



**U.S. Department of Housing and Urban
Development**

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Buena Vista Redevelopment Project

Responsible Entity: City of Palo Alto

Grant Recipient: Santa Clara County Housing Authority

Preparer: David J. Powers and Associates, Inc. for the City of Palo Alto

Certifying Officer Name and Title: John Lait, Planning and Development Services, City of Palo Alto

Consultant: David J. Powers and Associates, Inc.

Direct Comments to: Claire Raybould, AICP. Principal Planner, City of Palo Alto,
Claire.Raybould@CityofPaloAlto.org

Project Location:

The 4.5-acre project site is located at 3890 El Camino Real in the City of Palo Alto (Assessor's Parcel Number [APN] 137-11-103). The project site is currently developed with a mobile home park containing 79 mobile homes and three accessory buildings including a laundry/shower building, a residence/office, and a shop building. Regional and vicinity maps of the site are shown on Figure 1 and Figure 2, respectively, and an aerial photograph of the project site and the surrounding land uses is shown on Figure 3.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

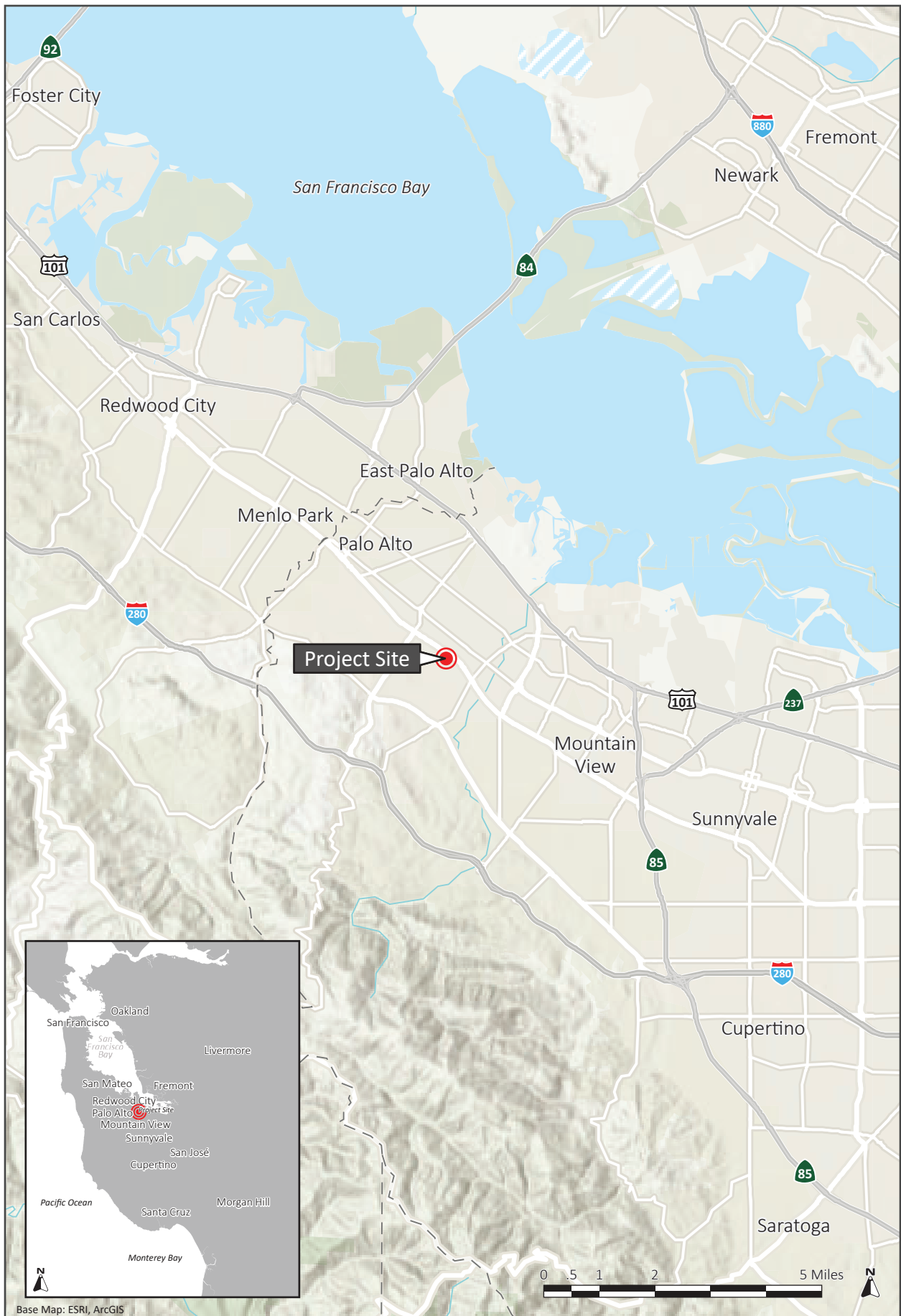
The project proposes to split the lot into two parcels and increase the number of residential units on-site to a total of 105 units. The larger two-thirds of the site (approximately 2.81 acres) would remain a mobile home park with 44 units. The existing mobile homes on-site would be replaced with new mobile homes with utility upgrades. The 44 new mobile homes would consist of one-bedroom, two-bedroom, three-bedroom, and four-bedroom units. The renovated mobile home park would include new landscaping and site amenities such as a dog park, office, and laundry facilities.

On the remaining one-third of the site (approximately 1.69 acres), the existing mobile home units would be removed. This portion of the site would be redeveloped with a three-story affordable apartment building containing 61 units. The apartment building would include one-bedroom, two-bedroom, and three-bedroom units. All units would be for low-income families and individuals. The standalone building would include amenities such as a teen room and homework club, bike room, laundry room and storage areas, and a shared courtyard and patio spaces. Refer to Figure 4 and Figure 5 for a conceptual site plan and rendering of the project, respectively.

Parking and Site Access

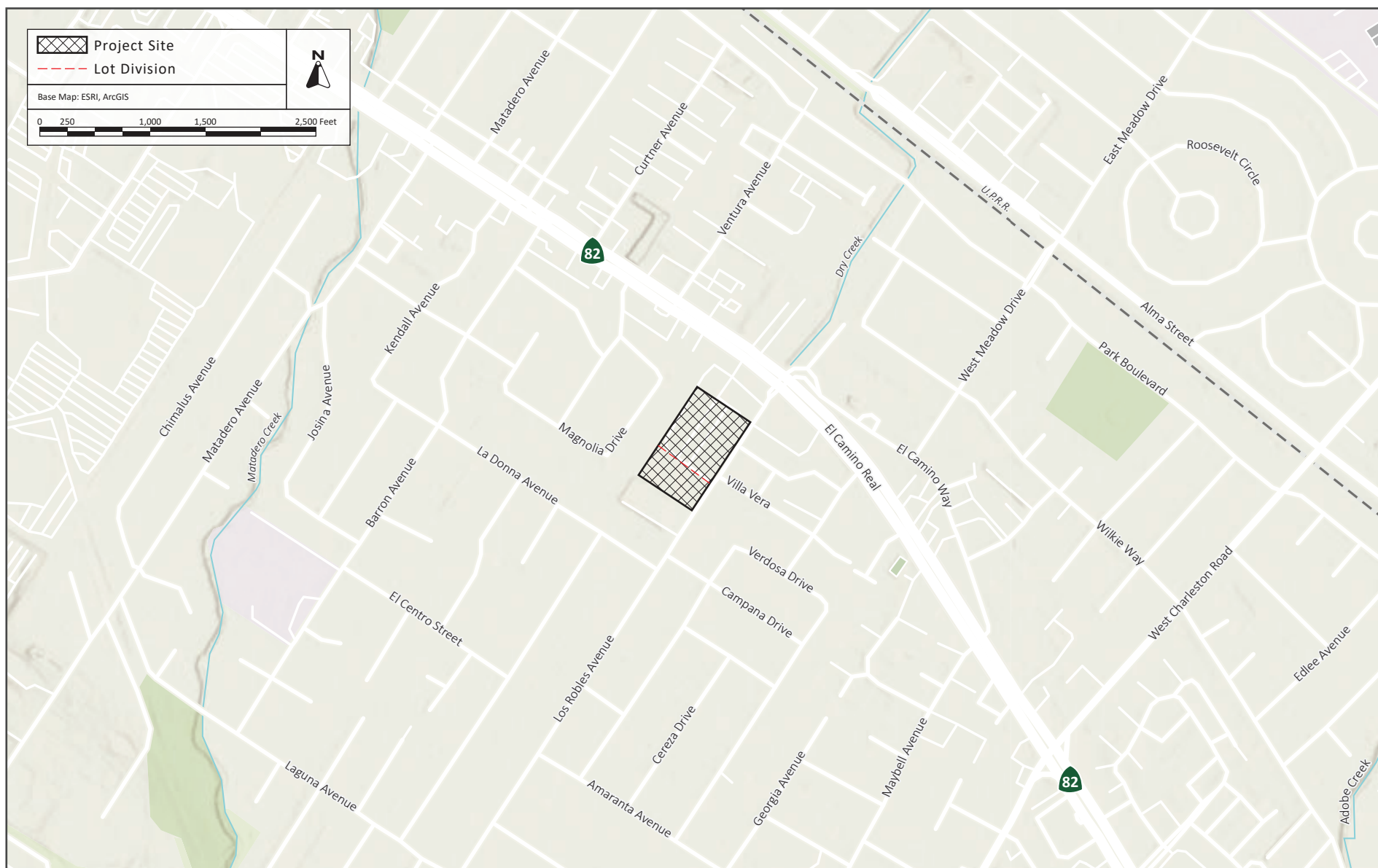
The project would provide 123 vehicle parking spaces. Of the 118 parking spaces, 79 would be for the apartment building and 44 would be for the mobile homes. The project would include 70 EV-ready spaces. The apartment building would include a bike storage room that would provide 63 long-term bike parking spaces. The project would also provide three outdoor bike racks near the southernmost driveway.

There is one driveway on Los Robles Avenue (across from Villa Vera Drive) that provides direct access to the site. There is another driveway on El Camino Real that provides emergency access to the site via connections to adjacent commercial uses and surface parking lots. Under the proposed project both the apartments and mobile home park would be accessed via two driveways on Los Robles Avenue. The existing Los Robles Avenue driveway would remain, and a new driveway would be added further east. Both driveways would be full access, providing both ingress and egress routes, and would feed into internal circulation routes that would connect the apartment and mobile home site.



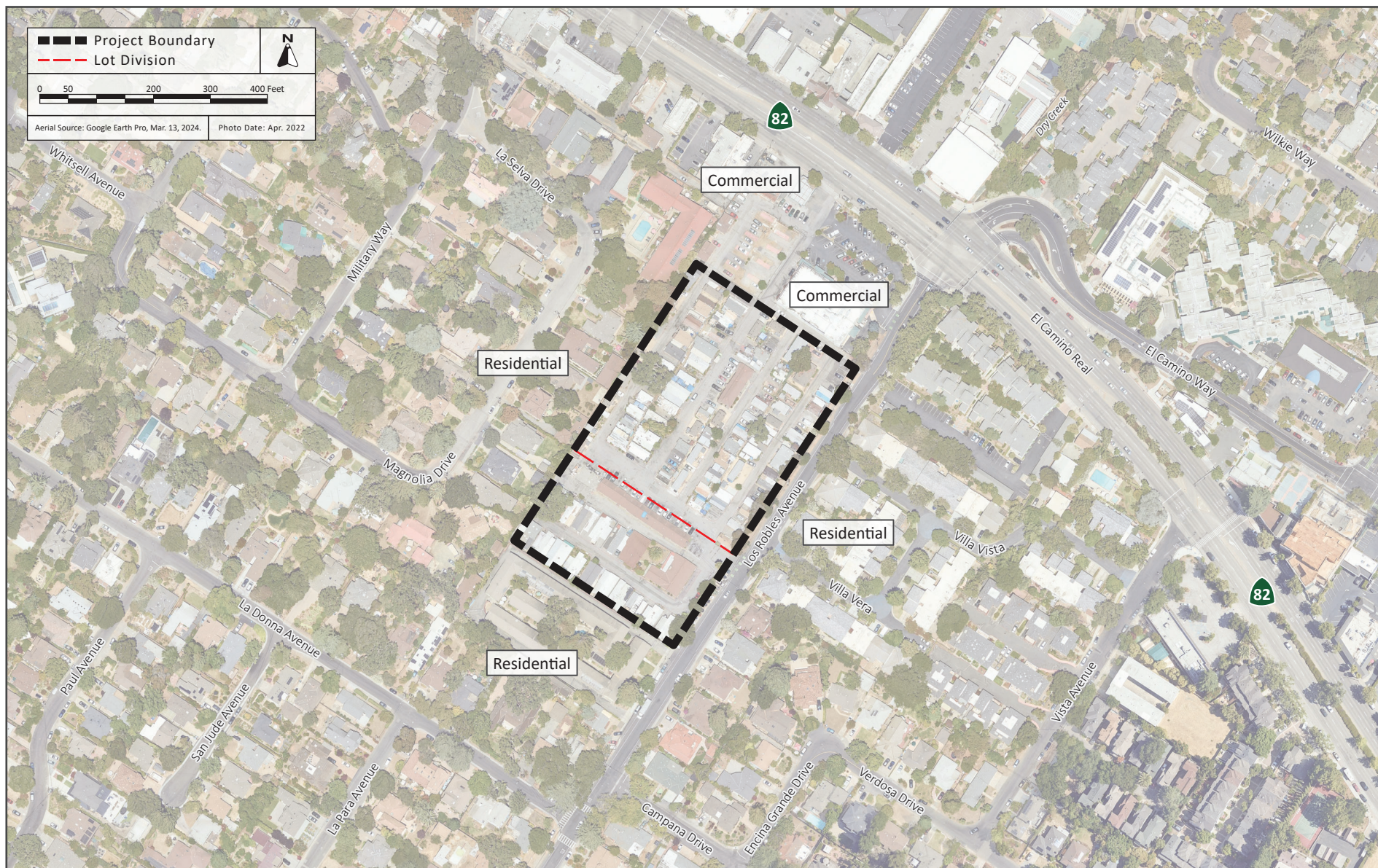
REGIONAL MAP

FIGURE 1



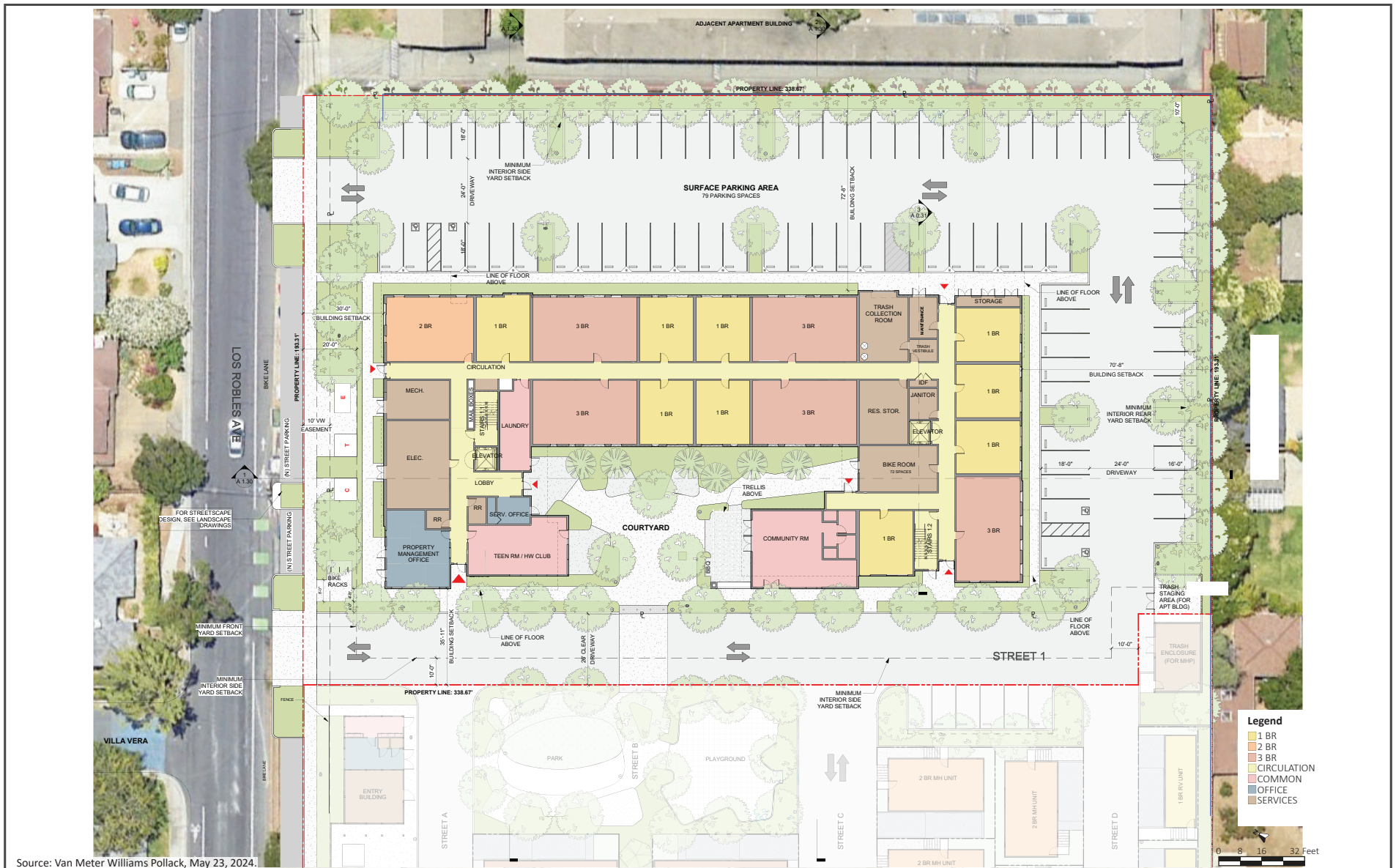
VICINITY MAP

FIGURE 2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3



CONCEPTUAL SITE PLAN

FIGURE 4



Source: Van Meter Williams Pollack, April 10, 2024.

PROJECT RENDERING

FIGURE 5

Landscaping and Stormwater Controls

The project would remove 44 existing trees (39 on-site and five off-site). Per the City's tree removal requirements, the applicant proposes to plant a total of 130 24-inch box replacement trees where 122 24-inch box trees would be required. Stormwater controls for the project include eight drainage areas that would use bioretention as a treatment control method. The bioretention areas would be dispersed throughout the site with two bordering the north of the site, three adjacent to the southern border of the site, and three in center of the site.

The proposed project would result in a reduction of impervious area by approximately 14 percent. Table 1 summarizes the impervious and pervious surfaces on-site under existing and project conditions.

Table 1: Existing and Proposed Impervious/Pervious Surfaces				
	Existing		Proposed	
	Square Footage	Percent of Site	Square Footage	Percent of Site
Impervious	186,732	94.9%	159,679	81.1%
Pervious	10,189	5.1%	37,242	18.9%
<i>Total</i>	<i>196,921</i>	<i>100%</i>	<i>196,921</i>	<i>100%</i>

The proposed improvements that would contribute to the decrease in impervious area include the addition of bioretention areas, landscaping, and rain gardens in several areas around the new buildings. These improvements would be constructed on portions of the project site that are currently paved areas.

Utility Improvements

Water, storm, and sanitary sewer services and electrical services would be provided by the City of Palo Alto. The project would install lateral connections to the existing water, sewer, and storm drain system in Los Robles Avenue. The project would install 12-inch storm drain lines, eight-inch sewer lines, and 12-inch water lines.

Construction

Construction of the project would be staggered, with the mobile home site beginning construction in February 2025 and the apartments beginning in May 2025. Construction is expected to last a total of 16 months. Construction phases of the project include demolition, site preparation, grading/excavation, trenching/foundation, building the exterior and interior, and paving. Equipment used during construction activities would include saws, excavators, dozers,

tractors/loaders/ backhoes, graders, cranes, forklifts, generator sets, welders, air compressors, ariel lifts cement/mortar mixers, pavers, and rollers. Excavation necessary for utility improvements would occur at an approximate maximum depth of 12 feet below the ground surface. The applicant proposes to utilize construction equipment with Tier 4 engines or equipment that meets U.S. EPA emission standards for Tier 3 engines and includes particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices for any equipment over 25 horsepower.

Consistent with Section 9.10.060 of the Palo Alto Municipal Code (PAMC), construction would take place between 8 a.m. to 6 p.m. on weekdays and 9 a.m. to 6 p.m. on Saturdays. Construction would be prohibited on Sundays and holidays.

Operation

The project would include roof-mounted heating, ventilation, and air conditioning (HVAC) equipment and heat pumps. In addition, the project would include green-building and energy-efficient measures such as cool roofs, electric vehicle (EV) charging, water-conserving faucets and toilets, hot water recirculation systems, and irrigation monitoring services. The proposed project (apartments and mobile homes) would be all electric and does not propose the use of gas.

Concessions and Waivers for Proposed Apartment Building

The applicant requests an 80 percent density bonus to allow for the construction of 61 units (where 34 would otherwise be allowed by existing designation and zoning) and proposes a floor area ratio (FAR) of 1.0 for the proposed apartment building. The density bonus request includes the following concessions and waivers from the development standards of the existing Comprehensive Plan designation and zoning district for this project.

Concessions:

- **Façade Breaks.** The minimum required façade breaks per PAMC 18.24.040(b)(2)(B) are four inches wide, two inches deep, and 32 square feet of area for every 36 to 40 feet of façade length. The applicant proposes smaller façade breaks, particularly where material changes occur; however, the applicant requests a deviation from the two-inch-deep requirement.
- **Ground Floor Unit Entry.** Per PAMC 18.24.040(b)(4)(E), a minimum of 80 percent of ground floor units facing public right-of-way/publicly accessible path/open space must have a unit entry with direct access to the sidewalk, path, or open space. The applicant proposes no ground floor unit entries.
- **Frontage Requirements.** Per PAMC 18.24.060(c)(7)(1), a maximum of 25 percent of the site's frontage facing a street can be devoted to garage openings, carports, surface parking. Loading entries, or utilities access. The applicant proposes 57.29 percent of the Los Robles street frontage to be devoted to parking, utilities, and driveway access.

- **Private Open Space.** The City requires a minimum of 50 square feet of private open space per dwelling unit. The applicant proposes no private open space.

Waivers:

- **Floor Area Ratio.** A floor area ratio of 1.0:1 is requested where 0.5:1 is allowed.
- **Building Height Limit.** The applicant requests an increase of 7.5 feet in the building height limit. The applicant proposes three stories, which would be 37.5 feet at the top of the parapet. The project is allowed a maximum height of 30 feet from the existing grade under the base zoning.
- **Landscape/Open Space Coverage.** The required landscape/open space coverage for the project is a minimum of 35 percent of the site area. The applicant proposes that 24.5 percent (18,073 square feet) of the apartment site area be covered by landscaping/open space.
- **Parking Facility Design – Tree Canopy Area.** The City requires a minimum of 50 percent of tree canopy area for surface parking. The applicant proposes to dedicate 47 percent (11,198 square feet) of parking lot surface area to tree canopy.
- **Street Trees.** Per PAMC 18.24.020(b)(2), one street tree is required for every 30 linear feet of sidewalk length and must be located within six feet of the sidewalk. As such, 19 street trees are required for the project. The applicant proposes six trees, approximately eight to nine feet behind the sidewalk. The waiver is necessary due to the Valley Water easement and an existing City of Palo Alto sewer line adjacent the Valley Water easement, which restricts trees along the frontage of the mobile home portion of the site.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the Buena Vista Redevelopment project is to improve the mobile home park and facilitate an increase in low-income units on-site. The project is consistent with the City's Comprehensive Plan goals of building communities and neighborhoods and meeting housing supply challenges.

Existing Conditions and Trends [24 CFR 58.40(a)]:

Regional Outlook

The Bay Area continues to be one of the most expensive real estate markets in the country. Bay Area residences can be unaffordable for individuals and families with average household incomes. In Santa Clara County, data from the California Employment Development Department (EDD) shows that while about one third of the County's workforce command high salaries in the range of approximately \$86,000 to \$144,000 per year, nearly half of all jobs pay low-income wages between \$19,000 and \$52,000 annually. Further, projections from EDD anticipate that more than half of the new jobs created in the County over the next few years would pay minimum wage. These working-class wages are not enough to pay for housing costs without creating a housing burden, defined as housing costs that exceed 30 percent of income. Low levels of housing production, relative to demand, contribute to this region's high housing costs. Further, the market has not produced housing that is naturally affordable to low-income households, and public resources for affordable housing have been significantly diminished in recent years. As such, both the existing and future need for affordable housing in Palo Alto is considerable and far exceeds available supply.

Local Perspective

According to the Santa Clara County Housing Needs Allocation, 2023 to 2031 (see Table 2 below) prepared by the Association of Bay Area Governments (ABAG), the City of Palo Alto should add 6,085 new units by 2031 (of which 1,556 should be very low, 896 should be low, and 1,031 should be moderate) in order to meet the needs for affordable housing.

Table 2: Santa Clara County Housing Needs Allocation, 2023-2031					
Jurisdiction	Very Low <50 Percent	Low < 80 Percent	Moderate <120 Percent	Above Moderate	Total
Campbell	752	434	499	1,292	2,977
Cupertino	1,193	687	755	1,953	4,588
Gilroy	669	385	200	519	1,773
Los Altos	501	288	326	843	1,958
Los Altos Hills	125	72	82	210	489
Los Gatos	537	310	320	826	1,993
Milpitas	1,685	970	1,131	2,927	6,713
Monte Sereno	53	30	31	79	193
Morgan Hill	262	151	174	450	1,037

Table 2: Santa Clara County Housing Needs Allocation, 2023-2031					
Jurisdiction	Very Low <50 Percent	Low < 80 Percent	Moderate <120 Percent	Above Moderate	Total
Mountain View	2,773	1,597	1,885	4,880	11,135
<i>Palo Alto</i>	<i>1,556</i>	<i>896</i>	<i>1,013</i>	<i>2,621</i>	<i>6,086</i>
San José	15,088	8,687	10,711	27,714	62,200
Santa Clara	2,872	1,653	1,981	5,126	11,632
Saratoga	454	261	278	719	1,712
Sunnyvale	2,968	1,709	2,032	5,257	11,966
Unincorporated	828	477	508	1,312	3,125
Santa Clara County Total	32,316	18,607	21,926	56,728	129,577
Source: Association of Bay Area Governments. <i>Regional Housing Needs Plan, San Francisco Bay Area 2023-2031</i> . November 2021. https://abag.ca.gov/sites/default/files/documents/2021-12/proposed%20Final_RHNA_Allocation_Report_2023-2031.pdf					

Physical Setting / Existing Conditions

The City of Palo Alto is located in the northwest portion of Santa Clara County. The County is located at the southern end of San Francisco Bay. Palo Alto is surrounded by East Palo Alto to the north, Menlo Park to the northwest, Stanford University to the west, Los Altos to the south, and San Francisco Bay to the east.

The 4.5-acre project site is located at 3980 El Camino Real in the City of Palo Alto. The project site is currently developed with a mobile home park containing 79 mobile homes and three accessory buildings including a laundry/shower building, a residence/office, and a shop building. As mentioned in the Description of the Project above, there is one driveway on Los Robles Avenue (across from Villa Vera Drive) that provides direct access to the site. Another access driveway on El Camino Real provides emergency ingress/egress to the parcel through an easement. The site contains a total of 53 trees. There are also 38 off-site trees (including five street trees) within the vicinity of the site as shown in the arborist report.¹

The project site is bordered by Los Robles Avenue to the east and commercial uses along El Camino Real to the north. Single family residential uses abut the site to the west and a multi-family use borders the project site to the south along Los Robles.

¹ The arborist survey is shown in the project plans (sheet L0.09).

Per the City of Palo Alto's Comprehensive Plan, the site is designated as Multifamily Residential which allows for multi-family residential uses. The allowable net density for Multifamily Residential ranges from eight to 40 units and eight to 90 persons per acre. The site is within the Multifamily Residential (RM-20) zoning district, which ranges from 11 to 20 dwelling units per acre (du/ac). The project requests an 80 percent density bonus and proposes an FAR of 1.0 for the proposed apartment building.

Funding Information

Grant Number	HUD Program	Funding Amount
Apartments		
Not Applicable	Moving to Work	\$28,017,864
Not Applicable	Section 8 Project Based Vouchers	\$20,485,249
Application Filed*	Preparation and Reinvestment Initiative funds	\$10,000,000
Mobile Home Park		
Not Applicable	Moving to Work	\$8,614,942
Not Applicable	Section 8 Rental Subsidy	\$2,000,000
Application Filed*	Preparation and Reinvestment Initiative funds	\$11,120,542

* The project has applied for Preparation and Reinvestment Initiative funds. If secured, these funds will be used to pay down the Moving to Work Commitment.

Estimated Total HUD Funded Amount: \$80,238,597

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$108,240,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D ²	Yes No ☐ ☒	The nearest civil airport is Palo Alto Airport, which is located approximately three miles (15,840 feet) northeast of the project site. Since the distance between the project site and Palo Alto Airport is greater than 2,500 feet, no additional information is required regarding the site's proximity to a civil airport. The project site is located approximately five miles (26,400 feet) west of Moffett Federal Airfield, which is a military airport operated by the National Aeronautics and Space Administration (NASA). The site also houses several National Guard units. The project site is not located within the airfield's Airport Influence Area (AIA) and is greater than 15,000 feet from the airport.³

² HUD Guidance regarding compliance with 24 CFR 51 D states that additional information is necessary if a project site is within 15,000 feet of a military airport or 2,500 feet of a civil airport.

Source: HUD Exchange. "Airport Hazards." Accessed March 2, 2024. Available at:

<https://www.hudexchange.info/programs/environmental-review/airport-hazards/#:~:text=If%20within%2015%2C000%20feet%20of,the%20airport%20operator%20stating%20so>

³ Santa Clara County Airport Land Use Commission. *Moffett Federal Airfield Comprehensive Land Use Plan*. November 18, 2016.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Therefore, the proposed project is not incompatible with nearby civil or military airports, and would comply with 24 CFR Part 51 Subpart D.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No ☐ ☒	Pursuant to the Statutes, Executive Orders, and Regulations listed in 24 CFR Section 58.5, there are no Coastal Barrier Resources Act (COBRA) buffer zones in California. Therefore, the project will not affect or be affected by any coastal barrier resources. ⁴
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] ⁵	Yes No ☐ ☒	According to Federal Emergency Management Agency (FEMA) flood map number 06085C0017H, the proposed project site is mapped as Zone X Area with Reduced Flood Risk due to Levee. The project site is not mapped in a special flood hazard area. ⁶
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air	Yes No ☒ ☐	An Air Quality Assessment was prepared by Illingworth & Rodkin, Inc. in May 2024 and is attached as Appendix A.

⁴ U.S. Fish & Wildlife Service. "Coastal Barrier Resources System Mapper". Accessed March 2, 2024. Available at: <https://fwsprimary.wim.usgs.gov/CBRMapper-v2/>.

⁵ Section 202 of the Flood Disaster Protection Act of 1973 (42 USC 4106) requires that projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program (NFIP).

⁶ Federal Emergency Management Agency. "FEMA Flood Map Service Center – Map Number 06085C0017H". Accessed March 2, 2024. Available at: <https://msc.fema.gov/portal/search?AddressQuery=1020%20terra%20bella%20ave%20mountain%20view%20ca#searchresultsanchor>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93		Santa Clara County is considered a non-attainment area for ground-level ozone (marginal) and particulate matter PM_{2.5} (moderate) under the Federal Clean Air Act. As established under the Clean Air Act, all actions must show General Conformity to ensure that said action does not conflict or interfere with a state's effort to achieve attainment of all the NAAQS. Federal actions must not cause or contribute to a new violation of NAAQS. The General Conformity rule has established De Minimis thresholds for nonattainment and maintenance areas. The following thresholds are applicable to Santa Clara County and the proposed project: • 100 tons per year for ozone (Reactive Organic Gases [ROG] and nitrous oxide [NO_x]) • 100 tons per year for PM_{2.5} In addition, air quality impacts are analyzed using the Bay Area Air Quality Management District's (BAAQMD's) CEQA Air Quality Guidelines, which are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. BAAQMD has more

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		stringent thresholds than those applied to Santa Clara County. The BAAQMD thresholds for construction and operational period emissions are: • 10 tons per year for ROG, NO_x, and PM_{2.5} exhaust • 15 tons per day for PM₁₀ <u>Construction Emissions</u> Construction activities associated with development of the project would result in short-term emissions from demolition, site grading, asphalt paving, building construction, and architectural coating. These emissions include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips. The dominant source of PM₁₀ and PM_{2.5} emissions would be fugitive dust generated by the disturbance of surface materials during construction activities. The use of off-road construction equipment and demolition and construction of buildings would also generate PM₁₀ and PM_{2.5} emissions. Construction period emissions for the project were analyzed in the technical air quality analysis conducted for the project (Appendix A). As noted in the Project Description, it is estimated that construction for the mobile homes would

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		start in February 2025 and construction for the apartments would start May 2025, with the total project built out over a period of 16 months (470 workdays). The resulting criteria pollutant emission for construction of both mobile homes and apartments during 2025 would be up to 0.47 tons per year of ROG, 2.04 tons per year of NO_x, and 0.07 tons per year of PM_{2.5} exhaust. For construction of the apartments during 2026, emissions would be up to 0.56 tons per year of ROG, 1.01 tons per year of NO_x, and 0.03 tons per year of PM_{2.5} exhaust. Construction emissions would be below the HUD de minimis thresholds and BAAQMD thresholds. For these reasons, the project's criteria air pollutant construction emissions would not result in a substantial contribution to regional air pollution. In addition, the project would implement condition of approval (COA) AIR-1.1, consistent with mitigation measure AIR-2a in the City's Comprehensive Plan, which requires the project to implement construction emission reduction measures that would reduce construction-related criteria air pollutant emissions further below the BAAQMD thresholds. <u>Operational Emissions</u> Operational emissions were analyzed in the technical air quality analysis conducted for the project (Appendix A). The analysis

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		found that resulting criteria pollutant emission from the operation of the project would be up to 0.78 tons per year of ROG, 0.21 tons per year of NOx, 0.50 tons per year of PM_{2.5}, and 0.13 tons per year of PM₁₀. The project would generate operational criteria pollutant emissions below the BAAQMD thresholds and the HUD de minimis thresholds. Based on this discussion, the project would not cause a violation of a federal ambient air quality standard or substantially contribute to criteria air pollutant emissions. Thus, the project would comply with the Federal Clean Air Act.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d) ⁷	Yes No ☐ ☒	California's coastal zone generally extends 1,000 yards inland from the mean high tide line. In significant coastal estuarine habitat and recreational areas, it extends inland to a maximum of five miles; in developed urban areas it generally extends inland less than 1,000 yards.⁸ The project site is approximately 16 miles east of the California coastline; therefore, it is not located in the coastal zone and would not involve development in the coastal

⁷ The Coastal Zone Management Program (CZMP) is authorized by the Coastal Zone Management Act (CZMA). Projects that can affect a coastal zone must be carried out in a manner consistent with the state CZMP under Section 307(c) and (d) of the CZMA.

⁸ California Coastal Commission. "Description of California's Coastal Management Program (CCMP)." Accessed March 2, 2024. Available at: https://www.coastal.ca.gov/fedcd/ccmp_description.pdf.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		zone. Thus, the project would comply with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2) ⁹	Yes No ☐ ☒	Several Phase I Environmental Site Assessments (ESAs) have been prepared for the site since 1991, with the most recent ESA dated September 2023. The Phase I ESA was prepared by Ninyo & Moore and is attached as Appendix B. <u>Project Site History</u> In the 1930s, the site was vacant, with the exception of a farm building on the southern portion of the site. By the late 1940s, the farm building was removed, and the site was developed with the Buena Vista Motel and a mobile home park with a bathroom/laundry building. In the early 1960s, two additional facility buildings (an office building and maintenance shop) and several mobile homes were added on the southern portion of the site. The site has not changed since the 1960s, with the exception of the Buena Vista Motel’s demolition in 2023. <u>On-Site Contamination</u> As part of the Phase I ESA, a regulatory database search was conducted to identify

⁹ As described in 24 CFR Part 50.3(i) and 24 CFR 58.5(i)(2), properties that would be used in HUD programs should be free of hazardous materials that could affect the health and safety of occupants and should have the previous uses on-site evaluated for potentially hazardous uses. These evaluations should be conducted by qualified professionals and particular attention should be paid to the sites within the general proximity of locations that contain hazardous wastes.

Source: Department of Housing and Urban Development. “Site Contamination.” Accessed March 2, 2024. Available at: <https://www.hudexchange.info/programs/environmental-review/site-contamination/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		any recognized environmental conditions (RECs). No RECs were identified in the historical review. Though not a REC, it is possible that asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs) are present based on the age of the buildings. The project would comply with COA HAZ-1.1 to reduce the potential for ACMs, LBP, and PCBs to be released into the environment and pose a risk to construction workers and nearby sensitive receptors. The project site has been listed on the two databases (U.S. EPA Enforcement and Compliance History Online and RCRA Non Generators/No Longer Required) for handling but not generating hazardous waste in 2023; and on the Hazardous Waste Tracking System database for having tracked hazardous waste on the site in 2018 and 2023. The database listings are not considered RECs because the incidents were remediated. <u>Off-Site Sources of Contamination</u> Land uses surrounding the project site include residential and commercial uses. The commercial uses to the north include a gas station, located approximately 180 feet from the project site. The gas station property is listed on several regulatory databases for having a leaking underground storage tank (LUST) on the property. In November 1984, total petroleum

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		hydrocarbons (TPH) as gasoline (TPHg) were detected at the property. In November 1987, six USTs were removed from the property. Based on groundwater sampling results in August 2004, the County of Santa Clara Environmental Resources Agency (CSCERA) issued a site closure letter for the property. In the letter, the CSCERA acknowledged that residual contamination was still present in the soil and groundwater beneath the gas station property. A comparison of the gas station's most recent sampling data to the 2019 Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) shows that no contaminants were found to exceed their applicable ESLs. Due to the distance from the project site, the project site's location upgradient of the gas station, and the age and closed status of the case, this is not considered a REC. As part of the Phase I ESA prepared for the Buena Vista Redevelopment project, Ninyo & Moore conducted a preliminary vapor encroachment screen to identify a vapor encroachment condition (VEC), defined as the presence or likely presence of chemicals of concern. The results show that VEC does not exist beneath the site. Based on the discussion above, the project would not result in adverse health effects to

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		construction workers and future occupants related to contamination and toxic substances.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No ☐ ☒	The project site is located in an urban area, surrounded by development, and is currently fully developed with mobile homes and surface parking areas with ornamental landscaping. Most of the site is covered by impervious surfaces, and the landscaped areas are comprised of shrubs and trees. According to the U.S. Fish and Wildlife Service, there are no critical habitat areas for threatened or endangered species on-site or in the vicinity of the project site.¹⁰ Additionally, there are no wetlands that could provide valuable habitat on or immediately adjacent to the project site that would be impacted by implementation of the project.¹¹ The nearest wetland is the riverine habitat along Barron Creek, located approximately 370 feet northeast of the project site on the opposite side of El Camino Real. Although an underground culvert containing Barron Creek is located within the first 10 feet of the property within a Valley Water easement, this underground, fully concretized culvert

¹⁰ U.S. Fish & Wildlife Service. “USFWS Threatened & Endangered Species Active Critical Habitat Report.” Accessed March 2, 2024. Available at: <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>.

¹¹ U.S. Fish & Wildlife Service. “National Wetlands Inventory.” Accessed March 2, 2024. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		does not contain any potential for special status species habitat. Based on this discussion, and the absence of critical habitat on the project site, the project would not impact any federally protected, threatened, or endangered species and would not adversely modify their critical habitats. Thus, the project would comply with the Endangered Species Act.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C ¹²	Yes No ☐ ☒	A HUD Explosives and Fire Hazards Review was prepared in March 2024 and is attached as Appendix C. The review included a visual survey of the area within approximately one mile of the project site and consultation with the Santa Clara County Environmental Health Department (SCCEHD). The review and survey were completed in accordance with 24 CFR Part 51 C. There are no explosive or flammable operations on the project site. Current hazardous materials and waste inventories were requested from SCCEHD for 64 businesses in project vicinity. Of these businesses, the survey determined that 37 businesses within one mile of the site reported storage of materials that warranted calculation of Acceptable Separation Distance (ASD). The project

¹² Per 24 CFR 51 C, stationary aboveground storage tanks must be located at a distance of at least one mile from the project site. If no storage tanks are found, then no further compliance or documentation pertaining to aboveground stationary storage tanks is necessary.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		site is not located within the ASDs of any of the identified businesses. ¹³ Thus, the project would comply with 24 CFR Part 51 Subpart C.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658 ¹⁴	Yes No ☐ ☒	The project site is developed and located in an urban area, surrounded by existing development. The California Department of Conservation has identified the project site and the surrounding area as Urban and Built-Up Land. ¹⁵ Therefore, the project would not result in the conversion of farmland to non-agricultural uses and would not be subject to the Farmland Protection Policy Act (FPPA).
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No ☐ ☒	Compliance with Executive Order 11988, Floodplain Management, is required if a project involves property acquisition, land management, construction, or improvement within a 100-year floodplain; or a “critical facility” such as a hospital or fire department within a 500-year floodplain. As discussed previously, according to FEMA flood map number 06085C0017H, the project site is located in Zone X Area with Reduced Flood Risk due to Levee, and

¹³ Running Moose Environmental Consulting, LLC. *HUD Explosive and Fire Hazards Review – Buena Vista Redevelopment*. March 25, 2024.

¹⁴ Federal projects are subject to FPPA requirements if they may irreversibly convert farmland to a nonagricultural use. According to 7 CFR 658.2(a), the FPPA does not apply to projects already in or committed to urban development, which includes lands identified as “urban/built-up” on the USDA Important Farmland Maps.

¹⁵ California Department of Conservation. “California Important Farmland Finder.” Accessed March 2, 2024. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		is not mapped in a special flood hazard area. Thus, the project complies with Executive Order 11988.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No ☒ ☐	A Cultural Resources Survey was completed by Archaeological/ Historical Consultants in June 2024. A copy of the Cultural Resources Survey Report, which contains confidential information related to archaeological resources, is on file with the City. <u>Historic Resources</u> The project site is not listed on the City’s Historic Inventory, California’s Historic Resources (CRHR) Inventory, or the National Register of Historic Places (NRHP).^{16,17} The site contains three buildings that are over 50 years old and 86 mobile homes with varying ages. The three buildings consist of a laundry/shower building, a residence/office, and a shop building. Approximately 36 of the 86 mobile homes date from before 1974. The evaluation determined that although the structures are more than 50 years old, they do not meet any of the relevant criteria to be considered a historic resource on local, state, or national registers. The adjoining

¹⁶ City of Palo Alto. *Master List of Structures on the Historic Inventory*. Accessed March 2, 2024. Available at: <https://www.cityofpaloalto.org/files/assets/public/v/1/planning-amp-development-services/historic-preservation/historic-inventory/city-historic-inventory-list.pdf>.

¹⁷ Office of Historic Preservation. “California Historical Resources.” Accessed March 2, 2024. Available at: <https://ohp.parks.ca.gov/ListedResources/?view=name&criteria=palo+alto>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		properties do not contain historic resources. Since no historic resources are present on-site, a finding of no historic properties affected as defined at 36 CFR 800.11(d) is appropriate for this undertaking. A request for review and historic resources determination was submitted to the State Historic Preservation Officer (SHPO) by the City of Palo Alto on June 11, 2024 for concurrence of finding of no historic properties affected. No objection was received within the review timeframe; therefore, it can be presumed that SHPO concurs with the finding of no historic properties on-site. <u>Archaeological Resources</u> As part of the Cultural Resources Survey, the archaeological sensitivity assessment determined that the project site has a low sensitivity for buried Native American archaeological resources and a low sensitivity for historic-era archaeological resources. There are no known archaeological resources on-site. Consistent with City requirements, the project would comply with COA CUL-1.1, which requires a work stoppage in the event that unrecorded resources are uncovered during construction activities until the resources can be identified and evaluated for historical significance. In addition, the project would implement

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		COA CUL-2.1, which requires work stoppage in the event that unrecorded human remains are uncovered during construction activities. Based on the above discussion, the project would comply with the National Historic Preservation Act.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No ☐ ☒	A Noise and Vibration Assessment was prepared by Illingworth & Rodkin, Inc. in May 2024 and is attached as Appendix D. The following HUD noise standards for new housing construction are applicable to this project: Interior: • Acceptable – 45 DNL or less Exterior: • Acceptable – 65 DNL or less. • Normally unacceptable – exceeding 65 DNL but not exceeding 75 DNL. • Unacceptable– Exceeding 75 DNL. Noise-sensitive recreational areas proposed by the project include a park and playground near the south end of the proposed mobile home park parcel, and common open space area on the north end of the apartment parcel. These recreational areas will be at least 90 feet from the centerline of Los Robles Avenue and 575

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		feet from the center of El Camino Real. The Noise and Vibration Assessment for the project determined that future exterior noise levels at the proposed recreational areas are calculated to be 59 dBA Ldn or less, meeting the City's normally acceptable threshold for multi-family residential uses and HUD's acceptable threshold of 65 dBA DNL or less. The Noise and Vibration Assessment found that residential units proposed within 90 feet of the centerline of Los Robles Avenue would be exposed to noise levels between 60 and 65 dBA Ldn. Exterior noise levels at residential units throughout the remainder of the site would be less than 60 dBA Ldn. To meet the interior noise requirements set forth by the State of California, City of Palo Alto, and HUD, a suitable form of forced-air mechanical ventilation, as determined by the local building official, shall be provided to residential units within 90 feet of the centerline of Los Robles Avenue so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards. Based on this discussion, the exterior and interior noise levels of the proposed project would meet HUD's acceptable noise levels standards. Thus, the project would comply with the Noise Control Act.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No ☐ ☒	According to the Safe Drinking Water Act, an underground source of drinking water is defined as an aquifer¹⁸ that supplies a public water system, or contains and currently supplies a sufficient quantity of groundwater for public consumption that contains fewer than 10,000 milligrams per liter (mg/L) of total dissolved solids. Per section 1424(e) of the Safe Drinking Water Act, the EPA can designate an aquifer for special protection if it is the sole drinking water resource for an area, and if its contamination would create a significant hazard to public health. The nearest sole source aquifer is the Santa Margarita Aquifer in Scotts Valley, located approximately 35 miles south.¹⁹ Since the project site is not located on a sole source aquifer, or within a watershed area of a sole source aquifer, the project would not result in impacts to drinking water from sole source aquifers, and would comply with the Safe Drinking Water Act.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5²⁰	Yes No ☐ ☒	According to the U.S. Fish and Wildlife’s National Wetlands Inventory, there are no wetlands on-site or adjacent to the project

¹⁸ An aquifer is an underground body of rock that contains or can transmit groundwater.

¹⁹ U.S. Environmental Protection Agency. “Sole Source Aquifers Web Viewer.” Accessed March 2, 2024. Available at: <https://catalog.data.gov/dataset/epa-sole-source-aquifers>.

²⁰ Section 2 of Executive Order 11990 limits agencies from undertaking or providing assistance for new construction in wetlands unless they can show that there are no viable alternatives or that the proposed project includes all

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		area. ²¹ The nearest wetland is the riverine habitat along Barron Creek, located approximately 370 feet northeast of the project site. Barron Creek is separated from the site by existing development and El Camino Real. Thus, the project would not result in impacts to wetlands and would comply with Executive Order (EO) 11990.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No ☐ ☒	There are no national wild and scenic rivers or river segments in the project vicinity. The nearest designated wild and scenic river segment is the Big Sur River, which is located approximately 110 miles south of the project site. ²² Thus, the project would not result in impacts to wild and scenic rivers and would comply with the Wild and Scenic Rivers Act.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No ☐ ☒	The project site is located within Blockgroup 060855106002 of the EPA’s Region 9. According to the EPA’s Environmental Justice Screening and Mapping Tool (EJSCREEN), the project site is not in an area that has a disproportionate concentration of low-income or minority populations. Using the

practical measures to limit harm to the wetlands. Section 5 of Executive Order 11990 lists the factors that must be evaluated for projects proposing constructions in wetlands.

²¹ U.S. Fish and Wildlife Service. “National Wetlands Inventory.” Accessed March 2, 2024. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

²² National Wild and Scenic Rivers System. “California.” Accessed March 2, 2024. Available at: <https://www.rivers.gov/rivers/big-sur.php>.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		EJSCREEN tool, the project site is an area that is 57 percent minority and 25 percent low income, and is at the 43rd and 52nd national percentile, respectively. The area’s 57 percent minority population is higher than the national average of 39 percent but lower than the state average of 61 percent. In addition, 25 percent of the population in this area qualify as low income, which is below the regional, state, and national averages (all of which are 31 percent). For these reasons, any potential impacts would not be disproportionately high for minority or low-income residents since the percentages of minority and low-income residents are lower than regional and state averages. The query completed using the EJSCREEN tool showed that residents in this blockgroup are exposed to levels of pollutants that are primarily in-line or below state and regional averages for All People’s Block Groups.²³ Therefore, this project would comply with EO 12898.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in

²³ U.S. Environmental Protection Agency. “Environmental Justice Screening and Mapping Tool.” Accessed March 2, 2024. Available at: <https://ejscreen.epa.gov/mapper/>.

proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	<u>Climate Change Impacts on Project</u> Climate change has the potential to increase the frequency and severity of natural hazards including wildfires and flooding. As discussed previously, the project site is not located in a special flood hazard area. In addition, the site is not located in a moderate, high, or very high fire hazard severity area in either the State or Local Responsibility Areas.²⁴ In 2022, the City completed a Sea Level Rise Vulnerability Assessment, which documents potential sea level rise hazards to the City from increments of sea level rise between 12 and 84 inches. The study identified key sea level rise vulnerabilities (i.e., portions of the City that would be adversely affected by flooding, storm tides, and emergent groundwater) and identified infrastructure projects that would protect development in the City from climate change induced sea level rise. The study identified portions of the City that would be vulnerable to inundation caused by sea level rise without the implementation of the recommended infrastructure

²⁴ California Department of Forestry and Fire Protection. "Fire Hazard Severity Zones Viewer." Accessed March 2, 2024. Available at: <https://egis.fire.ca.gov/FHSZ/>.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		improvements. The project site was not among the identified assets that would be vulnerable to climate change induced sea level rise.²⁵ Based on this discussion, climate change would not have significant adverse impacts on the proposed development. <u>Greenhouse Gas Emissions</u> The jurisdictions in the San Francisco Bay Area Air Basin (which encompasses Palo Alto) utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures. The BAAQMD CEQA Air Quality Guidelines also include thresholds of significance for GHG emissions. For land use projects, BAAQMD developed plan- and project-level thresholds that evaluate the significance of operational GHG emissions based on its effect on the State's efforts to meet the identified long-term climate goals. Projects that comply with an adopted GHG Reduction Strategy are considered to have less than significant GHG impacts. Projects that do not comply with an adopted GHG Reduction Strategy must demonstrate the following: a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b) 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. c) Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average

²⁵ City of Palo Alto. *Sea Level Rise Vulnerability Assessment*. June 2022.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		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. d) Achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2. The City's 2022 Sustainability and Climate Action Plan (S/CAP) sets quantifiable emission reduction goals. The S/CAP's goal is to reduce GHG emissions 80 percent below 1990 levels by 2030. The City aims to reduce GHG emissions from the direct use of natural gas in the City's building sector by at least 60 percent below 1990 levels, and reduce GHG emissions from transportation at least 65 percent below 1990 levels. The S/CAP also aims to reduce VMT 12 percent below a 2019 baseline by 2030. The proposed project is estimated to generate a total of approximately 708 metric tons of carbon dioxide equivalent (MTCO₂e) of GHG emissions during construction. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction related GHG emissions. However, the project would implement BAAQMD construction best management practices (BMPs) to restrict idling of construction equipment and utilize energy-efficient equipment (COA AIR-1.1), which would in turn reduce GHG emissions. During operation, the proposed project is estimated to generate a total of approximately 495 MTCO₂e annually. As discussed in the project description, the project would include green-building and energy-efficient measures including cool roofs, EV charging, water-conserving

Environmental Assessment Factor	Impact Code	Impact Evaluation
		faucets and toilets, hot water recirculation systems, and irrigation monitoring services. The proposed project (apartments and mobile homes) would be all electric and does not propose the use of natural gas. The project includes bicycle parking, is served by public transit and bicycle facilities that would promote alternative modes of transportation, and would plant 130 new trees which would provide shade. For this impact to be considered less than significant, the project must meet the project design elements listed above. The project would satisfy requirement (a) because it proposes all-electric uses and would not include natural gas, requirement (b) because it would meet the CALGreen Building Standards Code requirements for energy efficiency, requirement (c) because it would include EV-ready parking spaces, and requirement (d) because the project would generate less traffic than existing conditions, as apartments generate fewer trips than mobile homes per unit.
Energy Efficiency	2	As discussed in the project description and above, the project would be all-electric and would include green-building and energy-efficient measures including cool roofs, EV charging, water-conserving faucets and toilets, hot water recirculation systems, and irrigation monitoring services. Further, the project site is located in an area of the City that is developed with existing shopping and employment centers, allowing residents to easily access services. The nearest bus stop to the project site is located approximately 250 feet north at El Camino Real and Los Robles Avenue. The stop serves VTA bus route 22 (Palo Alto Transit Center to Eastridge Transit Center). The project site is located 1.3 miles south of the California Avenue Caltrain Station and 1.3 miles north of the San Antonio Caltrain Station. As of March 2023, Palo Alto Link provides ride share shuttle service within city limits. Standard fares are \$3.50 per person per trip; discounted

Environmental Assessment Factor	Impact Code	Impact Evaluation
		student, senior, disabled, and low-income fares are \$1.00 per person per trip. Based on this discussion, the project would be designed in an energy efficient manner. In addition, the proximity of the project site to existing shopping and employment centers and accessibility to transit and community shuttle services offers essential services near the project site.
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<u>Comprehensive Plan</u> The Comprehensive Plan land use designation for the project site is multi-family residential. The multi-family residential land use allows densities ranging from 8 to 40 dwelling units. The proposed project is a multi-family development and would provide 36 dwelling units per acre on the apartment building parcel (61 units on a 1.69 acre lot) and 15 dwelling units per acre for the remaining mobile home parcel (44 units on a 2.81 acre lot). Therefore, the proposed development on each respective parcel would be consistent with the land use designation for both use and allowed densities. The site is located within the RM-30 zone district. Multi-family uses are permitted within this district at densities ranging from 16 to 30 dwelling units per acre. The project proposes a density bonus including concessions and waivers for building height, FAR, landscape/open space coverage, and private open space, as well as five waivers or concessions to specific aspects of the design, as summarized in the project description. In accordance with state density bonus law, concessions and waivers granted under the state density bonus law are considered to be consistent with the Municipal Code. Therefore, with approval of the proposed waivers and concessions, the project would be considered consistent with the City's Comprehensive Plan policies and zoning requirements.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<u>Scale and Urban Design</u> The project would replace the existing mobile homes on-site with new mobile homes with utility upgrades and construct a new three-story apartment building. The project would remove 44 existing trees on and immediately adjacent the site, and plant 130 replacement trees in areas surrounding the mobile homes, apartment, and throughout the parking lot. In addition to the replacement trees, the project would include eight drainage areas that would use bioretention as a treatment control method. The scale and design of the mobile home portion of the site would be similar to the existing conditions on-site. The three-story apartment building would be compatible with the existing neighborhood character that includes one- and two-story single-family houses and apartments.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<u>Soil Suitability</u> The project site is located in the San Francisco Bay Area, which is a seismically active region. The faults in this region are capable of generating earthquakes of magnitude 7.0 or higher. Major active faults in the area include San Andreas fault (approximately 3.5 miles to the west); the Monte Vista-Shannon (2.5 miles southwest), the San Andreas (5.8 miles southwest), and the Hayward (approximately 12.5 miles to the east). The site is not located in a State Earthquake Fault Zone or a County Fault Rupture Hazard Zone; however, it is located adjacent to a County Liquefaction Hazard Zone.²⁶ Liquefaction is a temporary loss of shear strength as a result of increased pore pressure due to strong ground shaking or cyclic loading. Liquefaction is defined by saturation of soil and loss of cohesion. It is associated with loose, high-plasticity soils and near-surface groundwater levels. Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-

²⁶ County of Santa Clara. "Geologic Hazard Zones." Accessed March 2, 2024. Available at: <https://sccplanning.maps.arcgis.com/apps/webappviewer/index.html?id=5ef8100336234fbdafc5769494cfe373>.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		lying soil toward an open or “free” face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures. A Geotechnical Investigation was prepared for the project site in May 2023 by Rockridge Geotechnical and is attached as Appendix E. The Geotechnical Investigation concluded that the soils at depths ranging from 10 to 42 feet below the ground surface (bgs) are potentially liquefiable based on their plasticity index scores. The potentially liquefiable layers are generally less than three feet thick. Due to the variability of thickness and lateral extent of the potentially liquefiable soil layers, the potential for surface manifestations resulting from soil liquefaction such as sand boils or a loss of load bearing potential at the project site is low. The project would be built in compliance with the California Building Code (CBC), which would reduce any potential adverse effects related to liquefaction on-site. <u>Slope</u> Construction of the project would not impact slope stability in the area. The project site is not located on a hillside. The project is proposed on a flat site and the topography of the site area is generally flat as well. <u>Erosion/Drainage/Stormwater Runoff</u> As the project site is 4.5 acres in size, the project would disturb over one acre of ground surface; therefore, the project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities. Projects in Palo Alto are also required to comply with the City’s Grading and Drainage Guidelines for Residential Developments. Compliance with the state regulations,

Environmental Assessment Factor	Impact Code	Impact Evaluation
		as reinforced by the City’s municipal code, would ensure that impacts to water would remain less than significant. A temporary encroachment permit from Valley Water would be required for any construction work within their easement to ensure that work would not impact the culvert. The project site is connected to an existing stormwater drainage system managed and maintained by the city of Palo Alto. Currently, the project site is almost entirely covered in impervious paving. The project would replace the impervious surface with new impervious paving, landscaping, and new buildings. The total impervious surface area on-site is currently 186,732 square feet and would decrease by 27,053 square feet to a total of 159,679 square feet under the proposed project. Pursuant to PAMC Chapter 16.11, the project is considered a “significant redevelopment project” because it would result in the replacement of 10,000 square feet or more of impervious surface. Significant redevelopment projects must treat, either through capture, flow-through filtration, or a combination of capture and flow-through filtration, the volume of stormwater specified in the PAMC. The project would include stormwater bioretention areas in various locations across the project site. The bioretention area would capture and filter runoff before entering the storm drain system, thereby removing pollutants and reducing the rate and volume of stormwater flow. The proposed square footage of bioretention area would exceed City of Palo Alto requirements and the total impervious area of the site would be reduced. Therefore, the proposed project would not increase runoff from the site. Through inclusion of LID stormwater treatment, and compliance with the City’s regulatory policies pertaining to stormwater runoff, operation of the proposed project would not result in a significant effect to water quality.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Stormwater leaving the project site would enter the City's existing stormwater conveyance system via storm drains on-site. Impervious surface that would result from the construction of the proposed project would not create or contribute runoff that would exceed the capacity of the existing stormwater conveyance infrastructure or otherwise result in flooding on or near the project site. In addition, the project would adhere to all Bay Area Municipal Regional Stormwater Permit requirements and comply with specifications regarding installation and maintenance for C.3 features as described in the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Handbook. Because the project would not increase stormwater runoff and would comply with City requirements to control and filter runoff, development of the proposed project would not degrade the quality of stormwater runoff from the site. Based on the above discussion, there would be no significant, adverse effects to soil stability and drainage systems resulting from the project.
Hazards and Nuisances including Site Safety and Noise	3	<u>Natural Hazards</u> As discussed in the Soil Suitability section, the project site is located in the San Francisco Bay Area, which is a seismically active region. The site is not located in a State Earthquake Fault Zone, County Fault Rupture Hazard Zone, or a Landslide Hazard Zone; however, the site is located adjacent a County Liquefaction Hazard Zone. The Geotechnical Investigation (Appendix E) concluded that the soils at depths ranging from 10 to 42 feet bgs are potentially liquefiable, but that there is a low likelihood of surface manifestations resulting from soil liquefaction. Based on FEMA flood maps, the proposed project site is not located in a special flood hazard area. It is located in

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Zone X, which is an area with reduced flood risk due to a levee. The project site is in a highly developed urban area and is not located within a moderate, high, or very high fire hazard severity area in either the State or Local Responsibility Areas. Thus, the project would not be subject to liquefaction, flooding, or wildfires. <u>Man-Made Site Hazards</u> The proposed development would include the on-site use and storage of cleaning supplies and maintenance chemicals in small quantities (oil, paint, pesticides, etc.) typical of residential developments. Residents and staff would be responsible for the safe use and disposal of any hazardous materials on-site. Compliance with existing laws and regulations would ensure that the routine transport, storage, use, and disposal of these limited amounts of materials would not result in any adverse effects to the residents on-site or the surrounding environment. <u>Nuisance: Construction Noise</u> As discussed in the project description, construction of the entire project would take approximately 16 months, with construction of the mobile home and apartments staggered. Project construction would include demolition, site preparation, grading, trenching, building construction, architectural coating, paving, and landscaping. During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary by phase and vary within phases, based on the amount of equipment in operation and the location at which the equipment is operating. Pile driving is not proposed during any phase of project construction. The nearest sensitive receptors to the project site are the residences located northwest of the mobile home site and

Environmental Assessment Factor	Impact Code	Impact Evaluation
		the apartment residences located adjacent and southwest of the apartment site. Per Section 9.10.060(b) of the PAMC, construction activities are permitted between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday and between 9:00 a.m. and 6:00 p.m. on Saturdays provided that no individual piece of equipment produces a noise level exceeding 110 dBA at a distance of 25 feet or noise levels of 110 dBA are exceeded anywhere outside the property plane. If the equipment is housed in a structure, the 110 dBA would be enforced at a distance of 25 feet from the structure. All construction activities are prohibited on Sundays and holidays. The Federal Highway Administration's Roadway Construction Noise Model was used to calculate the hourly average noise levels for each stage of construction, assuming every piece of equipment (per phase) would operate simultaneously, which would represent the worst-case scenario. The analysis also looked at maximum noise levels of individual pieces of equipment at closer distances. Construction noise levels would range from 59 to 81 dBA Leq at nearby sensitive receptors and would comply with the City's threshold of 110 dBA at 25 feet during daytime hours on typical construction days (see Appendix D) and would comply with the City's threshold of 110 dBA at 25 feet during daytime hours on typical construction days. Based on this discussion, there would be no significant adverse impacts from short-term construction noise. <u>Nuisance: Construction Vibration</u> Construction of the project may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used in the vicinity of nearby sensitive land uses. The City of Palo Alto refers to California Department of Transportation recommendations for vibration limits. California

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Department of Transportation recommends a vibration limit of 0.5 inches per second (in/sec) peak particle velocity (PPV) for new residential and modern commercial/industrial structures, 0.3 in/sec PPV for older residential structures, and a limit of 0.25 in/sec PPV for historic and some old buildings. The 0.3 in/sec PPV vibration limit would be applicable to properties in the immediate vicinity of the project site. Based on typical vibration levels generated by construction equipment, the vibration levels from project construction were estimated from the boundary of the project site, which would represent the nearest location for use of vibration generating equipment, at the nearest building façades (refer to Appendix D for more information on the methodology used to calculate vibration levels). The nearest buildings constructed of conventional materials would be the existing residential building near the north corner of the site (3898 Magnolia Drive) and the existing commercial building near the northeast boundary of the site (3990 El Camino Real). Both buildings are approximately 15 feet from the shared boundary, and construction vibration levels at the nearest building façades would be at or below 0.4 in/sec PPV when vibratory rollers are used near the boundary line. The residential building near the southwest property line is approximately 20 feet from the shared boundary, and construction vibration levels at the building façade would be at or below 0.3 in/sec PPV when vibratory rollers are used near the boundary line. Other nearby buildings are approximately 40 to 50 feet from the shared northwest boundary. No minor or major damage would be expected at the buildings immediately adjoining the project site. However, as calculated by I&R, maximum vibration levels of 0.3 in/sec PPV or lower would result in no measurable damage, while maximum vibration levels of 0.4 in/sec PPV would result in a four percent chance of cosmetic damage. The applicant, in coordination with the

Environmental Assessment Factor	Impact Code	Impact Evaluation
		construction contractor, has confirmed that adjacent the property line, alternative equipment can be utilized to reduce vibrations. This includes the use of a smaller vibratory roller and/or the use of a walk-behind compaction equipment. The project would comply with the requirements set forth in the Comprehensive Plan Environmental Impact Report (EIR) and reflected in Policy N6.1.11 of the Comprehensive Plan, as reinforced in the project's conditions of approval, to prepare a vibration mitigation plan to ensure that the project would not exceed construction-related vibration thresholds and would, therefore, not result in adverse vibration effects. <u>Nuisance: Operational Noise</u> As mentioned previously, the project would result in fewer vehicle trips than existing conditions, as apartments generate fewer trips than mobile homes per unit. This decrease in vehicle trip generation would not cause any measurable change to the ambient noise environment resulting from local traffic. The primary sources of mechanical equipment noise associated with the project would be the HVAC units proposed on the roof of the apartment building. The units would be shielded from adjacent receptors by a 42-inch parapet wall. Per Section 9.10.040 of the PAMC, noise generated at the project site shall not exceed ambient levels at residential properties by more than six dBA. From the results of I&R's noise monitoring survey, receptors near the southwest portion of the site would have the lowest ambient noise environment. These same receptors would be subject to the highest noise levels from rooftop equipment, given the proposed concentration of rooftop equipment. Ambient noise levels at receptors to the southwest range from 40 to 48 dBA (or 44 dBA average). I&R conservatively calculated HVAC noise levels at nearby receptors assuming the simultaneous operation of up to 25 percent of the nearby units located on the roof of the building, assuming a sound power level of 76 dBA. The results indicated that worst-case operational noise

Environmental Assessment Factor	Impact Code	Impact Evaluation
		levels from project-generated mechanical equipment could reach 46 dBA at the residences immediately southwest of the project site. Thus, operational noise levels associated with the project would comply with the PAMC noise limits and would not substantially increase ambient noise levels in the site vicinity. Therefore, the project would not result in adverse noise effects to the nearby receptors.
SOCIOECONOMIC		
Employment and Income Patterns	2	According to data from the 2020 Census, Palo Alto's population is 68,572, a 6.5 percent increase from 2010.²⁷ The average number of persons per household in the City is 2.49.²⁸ According to the 2016–2020 American Community Survey (ACS), the civilian labor force in Palo Alto includes approximately 34,351 residents aged 16 and older. Of these, approximately 1,149 are unemployed, resulting in an unemployment rate of 2.1 percent.²⁹ Most of the employed residents are in the professional, scientific, and management industries; educational services and healthcare industries; and manufacturing.³⁰ According to U.S. Census Bureau data, the median household income for the City of Palo Alto is \$174,003. Approximately 3.3 percent of households earned less than \$10,000, 2.7 percent between \$10,000 and \$14,999, 4.0 percent between \$15,000 and \$24,999, 2.7 percent between \$25,000 and \$34,999, 4.3 percent between \$35,000 and \$49,999, 8.5 percent between \$50,000 and \$74,999, 5.5 percent between \$75,000 and \$99,999, 12.9 percent between \$100,000 and \$149,999, 10.6 percent

²⁷ U.S. Census Bureau. "QuickFacts – Palo Alto CA." Accessed May 31, 2024. Available at: <https://www.census.gov/quickfacts/fact/table/paloaltocalifornia/PST045223>.

²⁸ State of California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024." Accessed May 28, 2024.

²⁹ U.S. Census Bureau. "DP03: Selected Economic Characteristics." Accessed May 31, 2024. Available at: <https://data.census.gov/table/ACSDP5Y2020.DP03?t=Employment%20and%20Labor%20Force%20Status&g=160XX00US0655282>

³⁰ Ibid.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		between \$150,000 and \$199,999, and 45.6 percent \$200,000 or more.³¹ The project site is currently developed with a mobile home park. Since the project would continue to serve as a mobile home park with a new apartment complex, the project would not result in the loss of any jobs. Any on-site property managers would continue working on-site. The project would also generate temporary jobs in construction during both phases of development. Based on this discussion, the project itself would not create any significant, adverse effects to employment and income patterns as no jobs would be lost. In addition, the project would increase the availability of affordable housing for the residents of Palo Alto, where such housing is in high demand.
Demographic Character Changes, Displacement	2	The site currently contains 79 mobile homes. The project would replace 44 mobile homes with new mobile homes, and would replace the remaining mobile homes with an apartment building containing 61 units. Based on a persons per household rate of 2.49, the existing site contains 197 residents and the proposed project would generate 262 residents, resulting in a net increase of 65 residents.³² As the project would improve mobile homes and increase the number of affordable housing units on-site, the project would not displace any existing residents or result in demographic changes.
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<u>Educational Facilities</u> All public schools in Palo Alto are operated by the Palo Alto Unified School District (PAUSD). Students in the project area attend Barron Park Elementary School,

³¹ Ibid.

³² State of California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024." Accessed May 28, 2024.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Ellen Fletcher Middle School, and Henry M. Gunn High School.³³ During the 2022-2023 school year, Barron Park Elementary School had an enrollment of 211 students, Ellen Fletcher Middle School had 515 students, and Henry M. Gunn High School had 1,787 students.³⁴ The schools have remaining capacities of 320, 775, and 2,300 respectively.³⁵ The project would result in a net increase of approximately 65 residents on-site. Additionally, the project would be subject to the City’s school impact fees for multifamily residential projects.³⁶ Therefore, local school districts would have capacity to accommodate new students generated by the project. <u>Cultural Facilities</u> Cultural facilities within the City of Palo Alto include the Mitchell Park Branch Library located 1.3 miles northwest of the site, Downtown Branch Library located 3.1 miles northeast, Palo Alto Art Center located 3.2 miles northeast, and Cubberley Community Center 1.8 miles northwest. The Mitchell Park and Downtown Branch Libraries were renovated in 2014 and 2011, respectively.³⁷ The Comprehensive Plan determined that future development proposed under the plan would be adequately served by existing facilities. While the project includes a request for a density bonus to develop beyond what was assumed in the Comprehensive Plan, the 65 net new residents would be a minor increase over the Plan’s assumptions. Additionally, the project would be subject to the City’s library and community center impact fees for multifamily residential projects.³⁸ Thus, the use of the above public services by future residents would not be substantial enough to warrant modification

³³ Palo Alto Unified School District. “School Finder”. Accessed May 29, 2024.

<https://locator.pea.powerschool.com/?StudyID=171992>

³⁴ California Department of Education. “Data Quest”. Accessed November 1, 2023. <https://dq.cde.ca.gov/dataquest/>

³⁵ Personal Communication. Eric Holm, Palo Alto Unified School District. July 17, 2024.

³⁶ City of Palo Alto. *Fiscal Year 2024 Adopted Municipal Fee Schedule*. June 2023.

³⁷ City of Palo Alto. *Comprehensive Plan 2030*. Adopted November 13, 2017. Amended June 2021.

³⁸ City of Palo Alto. *Fiscal Year 2024 Adopted Municipal Fee Schedule*. June 2023.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		of existing or construction of new public service facilities.
Commercial Facilities	2	The proposed project would replace existing mobile homes and construct an apartment building. No commercial uses are present on-site; therefore, none would be displaced by the proposed project. There are several commercial facilities within one half mile of the project site, including multiple restaurants and convenience stores. The nearest grocery store and shopping center is approximately 0.5 miles north of the project site. Based on this discussion, there are existing commercial services that are adequately accessible from the project site and no adverse effects on other commercial facilities would result from project implementation.
Health Care and Social Services	2	There are several major health care centers in the City that are proximate to the project site. These include the Palo Alto Veterans Affairs (VA) Medical Center approximately 1.8 miles south of the site and Stanford Medicine two miles southeast. The Palo Alto Fire Department (PAFD) also provides emergency medical services. There are also social services in the City that are proximate to the project site, such as the Human Services Administration located two miles northwest at 4000 Middlefield Road. While there would be increased demand placed on the hospitals, PAFD, and social services facility from the addition of 65 new residents, the project site is already developed and is within the hospital and PAFD service areas. The project would not substantially increase the number of residents in the area and would be subject to the City's public safety facilities impact fee, which would benefit the PAFD.³⁹ Therefore, the project would

³⁹ City of Palo Alto. *Fiscal Year 2024 Adopted Municipal Fee Schedule*. June 2023.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		not substantially increase the need for additional medical services in the City.
Solid Waste Disposal/Recycling	2	During project construction, construction debris (include building materials, pavement, organic materials from the existing landscaping) would be hauled off-site and would be handled in accordance with state and local regulations, including CALGreen construction waste management requirements, which require a minimum 65 percent waste diversion of building materials from landfills.⁴⁰ Solid waste collected in the City is transported to the Sunnyvale Materials Recovery and Transfer Station (SMaRT Station®). The SMaRT Station currently serves the cities of Palo Alto, Mountain View, and Sunnyvale. In 2023, the SMaRT Station processed an average peak tonnage of 771 tons of materials, with a permitted peak capacity of 1,500 tons of material per day.⁴¹ The SMaRT Station receives municipal solid waste, recyclables, and yard trimmings. The SMaRT Station diverts approximately 50 percent of the materials delivered from being landfilled.⁴² Diverted materials primarily include compostable organics, concrete, dirt, carpet, mattresses, and yard trimmings. The remaining waste is disposed of at Kirby Canyon Landfill in south San José. Kirby Canyon Landfill has a capacity of 36.4 million cubic yards and is permitted to receive 2,600 tons of waste per day.⁴³ As of January 1, 2021, the landfill has a remaining Phase 1 capacity of 14.67 million cubic yards. Based on

⁴⁰ California Department of Resources Recycling and Recovery. “CALGreen Construction Waste Management Requirements.” Accessed May 29, 2024. Available at: <https://calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures/#::~:~:text=Waste%20Diversion,to%20various%20occupancies%20and%20types>.

⁴¹ CalRecycle. “Sunnyvale MRF & Transfer Station (43-AA-0009).” Accessed February 1, 2024. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Index/3376>. This average was calculated using the average peak tonnage measured during each of the monthly inspections for 2021.

⁴² City of Sunnyvale, Environmental Services Department. “SMaRT Station Annual Report 2022-2023.” Accessed: February 1, 2024. Available at: <https://www.sunnyvale.ca.gov/homes-streets-and-property/recycling-and-garbage/smart-station-recycling-center>

⁴³ CalRecycle. “Kirby Canyon Recycle & Disposal Facility (43-AN-0008).” Accessed May 29, 2024. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1370?siteID=3393>.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		the current remaining capacity available and projected volumes, Kirby Canyon Landfill is projected to close its Phase 1 section in 2060.⁴⁴ The existing uses on-site are estimated to generate approximately 32 tons of solid waste per year (or 175 pounds per day) and the proposed project would generate approximately 77 tons of solid waste per year (or 422 pounds per day).⁴⁵ The project's net increase of 247 pounds per day would not exceed the Kirby Canyon Landfill capacity and would be adequately served.
Waste Water / Sanitary Sewers	2	Wastewater within the City is treated at the RWQCP, which is owned and operated by the City and treats wastewater from Los Altos, Los Altos Hills, Mountain View, Palo Alto, Stanford University, and the East Palo Alto Sanitary District.⁴⁶ Treated effluent from the RWQCP is discharged at two locations, one effluent pipe near the Palo Alto Airport discharges directly into the San Francisco Bay and the other discharges into Matadero Creek, which eventually drains into the San Francisco Bay. The RWQCP's average dry weather flow (ADWF) design capacity is 39 million gallons per day (mgd). The amount of influent wastewater handled by the RWQCP varies by the time of day and with seasonal changes in demand.⁴⁷ In 2020, the ADWF was approximately 17.24 mgd and the maximum daily flow was 22.21 mgd.⁴⁸ The existing uses on-site are estimated to generate approximately 2.7 million gallons of wastewater per year (or 7,432 gpd) and the proposed project would generate approximately 3.2 million gallons of wastewater

⁴⁴ Azevedo, Becky. Technical Manager, Waste Management, Inc. Personal Communication. December 27, 2021.

⁴⁵ Illingworth & Rodkin, Inc. *Buena Vista Redevelopment Air Quality and Greenhouse Gas Assessment. Attachment I: CalEEMod Input Assumptions and Outputs*. May 24, 2024.

⁴⁶ City of Palo Alto. "Regional Water Quality Control Plant." Accessed May 29, 2024. Available at: <https://cleanbay.org/our-programs/regional-water-quality-control-plant/#RWQCP>.

⁴⁷ City of Palo Alto. Annual NPDES Report – 2018. January 2019.

⁴⁸ City of Palo Alto. *2020 Urban Water Management Plan and Water Shortage Contingency Plan*. June 2021.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		per year (or 8,868 gpd). The project would result in a net wastewater generation of 0.5 million gallons per year (or 1,436 gpd). The project would not exceed the RWQCP's treatment capacity and would be adequately served.
Water Supply	2	Water service is provided to the project site by the Palo Alto municipal water system. Potable water supply in the City is sourced entirely from the San Francisco Public Utilities Commission (SFPUC). The City also produces a small amount of recycled water at the RWQCP to be used for irrigation and other minor applications.⁴⁹ The City's Urban Water Management Plan (UWMP) projects the water demand (water sales) at the time of the build out of the 2030 Comprehensive Plan to be approximately 10,597 acre-feet of water per year (AFY). The total supply available to the City is projected to be 11,710 AFY, which exceeds the demand and results in a surplus of available water. Projections from the 2020 UWMP indicate that the City would face a substantial shortfall in potable water supply during single-dry year, and multiple consecutive dry-year conditions. The existing uses on-site are estimated to consume approximately 3.2 million gallons of water per year (or 9.8 AFY) and the proposed project would consume approximately 3.8 million gallons of water per year (or 11.6 AFY).⁵⁰ The project would result in a net usage increase of 0.6 million gallons of water per year compared to existing conditions. The project would include several water efficiency measures such as water-efficient interior fixtures and recycled water irrigation system. The project would not generate water flow demands exceeding the capacity of the existing water system and would be adequately served.

⁴⁹ City of Palo Alto. *2020 Urban Water Management Plan and Water Shortage Contingency Plan*. June 2021

⁵⁰ Illingworth & Rodkin, Inc. *Buena Vista Redevelopment Air Quality & Greenhouse Gas Assessment. Attachment 1: CalEEMod Assumptions and Outputs*. May 24, 2024.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Public Safety - Police, Fire and Emergency Medical	2	<u>Police and Fire Protection</u> The Palo Alto Police Department (PAPD) provides law enforcement services within the City limits. The offices for the PAPD are located adjacent to City Hall at 275 Forest Avenue, approximately three miles northeast of the site. The PAFD provides fire protection services within the City limits. The PAFD is located at City Hall at 250 Hamilton Avenue. The nearest fire station to the project site is Fire Station 5 at 600 Arastradero Road, approximately 0.8 miles southwest of the site. While there would be increased demand placed on PAFD and PAPD from the addition of 65 new residents, the project site is already developed and is within the PAFD and PAPD service areas. Additionally, the proposed project would be reviewed by the PAFD to ensure safety features are incorporated to minimize the opportunity for criminal activity. The project would be constructed to current Fire Code standards and the project plans would also be reviewed by the PAFD to ensure adequate design and infrastructure for fire protection. Further, the project would be subject to the City's public safety facilities impact fee for multi-family residential projects.⁵¹ For these reasons, the project would not require new or expanded police or fire protection facilities, and would be adequately served by the existing facilities. <u>Emergency Medical</u> As mentioned previously, there are hospitals in proximity to the project site and the PAFD provides paramedic services. The project would not substantially increase the number of residents in the area and would be subject to the City's public safety facilities impact fee. Therefore, it would not substantially increase the need for additional medical services in the City.

⁵¹ City of Palo Alto. *Fiscal Year 2024 Adopted Municipal Fee Schedule*. June 2023.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Parks, Open Space and Recreation	2	The City of Palo Alto has almost 4,000 acres of open space, including 162 acres of developed urban parks throughout the City.⁵² The nearest public park to the project site is Robles Park, located 0.5 miles northwest of the site at 4116 Park Boulevard. Other nearby park facilities include Juana Briones Park, 0.7 miles to the southwest, and Cornells Bol Park, 0.8 miles to the southeast. The proposed project includes a dog park and shared courtyard and patio spaces that would serve existing and future residents. In summary, multiple nearby park facilities and the proposed on-site amenity space would adequately serve the demands of the project. Additionally, the project would be subject to the City's park impact fee for multi-family residential projects.⁵³ Therefore, the project would not cause overuse of the existing parking, open space, and recreational facilities.
Transportation and Accessibility	2	A Transportation Analysis (TA) was prepared for the project by Hexagon Transportation Consultants, Inc. in May 2024 and is attached as Appendix F. <u>Circulation and Parking</u> On-site circulation and parking were assessed as part of the traffic study. Per California Government Code Section 65915 (state density bonus law), the project must provide 77 parking spaces for the apartment building. The project proposes 79 off-street parking spaces, which meets the off-street parking requirements in accordance with state density bonus law allowance for the proposed project. The project would also include 44 parking spaces for the mobile homes for a total of 123 parking spaces.

⁵² City of Palo Alto. "Open Space & Parks." Accessed May 31, 2024.

<https://www.cityofpaloalto.org/Departments/Community-Services/Open-Space-Parks>

⁵³ City of Palo Alto. *Fiscal Year 2024 Adopted Municipal Fee Schedule*. June 2023.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Additionally, the site would provide a passenger loading area at the front of the parking lot adjacent to the apartment complex, which could also be used for delivery vehicles as well as street parking within the public right-way. Commercial loading is not required or proposed for the project. Analysis of the site plan showed that the site would have adequate emergency vehicle access from either driveway and through the project site. <u>Transit, Pedestrian, and Bike Facilities</u> As discussed under the Energy Efficiency section, the nearest bus stop is approximately 250 feet north of the project site and Caltrain Stations are located 1.3 miles south and 1.3 miles north. The City, including the project site, is served by Palo Alto Link which provides ride share shuttle services within the city limits. Within the immediate vicinity of the project site, pedestrian access is provided via sidewalks along El Camino Real and the south side of Los Robles Avenue. There is currently no sidewalk along the project frontage, though there is a sidewalk to both the east and west of the project site along Los Robles frontage. The project would add a sidewalk along the site's frontage, connecting the existing sidewalk to the east and west of the project frontage and project frontage, though there is a sidewalk to both the east and west of the project site along the Los Robles frontage. The project vicinity also contains several bike pathways. There is a Class I bike path along Bol Park; Class II bike lanes along Los Robles Avenue, California Avenue, Page Mill Road, Hanover Street, Middlefield Road, and Charleston Road; and Class III bike boulevards along Bryant Street and Maybell Avenue. The project would not remove the existing bike lanes on Los Robles Avenue or impact existing or planned bike facilities. Further, per Section 18.52.040 of the PAMC, the project must provide

Environmental Assessment Factor	Impact Code	Impact Evaluation
		61 long-term bike parking spaces and six short-term bike parking spaces. The proposed apartment building would include a bike room that would provide 63 bike parking spaces. The project also proposes six short-term spaces near the southernmost driveway. By providing a total of 69 bike parking spaces, the project would adhere to the City's bike parking requirements. Based on this discussion, the project site would be adequately served by transit, pedestrian, and bike facilities. <u>Safety</u> The TA evaluated the project design for adequate site access and on-site circulation. The project would generate less traffic than existing conditions, as apartments generate fewer trips than mobile homes per unit. The project proposes two driveways (one existing and one new) on Los Robles Avenue that would provide access to the residential units and surface parking lot. The driveways would be 24 feet wide, meeting the Municipal Code's required minimum width of 20 feet for a two-way driveway. The minimum acceptable sight distance for the driveways on Los Robles Avenue is 200 feet. The site plan shows over 200 feet of sight distance for both directions of both driveways. The project proposes 18 parallel parking spaces along the project frontage, which would be set back from the edge of the pavement without affecting sight distance. Thus, the project has adequate sight distance at both driveways. Emergency vehicles would be able to access the project site from either driveway and would have room to maneuver throughout the site. Refer to Appendix F for details of the site access and on-site circulation analysis. The City will review the site development plans to ensure fire protection design features are incorporated and adequate emergency access is provided.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Unique natural features are primarily geological features that are rare or of special social/cultural, economic, educational, aesthetic, or scientific value. Examples of unique natural features include rock outcroppings, fossils, and native plants or animal communities. No unique natural features are present on-site. There are no streams, creeks, ponds, or other surface water bodies located within the project site. The nearest waterway, Barron Creek, is located approximately 370 feet northeast of the site and is separated from the site by existing development and El Camino Real. As discussed previously, with inclusion of LID stormwater treatment, and compliance with the City's regulatory policies pertaining to stormwater runoff, operation of the proposed project would not result in a significant effect to water quality. Based on this discussion, the project would not result in adverse impacts to unique natural features or water resources.
Vegetation, Wildlife	2	<u>Vegetation</u> The project site is completely developed within an urban area. The primary biological resources on-site are trees. The site contains 53 trees and there are 38 street trees immediately adjacent to the site. The project proposes to remove 44 trees (39 on-site trees and four off-site trees), nine of which are considered protected trees. In accordance with the City's Tree Technical Manual, the applicant would be required to obtain a permit for the removal of protected trees and would be required to provide replacement trees or pay an in-lieu fee for replacement trees. The applicant would abide by tree replacement requirements, providing 130 24-inch box trees where 122 are required. Landscaping would include low to moderate water use plants and California native species.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Because the project would comply with City regulations regarding the requirement for replacement trees, no adverse impacts would be expected to occur as a result of the project. <u>Wildlife</u> As discussed previously, the project site is in a developed urban area with no sensitive habitat on or adjacent to the site. The project would not impact any natural habitat containing endangered species or any designated or proposed critical habitat.⁵⁴ However, removal of the trees on-site could be used by birds as nesting and foraging habitat. Nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and the California Department of Fish & Wildlife (CDFW). Noise and vibration generated by construction activities have the potential to disturb raptors and nesting birds, which could potentially lead to nest abandonment and/or loss of reproductive effort, both of which are prohibited by the MBTA and CDFW. Consistent with City requirements, the project would implement COA BIO-1.1 and complete a pre-construction nesting bird survey if construction or vegetation removal occurs during the nesting season and implement buffer zones if needed to ensure compliance with the MBTA to protect nesting birds. Based on this discussion, there would be no adverse impacts to wildlife on or adjacent to the site as a result of the project.
Other Factors	2	The project site is an urban area, surrounded by urban development, and is fully developed. There are no other natural features on the site or surrounding the site.

⁵⁴ U.S. Fish & Wildlife Service. "Critical Habitat for Threatened & Endangered Species." Accessed May 31, 2024. Available at: <https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>.

Additional Studies Performed:

Appendix A: Illingworth & Rodkin, Inc. *Buena Vista Redevelopment Project Air Quality and Greenhouse Gas Assessment*. May 24, 2024.

Appendix B: Ninyo & Moore. *Phase I Environmental Site Assessment*. September 2023.

Appendix C: Running Moose Environmental Consulting, LLC. *HUD Explosive and Fire Hazards Review – Buena Vista Redevelopment*. March 2024.

Appendix D: Illingworth & Rodkin, Inc. *Buena Vista Commons Noise and Vibration Assessment*. May 24, 2024.

Appendix E: Rockridge Geotechnical. *Geotechnical Investigation for Buena Vista Redevelopment*. May 2023.

Appendix F: Hexagon Transportation Consultants. *Buena Vista Redevelopment Transportation Analysis*. May 5, 2024.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Association of Bay Area Governments. *Regional Housing Needs Plan, San Francisco Bay Area 2023-2031*. November 2021. https://abag.ca.gov/sites/default/files/documents/2021-12/proposed%20Final_RHNA_Allocation_Report_2023-2031.pdf

Azevedo, Becky. Technical Manager, Waste Management, Inc. Personal Communication. December 27, 2021.

California Coastal Commission. “Description of California’s Coastal Management Program (CCMP).” Accessed March 2, 2024. Available at: https://www.coastal.ca.gov/fedcd/ccmp_description.pdf.

California Department of Conservation. “California Important Farmland Finder.” Accessed March 2, 2024. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>.

California Department of Education. “Data Quest”. Accessed November 1, 2023. <https://dq.cde.ca.gov/dataquest/>

California Department of Forestry and Fire Protection. “Fire Hazard Severity Zones Viewer.” Accessed March 2, 2024. Available at: <https://egis.fire.ca.gov/FHSZ/>.

California Department of Resources Recycling and Recovery. "CALGreen Construction Waste Management Requirements." Accessed May 29, 2024. Available at: <https://calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures/#:~:text=Waste%20Diversion,to%20various%20occupancies%20and%20types>.

CalRecycle. "Kirby Canyon Recycle & Disposal Facility (43-AN-0008)." Accessed May 29, 2024. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1370?siteID=3393>.

---. "Sunnyvale MRF & Transfer Station (43-AA-0009)." Accessed February 1, 2024. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteInspection/Index/3376>. This average was calculated using the average peak tonnage measured during each of the monthly inspections for 2021.

City of Palo Alto. *2020 Urban Water Management Plan and Water Shortage Contingency Plan*. June 2021.

---. Annual NPDES Report – 2018. January 2019.

---. *Comprehensive Plan 2030*. Adopted November 13, 2017. Amended June 2021.

---. *Fiscal Year 2024 Adopted Municipal Fee Schedule*. June 2023.

---. *Master List of Structures on the Historic Inventory*. Accessed March 2, 2024. Available at: <https://www.cityofpaloalto.org/files/assets/public/v/1/planning-amp-development-services/historic-preservation/historic-inventory/city-historic-inventory-list.pdf>.

---. "Open Space & Parks." Accessed May 31, 2024. <https://www.cityofpaloalto.org/Departments/Community-Services/Open-Space-Parks>

---. "Regional Water Quality Control Plant." Accessed May 29, 2024. Available at: <https://cleanbay.org/our-programs/regional-water-quality-control-plant/#RWQCP>.

---. *Sea Level Rise Vulnerability Assessment*. June 2022.

City of Sunnyvale, Environmental Services Department. "SMaRT Station Annual Report 2022-2023." Accessed: February 1, 2024. Available at: <https://www.sunnyvale.ca.gov/homes-streets-and-property/recycling-and-garbage/smart-station-recycling-center>

County of Santa Clara. "Geologic Hazard Zones." Accessed March 2, 2024. Available at: <https://sccplanning.maps.arcgis.com/apps/webappviewer/index.html?id=5ef8100336234fbdafc5769494cfe373>.

Department of Housing and Urban Development. "Site Contamination." Accessed March 2, 2024. Available at: <https://www.hudexchange.info/programs/environmental-review/site-contamination/>.

Federal Emergency Management Agency. "FEMA Flood Map Service Center – Map Number 06085C0017H". Accessed March 2, 2024. Available at: <https://msc.fema.gov/portal/search?AddressQuery=1020%20terra%20bella%20ave%20mountain%20view%20ca#searchresultsanchor>.

HUD Exchange. "Airport Hazards." Accessed March 2, 2024. Available at: <https://www.hudexchange.info/programs/environmental-review/airport-hazards/#:~:text=If%20within%2015%2C000%20feet%20of,the%20airport%20operator%20stat ing%20so>

Illingworth & Rodkin, Inc. *Buena Vista Redevelopment Air Quality and Greenhouse Gas Assessment. Attachment 1: CalEEMod Input Assumptions and Outputs*. May 24, 2024.

National Wild and Scenic Rivers System. "California." Accessed March 2, 2024. Available at: <https://www.rivers.gov/rivers/big-sur.php>.

Office of Historic Preservation. "California Historical Resources." Accessed March 2, 2024. Available at: <https://ohp.parks.ca.gov/ListedResources/?view=name&criteria=palo+alto>.

Palo Alto Unified School District. "School Finder". Accessed May 29, 2024. <https://locator.pea.powerschool.com/?StudyID=171992>

Running Moose Environmental Consulting, LLC. *HUD Explosive and Fire Hazards Review – Buena Vista Redevelopment*. March 25, 2024.

Santa Clara County Airport Land Use Commission. *Moffett Federal Airfield Comprehensive Land Use Plan*. November 18, 2016.

State of California Department of Finance. "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024." Accessed May 28, 2024.

U.S. Census Bureau. "DP03: Selected Economic Characteristics." Accessed May 31, 2024. Available at: <https://data.census.gov/table/ACSDP5Y2020.DP03?t=Employment%20and%20Labor%20Force%20Status&g=160XX00US0655282>

---. "QuickFacts – Palo Alto CA." Accessed May 31, 2024. Available at: <https://www.census.gov/quickfacts/fact/table/paloaltocitycalifornia/PST045223>.

U.S. Environmental Protection Agency. “Environmental Justice Screening and Mapping Tool.” Accessed March 2, 2024. Available at: <https://ejscreen.epa.gov/mapper/>.

---. “Sole Source Aquifers Web Viewer.” Accessed March 2, 2024. Available at: <https://catalog.data.gov/dataset/epa-sole-source-aquifers>.

U.S. Fish & Wildlife Service. “Coastal Barrier Resources System Mapper”. Accessed March 2, 2024. Available at: <https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>.

---. “Critical Habitat for Threatened & Endangered Species.” Accessed May 31, 2024. Available at: <https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>.

---. “National Wetlands Inventory.” Accessed March 2, 2024. Available at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

---. “USFWS Threatened & Endangered Species Active Critical Habitat Report.” Accessed March 2, 2024. Available at: <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>.

Field Inspection (Date and completed by):

June 21, 2024

David J. Powers & Associates, Inc.

Maria Kisyova, Project Manager

List of Permits Obtained:

The proposed action would require the following approvals:

- Development Review Permit
- Subdivision Permit
- Building Permits

Public Outreach [24 CFR 50.23 & 58.43]:

The redevelopment plan and resident housing options were developed by direct input from the residents and various stakeholders, gathered through an extensive outreach and engagement effort. The outreach started several years ago and became more focused starting in early 2023 as the redevelopment concept took shape. The Housing Authority’s efforts included:

- Five large town hall meetings for all residents (with Spanish translation services) at the nearby Barron Park Elementary School to discuss process, hear concerns, explain housing options, answer questions in large group and one-on-one formats, and garner design input.
- In-person meetings with each Buena Vista household and their personal BV Advisors to go over their Individual Housing Plans, term sheets or other questions, including approximately sixty-five in person meetings and sixty-one phone calls with the twenty-three undecided households.
- Small workshops to present and discuss a variety of topics, including information on the below-market-rate loan program, the appraisals, the relocation plan, and the annual inspection process.
- Q&A documents were released on five occasions to address common general questions, concerns, and misconceptions.
- Monthly meetings with City Manager's office, County staff, and Supervisor Simitian's office.
- Meetings with Palo Alto Unified School District and Barron Park Elementary School leadership.
- Meetings with other community members, stakeholders, and neighborhood groups.
- Housing Authority staff held open office hours at the site at least sixteen times during the period in which housing decisions were due and when the relocation plan was out for public comment. These meetings were held to answer resident questions and concerns, and generally build trust and rapport with the residents.
- City Councilmember briefings.
- Hosted social events like ice cream socials and National Night Out; and
- With an "open-door" policy, countless emails, and phone calls with residents.

In processing the Streamlined Housing Development Review application and Vesting Tentative Map Application, the City also held two study sessions with Council in February 2024 and June 2024, a study session with the Architectural Review Board in May 2024, a hearing for formal recommendation on the Vesting Tentative Map with the Planning and Transportation Commission in July 2024, and a final hearing for City Council decision on the project in August 2024. All hearings and study sessions were duly noticed in the local newspaper as well as to property owners and tenants within 600 feet of the project site. City staff also met with interested stakeholders whenever a request was made to hear comments and respond to questions on the proposed project.

Cumulative Impact Analysis [24 CFR 58.32]:

Title 24 Part 58 of the Code of Federal Regulations requires that responsible entities must group together and evaluate as a single project all individual activities which are related either on a geographical or functional basis, or are logical parts of a composite of contemplated actions. As part of this Environmental Assessment, the potential impacts from the entirety of the proposed

project were considered. The COAs identified throughout this Environmental Assessment would reduce potential environmental impacts to a less than significant level.

Within the localized area of effect (immediately adjacent from the project site), there are no approved or future projects that are reasonably foreseeable. Therefore, the project would have no cumulative impacts to localized environmental factors, specifically including aesthetics, biological and cultural resources, geology and soils, and hydrology and water quality. Additionally, because a project's GHG emissions do not have localized impacts, but instead contribute to the global climate change effect, a project's GHG impact is inherently cumulative. The jurisdictions in the San Francisco Bay Area Air Basin (which encompasses Palo Alto) utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. Refer to the GHG discussion in the Climate Change Impacts section.

The cumulative area of effect for hazards/hazardous materials and air quality is approximately 1,000 feet. As outlined in the Phase 1 ESA report prepared by Ninyo & Moore, no evidence of RECs was found on the site or on adjacent sites. Thus, the project would not have a cumulative impact on hazards or hazardous resources.

A health risk assessment (HRA) conducted for the project evaluated potential health effects to nearby sensitive receptors from construction emissions of diesel particulate matter (DPM) and PM_{2.5}. A review of the project area indicated that one roadway (El Camino Real) and two stationary sources (gas dispensing facilities) within the 1,000-foot influence area could have cumulative health risk impacts at the construction maximally exposed individuals (MEIs). I&R's assessment indicates that the construction MEIs would be located at two different receptors. The cancer risk MEI would be located on the second floor (15 feet above the ground) of a multi-family residence in the adjacent apartments south of the project site, and the annual PM_{2.5} MEI would be located on the first floor (five feet above the ground) of a single-family house east of the project site. See Appendix A for additional details of the health risks from the individual sources. To reduce these health risk effects to existing off-site sensitive receptors, the applicant proposes to utilize equipment with Tier 4 engines or equipment that meets U.S. EPA emission standards for Tier 3 engines and includes particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices for any equipment over 25 horsepower. Compliance with this project feature would ensure construction emissions would be below BAAQMD thresholds. Thus, construction emissions, combined with other identified mobile and stationary source emissions, would not exceed the BAAQMD's cumulative source health risk thresholds.

Noise impacts could result from the cumulative traffic generation of the project and other nearby projects and the simultaneous construction of the project and other nearby projects. A significant cumulative traffic noise impact would occur if 1) the cumulative traffic noise level increase was three dBA Ldn or greater for future levels exceeding the normally acceptable threshold and 2) the project would make a "cumulatively considerable" contribution to the overall traffic noise

increase. A “cumulatively considerable” contribution would be defined as an increase of one dBA Ldn or more attributable solely to the proposed project.

The Palo Alto Commons project, located at 4075 El Camino Way, is located within 500 feet of the Buena Vista project site. The Palo Alto Commons project would expand an existing 121-unit assisted living facility with the addition of 18 new units totaling 6,816 square feet, primarily located on the second and third floors on the north side of the building. Given the distance separating the sites, acoustical shielding provided by intervening structures, and the minor scope of the construction activities planned as part of the Palo Alto Commons project, cumulative construction noise levels would not be higher than the construction noise levels estimated from the project alone. Additionally, as noted previously, the proposed project would decrease vehicle trips. Thus, the proposed project would not make a cumulatively considerable contribution to cumulative traffic noise increases.

Based on the above discussion, the cumulative air quality and noise impacts of the potentially overlapping construction periods were analyzed and found to be less than significant with implementation of the previously identified City standard COAs.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

This alternatives analysis is included to fulfill the requirements for an Environmental Assessment under NEPA. Under NEPA, an Environmental Assessment shall include brief discussions of alternatives. No development alternatives to the proposed project have been identified or considered because the proposed action would not result in any significant unavoidable impacts and the applicant has agreed to comply with all COAs. For the proposed project, the No Action Alternative was included.

No Action Alternative [24 CFR 58.40(e)]:

The No Action Alternative would not redevelop the existing mobile home park with new mobile homes or construct a new 61-unit apartment building. Under the No Action Alternative, the site would remain in its current condition, consisting of 86 mobile homes, a laundry/shower building, residence/office, shop building, and surface parking. Under this alternative, both the potentially adverse and beneficial impacts of the proposed action would be avoided.

Adverse impacts which would be avoided could include the temporary exposure of persons to air pollutants or noise impacts during construction, potential disturbance of nesting raptors through removal of trees, and potential disturbance of subsurface cultural resources during excavation. It should be noted, however, that the magnitude of these adverse impacts associated with the proposed action would be less than significant with compliance of the COAs required by the City and included as part of the project. Thus, the No Action Alternative would not avoid any significant

environmental impacts, because none would occur if the proposed project (with COAs included) is constructed.

Benefits of the project include upgrading mobile homes and providing new amenities for current and future residents. Additionally, the project would provide additional housing in Palo Alto that would help the City meet its affordable housing allocation.

The No Action Alternative would not meet the goals and objectives of the proposed action, which are to provide affordable housing on the project site in a manner that is consistent with the goals and plans of the City of Palo Alto and is compatible with the surrounding land uses.

Summary of Findings and Conclusions:

- The proposed project would provide affordable housing in Palo Alto where affordable housing options are in high demand.
- The proposed project would comply with all local, state, and federal statutory regulations pertaining to environmental issues and implement the COAs to reduce, avoid, and/or eliminate adverse environmental impacts.
- The proposed project could result in short-term (i.e., construction-related) environmental impacts with regard to air quality, biological resources, cultural resources, geology & soils, hazardous materials, and noise. COAs have been incorporated into the project that would minimize or avoid these short-term impacts.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	City Standard Conditions of Approval and Mitigation Measures
Clean Air	COA AIR-1.1: Basic Air Quality Construction Measures: The following conditions shall be implemented during all phases of construction to control dust and exhaust at the project site. • Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) two times per day. • Cover all haul trucks transporting soil, sand, and other loose materials off-site. • Remove all visible mud or dirt track out onto adjacent public roads at least once per day using wet power vacuum street sweepers. The use of dry power sweeping is prohibited. • Limit all vehicle speeds on unpaved roads to 15 miles per hour. • Pave all new roadways, driveways, and sidewalks as soon as possible. • Lay building pads as soon as possible after grading unless seeding or soil binders are used. • Suspend all excavation, grading, and/or demolition activities when average wind speeds exceed 20 miles per hour. • Wash off all trucks and equipment, including their tires, prior to leaving the site. • Post a publicly visible sign with the name and phone number of an on-site construction coordinator to contact regarding dust complaints. The on-site construction coordinator shall respond and take corrective action within 48 hours. The sign shall also provide the City's Code Enforcement Complaints email and number and the Air District's General Air Pollution Complaints number to ensure compliance with applicable regulations.

Law, Authority, or Factor	City Standard Conditions of Approval and Mitigation Measures
Contamination and Toxic Substances	COA HAZ-1.1: To reduce the potential for construction worker and nearby sensitive receptor exposure to hazardous materials (ACMs, LBPs, and PCBs), the applicant shall implement the following measures prior to and during demolition and construction: • Prior to issuance of a demolition permit, the applicant shall submit a PCB Screening Assessment Form to the Director of Planning. As required under the Toxic Substances Control Act (TSCA), all building materials containing PCBs at levels greater than 50 parts per million (ppm) shall be removed upon discovery. If on-site buildings do contain PCBs that exceed threshold limits, the applicant shall follow applicable federal and state laws, which includes reporting to the Environmental Protection Agency, Regional Water Quality Control Board, and Department of Toxic Substances Control, who may require additional sampling and abatement of PCBs. If demolition is likely to impact such materials, they must be properly characterized by an Environmental Professional (as defined in Title 40 of the California Code of Federal Regulations) and removed in accordance with TSCA regulations. • In conformance with local, state, and federal laws, the applicant shall engage a qualified professional to complete an asbestos building survey and a lead-based paint survey to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition prior to issuance of a demolition permit. Written findings of the surveys shall be submitted to the Director of Planning. • If the presence of ACMs is found through surveys, the applicant shall retain a registered asbestos abatement contractor to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines, prior to the issuance a demolition permit. The applicant shall conduct all construction activities in accordance with California Division of Occupational Safety and Health (Cal/OSHA)

Law, Authority, or Factor	City Standard Conditions of Approval and Mitigation Measures
	standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to Bay Area Quality Management District (BAAQMD) regulations. • If the presence of LBP is found through surveys, prior to any demolition activities, the applicant shall remove all building materials containing LBP in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring and dust control. The applicant shall dispose of any debris or soil containing LBP or coatings at landfills that meet acceptance criteria for the waste being disposed.
Historic Preservation	COA CUL-1.1: In the event archaeological resources are encountered during construction, the project shall implement the following measure. • In the event that an archeological 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.

Law, Authority, or Factor	City Standard Conditions of Approval and Mitigation Measures
	COA CUL-2.1: In the event human remains are encountered during construction, the project shall implement the following measure. • In the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find would be stopped. The Santa Clara County Coroner would be notified and would make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner would notify the California Native American Heritage Commission (NAHC) immediately. Once NAHC identifies the most likely descendants, the descendants would make recommendations regarding proper burial, which would be implemented in accordance with Section 15064.5 of the CEQA Guidelines.
Vegetation, Wildlife	COA BIO-1.1: Preconstruction Nesting Bird Survey: The project shall implement the following measures to prevent construction activities from disturbing nesting birds and raptors. • 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

Law, Authority, or Factor	City Standard Conditions of Approval and Mitigation Measures
	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.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: Akoni Danielson Date: 9.12.2024

Name/Title/Organization: Akoni Danielson, President, David J. Powers & Associates, Inc.

Certifying Officer Signature:  Date: 9/18/2024

Name/Title: Jonathan Lait

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).