted to electricity (kWh/year) and added to the total annual consumption for electricity. CalEEMod incorporates 2019 Title 24 CALGreen Building Standards.

SOLID WASTE EMISSIONS

Emissions from solid waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CAPCOA 2017). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

WATER AND WASTEWATER USE EMISSIONS

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the California Energy Commission's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California. The Palo Alto RWQCP was assumed to be 100 percent aerobic since it does not contain facultative lagoons or septic tanks.

MOBILE SOURCE EMISSIONS

For mobile sources, CO_2, CH_4, and N_2O emissions were quantified in CalEEMod. Trip rates used are based on the Transportation Analysis prepared by Fehr and Peers on November 4, 2024 (Appendix C).

REFRIGERANT EMISSIONS

Refrigerants are substances used in equipment for cooling and heating purposes and are mostly comprised of hydrofluorocarbons (HFC). HFCs are potent GHGs that have high global warming potential (GWP) values. CalEEMod calculates refrigerant emissions according to equipment charge sizes and leak rates that have been determined for relevant land uses and equipment types.

CONSTRUCTION EMISSIONS

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. As stated in the CEQA and Climate Change white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA 2008). Additionally, the Air District does not have specific quantitative thresholds for construction activity. Therefore, although estimated in CalEEMod and provided for informational purposes, construction activity is not included in the total emissions calculations.

PROJECT-SPECIFIC IMPACTS

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Proposed construction activities, energy use, daily operational activities, and mobile sources (traffic) associated with the proposed project would generate GHG emissions. CalEEMod version 2022.1 was used to calculate emissions resulting from construction and long-term operation (see Appendix C for model output).

CONSTRUCTION EMISSIONS

Emissions generated from construction of the proposed project are estimated to be 1,497 MT of CO_2e per year. However, as the Air District does not have a recommended threshold for construction-related GHG emissions, emissions associated with construction are not included in Table 15 and compared to Air District significance thresholds.

OPERATIONAL INDIRECT AND STATIONARY DIRECT EMISSIONS

Long-term emissions relate to area sources, energy use, solid waste, water use, and transportation. Each of the operational sources of emissions is discussed further below.

MOBILE EMISSIONS

As shown in Table 15 below, the proposed project would generate approximately 891 $MTCO_2e$ per year from mobile sources.

AREA SOURCE EMISSIONS

CalEEMod was used to calculate direct sources of air emissions associated with the proposed project. These include consumer product use and landscape maintenance equipment. Area emissions are estimated at 9 $MTCO_2e$ per year.

ENERGY USE EMISSIONS

Operation of the proposed project would consume both electricity and natural gas. The generation of electricity through combustion of fossil fuels emits CO_2, and to a smaller extent, N_2O and CH_4. As discussed under the Methodology section, pursuant to the City's All-Electric Ordinance, natural gas was converted to electricity to account for increased electricity usage. Since CPAU provides electricity to the city, and has supplied 100 percent carbon neutral electricity since 2013, GHG emissions from energy use are estimated at 0 $MTCO_2e$ per year.

WATER USE EMISSIONS

Based on the amount of electricity generated to supply and convey water for the project, the proposed project would generate an estimated 3 $MTCO_2e$ per year.

SOLID WASTE EMISSIONS

Based on the estimate of GHG emissions from project-generated solid waste as it decomposes, solid waste associated with the proposed project would generate approximately 28 $MTCO_2e$ per year.

REFRIGERANT EMISSIONS

Based on the estimate of GHG emissions from refrigerants used for the project, the proposed project would generate less than 1 $MTCO_2e$ per year.

The annual emissions associated with the project would total approximately 931 $MTCO_2e$ per year. As discussed in Section 14, *Population and Housing*, the service population from the project would be 361 new residents. Therefore, the $MTCO_2e$ per service population for the proposed project would be 2.6. These emissions would not exceed the 2017 EIR's Air District 2030 efficiency target of 3.74 $MTCO_2e$. In addition, the proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

Table 15 Operational GHG Emissions

Emissions Source	Annual Emissions (MT of CO2e/year)
Mobile	891
Area	9
Energy	0
Water	3
Waste	28
Refrigerants	<1
Total	**931**
Service Population	361
$MTCO_2e$/Service Population	**2.6**
2017 EIR Air District 2030 Efficiency Target (Adjusted for SB 32)	3.74
Exceeds Threshold?	**No**

See Table 2.5 "Operations Emissions by Sector, Unmitigated" emissions. CalEEMod worksheets in Appendix C.

b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Applicable plans, policies, and regulations to the project for reducing GHG emissions includes the Air District's GHG thresholds of significance, Plan Bay Area 2050, the City's 2030 Comprehensive Plan, and the 2022 S/CAP. The project would result in a potentially significant impact if it would conflict with these plans.

AIR DISTRICT'S THRESHOLDS OF SIGNIFICANCE

The Air District adopted updated thresholds of significance for climate impacts on April 20, 2022 (Air District 2023). Under the updated thresholds, a project must include, at a minimum, the following project design elements, or must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b):

- **Buildings**
  - The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
  - The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
- **Transportation**
  - Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

- Residential projects: 15 percent below the existing VMT per capita
- Office projects: 15 percent below the existing VMT per employee
- Retail projects: no net increase in existing VMT

- Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

As discussed above under Thresholds, the 2022 S/CAP constitutes as a qualified CAP under CEQA Guidelines 15183.5(b)(1). As shown below under Table 16, the proposed project would be consistent with applicable key actions within the 2022 S/CAP. Therefore, the proposed project would be consistent with Air District GHG thresholds and impacts would be less than significant.

PLAN BAY AREA 2050

Table 16 provides an evaluation of project consistency with applicable GHG key strategies in Plan Bay Area 2050.

Table 16 Project Consistency with Plan Bay Area 2050

Measure	Project Consistency
H3. Allow a greater mix of housing densities and types in Growth Geographies. Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit-Rich Areas and select High-Resource Areas.	**Consistent.** The project includes construction of 145 multifamily townhome units in an area characterized by a mix of uses including residential, retail, office, and commercial. The project would diversify housing densities and would be located near transit. The project site located within a 0.7-mile walk from SamTrans Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F.
H4. Build adequate affordable housing to ensure homes for all. Construct enough deed-restricted affordable homes to fill the existing gap in housing for the unhoused community and to meet the needs of low-income households.	**Consistent**. The project would include 19 affordable units (13 percent of total units) restricted to low-income households, which meets the requirements of the Housing Accountability Act as amended by AB 1893
T8. Build a Complete Streets network. Enhance streets to promote walking, biking and other micro-mobility through sidewalk improvements, car-free slow streets, and 10,000 miles of bike lanes or multi-use paths.	**Consistent.** The project would include 145 long-term bicycle parking spaces and 16 short-term bicycle parking spaces. The project site is located near Class II and III bicycle lanes along East Bayshore Road and Embarcadero Road, and residents would also be able to utilize pedestrian connections such as sidewalks, crosswalks, and curb ramps in order to access transit options.
EN4. Maintain urban growth boundaries. Using urban growth boundaries and other existing environmental protections, focus new development within the existing urban footprint or areas otherwise suitable for growth, as established by local jurisdictions.	**Consistent.** The project would maintain urban growth boundaries through infill development on an underdeveloped site.

Measure	Project Consistency
EN8. Expand clean vehicle initiatives. Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers.	**Consistent.** The project would include two Level 2 EV Ready parking spaces in each garage.

Source: ABAG 2021

CITY OF PALO ALTO S/CAP

Table 17 provides an evaluation of project consistency with applicable GHG key actions in the City S/CAP.

Table 17 Project Consistency with S/CAP

Measure	Project Consistency
C3. Complete study to identify any additional Energy, EV, or Mobility key actions needed to achieve 80% reduction in greenhouse gas emissions from 1990 levels by 2030, such as electrification of additional multi-family or commercial end uses, greater electrification of vehicles, or other emissions reduction actions not already identified in this Plan.	**Consistent.** The project would include two Level 2 EV Ready parking spaces in each garage.
E1. Seek additional electrification opportunities in commercial and multi-family buildings to contribute as much as possible towards achieving an additional 8% city-wide emissions reduction below 1990 levels.	**Consistent.** The project would include an all-electric design and would also include solar PV panels on roofs, energy efficient appliances and lighting, as well as water efficient fixtures and irrigation. Additionally, the project would include two Level 2 EV Ready parking spaces in each garage.
EV6. Expand access to on-site EV charging for multi-family residents.	**Consistent.** The project would include two Level 2 EV Ready parking spaces in each garage.

Source: City of Palo Alto 2023

CITY OF PALO ALTO 2030 COMPREHENSIVE PLAN

Table 18 provides an evaluation of project consistency with applicable GHG goals and policies in the 2030 Comprehensive Plan.

Table 18 Project Consistency with the City of Palo Alto 2030 Comprehensive Plan

Measure	Project Consistency
Transportation Element	
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.	**Consistent**. The project itself would not expand transit options; however, the project site is located within a 0.7-mile walk from SamTrans Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F. The project site is located near Class II and III bicycle lanes along East Bayshore Road and Embarcadero Road, and residents would also be able to utilize pedestrian connections such as sidewalks, crosswalks, and curb ramps in order to access transit options. The project would place residences in a transit-accessible area and would generate less than significant impacts to VMT. The project site is also designed to promote walking and bicycling and would include 145 long-term bicycle parking spaces and 16 short-term bicycle parking spaces.

Measure	Project Consistency
Policy T-1.4 Ensure that electric vehicle charging infrastructure, including infrastructure for charging e-bikes, is available citywide.	**Consistent.** The project would include two Level 2 EV Ready parking spaces in each garage.
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.	**Consistent.** The project site is located within a 0.7-mile walk from SamTrans Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F. The project site is also located near Class II and III bicycle lanes along East Bayshore Road and Embarcadero Road, and residents would also be able to utilize pedestrian connections such as sidewalks, crosswalks, and curb ramps in order to access transit options. The project would promote usage of alternative forms of transportation and reduce reliance on single-occupancy vehicles.
Policy T-1.17 Require new office, commercial and multi-family residential developments to provide improvements that improve bicycle and pedestrian connectivity as called for in the 2012 Palo Alto Bicycle + Pedestrian Transportation Plan.	**Consistent.** The project would promote bicycling and walkability by including 145 long-term bicycle parking spaces in each garage and 16 short-term bicycle parking spaces located throughout the site.
Natural Environment Element	
Policy N-7.4 Maximize the conservation and efficient use of energy in new and existing residences and other buildings in Palo Alto.	**Consistent.** The project would include an all-electric design, and would also include solar PV panels on roofs, energy efficient appliances and lighting, as well as water efficient fixtures and irrigation. The project would also receive carbon neutral electricity from CPAU.
Policy N-7.7 Explore a variety of cost-effective ways to reduce natural gas usage in existing and new buildings in Palo Alto in order to reduce associated greenhouse gas emissions.	**Consistent.** The project would include an all-electric design and would not include natural gas usage. CPAU also provides 100 percent carbon neutral electricity and purchases carbon offsets to offset the GHG emissions from natural gas usage in the City.
Policy N-7.8 Support opportunities to maximize energy recovery from organic materials such as food scraps, yard trimmings and residual solids from sewage treatment.	**Consistent.** The project would be required to comply with SB 1383 which aims to reduce organic waste disposal by 75 percent by 2025.

Source: City of Palo Alto 2017

As shown in the tables above, the project would be consistent with applicable GHG goals, policies, and strategies in regional plans such as Plan Bay Area 2050 and local plans such as the City of Palo Alto S/CAP and the 2030 Comprehensive Plan. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on greenhouse gas emissions, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

9 Hazards and Hazardous Materials

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	■	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	■	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	■	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	■	☐	■	■
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	■	☐	■	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	■	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.7, *Hazards and Hazardous Materials,* of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to hazards and hazardous materials. The 2017 EIR found that the 2030 Comprehensive Plan would not create a significant hazard to the public or environment as a result of the routine transport, use, or disposal of hazardous materials, and would not involve the release of hazardous materials into the environment through upset and accident conditions. The 2017 EIR concluded that through compliance with applicable federal, State, and local regulations regarding the storage, use, and handling of hazardous materials, the 2030 Comprehensive Plan would not result in hazardous emissions or the handling of hazardous wastes within 0.25 mile of an existing or proposed school, and would not expose future occupants to contaminated soil and groundwater. The 2017 EIR also found that the 2030 Comprehensive Plan would not impair implementation or interfere with an adopted emergency response or evacuation plan, or result in a safety hazard from a public airport or private airstrip for people residing or working within the plan area.

PROJECT-SPECIFIC IMPACTS

This analysis is based upon the Phase I Environmental Site Assessment (ESA) prepared by Ramboll on January 10, 2018 (Appendix H).

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

CONSTRUCTION IMPACTS

During project construction, accidental conditions involving hazardous materials could occur and result of any of the following: direct dermal contact with hazardous materials, incidental ingestion of hazardous materials, or inhalation of airborne dust released from dried hazardous materials. Additionally, the transportation of hazardous materials could result in accidental spills, leaks, toxic releases, fire, or explosion. Appropriate documentation for all hazardous waste that is transported, stored, or used in connection with specific project-site activities is required for compliance with existing hazardous materials regulations codified in the CCR. Hazardous materials would also be required to be transported under the United States Department of Transportation (DOT) regulations. In addition, Santa Clara County has substantial regulations concerning hazardous materials under its Certified Unified Program Agencies (CUPA) jurisdiction and related Unified Programs. This is further enforced by Palo Alto Fire Department Programs. Compliance with federal, State, and local laws, regulations, and Cal/OSHA training programs would minimize potential impacts associated with the routine transport, use, or disposal of hazardous materials during construction to a less than significant level.

OPERATIONAL IMPACTS

Although new residential development at the project site could involve the use, storage, disposal, or transportation of minute quantities of hazardous materials, new residential uses would not be expected to involve large quantities of these materials. Normal residential activities do not generally present a significant threat to the public or the environment through the use, storage, disposal, or transportation of significant quantities of hazardous materials. Some materials considered hazardous may be used or stored on the project site, but these materials would be limited primarily to common household solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies and would not be substantially different from household chemicals and solvents already in general and wide use throughout any residential area. Furthermore, the proposed project would also be required to comply with Section 16.11 of the PAMC which requires the implementation of a SWPPP and stormwater pollution prevention measures. In addition, residential uses would not involve the transport of hazardous materials such that regulations would be triggered. The overall amounts of hazardous materials being transported to and from the site is likely to be minimal, and exposure of the public or environment to the routine use or accidental release of hazardous materials from operation of the project would be less than significant.

Overall, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The proposed project would be located approximately 320 feet east of Fusion Academy Palo Alto. Nonetheless, as a residential project, the proposed project would not emit substantial quantities of hazardous materials or hazardous waste. As discussed above under checklist items (a) and (b), the use, storage, transportation, and disposal of hazardous materials associated with construction activities would be required to adhere to numerous regulatory requirements which would prevent emissions of hazardous substances. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

A search of the California Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Sites (Cortese) List and EnviroStor database, and State Water Resources Control Board's (SWRCB) GeoTracker database was conducted in August 2025 (DTSC 2025a; DTSC 2025b; SWRCB 2025). The records review indicated that the project site is not listed as a hazardous materials release site on a list compiled pursuant to Section 65962.5. The closest hazardous materials release site is a Leaking Underground Storage Tank (LUST) cleanup site located at 2197 East Bayshore Road, adjacent to the southwestern corner of

the project site. This LUST cleanup site was closed in February 2000. No hazardous releases have been reported at the site, and no permit violation with regulatory agencies have been reported.

In addition, as discussed in the Phase I ESA prepared by Ramboll on January 10, 2018 (Appendix H), no recognized environmental conditions were identified in connection with the project site. The Phase I ESA noted that prior uses on the project site have utilized chlorinated solvents on the site, however, quantities were small and located within a single suite in the building at 2400 Geng Road; appear to have taken place over the course of fewer than 10 to 15 years; and did not appear to result in any reportable unauthorized releases or known impacts to the subsurface. In addition, the Phase I ESA reported that as part of a 1996 limited subsurface investigation, D&M identified up to 980 micrograms per liter of total petroleum hydrocarbons in the diesel range (THP-d) in groundwater at the northwestern corner of the project site. However, the Phase I ESA concluded that the TPH-d had likely migrated from an upgradient off-site location, and the known on-site contamination appeared limited to petroleum hydrocarbons and was not identified near any of the project site buildings. The Phase I ESA identified a de minimis condition for the project site as the project site may have been used for agricultural purposes from the 1930s to the 1970s, and it is possible residual concentrations of agricultural chemicals may be present in soil and potentially groundwater. Although the entire project site was graded in 1980 and redeveloped with existing commercial structures, there is the potential for demolition, grading, and construction workers to be exposed to contaminants (e.g., total petroleum hydrocarbons, volatile organic compounds [VOC], pesticides, and metal(s) via impacted dust and/or soil. Nonetheless, Policy S-3.3 of the City's 2030 Comprehensive Plan calls for the City to "support public health by requiring as part of development review, property owners and private entities to disclose the presence of contaminated soil or groundwater, identify potential health impacts, prevent vapor intrusion and remediate contamination." To ensure consistency with this policy, the City would require the following as a condition of approval of the project:

SITE MANAGEMENT PLAN CONDITION OF APPROVAL

The project applicant shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Site Management Plan (SMP) prior to construction. The SMP, or equivalent document, will be prepared to address onsite handling and management of impacted soils, soil vapor, groundwater, or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan shall establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the project site. These measures and practices may include, but are not limited to:

- Stockpile management, including stormwater pollution prevention and the installation of BMPs
- Proper disposal procedures of contaminated materials

- Monitoring, reporting, and regulatory oversight notifications
- A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
- The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The City of Palo Alto will review and approve the SMP for impacted soils, soil vapor, and groundwater prior to issuance of any permits necessary for the beginning of construction. The project applicant will review and implement the SMP prior to and during demolition and grading (construction).

Consistent with Comprehensive Plan Policy S-3.3, compliance with the COA would ensure that planning for the procedures to be implemented throughout work with impacted soils, soil vapor, or groundwater is conducted prior to approval of permits to begin construction from City or other agencies. Adherence to an approved SMP developed in conformance with current industry standards would reduce potential impacts relating to disturbance and removal of potentially contaminated soils and exposure to soil vapor or groundwater. Further, adherence to the SMP would reduce potential impacts with regard to fugitive dust and VOCs generated during ground disturbance that could pose a temporary risk to human health due to inhalation. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The closest airport is the Palo Alto Airport, located approximately 0.8 miles northeast of the project site. The project is located within the Airport Influence Area (AIA) of the Adopted Airport Land Use Plan for the airport. The project is located within the Traffic Pattern Zone, a portion of the airport area routinely overflown by aircraft operating in the airport traffic pattern, of the AIA.. The potential for aircraft accidents is relatively low and the need for land use restrictions is minimal. There are no limits on residential units within the Traffic Pattern Zone. However, the project site is not located within the airport's noise contours or within the airport's safety zone (Santa Clara County 2020).The proposed multi-family residential land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. Outdoor activities are not likely to be adversely affected. The project would not expose people residing or working in the project area to safety hazards or excessive noise and impacts would be less than significant. Impacts would not be substantially greater than those identified in the 2017 EIR.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction of the proposed project would occur within the boundary of the project site and would not lead to street closures which would interfere with emergency evacuations or response. The proposed project does not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No streets or property access points would be closed, rerouted, or substantially altered upon implementation and operation of the project. There would be no impact and impacts would not be substantially greater than those identified in the 2017 EIR.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As described below in Section 20, *Wildfire*, the project site is in a developed urban area and is not within or adjacent to a designated very high wildland fire hazard zone (CalFire 2025). Therefore, the project would not expose people or structures to a significant loss, injury, or death involving wildland fires. There would be no impact and impacts would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on hazards and hazardous materials, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

10 Hydrology and Water Quality

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	■	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	■	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) Result in substantial erosion or siltation on- or off-site;					
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;					
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or					
(iv) Impede or redirect flood flows?	☐	■	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	■	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.8 of the 2017 EIR analyzes impacts to hydrology and water quality. The 2017 EIR determined that the 2030 Comprehensive Plan could substantially degrade or deplete groundwater resources or interfere substantially with groundwater recharge since there is a potential for localized lowering of the shallow aquifer during construction dewatering activities. However, implementation of mitigation measure HYD-2 would reduce impacts to a less than significant level. The 2017 EIR found that the 2030 Comprehensive Plan would not violate any water quality standards or waste discharge requirements with compliance with the NPDES General Construction Permit (GCP), SWPPP requiring incorporation of BMPs, and Low Impact Development (LID) treatment measures. The 2017 EIR also states that the 2030 Comprehensive Plan would not increase the rate of stormwater runoff or alter the existing drainage pattern; result in stream bank instability; result in new or increased flooding on-or off-site or exceed the capacity of stormwater drainage systems in local streams; or provide substantial additional sources of pollutants associated with urban runoff or otherwise substantially degrade surface or ground water quality. The 2017 EIR determined that the 2030 Comprehensive Plan would not substantially impede or redirect flood flows through placement of structures within the 100-year flood hazard area with compliance with the National Flood Insurance Program (NFIP) and Flood Hazard Regulations in the PAMC. Additionally, the 2030 Comprehensive Plan would not expose people or structures to a significant risk or loss, injury or death involving flooding by placing housing or other development within a 100-year flood hazard area or a levee or dam failure inundation area and would not result in impacts from inundation by seiche, tsunami, or mudflow.

Table 19 lists the mitigation measure from the 2017 EIR related to Hydrology and Water Quality.

Table 19 2017 EIR Mitigation Measures: Hydrology and Water Quality

Mitigation Measure #	Mitigation Text
Impact HYD-2: The proposed Plan could substantially degrade or deplete ground water resources or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. (Significant and Mitigable)	
HYD-2	To reduce potential impacts associated with construction dewatering the proposed Plan shall include policies that achieve the following: ▪ Avoidance of the impacts of basement construction for single-family homes on the natural environment and safety. ▪ Conservation of subsurface water resources. ▪ Construction techniques and recharge strategies to reduce subsurface and surface water impacts. ▪ Monitoring of dewatering and excavation projects. ▪ Cooperation with other jurisdictions and regional agencies to protect groundwater. ▪ Protection of groundwater as a natural resource.

Source: City of Palo Alto 2017

PROJECT-SPECIFIC IMPACTS

a. Would the project violate any water quality standards or waste discharge requirements?

The project site is currently developed with four existing two-story office buildings and surface parking and would include the construction of 145 multifamily townhome units. The proposed project would be required to comply with Section 16.11 of the PAMC, which requires that permanent stormwater pollution prevention measures be incorporated into the project. In compliance with PAMC requirements, an SWPPP must be prepared for the proposed project. The project would also be required to comply with the Santa Clara Valley Urban Runoff Pollution Prevention Program's C.3. Requirement. The proposed project would include pervious surfaces through landscaping and pervious pavements. The project would also include bioretention areas on the eastern portion of the site adjacent to Buildings 65 and 66 as well as silva cells adjacent to the southern boundary of the central open space which would further reduce pollutants from stormwater runoff.

The proposed project would include a maximum depth of excavation of eight to 10 feet. As discussed in the Preliminary Geotechnical Report (Appendix G), the highest expected groundwater level exists approximately 5 feet below ground elevation. Therefore, groundwater could potentially be encountered during construction. Nonetheless, if groundwater is encountered, the proposed project would be required to comply with the City's *Construction Dewatering System Policy and Plan Preparation Guidelines,* which require excavation activities that may encounter groundwater to submit a Construction Dewatering Plan to the City's Public Works Department (City of Palo Alto 2020). The Public Works Department would review and permit the dewatering plan prior to commencement of dewatering as part of the Street Work Permit process. The Construction Dewatering Plan must comply with the City's Guidelines that require that water be tested for contaminants prior to initial discharge and at intervals during dewatering. In the dewatering plan, the applicant must include provisions for keeping sediment and contaminated groundwater out of the storm drain system (City of Palo Alto 2017a).

Therefore, with compliance with regulations and implementation of stormwater treatment measures, impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

As discussed in Section 17, *Utilities and Service Systems*, the proposed project would receive its water from the San Francisco Public Utilities Commission (SFPUC). The Regional Water System collects water from the Tuolumne River in the Sierra Nevada and from protected local watersheds in the East Bay and Peninsula. Therefore, water supply to the project site would not rely on groundwater supplies. Development under the proposed project would not include installation of new groundwater wells or use of groundwater from existing wells. Excavation could potentially encounter groundwater. However, as discussed above

under checklist item (a), the proposed project would be required to comply with the City's *Construction Dewatering System Policy and Plan Preparation Guidelines,* which would minimize impacts on groundwater such that the significant depletion of groundwater supply would not occur. Consequently, the project would not result in a net deficit in aquifer volume, a lowering of the groundwater table, or an exceedance of safe yield.

Therefore, impacts related to groundwater would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

San Francisquito Creek is approximately 128 feet north of the project site but does not flow through, nor does it immediately abut the site. The area is currently developed, and construction of the proposed project would not alter the course of this creek or any other stream or river (no other surface water features are identified in the project area). The proposed project would not alter the course of a stream or river and would not cause erosion, flooding, water pollution, or change in water flows. The project site is largely paved, and proposed development would not introduce new paved areas to the extent that the rate or amount of surface runoff would substantially increase (see discussion under criteria a, f, and g above). To comply with both FEMA's and the City's local floodplain requirements, the proposed project would raise the site's grade by approximately one to six feet to minimize the risk of flooding. However, the project would continue to discharge stormwater runoff to the existing stormwater drainage systems located along the northwestern corner of the site and the northeastern corner of the site that would discharge into the stormwater drainage system along Geng Road and eventually the San Francisco Bay. The amount and direction of runoff would not substantially change due to

the proposed project. Although the proposed project would increase the amount of impervious surfaces on the site, with compliance with regulations like the Santa Clara Valley Urban Runoff Pollution Prevention Program's C.3. Requirements and incorporation of stormwater treatment measures such as the inclusion of bioretention areas and silva cells, stormwater runoff would be reduced. The proposed project would not substantially increase polluted runoff volumes, would not exceed the capacity of existing or planned stormwater drainage systems, would not lead to erosion or siltation, would not impede or redirect flows, and would not result in flooding on- or off-site. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is located in Flood Zone "AE (EL 11)" according to the Federal Emergency Management Agency (FEMA). Flood Zone AE describes an area lying within the 100-year flood limit, and EL 11 describes an area with a base flood elevation of 11 feet above mean sea level (FEMA 2021). The proposed project would be required to comply with the City's floodplain ordinance pursuant to PAMC Chapter 16.52 as well as national flood insurance requirements. In order to meet both FEMA's and the City's local floodplain requirements, the proposed project would raise the site's grade by approximately one to six feet to minimize the risk of flooding. Therefore, the proposed project would not expose people or structures to a significant loss, injury, or death involving flooding.

According to the DOC Tsunami Inundation Map, the site is not located within a tsunami inundation zone (DOC 2025c). According to the City of Palo Alto's Natural and Urban Environment and Safety Element, mudflows and seiches are not identified as issues for the city. In addition, the nearest body of water that could experience a seiche event is the San Francisco Bay, which is located approximately one mile northeast of the project site. Due to various physical barriers (i.e. buildings and airport), a seiche in the Bay would have minimal potential to affect the project site. The project site is surrounded by commercial and office development and a golf course, away from crests and steep ridges. Therefore, the project site is located in a low hazard area for tsunami or seiche. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under criteria (a) above, the project would not violate water quality standards or degrade water quality during construction or operation.

The City of Palo Alto is under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (RWQCB). The San Francisco Bay RWQCB provides permits for projects that may affect surface waters and groundwater locally and is responsible for preparing the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The

Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the San Francisco Bay RWQCB's regulatory programs and incorporates an implementation plan for achieving water quality objectives (California Water Board 2024). The proposed project would not interfere with the objectives and goals in the Basin Plan. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on hydrology and water quality, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

11 Land Use and Planning

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Physically divide an established community?	☐	☐	■	■	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.9, *Land Use and Planning,* of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to land use. The 2017 EIR found that the 2030 Comprehensive Plan could adversely change the type or intensity of existing or planned land use patterns in the area, and therefore mitigation measure LAND-1 would be required to guide the change in density and character in order to avoid or minimize potential impacts to a less than significant level. Additionally, the 2030 Comprehensive Plan would allow development that could be incompatible with adjacent land uses or with the general character of the surrounding area, including density and building height. Therefore, implementation of mitigation measure LAND-2 would be required to ensure development is compatible with adjacent land uses and that the general character in Palo Alto is maintained. The 2030 Comprehensive Plan states that the 2030 Comprehensive Plan would not allow development that could conflict with established residential, recreational, educational, religious, or scientific uses of an area; would not allow new development that could conflict with any applicable City land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect; and would not conflict with an applicable habitat conservation plan or natural community plan. However, the 2030 Comprehensive Plan could include transportation improvements at existing roadways and rail corridors that could potentially physically divide existing communities. As a result, Mitigation Measure LAND-5 would be required to promote connectivity and context-sensitive design of infrastructure improvements and to reduce impacts to a less than significant level.

Table 20 lists mitigation measures related to land use and planning in the 2017 EIR.

Table 20 2017 EIR Mitigation Measures: Land Use and Planning

Mitigation Measure #	Mitigation Text
Impact LAND-1: The proposed Plan could adversely change the type or intensity of existing or planned land use patterns in the area. (Potentially Significant and Mitigable)	
LAND-1	To ensure that the intensity of future development would not adversely change the land use patterns or affect the livability of Palo Alto neighborhoods, the proposed Plan shall include policies that achieve the following: ▪ Strengthening of residential neighborhoods. ▪ Vitality of commercial areas and public facilities. ▪ High-quality building and site design. ▪ Architectural compatibility of new development. ▪ Compatible infill development. ▪ Avoidance of abrupt changes in the scale of development where residential districts abut more intense uses.
Impact LAND-2: The proposed Plan would allow development that could be incompatible with adjacent land uses or with the general character of the surrounding area, including density and building height. (Potentially Significant and Mitigable)	
LAND-2	Implement Mitigation Measure LAND-1. In addition, to further reduce potential impacts to visual character and ensure compatibility with adjacent land uses, the proposed Plan shall include policies that achieve the following: ▪ Use of City procedures, plans, and requirements to ensure high-quality building design and architectural compatibility.
Impact LAND-5: The proposed Plan could physically divide an established community. (Potentially Significant and Mitigable)	
LAND-5	To avoid potential impacts from physically dividing an established community, the proposed Plan shall include policies that achieve the following: ▪ Enhanced connections to and from parks, schools, and community facilities for all users. ▪ Safe and convenient pedestrian, bicycle, and transit connections between residential areas and commercial centers. ▪ Cooperation with other agencies to improve circulation connections. ▪ Grade separation of rail crossings.

Source: City of Palo Alto 2017

PROJECT-SPECIFIC IMPACTS

a. Would the project physically divide an established community?

The proposed project would involve redevelopment of an existing commercial site and would not cut off connected neighborhoods or land uses from each other. No new roads, linear infrastructure or other development features are proposed that would divide an established community or limit movement, travel or social interaction between established land uses. Therefore, no impact would occur, and impacts would not be substantially greater than those identified in the 2017 EIR.

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

2030 COMPREHENSIVE PLAN CONSISTENCY

The project site has a land use designation of Research/Office Park. As described in the 2030 Comprehensive Plan, typical uses include office, research and manufacturing establishments whose operations are buffered from adjacent residential uses. However, multi-family housing may be allowed in specific locations in this land use category. The proposed project would involve residential use on Geng Road. The Comprehensive Plan provides that residential uses are permitted in the Research/Office Park zone and encourages residential uses near transit. The project site is located within a 0.7-mile walk from SamTrans Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F, and therefore would be consistent with the land use designation for the site. The Comprehensive Plan indicates that land uses in the Research/Office Park land use zones should have FARs ranging from 0.3-0.5. The project proposes an FAR of 1.0. Although this would be inconsistent with the 2030 Comprehensive Plan, the proposed project would be entitled to waivers to exceed the maximum FAR pursuant to the State Density Bonus Law and Housing Accountability Act.

PALO ALTO ZONING CODE CONSISTENCY

Table 21 compares existing ROLM(E) development standards and the proposed project. As shown in the table, the proposed building would conform to the applicable zoning standards but would deviate from site-specific allowances with respect to maximum FAR, maximum height, front yard setback, side yard setback, rear yard setback, and maximum site coverage. As discussed above under Description of Project, the project is proposed under Builder's Remedy, a provision of California's Housing Accountability Act that prevents jurisdictions without a substantially compliant housing element from denying certain housing projects, even if such projects do not comply with the jurisdiction's zoning. The proposed project would include 19 affordable units (13 percent of total units) restricted to low-income households, which meets the requirements of the Housing Accountability Act as amended by AB 1893. Under the amended Housing Accountability Act, the project would be entitled to utilize this reduced affordability percentage, along with the other associated amendments to the Housing Accountability Act, because it meets the definition of a Builder's Remedy project (Government Code Section 65589.5(f)(7)(A)). The project would also be subject to the State Density Bonus Law and is entitled to waivers and three concessions. The applicant is requesting a concession regarding the distribution of affordable units under the Palo Alto Municipal Code (PAMC) Section 16.65.075, as current below-market-rate units are not incorporated within the detached townhouses and therefore would be inconsistent with PAMC Section 16.65.075.

Table 21 Zoning Development Standards Comparison Table

Development Standard	ROLM(E) Base Zoning[1]	Proposed Project
Minimum Site Area	1 ac	480,230 sf (11 ac)
Front Yard Setback (Minimum)	20 ft	16.5 ft[2]
Rear Yard Setback (Minimum)	20 ft	10 ft[2]
Interior Side Yard Setback (Minimum)	20 ft	15 ft[2]
Maximum Site Coverage	30%	73% (347,877 sf)[2]
Maximum Building Height	30 ft	43 ft[2]
Maximum Floor Area Ratio (FAR)	0.5:1	1.0[2]
Residential Density (Minimum-Maximum)	11-20 units per ac	13.15 units per acre
Minimum Landscape/Open Space Coverage	35%	45.5%
Minimum Useable Open Space (Private and/or Common)	150 sf per unit (21,750 sf)	91,555 sf
Vehicle Parking Spaces	1 per one-bedroom unit	333 spaces
Bicycle Parking Spaces	1 per unit	145 long-term spaces, 16 short-term spaces

ft = feet; in = inch

[1] Per PAMC Section 18.20.040 and 18.13.040, development standards for the ROLM(E) and RM-20 districts.

[2] Allowed deviations from the PAMC pursuant to the State Density Bonus Law and Housing Accountability Act.

The proposed project would be reviewed by the Architectural Review Board for approval of a Conditional Use Permit pursuant to Section 18.20.040(b)(5). Therefore, with approval of the Conditional Use Permit, the proposed project would be consistent with applicable regulations in the PAMC. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on land use and planning, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

12 Mineral Resources

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	■	■	☐
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

The City's Comprehensive Plan EIR analyzes mineral resources in Chapter 7, *CEQA-Mandated Sections*, and found that no impacts related to mineral resources would occur.

PROJECT-SPECIFIC IMPACTS

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project site and surrounding properties are located in an urbanized area with no current oil or gas extraction. According to the Natural Environment Element of the Comprehensive Plan, there are no policies relating to mineral resources because Palo Alto does not contain any mineral deposits of regional significance (City of Palo Alto 2017b). No mineral resource activities would be altered or displaced by the proposed project. No impact would occur and impacts would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on mineral resources, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

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13 Noise

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	■	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	■	☐	■	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.10, *Noise*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to on-site operational noise, traffic noise, and construction noise. The 2017 EIR found that impacts related to long-term non-transportation, operational noise would be potentially significant due to zoning changes for commercial and residential uses, and mitigation measure NOISE-1a would be required to reduce impacts to a less than significant level. The 2017 EIR also found that transportation noise impacts related to aircraft and railway noise sources would be potentially significant due to encroachment of land uses near aircraft facilities, along with unknown future operations patterns, which could potentially result in unacceptable aircraft-related noise environments from one or both of these Palo Alto-based facilities (Stanford University Hospital helipad and the Palo Alto Airport). Therefore, mitigation measures NOISE-1b and NOISE-1c would be required to reduce impacts to a less than significant level. Additionally, the 2030 Comprehensive Plan would have the potential to result in noise level increases such that L_{dn} would increase by three dB, causing the L_{dn} in existing residential areas to exceed 60 dBA. Implementation of mitigation measures NOISE-2 and NOISE-3 would be required to reduce impacts from long-term operational noise as well as transportation noise related to aircraft and railway noise to a less than significant level.

The 2017 EIR determined that the 2030 Comprehensive Plan would have the potential to result in indoor noise levels for residential development to exceed 45 dB L_{dn}, and mitigation measures NOISE-4a and NOISE-4b would be required to reduce indoor noise impacts to a less than significant level. Furthermore, the 2030 Comprehensive Plan would have the potential to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels, and therefore impacts related to temporary construction-related vibration, long-term operational vibration, and railway-related vibration could be potentially significant, requiring implementation of mitigation measures NOISE-5a and NOISE-5b to reduce vibration impacts to a less than significant level. The 2017 EIR also concluded that the 2030 Comprehensive Plan would have the potential to expose people to noise levels in excess of established State standards and standards established in the local General Plan or noise ordinance since previous Comprehensive Plan policies do not require acoustical analyses to demonstrate compliance with applicable interior or exterior noise compatibility standards. Therefore, implementation of mitigation measures NOISE-6 and NOISE-7 would be required to ensure that pertinent exterior and interior noise environments would comply with City guidelines and State standards. Additionally, the 2030 Comprehensive Plan could result in a potentially substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project since certain construction activities may lead to substantial temporary or periodic increases to ambient noise levels. Mitigation Measure NOISE-8 would be required to reduce impacts to a less than significant level.

The 2017 EIR found that the 2030 Comprehensive Plan would not expose people residing or working within an airport land use plan or within two miles of a public airport to excessive noise levels since all areas of Palo Alto are miles outside of the pertinent 65 dBA CNEL noise contour of medium or large airports including the Moffett Federal Airfield (KNUQ), San Carlos Airport (KSQL), San Jose International Airport (SJC), San Francisco International Airport (SFO), and Oakland International Airport (OAK). Additionally, since only airport property and the golf course – neither of which are noise-sensitive land uses – are within the Palo Alto Airport's 60 dBA CNEL noise contours, within-city public airport noise impacts would also be less than significant.

Table 22 lists mitigation measures related to noise in the 2017 EIR.

Table 22 2017 EIR Mitigation Measures: Noise

Mitigation Measure #	Mitigation Text
Impact NOISE-1: Implementation of the proposed Plan would have the potential to cause the average 24-hour noise level (Ldn) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the Ldn would remain below 60 dB. (Potentially Significant and Mitigable)	
NOISE-1a	To ensure that average 24-hour noise levels associated with long term operational noise would not increase by 5.0 decibels (dB) or more in an existing residential area, the proposed Plan shall include policies that achieve the following: ▪ Location of land uses in areas with compatible noise environments. ▪ Use of the guidelines in the "Land Use Compatibility for Community Noise Environment" table in the proposed Plan to evaluate the compatibility of proposed land uses with existing noise environments. ▪ Clear guidelines for maximum outdoor noise levels in residential areas. ▪ Adherence to the interior noise requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25). ▪ Inclusion of a noise contour map in the proposed Plan. ▪ Reduction of noise impacts of development on adjacent properties. ▪ Evaluation of noise impacts on existing residential, open space, and conservation land. ▪ Requirement for new projects in the Multiple Family, Commercial, Manufacturing, or Planned Community districts to demonstrate compliance with the Noise Ordinance.
NOISE-1b	To reduce potential impacts to new land uses from aircraft noise, the proposed Plan shall include policies that achieve the following: ▪ Compliance with the airport-related land use compatibility standards for community noise environments. ▪ Prohibition of incompatible land use development within the 60 dBA CNEL noise contours of the Palo Alto airport, as established in the adopted County of Santa Clara Airport Land Use Commission Comprehensive Land Use Plan (CLUP) for the Palo Alto Airport.
NOISE-1c	To reduce potential impacts to new land uses from railway noise, the proposed Plan shall include policies that achieve the following: ▪ Minimization of noise spillover from rail-related activities into adjacent residential or noise sensitive areas. ▪ Building design that reduces impacts from noise and ground borne vibrations associated with rail operations. ▪ Guidelines for interior noise levels.
Impact NOISE-2: Implementation of the proposed Plan would not cause the Ldn to increase by three dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB. (Significant and Mitigable)	
NOISE-2	Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.
Impact NOISE-3: Implementation of the proposed Plan would have the potential to cause an increase of three dB or more in an existing residential area where the Ldn currently exceeds 60 dB. (Potentially Significant and Mitigable)	
NOISE-3	Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.
Impact NOISE-4: Implementation of the proposed Plan would have the potential to result in indoor noise levels for residential development to exceed an Ldn of 45 dB. (Potentially Significant and Mitigable)	
NOISE- 4a	Implement Mitigation Measure NOISE-1a.
NOISE-4b	The Land Use Noise Compatibility Guidelines established in the 1998 Comprehensive Plan shall be maintained.

Mitigation Measure #	Mitigation Text
Impact NOISE-5: Implementation of the proposed Plan would have the potential to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.(Potentially Significant and Mitigable)	
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-5b	Implement Mitigation Measure NOISE-1c.
Impact NOISE-6: Implementation of the proposed Plan would have the potential to expose people to noise levels in excess of established State standards. (Potentially Significant and Mitigable)	
NOISE-6	Implement Mitigation Measures NOISE-4a and NOISE-4b
Impact NOISE-7: Implementation of the proposed Plan would have the potential to result in 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. (Potentially Significant and Mitigable)	
NOISE-7	Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a, and NOISE-4b.
Impact NOISE-8: Implementation of the proposed Plan could result in a potentially substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. (Potentially Significant and Mitigable)	
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.

Source: City of Palo Alto 2017

REGULATORY SETTING

PALO ALTO MUNICIPAL CODE

The PAMC contains standards for stationary and construction noise sources. Section 9.10.030 through 9.10.050 provide standards for operational stationary noise sources, allowing no more than 6 dBA above local ambient at residential uses, 8 dBA over existing ambient at commercial and industrial uses, and 15 dBA over existing ambient at public property uses. Section 9.10.060 states that construction activity is only authorized on Monday through Friday between the hours of 8:00 a.m. and 6:00 p.m. and Saturday 9:00 a.m. and 6:00 p.m., with no work on Sunday or holiday. Additionally, no individual piece of construction equipment shall produce a noise level exceeding 110 dBA at a distance of 25 feet.

The City's Comprehensive Plan Natural Environment Element includes goals and policies related to noise. This element establishes land use compatibility categories for community noise exposure (see Table 23. For residential uses, noise levels up to 60 dBA Ldn are identified as normally acceptable and noise levels between 60 and 75 dBA Ldn are identified as conditionally acceptable.

Table 23 Palo Alto Land Use Compatibility for Community Noise Environments

Land Use Category	Exterior Noise Exposure L_{dn} or CNEL or dB		
	Normally Acceptable	Conditionally Acceptable	Unacceptable
Residential, Hotel and Motels	50-60	60-75	75+
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds	50-65	65-80	80+
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches	50-60	60-75	75+
Office Buildings, Business Commercial, and Professional	50-70	70-80	80+
Auditoriums, Concert Halls, and Amphitheaters	N/A	50-75	75+
Industrial, Manufacturing, Utilities, and Agriculture	50-70	75+	N/A

Source: City of Palo Alto 2017

The PAMC regulates noise primarily through the Noise Ordinance, which comprises Section 9.10 of the Code, under Title 9, Public Peace, Morals and Safety. Section 9.10.060 of the PAMC restricts construction activities to the hours of 8 AM to 6 PM Monday through Friday and 9 AM to 6 PM on Saturday. Construction is prohibited on Sundays and holidays. Construction, demolition, or repair activities during construction hours must meet the following standards:

- No individual piece of equipment shall produce a noise level exceeding 110 dBA at a distance of 25 feet. If the device is housed within a structure on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible.
- The noise level at any point outside of the property plane of the project shall not exceed 110 dBA.
- The holder of a valid construction permit for a construction project in a non-residential zone shall post a sign at all entrances to the construction site upon commencement of construction, for the purpose of informing all contractors and subcontractors, their employees, agents, materialmen, and all other persons at the construction site, of the basic requirements of this chapter.

The project impacts from traffic noise would be significant if project-generated traffic results in the exposure of sensitive receptors to a perceptible increase in roadway noise. Roughly a doubling of traffic volume would be necessary to generate a perceptible increase in roadway noise levels of 3 dBA or more.

PROJECT-SPECIFIC IMPACTS

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

CONSTRUCTION NOISE

As discussed above under Regulatory Setting, PAMC Section 9.10.060 regulates temporary construction noise. Construction of the project would generate temporary noise that would be audible at the single-family residence adjacent to the northeastern portion of the project site. Noise associated with construction is a function of the type of construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of the construction activities. Based on construction details provided by the applicant, it is estimated that the construction period would involve approximately 25 days for demolition, 40 days for site preparation, 117 days for grading, 25 days for clean-up, 627 days for building construction, 24 days for paving and 27 days for architectural coating. While all phases of construction would generate noise, the building construction phase would represent the longest period of noise-generating activity. According to applicant provided information, pile drivers, typically the loudest piece of construction equipment, would not be used in building construction.

Construction noise was estimated using the Federal Highway Administration's Roadway Construction Noise Model (RCNM) (Appendix I). Noise was modeled based on the list of anticipated equipment for each phase of construction and the distances to nearby sensitive receptors. For a conservative approach, it was assumed that all construction equipment per phase would be operating simultaneously and would combine as a collective noise source. Table 24 shows the results of construction noise modeling from construction equipment to the closest property lines, which include the commercial use adjacent to the project site to the southeast and southwest and the recreational use (Baylands Athletic Center) to the north.

Table 24 Calculated Construction Noise Levels for Each Phase of Construction

Construction Phase	RCNM Reference Noise Level (dBA L_{max}) 50 feet	Commercial Use to the Southeast and Southwest (dBA L_{max}) 15 feet	Baylands Athletic Center to the North (dBA L_{max}) 20 feet
Demolition	82	93	90
Site Preparation	77	88	85
Grading	85	96	93
Clean-Up	77	88	85
Building Construction	81	92	89
Paving	80	91	88
Architectural coating	78	89	86

Notes: See Appendix I for RCNM outputs.

As shown in Table 24, construction noise could be as high as 96 dBA L_{max} during grading. Construction noise levels would be below the City's standard of 110 dBA L_{max} at any point outside the property line during allowable construction hours (PAMC Section 9.10.060). Taking into consideration the location of the source of noise on typical construction equipment, this analysis conservatively assumes the closest distance to the adjacent properties that equipment may operate. Construction work would occur across the entire property, portions of which are much further than 15 feet from adjacent sensitive receptors, and therefore the nearest receptors would often be exposed to lower noise levels than shown Table 24. All other sensitive receptors are located at a further distance away and the construction noise levels would be lower. Pursuant to Mitigation Measure Noise-8 of the 2017 EIR, as significant noise impacts have not been identified for project construction, a noise monitoring plan is not required to be prepared and submitted for the project. In addition, the proposed development intensity is generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

OPERATIONAL NOISE

MECHANICAL EQUIPMENT

The primary on-site operational noise source from the project would be from HVAC units that are anticipated to be on the rooftop of various buildings. Rooftop HVAC units could be located as close as approximately 450 feet from the sensitive receptors to the north (single-family residence) of the project site. Typical residential HVAC equipment generates noise levels ranging up to 68 dBA at a distance of 3 feet. At a distance of 450 feet, noise levels from HVAC noise would attenuate to approximately 25 dBA, which is equivalent to 31 dBA CNEL. As discussed above, under the City of Palo Alto Noise Standards, no person may produce a noise level more than six dBA above the local ambient noise level. An increase of six dBA or more would result in a significant impact. Based on the 2017 EIR, the local ambient noise level is 66.4 dBA CNEL at a distance of 50 feet from the roadway centerline along Embarcadero Road, from El Camino Real to US-101. Furthermore, this is a conservative estimate as it does not account for the traffic noise levels from US-101. Therefore, noise generated by HVAC equipment of 31 dBA CNEL would not produce a noise level more than six dBA above the local ambient noise level of 66.4 dBA CNEL. Impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

OTHER OPERATIONAL NOISE SOURCES

On-site noise sources such as landscape maintenance, conversations, and outdoor common open space would be typical of noise generated by neighboring land uses. Therefore, noise from these sources would be similar to the existing noise condition and would not substantially increase ambient noise levels in the project vicinity.

OFF-SITE TRAFFIC NOISE

The proposed project would generate traffic noise from vehicles traveling to and from the project site. The proposed project would generate an estimated decrease of 941 daily trips compared to the existing use (W-Trans 2025; Appendix B).

The project would not make substantial alterations to roadway alignments or substantially change the vehicle classifications mix on local roadways. The decrease in daily trips would result in lower traffic noise levels. Therefore, traffic noise impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The proposed project involves residential uses and would not include substantial vibration sources associated with operation. Therefore, operational vibration impacts would be less than significant. Thus, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receptors. The greatest anticipated source of vibration during general project construction activities would be from a vibratory roller, which may be used within 20 feet of the nearest off-site structures, the commercial use to the southeast. Neither blasting nor pile driving would be required for construction of the project. Taking into consideration the location of the source of groundborne vibration on typical construction equipment, Table 25 shows vibration levels of anticipated equipment used during construction at distances of 20 feet and 25 feet from the nearest off-site structure. Vibration levels were estimated using the FTA reference vibration levels at 25 feet.

Table 25 Vibration Levels Measured during Construction Activities

Construction Phase	PPV at 25 feet (in/sec)	PPV at 20 feet (in/sec)
Vibratory Roller	0.210	0.293
Large Bulldozer	0.089	0.124
Loaded Trucks	0.076	0.106
Small Bulldozer	0.003	0.004

Notes: See Appendix I for RCNM outputs.
Source: FTA 2018

Based on FTA recommendations, limiting vibration levels to below 0.3 in/sec PPV at engineered concrete and masonry buildings (commercial use to the southeast and southwest) would prevent architectural damage regardless of building construction type. A vibratory roller generates up to approximately 0.293 in/sec PPV at a distance of 20 feet (FTA 2018), which would not exceed the significance threshold of 0.3 in/sec PPV. Additionally, at a distance of 450 feet to the nearest residential structure, a vibratory roller generates up to

approximately 0.003 in/sec PPV. Therefore, impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The Palo Alto Airport is located 0.8 miles northeast of the project site. Although the project site lies within the AIA, it is outside the airport's noise contours and safety zone (Santa Clara County Airport Land Use Commission 2020). The proposed multi-family residential use is considered compatible, based upon the assumption that buildings are of standard construction without special noise insulation requirements. Outdoor activities associated with the project are not expected to be adversely affected. Furthermore, there is no private airstrip in the vicinity of the project site. Thus, future residents would not be exposed to excessive noise levels associated with air traffic and there would be no impact and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on noise and vibration, which would not exceed the impacts identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

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14 Population and Housing

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	■	☐	■	☐
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.11, *Population and Housing*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to population and housing growth. The 2017 EIR found that Scenario 6 of the 2030 Comprehensive Plan could increase the total population from 65,685 persons in 2014 to 79,765 persons in 2030, resulting in an addition of 2,665 persons or a 3.34 percent increase from ABAG projections. However, the 2017 EIR concluded that the exceedance of ABAG projections is intended to help to lower the jobs-to employed-resident ratio by providing more local housing opportunities, thereby helping to alleviate the need for workers to commute to Palo Alto from other areas of the region. Therefore, the 2030 Comprehensive Plan would not directly or indirectly induce substantial population growth and impacts would be less than significant.

The 2017 EIR determined that the 2030 Comprehensive Plan would not displace a substantial number of existing housing or people or necessitate the construction of replacement housing elsewhere since the 2015-2023 Housing Element included policies and programs that protect existing residents, neighborhoods, and housing. Additionally, the 2030 Comprehensive Plan would not create a substantial imbalance between employed residents and jobs, and impacts would be less than significant.

PROJECT-SPECIFIC IMPACTS

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

The proposed project involves construction of 145 residential units and the addition of approximately 361 new residents[9] to the city. This would be within the buildout assumed in the 2017 EIR, and the increase in population and housing associated with the project would be within the population and housing envisioned under Scenario 6 of the 2017 EIR. As discussed in the 2017 EIR, Scenario 6 of the 2030 Comprehensive Plan would exceed ABAG forecasts. Consequently, the proposed project would also exceed ABAG's population forecasts for the city. However, the 2017 EIR concluded that the exceedance of ABAG projections is intended to help to lower the jobs-to employed-resident ratio by providing more local housing opportunities, thereby helping to alleviate the need for workers to commute to Palo Alto from other areas of the region. The additional 145 units would also help meet the City's Regional Housing Need Assessment goal and would place residents closer to jobs. Similar to the 2017 EIR, the proposed project would not result in unplanned population growth and would not displace housing or people, and impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

There are no existing housing units at the project site or people residing on the project site in a form of temporary housing. Therefore, the project would not displace existing housing units or people. No impacts would occur and impacts would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on population and housing, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

[9] 145 units x 2.49 pph = 137 new residents (DOF 2024)

15 Public Services

		Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
	1 Fire protection?	☐	■	☐	■	☐
	2 Police protection?	☐	■	☐	■	☐
	3 Schools?	☐	■	☐	■	☐
	4 Parks?	☐	■	☐	■	☐
	5 Other public facilities?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.12, *Public Services and Recreation*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to public services. The 2017 EIR states that the 2030 Comprehensive Plan would not result in an adverse physical impact associated with the construction of additional school facilities, fire protection facilities, police facilities, and libraries. Impacts would be less than significant. However, the 2017 EIR found that the 2030 Comprehensive Plan could result in an adverse physical impact from the construction of additional parks and recreation facilities since the 2030 Comprehensive Plan would require new parkland to accommodate new development and meet the City's parkland standard. Therefore, implementation of mitigation measure PS-7 would be required to reduce impacts to a less than significant level.

Table 26 lists mitigation measures related to public services and recreation in the 2017 EIR.

Table 26 2017 EIR Mitigation Measures: Public Services and Recreation

Mitigation Measure #	Mitigation Text
Impact PS-7: Implementation of the proposed Plan would result in an adverse physical impact from the construction of additional parks and recreation facilities in order to maintain acceptable performance standards. (Significant and Mitigable)	
PS-7	To address the potential physical impacts of park construction/improvement, the Comprehensive Plan Update shall include policies that achieve the following: ▪ Evaluation and mitigation of construction impacts associated with park and recreational facility creation and expansion.

Source: City of Palo Alto 2016

PROJECT-SPECIFIC IMPACTS

a1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

To meet increased demand under the 2030 Comprehensive Plan, the 2017 EIR found that the City of Palo Alto Fire Department (PAFD) would likely increase staffing for EMS delivery and new apparatus and consider fire station improvements or expansion but would not anticipate the need to construct a new station, as development would be located in existing urbanized areas already served by existing PAFD stations. Furthermore, the City's approved infrastructure plan includes the replacement of two fire stations (City of Palo Alto 2017a). Fire Station 3 was replaced in March 2020 to meet the most current California Building Codes (CBC), Essential Services Building Seismic Safety Act, American with Disabilities Act (ADA), National Fire Protection Association (NFPA), and OSHA standards, and Fire Station 4 is currently underway and will be completed in December of 2026 (City of Palo Alto 2025).

The fire station closest to the project site is Fire Station 3, located at 799 Embarcadero Road, approximately 1.1 miles to the southwest; this station serves development currently on the site. The proposed project would be within the buildout assumed in the 2017 EIR, is consistent with the development goals and vision of the 2030 Comprehensive Plan and would produce housing for an increase in population within the expectations for Palo Alto. Similar to what was analyzed in the 2017 EIR, the proposed project would be located in an urbanized area already served by existing PAFD facilities. The proposed project would be required to comply with the same regulations as discussed in the 2017 EIR such as the City's Fire Code pursuant to PAMC Section 15.04, which includes requirements for fire sprinklers, fire hydrants, water fire flow requirements, and design of driveway turnaround and access points to accommodate fire equipment and would also be subject to plan review by the PAFD. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

a2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Police protection in the city is provided by the Palo Alto Police Department (PAPD). The PAPD has already indicated that the existing police station is inadequate to accommodate current and future needs, and the city constructed a new Public Safety Building (PSB) at 250 Sherman Avenue, which serves as the new headquarters of the Police Department, the Fire Department and the Office of Emergency Services and houses the city's dispatch operation. The construction or expansion of the PAPD facility would not be a result specifically of the additional residential units and was evaluated separately in accordance with CEQA to identify potential environmental impacts and mitigation measures as needed for the approved project. With the new police station, police services would be adequate to accommodate current and future needs of the city.

The closest police station is located at 141 Demeter Street, which is approximately 1.7 miles northwest of the project site and serves its existing uses. The proposed project would be within the buildout assumed in the 2017 EIR and would be consistent with the development goals and vision of the 2030 Comprehensive Plan and would produce housing for an increase in population within the expectations for Palo Alto. Similar to what was analyzed in the 2017 EIR, the proposed project would be located in an urbanized area already served by existing PAPD facilities. The project would not create excessive demand for police services or introduce development to areas outside of normal service range that would necessitate new or substantially altered police protection facilities. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

a3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Palo Alto is served by the Palo Alto Unified School District (PAUSD), which consists of 12 primary schools, three middle schools, two high schools, and an adult school. In general, school enrollment has been declining within PAUSD, and projections forecast a continued decline in enrollment district-wide based upon historical enrollment trends and projected new development (California Department of Education 2025; Moreno 2025). The proposed project would result in an incremental increase in the number of students and would not result in the need for new or physically altered school facilities. In addition, pursuant to Senate Bill 50 (Section 65995(h)), payment of mandatory fees to the affected school district would reduce school facility impacts to a less than significant level under CEQA. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, this impact would

be less than significant and would not be substantially greater than those identified in the 2017 EIR.

a4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Refer to Section 16, *Recreation.*

a5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

As discussed in Section 14 *Population and Housing*, the increase in population resulting from the proposed project would not be significant and would be within the buildout assumed in the 2017 EIR. As described in checklist questions (a) through (d), impacts related to expanded or altered government facilities, including fire, police, school, and park facilities, would be less than significant. Further, as described in Section 10, *Hydrology and Water Quality,* and Section 19, *Utilities and Service Systems,* the project would not result in the need for new or altered public water, wastewater, or stormwater facilities. As such, there would be no need for additional public facilities to maintain acceptable service ratios, response times, or other performance standards. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on public services, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

16 Recreation

		Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	■	☐	■	☐
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

The 2017 EIR analyzes recreation in Section 4.12, *Public Services and Recreation*, and impacts are summarized above under Section 14, *Public Services.* The 2017 EIR concludes that impacts regarding public services would be significant but mitigable with incorporation of mitigation measure PS-7, which would include new policies and programs addressing funding, community input, and environmental review for property acquisition and park construction/improvement.

PROJECT-SPECIFIC IMPACTS

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

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

The City of Palo Alto has adopted a policy of 4 acres of neighborhood and district parkland for every 1,000 residents and a parkland dedication standard of 5 acres of parkland (including open space) for every 1,000 residents. Based on the existing 2023 population of 68,794 and the adopted parkland standard, Palo Alto should currently provide 275.2 acres of neighborhood and district parkland.[10] There is an existing total of 173.4 acres of neighborhood and district parkland, 101.8 acres below the adopted policy.

[10] 68,794 (existing population) / 1,000 = 68.794 x 4 (number of acres per 1,000 residents of parkland) = 275.2

The proposed project would be within the buildout assumed in the 2017 EIR and would be consistent with the development goals and vision of the 2030 Comprehensive Plan and would produce housing for an increase in population within the expectations for Palo Alto. Similar to what was analyzed in the 2017 EIR, although proposed project would contribute additional residents to the city's population, it would not substantially alter citywide demand for parks such that substantial physical deterioration of parks would occur, or the construction of new recreational facilities would be required. The proposed project would not include recreational facilities other than the on-site areas that would serve future residents of the project. The parks and recreational spaces closest to the project site include the Baylands Athletic Center immediately adjacent to the site, Baylands Nature Preserve approximately 1 mile northeast of the site, Byxbee Park approximately 1.2 miles southeast of the site, and Greer Park approximately 1.3 miles south of the site. In addition, construction of the proposed project would not involve off-site activities or construction that would directly affect these parks. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on recreation, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

17 Transportation and Traffic

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	■	☐	■	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	■	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	■	☐	■	☐
d. Result in inadequate emergency access?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.13, *Transportation and Traffic*, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to traffic and the circulation system. The 2017 EIR analyzes transportation impacts using the level of service (LOS) methodology and found that impacts would be significant and unavoidable since there would be six intersections with a substandard LOS and there would be a significant impact during at least one of the peak hours. Although implementation of mitigation measures TRANS-1a through 1e would mitigate the projected impact to a less than significant level, the 2030 Comprehensive Plan EIR would still result in some impacted intersections, both because of growth in Palo Alto and regional growth. Therefore, the mitigation measures would reduce, but not eliminate, impacts at five of the six study intersections analyzed in the 2017 EIR. Additionally, the 2030 Comprehensive Plan was found to 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 since mitigation measures TRANS-1a and TRANS-3b would reduce but not eliminate the impact on four freeway segments. Although mitigation measures TRANS-3a and 3b would be required, impacts would remain significant and unavoidable. The 2017 EIR found that the 2030 Comprehensive Plan would not cause a roadway segment to drop below its level of service standard or deteriorate operations that already operate at a substandard level of service.

The 2017 EIR concluded that the 2030 Comprehensive Plan would not impede the function of planned bicycle or pedestrian facilities since compliance with existing City regulations and procedures would maintain existing and may improve the function of planned bicycle and pedestrian facilities. Furthermore, the 2030 Comprehensive Plan would not increase demand for pedestrian and bicycle facilities as well as transit services that cannot be met by existing or planned facilities or services. The 2030 Comprehensive Plan would also not result in inadequate emergency access and impacts would be less than significant.

The 2017 EIR determined that the 2030 Comprehensive Plan would create the potential demand for through traffic to use local residential streets and would create an operational safety hazard since growth under the 2030 Comprehensive Plan could result in increased congestion, increasing the potential for drivers to divert onto local streets and therefore causing a potential for increase in accidents onto local streets. Therefore, mitigation measures TRANS-8 and TRANS-9 would be required to reduce impacts to a less than significant level.

Table 27 lists the 2017 EIR's mitigation measures related to transportation. Pursuant to Public Resource Code, Section 21099 (b)(2), traffic congestion, while potentially an inconvenience to drivers, is not itself an environmental impact. Therefore, issues related solely to traffic congestion are outside the scope of CEQA analysis.

Table 27 2017 EIR Mitigation Measures: Transportation and Traffic

Mitigation Measure #	Mitigation Measure Text
Impact 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. (Significant and Unavoidable*)*	
TRANS-1a	Adopt a programmatic approach to reducing motor vehicle traffic, with the goal of achieving no net increase in peak-hour period motor vehicle trips from new development, with an exception for uses that directly contribute to the neighborhood character and diversity of Palo Alto (such as ground-floor retail and below-market-rate housing). The program should, at a minimum, require new development projects above a specific size threshold to prepare and implement a Transportation Demand Management (TDM) Plan to achieve the following reduction in peak-hour motor vehicle trips from the rates included in the Institute of Transportation Engineers' Trip Generation Manual for the appropriate land use category and size. These reductions are deemed aggressive, yet feasible, for the districts indicated. ▪ 45 percent reduction in the Downtown district ▪ 35 percent reduction in the California Avenue area ▪ 30 percent reduction in the Stanford Research Park ▪ 30 percent reduction in the El Camino Real Corridor ▪ 20 percent reduction in other areas of the city. TDM Plans must be approved by the City and monitored by the property owner or the project proponent on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets are not met and may achieve reductions by contributing to citywide or employment district shuttles or other proven transportation programs that are not directly under the property owner's control.
TRANS-1b	Require new development projects to pay a Transportation Impact Fee for all those peak-hour motor vehicle trips that cannot be reduced via TDM measures. Fees collected would be used for capital improvements aimed at reducing motor vehicle trips and motor vehicle traffic congestion.

Mitigation Measure #	Mitigation Measure Text
TRANS-1c	The proposed Plan shall include policies to ensure collaboration with regional agencies and neighboring jurisdictions, and identification and pursuit of funding for rail corridor improvements and grade separation. Policies shall support grade separation of rail crossings along the rail corridor as a City priority and the undertaking of studies and outreach necessary to advance grade separation of Caltrain to become a "shovel ready" project.
TRANS-1d	Consistent with State requirements, the City shall adopt a Multimodal Improvement Plan to address impacts to Congestion Management Program facilities. In addition, the proposed Plan shall include policies to engage in regional transportation planning and advocate for specific transit improvements and investments, such as Caltrain service enhancements and grade separations, Dumbarton Express service, enhanced bus service on El Camino Real with queue-jump lanes and curbside platforms, high-occupancy vehicle (HOV)/high-occupancy toll (HOT) lanes, and additional VTA bus service.
TRANS-1e	The proposed Plan shall include policies to encourage the PAUSD to analyze decisions regarding school assignments to reduce peak-period motor vehicle trips to and from school sites.
Impact 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. (Significant and Unavoidable)	
TRANS-3a	The City shall require new development projects to prepare and implement TDM programs, as described in TRANS-1a. TDM programs for worksites may include measures such as private bus services and free shuttle services to transit stations geared towards commuters.
TRANS-3b	The proposed Comprehensive Plan shall include policies that advocate for efforts by Caltrans and the Valley Transportation Authority to reduce congestion and improve traffic flow on existing freeway facilities consistent with Statewide GHG emissions reduction initiatives. Policies shall support the application of emerging freeway information, monitoring, and control systems that provide non-intrusive driver assistance and reduce congestion. Policies shall support, where appropriate, the conversion of existing traffic lanes to exclusive bus and high-occupancy vehicle (HOV)/high-occupancy toll (HOT) lanes on freeways and expressways, including the Dumbarton Bridge, and the continuation of an HOV lane from Redwood City to San Francisco.
Impact TRANS-6: Implementation of the project would impede the operation of a transit system as a result of congestion. (Significant and Unavoidable)	
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.
Impact TRANS-8: Implementation of the project would create the potential demand for through traffic to use local residential streets. (Significant and Mitigable)	
TRANS-8	The proposed Comprehensive Plan shall include policies to identify specific improvements that can be used to discourage drivers from using local, neighborhood streets to bypass traffic congestion on arterials.
Impact TRANS-9: Implementation of the project would create an operational safety hazard. (Significant and Mitigable)	
TRANS-9	Implement Mitigation Measure TRANS-8.

Source: City of Palo Alto 2017

REGULATORY SETTING

SENATE BILL 743 AND VEHICLE MILES TRAVELED

Senate Bill (SB) 743 was signed into law by Governor Brown in 2013 and directed the State Office of Planning and Research (OPR) to establish new criteria for determining the significance of transportation impacts under the California Environmental Quality Act (CEQA). SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

In January 2018, OPR transmitted its proposed CEQA Guidelines implementing SB 743 to the California Natural Resources Agency for adoption, and in January 2019 the Natural Resources Agency finalized SB 743 updates to the CEQA Guidelines. SB 743 changed the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (Public Resource Code, § 21099 (b)(2)). In addition to new exemptions for projects consistent with specific plans, the CEQA Guidelines replaced congestion-based metrics, such as auto delay and level of service (LOS), with VMT as the basis for determining significant impacts, unless the Guidelines provide specific exceptions.

The 2017 EIR examined program-level transportation impacts using the level of service (LOS) methodology and found that all such impacts would be significant and unavoidable. Although the 2017 EIR analyzes VMT, VMT was not the basis for a standard of significance used and no impact finding regarding VMT was made.

PROJECT-SPECIFIC IMPACTS

This analysis is based upon the Local Transportation Analysis prepared by W-Trans on September 19, 2025 (Appendix B).

IMPACT ANALYSIS

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

As discussed in the Local Transportation Analysis prepared by W-Trans (Appendix B), pedestrians can access the proposed buildings using continuous sidewalks along the project frontage on Geng Road, although sidewalks do not exist on the southern boundaries of East Bayshore Road and Embarcadero Road. Nonetheless, the proposed project would include construction of a retaining wall at the existing driveway north of the proposed project driveway and replacement of sidewalks along the project frontage on Geng Road. The proposed sidewalk would be five feet wide, not including the proposed landscape strip. The project would also include a network of five- to eight-foot-wide paved pedestrian pathways

to facilitate internal pedestrian access and connect the central open space to housing units. All pedestrian facilities would be constructed in accordance with the City's Public Works Department standards. Therefore, impacts to pedestrian facilities would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

The proposed project would provide 145 long-term bicycle spaces and 16 short-term bicycle spaces, consistent with PAMC Section 18.52.040. The proposed project would be located in proximity to Class I bicycle lanes on East Bayshore Road and Faber Place, Class II bicycle lanes on Embarcadero Road, and Class III bicycle lanes on San Francisquito Creek, Oregon Expressway, U.S. 101, and Greer Road which future residents would be able to utilize, reducing reliance on single-occupancy vehicles and VMT. In addition, the project would not conflict with the construction or location of City-proposed Class III bicycle lanes on Geng Road along the project site frontage and Embarcadero Road (Appendix B). Therefore, impacts to bicycle facilities would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

The project site is located within a 0.7-mile walk from SamTrans Bus Routes 81 and 280, the Stanford Marguerite Shuttle Service and AC Transit Route U, and the Stanford Shuttle Line AE-F. There are no transit facilities along the project frontage, so the project would not impact transit service. Impacts to transit facilities would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

Overall, because there would be no new or substantially more severe significant impacts than what was analyzed in the 2017 EIR, further analysis is not warranted.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3(b) requires specific consideration of a plan or project's transportation impacts based on VMT. This implements SB 743, which eliminates level of service as a basis for determining significant transportation impacts under CEQA and requires a different performance metric: VMT. With this change, the State shifted the focus from measuring a plan or project's impact upon drivers (LOS) to measuring the impact of driving (VMT) on achieving its goals of reducing GHG emissions, encouraging infill development, and improving public health through active transportation.

The City adopted a VMT threshold for residential projects on June 15, 2020. A residential project that exceeds a level of 15 percent below the Santa Clara County home-based VMT per resident rate of 13.33 miles resulting in a home-based VMT per resident threshold of 11.3 miles may indicate a significant transportation impact. As discussed in the Local Transportation Analysis (Appendix B), and as shown in Table 28, using the Santa Clara Countywide (SCC) VMT Evaluation Tool, the home-based VMT per resident rate for transportation analysis zone (TAZ) where the project is located was found to be 10.84 vehicle miles, indicating a low VMT generating area. Therefore, impacts related to VMT would be less than significant and would not be substantially greater than those identified in the 2017 EIR. Because there would be no new or substantially more severe significant impacts than what was analyzed in the 2017 EIR, further analysis is not warranted.

Table 28 Vehicle Miles Traveled Analysis Summary

VMT Metric	Baseline VMT Rate	Significance Threshold	Project VMT Rate	Resulting Significance
VMT per resident (Countywide baseline)	13.3	11.3	10.8	Less than significant

Sources: W-Trans 2025; Appendix B

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

The proposed project would include the continued use of the existing southern driveway with access to/from Geng Road as well as shared use of an existing driveway with access to/from East Bayshore Road. As discussed in the Local Transportation Analysis (Appendix B), based on a speed limit of 25 miles per hour on Geng Road, the minimum corner sight distance required is 350 feet for left turns and 315 feet for right turns, and the minimum stopping sight distance required is 150 feet. Sight distances at the proposed project driveway on Geng Road would exceed 350 feet in both direction, and sight distance would be adequate provided that vegetation near the driveways are trimmed to an appropriate height of three feet or less. In addition, for a motorist traveling northbound on Geng Road intending to turn left into the proposed project driveway, the stopping sight distance looking south along Geng Road is also greater than 150 feet, providing adequate visibility to allow a following driver to observe and react to a vehicle that may stop in the roadway before making a left turn into the driveway. Therefore, impacts on hazards due to a geometric design feature or incompatible use would be less than significant and would not be substantially greater than those identified in the 2017 EIR. Because there would be no new or substantially more severe significant impacts than what was analyzed in the 2017 EIR, further analysis is not warranted.

d. Would the project result in inadequate emergency access?

As discussed in the Local Transportation Analysis (Appendix B), the proposed drive aisles would be approximately 20- to 26-feet-wide, which would satisfy the minimum width of 20 feet for fire access required by the California Fire Code, and would have sufficient width to accommodate two-way traffic operations for circulating vehicles, as well as parking maneuvers to/from garage parking spaces.

Emergency vehicles have the right to use lights and sirens to allow them to bypass congestion, and all other vehicles are required by State law to pull over to allow emergency vehicles to pass. In addition, the proposed project would be required to comply with basic building designs and standards for residential buildings as mandated by the Palo Alto Fire Code pursuant to PAMC Section 15.04, as well as incorporate all applicable design and safety requirements as set forth in the most current adopted building codes and fire and life safety standards. Furthermore, as discussed under Section 9, *Hazards and Hazardous Materials*, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore,

impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR. Because there would be no new or substantially more severe significant impacts than what was analyzed in the 2017 EIR, further analysis is not warranted.

CONCLUSION

The project would have no new significant or substantially more severe or peculiar impacts to transportation, nor would there be potentially significant off-site impacts, cumulative impacts, or previously identified significant effects that were not discussed in the prior environmental document. Further, there are no previously identified significant effects which, as a result of substantial new information not known at the time of the previous environmental review, have been determined to have a more severe adverse impact than those discussed in the previous environmental documents. Accordingly, this issue **does not require further study in an EIR**.

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18 Tribal Cultural Resources

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	■	☐	☐	■
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐	■

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

The 2017 EIR does not specifically discuss impacts to tribal cultural resources or compliance with Assembly Bill 52 (AB 52), which was signed into law in 2014. AB 52 expanded CEQA by defining a new resource category, "tribal cultural resources," and requires lead agencies to complete consultation with California Native American Tribes regarding proposed projects. AB 52 became effective after the issuance of the Notice of Preparation for the 2017 EIR. However, as described in Section 5, *Cultural Resources*, of this Initial Study, the 2017 EIR incorporated required mitigation measures CULT-1 and CULT-3 for procedures in the event archaeological resources, tribal resources, and human remains are discovered during construction.

ASSEMBLY BILL 52 OF 2014

AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and are:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

The requirements of AB 52 do not apply to the proposed project because it falls under a previously certified EIR. Therefore, tribal consultation was not conducted as part of this project.

IMPACT ANALYSIS

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

The proposed project would be within the buildout assumed in the 2017 EIR. The proposed project would include construction activities such as grading and excavation to a depth of approximately eight to 10 feet below ground, which could potentially lead to the unanticipated discovery of tribal cultural resources. Nonetheless, the project would be required to comply with policies L-7.16 through 7.18 of the 2030 Comprehensive Plan, adopted in compliance with Mitigation Measure CULT-3 of the 2017 EIR, which would reduce impacts on tribal cultural resources. In addition, as discussed in Section 5, *Cultural Resources*, the proposed project would be required to comply with the City's Standard COA regarding the unanticipated discovery of buried archaeological resources as well as the COA related to WEAP and monitoring which would ensure the protection of tribal cultural

resources. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

With incorporation of the Standard COA described in Section 5, *Cultural Resources*, and implementation of Mitigation Measure CULT-3 of the 2017 EIR, the project would have less than significant impacts on tribal cultural resources, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

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19 Utilities and Service Systems

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Would the project:					
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	■	☐	■	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	■	☐	■	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	■	☐	■	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	■	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	■	☐	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

Section 4.14, *Utilities and Service System*s, of the 2017 EIR analyzed the 2030 Comprehensive Plan's impacts related to utilities and service systems. The 2017 EIR found that sufficient water supplies from existing entitlements would be available to serve development under the 2030 Comprehensive Plan and the increased demand in water would not result in the substantial physical deterioration of a water utility facility. Additionally, the 2030 Comprehensive Plan would not prompt a need to expand treatment facilities or regional water system conveyance and storage facilities in order to meet its demand. New or expanded local water distribution facilities would require permitting and review in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated. Therefore, impacts would be less than significant.

The 2017 EIR determined that the 2030 Comprehensive Plan would not exceed wastewater treatment requirements of the RWQCB or wastewater treatment capacity of the Regional Water Quality Control Plant (RWQCP). Furthermore, the 2030 Comprehensive Plan would not result in substantial physical deterioration of the RWQCP or adverse physical impacts from new or expanded wastewater utility facilities since the existing RWQCP would provide adequate capacity to meet dry weather and maximum month flows through at least 2035 and beyond. Therefore, impacts would be less than significant.

The 2017 EIR found that the 2030 Comprehensive Plan would not require or result in the construction of new stormwater facilities or expansion of existing facilities since development would be required to comply with Provision C.3 of the MRP, as well as the City's post-construction site design measures, source control measures, and stormwater treatment measures. The 2030 Comprehensive Plan would not result in a substantial physical deterioration of stormwater facilities with compliance with existing State, regional, and local regulations. Therefore, impacts would be less than significant.

The 2017 EIR determined that the 2030 Comprehensive Plan would be served by 17 different landfills with sufficient permitted capacity to accommodate the increased waste disposal needs. However, the 2017 EIR found that the 2030 Comprehensive Plan could potentially fall out of compliance with federal, State, and local statutes and regulations related to solid waste, and mitigation measure UTIL-15 would be required to reduce impacts to a less than significant level.

The 2017 EIR also analyzes impacts to energy supply and efficiency which is discussed in Section 6, *Energy*, of this document.

Table 29 lists the mitigation measure from the 2017 EIR related to utilities and service systems.

Table 29 2017 EIR Mitigation Measures: Utilities and Service Systems

Mitigation Measure #	Mitigation Text
Impact UTIL-15: Without the adoption of policies to promote recycling and conservation, the proposed Plan could potentially fall out of compliance with federal, State, and local statutes and regulations related to solid waste. (Potentially Significant and Mitigable)	
UTIL-15	To ensure that future development under Scenarios 2, 3, and 4 would comply with applicable solid waste regulations, the proposed Plan shall include policies that achieve the following: ▪ Ninety-five percent landfill diversion by 2030, and ultimately zero waste. ▪ Reduced solid waste generation. ▪ Use of reusable, returnable, recyclable, and repairable goods, through enforcement of the 2016 Plastic Foam Ordinance expansion. ▪ Enhanced recycling and composting programs for all waste generators.

Mitigation Measure #	Mitigation Text
Impact UTIL-17: The proposed Plan would not result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities. However, without the adoption of policies in support of energy efficiency and conservation, the proposed Plan would result in a potentially significant impact, requiring mitigation. (Potentially Significant and Mitigable)	
UTIL-17	To ensure that future development would maximize energy efficiency and conservation the proposed Plan shall include policies that achieve the following: ▪ Maximized conservation and efficient use of energy. ▪ Continued procurement of carbon-neutral energy. ▪ Investment in cost-effective energy efficiency and energy conservation programs. ▪ Provision of public education programs addressing energy conservation and efficiency. ▪ Use of cost-effective energy conservation measures in City projects and practices. ▪ Adherence to State and federal energy efficiency standards and policies. ▪ Consideration of a transition to a carbon-neutral natural gas supply.

Source: City of Palo Alto 2017

PROJECT-SPECIFIC IMPACTS

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

WATER

The City receives 100 percent of its potable water from the SFPUC. The City does not own or operate a water treatment plant (WTP). The water purchased from the SFPUC may be treated at one or more WTPs operated by SFPUC. SFPUC treats water to meet all applicable drinking water standards. SFPUC periodically makes improvements to its WTPs in order to improve system reliability and accommodate projected growth in its regional service areas. For example, the Water System Improvement Program (WSIP) includes capacity expansion and other improvements in order to upgrade SFPUC's regional and local water systems. The WSIP also includes many projects to improve the Regional Water System distribution lines and storage reservoirs (City of Palo Alto 2017a).

The proposed project involves construction of 145 townhome units which would be within the buildout assumed in the 2017 EIR. Therefore, similar to what was analyzed in the 2017 EIR, the proposed project would not result in the expansion or construction of new treatment facilities or regional water system conveyance and storage facilities in order to meet its incremental increase in demand. The proposed project may require new or upgraded connections to the existing water supply infrastructure to accommodate increased demand. These connections would be made to existing water lines and facilities and would not involve the construction of new water treatment plants or major distribution infrastructure. As such, the need for new or upgraded connections does not constitute the development of new water facilities under CEQA. Potential impacts associated with these

connections, such as construction-related disturbances, are discussed throughout this 15183 Checklist. In addition, as discussed above under Section 10, Hydrology and Water Quality, pursuant to Sections 16.12.030 and 16.12.035 of the Palo Alto Municipal Code, the project would be required to utilize recycled water for irrigation and incorporate dual plumbing to allow recycled water use for toilet flushing and floor trap priming. This would further reduce demand on potable water supplies. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

WASTEWATER

As discussed under criteria (c), the existing RWQCP facilities would provide adequate capacity to meet dry weather and maximum month flows through at least 2035 and beyond, and that new or expanded facilities would not be needed as a result of the 2030 Comprehensive EIR. In addition, the Long Range Facilities Plan (LRFP) anticipates that the existing RWQCP facilities will provide adequate capacity to meet dry weather and maximum month flows through at least 2035, assuming the same level of treatment is required. Since the proposed project would be within the buildout assumed in the 2017 EIR, similar to what was analyzed in the 2017 EIR, the proposed project would not result in the expansion or construction of new wastewater facilities. The proposed project may require new or upgraded connections to the existing wastewater supply infrastructure to accommodate increased demand. These connections would be made to existing wastewater lines and facilities and would not involve the construction of new wastewater treatment plants. As such, the need for new or upgraded connections does not constitute the development of new wastewater facilities under CEQA. Potential impacts associated with these connections, such as construction-related disturbances, are discussed throughout this 15183 Checklist. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

STORMWATER

As discussed in Section 10, *Hydrology and Water Quality*, the proposed project would be required to comply with Section 16.11 of the PAMC, which requires that permanent stormwater pollution prevention measures be incorporated into the project. In compliance with PAMC requirements, an SWPPP would be prepared for the proposed project. The proposed project would include pervious surfaces through landscaping and pervious pavements. The project would also include flow-through planters which would further reduce pollutants from stormwater runoff, and would be required to comply with SCVURPPP C.3 stormwater measures. The proposed project may require new or upgraded connections to the existing stormwater infrastructure to accommodate increased demand. These connections would be made to existing stormwater lines and facilities and would not involve the construction of new stormwater facilities. As such, the need for new or

upgraded connections does not constitute the development of new stormwater facilities under CEQA. Potential impacts associated with these connections, such as construction-related disturbances, are discussed throughout this 15183 Checklist. Compliance with State and local stormwater regulations would reduce impacts to a less than significant level. Impacts would not be substantially greater than those identified in the 2017 EIR.

TELECOMMUNICATIONS

The proposed project would include construction of 145 townhome units on an underdeveloped site in an urbanized area. Based on the availability of existing telecommunications infrastructure, construction of new telephone and cable lines would not be required, and the proposed development would be able to connect to existing infrastructure. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, there would be adequate telecommunications facilities to serve the development facilitated by the project, and impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

ELECTRICITY AND NATURAL GAS

The proposed project would include construction of 145 townhome units on an underdeveloped site in an urbanized area, and would be able to connect to existing electrical infrastructure. The proposed project would include an all-electric design and would not utilize natural gas. It is not anticipated that the construction of new electrical transmission and distribution lines would be required. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. Therefore, there would be adequate electrical infrastructure to serve the development facilitated by the project, and impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project involves construction of 145 townhome units which would be within the buildout assumed in the 2017 EIR. As discussed in the 2017 EIR, there would be sufficient water supplies from existing entitlements to serve development under the 2030 Comprehensive Plan EIR. In addition, according to the city's 2020 UWMP, the City of Palo Alto can reliably meet the projected water demand in normal years. However, there would be a potable water supply shortfall for single dry year and multiple dry years. Under these conditions, residents would be required to reduce water usage depending on the length of the dry year. The San Francisco Public Utilities Commission (SFPUC) and Bay Area Water Supply and Conservation Agency (BAWSCA) are also evaluating alternative water supplies during and seeking water supplies and solutions for drought years. Furthermore, the City has formed partnerships such as the one with Valley Water and is embarking on a One Water plan which will have dry year water supply reliability as a central tenet (City of Palo Alto 2021). Therefore, sufficient water supplies would be available to serve the project

during normal, single- and multiple-dry years, and impacts would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As discussed in the 2017 EIR, the preferred scenario would increase wastewater generation by 630,893 gallons per day (GPD) at the high end and this estimated worst-case increase in water flow would represent less than four percent of the existing excess dry flow capacity of 18 million gallons per day (MGD) available at the RWQCP. The Long Range Facilities Plan (LRFP) also further estimates that the RWQCP would have at least 5 MGD of excess capacity in 2062. The proposed project involves construction of 145 townhome units which would be within the buildout assumed in the 2017 EIR. Therefore, the RWQCP's existing capacity would be sufficient to accommodate the incremental increase in wastewater generation under the proposed project. This impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As discussed in the 2017 EIR, the preferred scenario would generate an approximate increase of 15,953 tons per year of solid waste over baseline at buildout at the high end. Additionally, the city's disposal rate per resident in 2014 was 3.6 pounds per day (PPD), which was below the CalRecycle target of 7.1 PPD per resident. The city's disposal rates for both residents and employees have been below target rates since 2007 (City of Palo Alto 2017a). The proposed project involves construction of 145 townhome units which would be within the buildout assumed in the 2017 EIR. The incremental increase in solid waste generated would not be in excess of State or local standards or in excess of the capacity of local infrastructure. The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Furthermore, the proposed project would be required to comply with PAMC Section 16.14.260 which requires an 80 percent diversion of construction and demolition debris and preparation of a Waste Management Plan for on-site sorting of construction debris, which is submitted to the City for approval, in order to ensure that the project meets the diversion requirement for reused or recycled construction and demolition debris. The project would also be required to comply with applicable federal, State, and local statutes and regulations related to solid waste such as AB 939, which requires the City to divert 50 percent of solid waste from landfills, as well as SB 1838, which would require mandatory organic waste recycling for future residents. As a result, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on utilities and service systems, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

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20 Wildfire

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	■	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	■	■	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	■	■	☐
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	■	■	☐

ANALYSIS IN PREVIOUS ENVIRONMENTAL DOCUMENTS

The 2017 EIR does not directly address the issue area of wildfire, but discusses wildfire impacts in Section 4.7, *Hazards and Hazardous Materials*, of the 2017 EIR. As discussed in the 2017 EIR, much of the area surrounding Palo Alto west of I-280 is considered to have a moderate and high risk of wildland fire, whereas all of the urbanized areas of Palo Alto do not have any wildland fire hazards. The 2017 EIR found that there would be less than significant impacts related to wildfire.

IMPACT ANALYSIS

a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

According to the California Department of Forestry and Fire Protection (CAL FIRE) Hazard Severity Zone map (CAL FIRE 2024), the project site is not located in a State Responsibility Area (SRA) or in a Very High Fire Hazard Severity Zone (VHFHSZ). The nearest VHFHSZ is located approximately 13 miles west of the project site near Woodside (CAL FIRE 2024). No impact would occur. Therefore, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

CONCLUSION

The project would have less than significant impacts on wildfire, the same as those identified in the 2017 EIR. Therefore, the project would not result in new significant effects not addressed in the prior EIR, and no new mitigation measures are warranted. This issue **does not require further study in an EIR**.

21 Mandatory Findings of Significance

	Significant Impact	Less than Significant	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
Does the project:					
a. Have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	■	■
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	■	☐	■	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	■	■

PROJECT-SPECIFIC IMPACTS

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

Consistent with the findings of the 2017 EIR and as discussed in Section 4, *Biological Resources*, with incorporation of the Standard COA related to nesting birds, the project would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife species population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 5, *Cultural Resources*, and Section 18, *Tribal Cultural Resources,* with incorporation of the Standard COA related to the unanticipated discovery of cultural resources and WEAP and monitoring consistent with policies L-7.15 and L-7.17 of the 2030 Comprehensive Plan as well as Mitigation Measure CUL-3 of the 2017 EIR, the project would

not eliminate important examples of the major periods of California history or prehistory, including archaeological, paleontological resources, or tribal cultural resources. As such, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

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

Required conformance with 2030 Comprehensive Plan policies and Standard COAs specified in this document would ensure that potential impacts are individually limited and not cumulatively considerable in the context of impacts associated with other pending and planned development projects. As part of the 2017 EIR, cumulative impacts associated with buildout of infill projects were analyzed. The project involves residential development on a site analyzed in the 2017 EIR and other existing and allowable land uses near the project are not significantly different than those studied in the cumulative analysis of the 2017 EIR. The 2030 Comprehensive Plan is a document that establishes a land use scenario and goals, policies, and objectives for development and growth throughout the city, through the year 2030. Thus, the impact analyses in the 2017 EIR effectively constitute cumulative analyses of the approved land uses in the planning boundaries. The project would not result in significant impacts peculiar to the project site, as indicated in sections 1 through 20 above. Nearby development would be required to be consistent with the local planning documents or mitigation would be required to assess the impacts that were not addressed in the 2017 EIR. Therefore, the project's consistency with the 2030 Comprehensive Plan and subsequent analysis above in sections 1 through 20 indicate that the project would not result in significant cumulative impacts that were not addressed in the 2017 EIR. The proposed use and development intensity are generally consistent with what the 2017 EIR envisioned and analyzed for sites such as the subject parcel. As such, this impact would be less than significant and would not be substantially greater than those identified in the 2017 EIR.

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

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, geology and soils, noise, traffic safety and wildfire. As detailed in the preceding sections, the project would not result, either directly or indirectly, in substantial adverse impacts related to these issue areas. The project's effects on regional air quality and transportation/traffic would be less than significant or were analyzed under prior environmental review. As discussed in Section 7, *Geology and Soils,* adherence to existing State and local regulations would reduce impacts related to geology and soils to a less than significant level. As discussed in Section 8, *Hazards and Hazardous Materials*, on-site construction and operations would not expose residents or customers to known hazardous materials with incorporation of the Standard COA related to preparation of an SMP

consistent with Policy S-3.3 of the 2030 Comprehensive Plan. The generation of noise and vibration from construction activity, as discussed in Section 12, *Noise*, would be reduced to a level that is less than significant with adherence to regulations in the PAMC. As discussed in Section 20, *Wildfire*, the proposed project is not located within or near a VHFHSZ and there would be no impacts related to wildfire. Therefore, the project would not have substantial direct or indirect adverse effects on human beings.

CONCLUSION

The proposed project would be consistent with the site's 2030 Comprehensive Plan land use designation and 2030 Comprehensive Plan policies for which an EIR was certified. Accordingly, based on the assessments presented in the environmental checklist, the project does not require additional environmental review as the impacts:

1. Are not peculiar to the project or the parcel on which the project would be located;
2. Were analyzed as significant effects in a prior EIR on the zoning action, general plan, and specific plan, with which the project is consistent where applicable;
3. Are not potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan and specific plan; or
4. Are not previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

The majority of impacts would be less than significant or were analyzed previously in the 2017 EIR. Additional impacts would be reduced or mitigated by the imposition of uniformly applied development policies or standards. Accordingly, implementation of the project complies with Section 15183 of the CEQA Guidelines and no further environmental review is required.

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