



CITY OF  
**PALO ALTO**



Comprehensive Plan Environmental Impact Report Addendum  
Update to the Sustainability and Climate Action Plan  
May 2023



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# 1 INTRODUCTION

This Environmental Impact Report Addendum (EIR Addendum) evaluates the impacts of the proposed City of Palo Sustainability and Climate Action Plan Update (S/CAP), referred to hereafter as the proposed project or S/CAP. This EIR Addendum was prepared in compliance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

The lead agency is the public agency primarily responsible for the proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." The City of Palo Alto (City), as the lead agency, has prepared this EIR Addendum to evaluate the environmental impacts of the implementation of the S/CAP.

## 1.1 BACKGROUND AND PURPOSE OF THE EIR ADDENDUM

The *City of Palo Alto 2017 Comprehensive Plan Final Environmental Impact Report* (State Clearinghouse Number 2014052101) was prepared analyzing four alternatives (also referred to as "scenarios") and was circulated for public review from February 5, 2016 to June 8, 2016. During the Comprehensive Plan development and review process, City Council directed the evaluation of two additional alternatives or scenarios, which were subsequently analyzed in a Supplement to the Draft EIR that was circulated for public review from February 10, 2017 to March 31, 2017. A *Final Environmental Impact Report* (Comprehensive Plan EIR) was prepared, which comprised of the Draft EIR dated February 5, 2016, together with the Supplement to the Draft EIR dated February 10, 2017 and was certified on November 13, 2017 along with the current *City of Palo Alto Comprehensive Plan 2030* (Comprehensive Plan 2030). In 2018, consistent with an Implementation Program directed by the Comprehensive Plan 2030, the City accepted the S/CAP Framework, which established goals and strategies to reduce greenhouse gas emissions and promote sustainability. The purpose of the EIR Addendum is to evaluate the potential environmental impacts of updating the S/CAP with revised greenhouse gas reduction targets and strategies.

Since accepting the 2016 S/CAP Framework, new state laws and regulations have been enacted, and the City has produced detailed information regarding existing GHG emissions and forecast emissions and emissions rates. The City has conducted broad-based community engagement, and has evaluated and developed best practice options for GHG reduction strategies relative to their effectiveness, cost, feasibility, and co-benefits.

On the basis of this research, analysis, and public engagement, the City has proposed an update of the S/CAP with revised greenhouse gas reduction targets and strategies. The EIR Addendum provides minor revisions necessary to address the potential environmental impacts of these updates to the S/CAP. The EIR Addendum builds upon the Comprehensive Plan EIR and assesses whether the updates to the S/CAP could result in new significant environmental impacts or exacerbate previously identified impacts. The EIR Addendum also considers whether the updates to the S/CAP require additional mitigation measures or revisions to the existing mitigation measures identified in the Comprehensive Plan EIR.

## 1.2 BASIS FOR DECISION TO PREPARE ADDENDUM

The Comprehensive Plan EIR considered the environmental impacts of implementing the Comprehensive Plan by 2030. Per Public Resources Code Section 21083.3(b) and CEQA Guidelines Sections 15168 and 15183, the Comprehensive Plan EIR can serve as the CEQA document for future projects (public and private) that align with the Comprehensive Plan. When evaluating projects, it must be determined if they are within the scope of the Comprehensive Plan, whether the potential impacts are addressed in the Comprehensive Plan EIR, and if all relevant performance standards and mitigation measures have been incorporated. If a project does not align with the approved Comprehensive Plan or has specific significant effects that cannot be addressed by uniformly applied policies or standards, further environmental review through subsequent review provisions of CEQA may be required for changes to approved projects. If the impact is not unique to the project, has been covered as a significant effect in the Comprehensive Plan EIR, or can be substantially mitigated through uniformly applied policies or standards, then an additional EIR is unnecessary solely based on that impact.

In determining whether an addendum is an appropriate document to analyze the modifications to the proposed project and its approval, CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states:

- (1) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (2) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (3) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (4) The decision-making body shall consider the Addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (5) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As the Comprehensive Plan EIR has been certified, the environmental impacts of subsequent activities proposed under the Comprehensive Plan, including the S/CAP, which is an implementation program of the Comprehensive Plan, must be examined in light of the impact analysis in the certified Comprehensive Plan EIR to determine whether additional CEQA documentation must be prepared. The standard that applies is whether, under Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163, there are new significant effects or other grounds that require the preparation of a subsequent EIR or supplemental EIR in support of further agency action on the proposed project. Under these guidelines, a subsequent or supplemental EIR shall be prepared if any of the following criteria are met:



- (1) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (A) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - (B) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - (C) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    - i. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - ii. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - iii. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - iv. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

In addition, CEQA Guidelines Section 15183.5(a) includes a provision for addressing greenhouse gases:

- (1) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175–15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).

The S/CAP, inclusive of this environmental review, meets the substantive and procedural recommendations for a GHG reduction plan set forth in Section 15183.5 of the CEQA Guidelines. Therefore, if adopted, the S/CAP could be used to streamline the analysis of GHG emissions for future projects. As established in Section 15183.5 of the CEQA Guidelines, a plan to reduce GHG emissions (i.e., the S/CAP) may be used as the basis of future project-

level analyses of GHG emissions impacts. Where subsequent projects use S/CAP consistency as the basis for the analysis of potential impacts due to GHG emissions, they would tier from and/or incorporate by reference the analysis in the Comprehensive EIR and this EIR Addendum. An environmental document that relies on the S/CAP for analysis of GHG emissions impacts would be required to identify the requirements in the S/CAP that apply to the project and incorporate those requirements as mitigation measures, if not otherwise binding and enforceable. In turn, “a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan” (CEQA Guidelines Section 15183.5[b]). An EIR may still be required for future projects, notwithstanding the project’s compliance with the S/CAP, “[i]f there is substantial evidence that the effects of a particular project may be cumulatively considerable” (CEQA Guidelines Section 15183.5[b][2]). Further, streamlining the GHG analysis based on S/CAP consistency does not affect the obligation to address potential effects related to other resource areas.

The proposed S/CAP identifies how the City will achieve (or exceed) its greenhouse gas emissions reduction target. The S/CAP provides goals and associated measures, also referred to as key actions, for energy, electric vehicles, mobility, water, climate adaptation and sea level rise, natural environment, and zero waste. The S/CAP also includes objectives and strategies to address long-term climate change adaptation and implementation of the plan. The S/CAP acknowledges that reducing greenhouse gas emissions alone will not immediately mitigate the impacts of climate change, and thus, it outlines actions to help the City adapt to climate change over the long term.

By incorporating the goals and measures of the S/CAP into the Comprehensive Plan EIR through this EIR Addendum, the City is ensuring future development and planning activities within the city conform to the objectives of the S/CAP and climate change legislation adopted by the State of California.

### **1.3 SUMMARY OF CHANGE TO THE PROGRAM**

The City has developed a comprehensive approach to reducing long-term greenhouse gas (GHG) emissions, consistent with the City's Comprehensive Plan, the Comprehensive Plan EIR Mitigation Measure GHG-1, and the State's emission reduction goals and targets. The S/CAP includes new reduction measures that would apply to new development, existing development, the City's actions and operations, and regional cooperatives. The S/CAP details existing programs that have effectively reduced GHG emissions and identifies the future benefit of these programs and expansions to these programs. The new reduction measures in the S/CAP were developed in an inclusive public process and informed by stakeholder and community engagement efforts. The S/CAP reduction strategies and actions provide tools to meet the City's goal of reducing GHG emissions by 80 percent below 1990 levels by 2030 (the "80 x 30" goal) and the most recent Carbon Neutral by 2030 goal. The City has further set a goal of reducing GHG emissions to 2 MT CO<sub>2</sub>e per capita by 2030 to demonstrate the City's commitment to the State of California's own long-term GHG goal. In addition, the S/CAP considers locally realized emissions reductions from the following State actions:

- ▶ Renewables Portfolio Standard,
- ▶ AB 1109 – Lighting Efficiency,
- ▶ AB 1493 – Pavley I and II, and
- ▶ Heavy-Duty Vehicle Aerodynamic Efficiency Regulations.

The S/CAP is organized into goals and key actions comprising measures related to a certain emissions source area or topic. The emission reduction strategies are as follows:

- ▶ **Energy** recommends ways for building efficiency and electrification and modernizing the City's electric grid to accommodate the technologies that will enable this transformation.
- ▶ **Electric Vehicles** encourage strategies to reduce the carbon intensity of fuels through electric vehicle adoption.
- ▶ **Mobility** promotes greater use of multi-modal transportation options to reduce vehicle miles traveled (VMT), including walking, biking, and transit through land use, design, infrastructure development, and demand management.
- ▶ **Water Strategy** furthers reducing water consumption and diversifying the water supply portfolio that supports urban canopy.
- ▶ **Climate Adaptation and Sea Level Rise** provides a plan to develop and adopt a Sea Level Rise Adaptation Plan and minimize wildland fire hazards.
- ▶ **Natural Environment** restores and enhances resilience and biodiversity, increasing tree canopy and land area used for green stormwater infrastructure.
- ▶ **Zero Waste** increases the diversion of waste materials that can be composted, recycled, or beneficially reused and implements initiatives identified in the 2018 Zero Waste Plan.

Section 5, “Goals and Key Actions” in the S/CAP describes each reduction measure's programs, policies, projects, and other actions the City will carry out to accomplish its emissions reduction goals, including reductions attributed to past actions that occurred since the baseline year. Each reduction measure identifies its relationship to local emissions reduction opportunities, related actions previously taken by the City or community members, and future actions that the City will lead during the S/CAP implementation process.

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## 1.4 ORGANIZATION AND SCOPE

Following is a summary of the organization of this EIR Addendum.

- ▶ **Chapter 1 – Introduction.** Provides an introduction and overview describing the intended use of the Comprehensive Plan EIR Addendum.
- ▶ **Chapter 2 – Summary of Findings.** References the potential environmental impacts of the S/CAP, based on the checklist questions from Appendix G of the CEQA Guidelines.
- ▶ **Chapter 3 – Environmental Analysis.** This section contains an analysis of environmental issue areas that were analyzed for the S/CAP and recommended mitigation measures if required, to reduce their significance.
- ▶ **Chapter 4 – Significant Unavoidable Impacts.** References the significant and unavoidable impacts from the Comprehensive Plan EIR which are also identified in Section 5 (Environmental Analysis).
- ▶ **Chapter 5 – Alternatives.** Explains how the six planning scenarios of the Comprehensive Plan EIR represent a reasonable range of options, including options that are appropriate in consideration of the proposed update to the S/CAP.

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## 2 SUMMARY OF FINDINGS

This EIR Addendum evaluates the potential environmental impacts of the proposed S/CAP for each of the topics included in Appendix G of CEQA Guidelines relative to the environmental impacts addressed in the City’s Comprehensive Plan EIR. As demonstrated in this EIR Addendum, the proposed S/CAP would not change any of the conclusions of the Comprehensive Plan EIR. Implementing the proposed S/CAP would not result in new significant effects or a substantial increase in the severity of previously identified significant effects. Further, no new information of substantial importance has been identified that suggests the potential for the proposed S/CAP to result in significant or substantially more severe effects not discussed in the previous Comprehensive Plan EIR.

This EIR Addendum evaluates the potential environmental impact changes from the proposed S/CAP since the adoption of Comprehensive Plan EIR. This EIR Addendum confirms that the proposed S/CAP would not alter the conclusions of the Comprehensive Plan EIR. Additionally, no new information of significant importance has been identified that suggests the potential for the proposed S/CAP to result in any significant or substantially more severe effects beyond what was previously analyzed in the Comprehensive Plan EIR. Instead, the EIR Addendum finds that the changes would provide beneficial actions promoting green building practices such as increasing the use of renewable energy sources, promoting energy efficiency, reducing vehicle miles traveled, and promoting sustainable development.

The Comprehensive Plan EIR analyzed the potential environmental impacts of the Comprehensive Plan and identified mitigation measures to reduce or avoid those impacts. The Comprehensive Plan EIR concluded that implementation of the Comprehensive Plan has the potential to generate significant environmental impacts. As shown in Table 2.1, most potentially significant impacts would be reduced to a less-than-significant level with implementation of mitigation measures imposed by the Comprehensive Plan EIR. However, pursuant to Section 15126.2(b) of the CEQA Guidelines, which requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures, as shown in Table 2-1, significant unavoidable impacts were identified for air quality and traffic. For a complete summary of the significant and unavoidable impacts, please see Chapter 4 (Significant Unavoidable Adverse Impacts).

As detailed in Chapter 3 (Environmental Analysis) of this EIR Addendum, the following table summarizes environmental issue areas of no changes relative to the Comprehensive Plan EIR. Chapter 3 (Environmental Analysis) confirms that the Comprehensive Plan EIR continues to provide a complete analysis of the potential environmental impacts associated with the proposed S/CAP.

**Table 2-1. Summary of Comprehensive Plan EIR Impacts**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
AES-1	Degrade the existing visual character or quality	Less than Significant	No Change
AES-2	Alter public viewsheds or view corridors or scenic resources	No Mitigation Necessary	No Change
AES-3	Create a new source of substantial light or glare	No Mitigation Necessary	No Change
AES-4	Shadow public open space	Less than Significant	No Change
AES-5	Result in cumulative impacts on aesthetic and visual resources	No Mitigation Necessary	No Change

<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
AIR-1	Conflict with or obstruct implementation of the applicable air quality plan	Less than Significant	No Change
AIR-2	Violate an air quality standard; contribute substantially to an existing or project air quality violation; and/or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard	Significant and Unavoidable	No Change
AIR-3	Expose sensitive receptors to substantial concentrations of air pollution.	Less than Significant	No Change
AIR-4	Create or expose a substantial number of people to objectionable odors	Less than Significant	No Change
BIO-1	Special-status species	No Mitigation Necessary	No Change
BIO-2	Riparian habitat or other sensitive natural community	No Mitigation Necessary	No Change
BIO-3	Movement corridors	No Mitigation Necessary	No Change
BIO-4	Conflict with any local policies or ordinances protecting biological resources	No Mitigation Necessary	No Change
BIO-5	Habitat Conservation Plan, Natural Community Conservation Plan or other approved habitat conservation plan	No Mitigation Necessary	No Change
BIO-6	Result in cumulative impacts on biological resources	No Mitigation Necessary	No Change
CULT-1	National and/or California Register, or listed on the City's historic inventory	Less than Significant	No Change
CULT-2	California history or prehistory	Less than Significant	No Change
CULT-3	Archaeological resources as defined in Section 15064.5 of the CEQA Guidelines	Less than Significant	No Change
CULT-4	Disturb any human remains	No Mitigation Necessary	No Change
CULT-5	Unique paleontological resource or site or unique geologic feature	Less than Significant	No Change
CULT-6	Local cultural resource	Less than Significant	No Change
CULT-7	Result in cumulative impacts on cultural resources	Less than Significant	No Change
GEO-1	Expose people or structures to substantial adverse effects	No Mitigation Necessary	No Change
GEO-2	Expose people or property to major geologic hazards	No Mitigation Necessary	No Change
GEO-3	Geologic unit or on soil that is unstable, or in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse	No Mitigation Necessary	No Change
GEO-4	Erosion or siltation	No Mitigation Necessary	No Change
GEO-5	Result in cumulative impacts on geology, soils, and seismicity	No Mitigation Necessary	No Change
HAZ-1	Routine transport, use, or disposal of hazardous materials	No Mitigation Necessary	No Change
HAZ-2	Release of hazardous materials	No Mitigation Necessary	No Change



<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
HAZ-3	Hazardous emissions or the handling of hazardous or acutely hazardous material within ¼-mile of an existing or proposed school	No Mitigation Necessary	No Change
HAZ-4	Existing hazardous materials contamination listed in Government Code Section 65962.5	No Mitigation Necessary	No Change
HAZ-5	Risk of loss, injury, or death involving wildland fires	No Mitigation Necessary	No Change
HAZ-6	Safety hazard from a public airport	No Mitigation Necessary	No Change
HAZ-7	Emergency response or evacuation plan	No Mitigation Necessary	No Change
HAZ-8	Vicinity of a private airstrip	No Mitigation Necessary	No Change
HAZ-9	Result in cumulative impacts on hazards and hazardous materials	No Mitigation Necessary	No Change
HYD-1	Violate any water quality standards or waste discharge requirements	No Mitigation Necessary	No Change
HYD-2	Degrade or deplete ground water resources or interfere substantially with groundwater recharge	Less than Significant	No Change
HYD-3	Increase the rate, volume, or flow duration of storm water runoff or alter the existing drainage pattern altering the course of a stream or river	No Mitigation Necessary	No Change
HYD-4	Stream bank instability	No Mitigation Necessary	No Change
HYD-5	Increase the rate, volume, or flow duration of storm water runoff result in new or increased flooding on-or off-site or exceedance of the capacity of existing or planned stormwater drainage systems in local streams	No Mitigation Necessary	No Change
HYD-6	Substantial additional sources of pollutants	No Mitigation Necessary	No Change
HYD-7	Impede or redirect flood flows	No Mitigation Necessary	No Change
HYD-8	Expose people or structures	No Mitigation Necessary	No Change
HYD-9	Inundation by seiche, tsunami, or mudflow	No Mitigation Necessary	No Change
HYD-10	Result in cumulative impacts on hazards and hazardous materials	No Mitigation Necessary	No Change
LAND-1	Change the type or intensity of existing or planned land use patterns	Less than Significant	No Change
LAND-2	Incompatible with adjacent land uses or with the general character of the surrounding area	Less than Significant	No Change
LAND-3	Conflict with established residential, recreational, educational, religious, or scientific uses of an area	No Mitigation Necessary	No Change
LAND-4	Allow new development that could conflict with any applicable City land use plan, policy or regulation	No Mitigation Necessary	No Change
LAND-5	Physically divide an established community	Less than Significant	No Change
LAND-6	Habitat conservation plan or natural community plan	No Mitigation Necessary	No Change
LAND-7	Result in cumulative impacts on land use and planning	No Mitigation Necessary	No Change

<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
NOISE-1	Cause the average 24-hour noise level (Ldn) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the Ldn would remain below 60 dB	Less than Significant	No Change
NOISE-2	Cause the Ldn to increase by 3 dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB	Less than Significant	No Change
NOISE-3	Cause an increase of 3 dB or more in an existing residential area where the Ldn currently exceeds 60 dB	Less than Significant	No Change
NOISE-4	Result in indoor noise levels for residential development to exceed an Ldn of 45 dB	Less than Significant	No Change
NOISE-5	Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels	Less than Significant	No Change
NOISE-6	Expose people to noise levels in excess of established State standards	Less than Significant	No Change
NOISE-7	Result in the exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies	Less than Significant	No Change
NOISE-8	Result in a potentially substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	Less than Significant	No Change
NOISE-9	Within an airport land use plan or within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels	No Mitigation Necessary	No Change
NOISE-10	Within the vicinity of a private airstrip, the project would not expose people residing or working in the project area to excessive noise levels	No Mitigation Necessary	No Change
NOISE-11	Result in cumulative impacts on noise	Less than Significant	No Change
POP-1	Induce substantial population growth in an area	No Mitigation Necessary	No Change
POP-2	Displace substantial numbers of existing housing	No Mitigation Necessary	No Change
POP-3	Displace substantial numbers of people	No Mitigation Necessary	No Change
POP-4	Create a substantial imbalance between employed residents and jobs	No Mitigation Necessary	No Change
POP-5	Result in cumulative impacts on population and housing	No Mitigation Necessary	No Change
PS-1	Adverse physical impact from the construction of additional school facilities	No Mitigation Necessary	No Change
PS-2	Less-than-significant cumulative impacts with respect to school facilities	No Mitigation Necessary	No Change
PS-3	Adverse physical impact from the construction of additional fire protection facilities	No Mitigation Necessary	No Change
PS-4	Less-than-significant cumulative impacts with respect to fire protection service	No Mitigation Necessary	No Change
PS-5	Adverse physical impacts from the construction of additional police protection facilities	No Mitigation Necessary	No Change

<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
PS-6	Less than significant cumulative impacts with respect to police protection service	No Mitigation Necessary	No Change
PS-7	Adverse physical impact from the construction of additional parks and recreation facilities	Less than Significant	No Change
PS-8	Adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities	Less than Significant	No Change
PS-9	Adverse physical impact from the construction of additional library facilities	No Mitigation Necessary	No Change
PS-10	Result in cumulative impacts on public services and recreation	No Mitigation Necessary	No Change
TRANS-1	Intersection to drop below its motor vehicle level of service standard, or deteriorate operations at representative intersections that already operate at a substandard level of service	Significant and Unavoidable	No Change
TRANS-2	Roadway segment to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service	No Mitigation Necessary	No Change
TRANS-3	Freeway segment or ramp to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service	Significant and Unavoidable	No Change
TRANS-4	Impede the function of planned bicycle or pedestrian facilities	No Mitigation Necessary	No Change
TRANS-5	Increase demand for pedestrian and bicycle facilities that cannot be met by existing or planned facilities	No Mitigation Necessary	No Change
TRANS-6	Impede the operation of a transit system as a result of congestion	Significant and Unavoidable	No Change
TRANS-7	Create demand for transit services that cannot be met by current or planned services	No Mitigation Necessary	No Change
TRANS-8	Potential demand for through traffic to use local residential streets	Less than Significant	No Change
TRANS-9	Create an operational safety hazard	Less than Significant	No Change
TRANS-10	Inadequate emergency access	No Mitigation Necessary	No Change
UTIL-1	Sufficient water supplies	No Mitigation Necessary	No Change
UTIL-2	Construction of new water facilities or expansion of existing facilities	No Mitigation Necessary	No Change
UTIL-3	Physical deterioration of a water utility facility	No Mitigation Necessary	No Change
UTIL-4	Cumulative impacts with respect to water supply	No Mitigation Necessary	No Change
UTIL-5	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board	No Mitigation Necessary	No Change
UTIL-6	Result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments	No Mitigation Necessary	No Change
UTIL-7	Adverse physical impacts from new or expanded wastewater utility facilities	No Mitigation Necessary	No Change
UTIL-8	Physical deterioration of a wastewater utility facility	No Mitigation Necessary	No Change

<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
UTIL-9	Cumulative impacts with respect to wastewater.	No Mitigation Necessary	No Change
UTIL-10	Construction of new stormwater facilities or expansion of existing facilities	No Mitigation Necessary	No Change
UTIL-11	Adverse physical impacts from new or expanded utility facilities	No Mitigation Necessary	No Change
UTIL-12	Physical deterioration of a utility facility	No Mitigation Necessary	No Change
UTIL-13	Cumulative impacts with respect to stormwater facilities	No Mitigation Necessary	No Change
UTIL-14	Served by landfills with sufficient permitted capacity to accommodate the proposed Plan's solid waste disposal needs	No Mitigation Necessary	No Change
UTIL-15	Fall out of compliance with federal, State, and local statutes and regulations related to solid waste	Less than Significant	No Change
UTIL-16	Cumulative impacts with respect to solid waste	No Mitigation Necessary	No Change
UTIL-17	Increase in natural gas and electrical service demands	Less than Significant	No Change

### **3 ENVIRONMENTAL ANALYSIS**

This Chapter of the EIR addendum provides analysis and cites substantial evidence that supports the city's determination that the environmental effects of the proposed Sustainability and Climate Action Plan (S/CAP) do not meet the criteria for preparing a subsequent or supplemental EIR under CEQA guidelines section 15162 and are consistent with the provisions of section 15183.5.

As addressed in the analysis below, the goals and key actions included in the S/CAP are beneficial actions and would not cause a new significant impact or substantially increase the severity of previously identified significant impacts from the Comprehensive Plan EIR that would require any substantive revision to the Comprehensive Plan EIR. The S/CAP would not result in substantial changes in physical circumstances that would cause a new significant impact or substantially increase the severity of a previously identified significant impact. There have been no other changes in the circumstances that meet this criterion. There is no significant new information that was not already known or could not have been known at the time of the Comprehensive Plan adoption in 2017 that would lead to new impacts or an increase in severity of any impacts. Additionally, there are no feasible mitigation measures or alternatives that would substantially reduce any significant effects of the Comprehensive Plan, nor are there any considerably different measures or alternatives that would substantially reduce significant environmental effects beyond what was analyzed in the Comprehensive Plan EIR. All impacts would be essentially equivalent to those previously analyzed in the Comprehensive Plan EIR.

The Comprehensive Plan EIR identified one significant and unavoidable impact on air quality and three significant and unavoidable impacts on transportation and traffic. These impacts would remain significant and unavoidable with the implementation of the S/CAP but not be substantially increased in severity. If the City were to adopt the proposed S/CAP, it would avoid a cumulatively considerable greenhouse gas (GHG) effect. The S/CAP includes several measures and strategies to reduce GHG emissions, such as increasing the use of renewable energy sources, promoting energy efficiency, reducing vehicle miles traveled, and promoting sustainable land use. These measures, when implemented, would lead to a reduction in GHG emissions and help the City achieve its emissions reduction targets. The remaining sections of this chapter provide an analysis of potential project impacts, including impacts from growth expected to occur during the life of the S/CAP that could occur as a result of the implementation of the S/CAP.

#### **3.1 AESTHETICS AND VISUAL RESOURCES**

Section 4.1, "Aesthetics and Visual Resources," of the Comprehensive Plan EIR (pages 4.1-1 to 4.1-25) described the character and quality of the visual resources within the City and analyzed the potential impacts of the Comprehensive Plan. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation and the changes under the 2023 S/CAP.

**Table 3.1-1. Previously Identified Impacts in the Comprehensive Plan EIR**

<b>Impact</b>	<b>Issue</b>	<b>Significance After Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
AES-1	Degrade the existing visual character or quality	Less than Significant	No Change
AES-2	Alter public viewsheds or view corridors or scenic resources	No Mitigation Necessary	No Change
AES-3	Create a new source of substantial light or glare	No Mitigation Necessary	No Change
AES-4	Shadow public open space	Less than Significant	No Change
AES-5	Result in cumulative impacts on aesthetic and visual resources	No Mitigation Necessary	No Change

### **3.1.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

Governor Brown signed Senate Bill (SB) 743 in September 2013, creating a process to change how transportation impacts are analyzed under CEQA. More details on SB 743 are provided in Section 3.12 of this SEIR, "Transportation and Traffic." However, SB 743 also indicated, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Aesthetic impacts for qualifying projects within a transit priority area are not considered significant effects on the physical environment (Public Resources Code Section 21099).

Governor Brown signed Assembly Bill (AB) 2341 in September 2018, which amends the aesthetic resource in CEQA. AB 2341 indicates that a lead agency is not required to evaluate the aesthetic effects of a project and aesthetic effects shall not be considered significant effects on the environment if the project involves the refurbishment, conversion, repurposing, or replacement of an existing building that meets requirements: (1) the building must be abandoned, dilapidated (defined as "decayed, deteriorated, or fallen into such disrepair through neglect or misuse to require substantial repair for safe and proper use") or have been vacant for over a year; (2) the site must be immediately adjacent to parcels developed with qualified urban uses or 75 percent of its perimeter must adjoin such parcels (with the remainder adjoining parcels previously so developed); (3) the project must include housing construction; (4) any new structure must "not substantially exceed the height of the existing structure"; and (5) the project must "not create a new source of substantial light or glare (Public Resources Code Section 21081.3).

### **3.1.2 PROPOSED S/CAP**

Implementation of the S/CAP would involve physical changes associated with the construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure (Key Action EV5, M1, M3, M8); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11) and tree planting (Key Action N1).

The S/CAP also supports mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9), which could involve structures that are tall enough to impact views and scenic resources within the city. Future development projects incorporating S/CAP key actions and goals, such as new construction for a salt removal facility (Key Action W2) and flood control infrastructure, including bridge improvements and a levee (Key Action S3 and S4), could involve changes to the visual environment. The S/CAP also establishes policies encouraging

building electrification and energy-saving retrofits to existing buildings (Key Action EV6 and E2) like electric vehicle charger installation or energy-saving retrofits, which would likely be visible to visitors, employees, and residents, depending on the location and design of improvements and the location of affected publicly accessible viewpoints. Depending on the size and mass of these energy-generating components, future redevelopment or development could result in the degradation of scenic resources by incorporating alternative energy systems into a building, such as solar photovoltaic (PV) panels.

Implementing the S/CAP would reduce natural gas use and increase electricity consumption through electrification opportunities such as installing solar PV panels, which could introduce substantial new sources of glare. Solar panels, to be effective, must be oriented to maximize solar radiation absorption. However, solar panels are designed to maximize sunlight absorption, are generally constructed of dark, light-absorbing materials, and are composed of a minimum of reflective surfaces. Therefore, it is not anticipated that solar arrays would result in an increased amount of glare. The S/CAP encourages the construction of mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9) that could add new sources of light and glare, such as glare from building windows or building surfaces. The Comprehensive Plan promotes energy conservation by minimizing light and glare from development while ensuring public health and safety (Policy N-7.5). New sources of lighting and glare from S/CAP key actions and goals would be consistent with the type and intensity of lighting and glare already created from existing uses.

The S/CAP encourages development programs to plant trees and increase tree canopy (Key Measure N1) and mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9). Trees planted could block views of scenic resources (Key Action N1). However, tree planting and mixed-use and transit-oriented development do not alter any land use designations or development intensities established by the Comprehensive Plan, nor would it involve substantial new shadow. The Comprehensive Plan EIR states that potential shade impacts would be a concern would be along the city's mixed-use corridors, where buildings could cast shadows across public plazas and small parks. However, implementation of Mitigation Measure AES-4 would ensure the City develops an ordinance that requires development projects of a certain size or location to prepare an analysis of potential shade and shadow impacts.

The S/CAP does not involve any development or other physical changes to the environment and does not directly change land use designations or zoning of proposed developments. Future development would be subject to meeting the City's zoning requirements, landscaping standards, and the regulations of any applicable specific plan. Specifically, future development would be required to comply with proposed policies that regulate the design of new buildings and protect the City's existing aesthetic and visual resources. Projects such as new or substantially renovated commercial properties, multi-family residential developments, and projects within the City's mixed-use areas or transit-oriented areas are subject to Palo Alto Municipal Code, Palo Alto Baylands Nature Preserve Site Assessment and Design Guidelines, South of Forest Avenue Coordinated Area Plan, and Downtown Urban Design Plan, which promotes and ensures design excellence. The following table summarizes S/CAP key actions related to aesthetics and visual resources:

**Table 3.1-2. Summary of S/CAP Key Actions Related to Aesthetics and Visual Resources**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M3, M8	Earth-moving activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
W3, N1, N11	Green stormwater infrastructure and tree planting
M2, M9	Mixed-use and transit-oriented development
W2	New construction for a salt removal facility
S3, S4	Flood control infrastructure, including bridge improvements and a levee
EV6, E2	Building electrification and energy-saving retrofits to existing buildings
N1	Tree planting and increasing tree canopy

There are no direct impacts from adopting the S/CAP and no mitigation would be required. However, the S/CAP uses land-use change assumptions consistent with those assumed for the Comprehensive Plan EIR, so impacts on aesthetic and visual resources, including development incorporating S/CAP key action and goals, are no different from that reported under the Comprehensive Plan EIR. The impacts associated with the implementation of the S/CAP as an implementation program of the Comprehensive Plan on aesthetic and visual resources remain **less than significant**.

## 3.2 AIR QUALITY

Section 4.2, "Air Quality," of the Comprehensive Plan EIR (pages 4.2-1 to 4.2-50) describes the air quality conditions, summarizes applicable regulations, and analyzes the potential short-term construction and long-term operational air quality impacts of the Comprehensive Plan. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation and the changes under the 2023 S/CAP.

**Table 3.2-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance After Mitigation	Changes under the 2023 S/CAP
AIR-1	Conflict with or obstruct implementation of the applicable air quality plan	Less than Significant	No Change
AIR-2	Violate an air quality standard; contribute substantially to an existing or project air quality violation; and/or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard	Significant and Unavoidable	No Change
AIR-3	Expose sensitive receptors to substantial concentrations of air pollution.	Less than Significant	No Change
AIR-4	Create or expose a substantial number of people to objectionable odors	Less than Significant	No Change

### 3.2.1 UPDATES TO REGULATORY SETTING

#### UPDATES TO THE REGULATORY SETTING

In 2008, the United States Environmental Protection Agency (U.S. EPA) strengthened the 8-hour ozone standard to 75 parts per billion (ppb). There were 16 areas in California designated nonattainment in 2012. In 2012, U.S.



EPA also strengthened the annual fine particulate matter (PM<sub>2.5</sub>) standard to 12 micrograms per cubic meter (µg/m<sup>3</sup>). U.S. EPA designated four areas in California as nonattainment for this standard. ARB initiated State Implementation Plans (SIPs) for both standards in 2017.

On March 23, 2017, the Air Resources Board (ARB or Board) adopted the Revised Proposed 2016 State Strategy for the State Implementation Plan (State SIP Strategy), describing the proposed commitment to achieve the reductions necessary from mobile sources, fuels, and consumer products to meet federal ozone and PM<sub>2.5</sub> standards over the next 15 years. The State SIP Strategy proposes a suite of regulatory and incentive programs, referred to as State SIP measures, which, in combination with local actions, are designed to achieve the required emission reductions to meet federal air quality standards. The Bay Area Air Quality Management District (BAAQMD) prepared and adopted a revision to the 8-Hour Ozone Attainment Plan for the Bay Area on April 19, 2017. The revised attainment plan meets the standards of the SIP.

The “Regulatory Setting” in the Comprehensive Plan EIR is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.2-10 to 4.2-50).

### **3.2.2 PROPOSED S/CAP**

The S/CAP uses land use assumptions consistent with those developed for the Comprehensive Plan EIR and with the Association of Bay Area Governments (ABAG) development forecasts. The S/CAP program is intended to mitigate the impacts of greenhouse gas (GHG) emissions but would have co-benefits for air quality. For example, implementation of the S/CAP would enhance pedestrian, bicycle, and transit connectivity (Key Action EV5, M1, M2, M3, M8 and M9) – all of which would promote active transportation that involves reduced levels of criteria air pollutant emissions. The S/CAP would also commit the City to develop incentives for housing, mixed-use, and transit-oriented development (Key Action M1, M2, M3, M8 and M9), which would also tend to reduce vehicular travel demand and associated criteria air pollutant emissions. The S/CAP proposes Transportation Demand Management (TDM) (Key Action M4) for employees and residents and reduce VMT to encourage alternative modes of transportation (Key Actions M1, M2, M3 and M9), to establish Safe Routes for Older Adults/Aging in Place program, and to continue the Safe Routes to School program (Key Action M4). The S/CAP proposes coordinating with regional transit agencies and cities to promote cohesive transit interconnections. These actions are consistent with other policies and plans intended to reduce air quality impacts.

The S/CAP would not result in growth that substantially exceeds local or regional planning projections of the Comprehensive Plan and is consistent with the goal of the 2017 Bay Area Clean Air Plan to reduce GHG emissions and protect the climate. As detailed in the Comprehensive Plan EIR, VMT per population and VMT per service population would decrease and emissions resulting from future development allowed by the Comprehensive Plan would not hinder BAAQMD’s ability to attain California or National Ambient Air Quality Standards (AAQS). Additionally, the Comprehensive Plan EIR concludes that an analysis conducted to understand the effect of implementing mitigation measures shows that additional policies included in the Comprehensive Plan per Mitigation Measure AIR-1 would ensure that the Comprehensive Plan would not hinder BAAQMD from implementing the control measures in the 2017 Bay Area Clean Air Plan.

Implementing S/CAP key actions and goals would involve physical changes, which could have adverse physical environmental effects depending on their location, character, design, phasing, and other operational characteristics. Ground disturbance would occur from the construction of transportation improvements (Key Action EV5, M1, M2,

M3 and M8); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); building electrification (Key Action EV5, EV6, E1 and E2); and future development projects that incorporate mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9). Although the proposed key actions in the S/CAP would generally be small-scale construction projects and within existing and developed areas, S/CAP key actions and goals would involve exhaust emissions from off-road diesel-powered construction equipment, dust generated by demolition, grading, earthmoving, construction activities exhaust emissions from on-road vehicles, and off-gas emissions of reactive organic gases (ROGs) from the application of asphalt, paints, and coatings. However, the Comprehensive Plan EIR includes Mitigation Measure AIR-2a, which would require adherence to the current BAAQMD basic control measures for reducing construction emissions of PM10 and would ensure impacts from fugitive dust generated during construction activities are less than significant. Comprehensive Plan EIR Mitigation Measure AIR-2b would require implementation of BAAQMD-approved mitigation measures if it determined during subsequent environmental review that future development projects in Palo Alto could generate construction exhaust emissions in excess of the BAAQMD significance thresholds. These mitigation measures would be implemented, as applicable, to reduce impacts associated with projects intended to implement key actions from the S/CAP.

S/CAP measures that pertain to the planning and design of communities would support mixed-use and transit-oriented development. These types of developments, which are encouraged in the Comprehensive Plan, are intended to reduce VMT from vehicles that generate criteria air pollutants and precursors. The Comprehensive Plan EIR analyzed the air quality impacts of the projected development over the Comprehensive Plan planning horizon, would include policies that minimize emissions (Policy N-5.1 through N-5.6) and the implementation of Mitigation Measure AIR-2c would require the City to implement BAAQMD-approved mitigation measures identified in the BAAQMD CEQA Guidelines if determined during subsequent environmental review that applicants for future development in Palo Alto could generate operational emissions in excess of the BAAQMD significance thresholds. As described in the Comprehensive Plan EIR, total criteria air pollutant emissions from the operation of future development projects allowed by the Comprehensive Plan would be substantial and would contribute to increases in concentrations of air pollutants, which could contribute to ongoing violations of air quality standards. The S/CAP would not lead to any new impacts or an increase in the severity of criteria air pollutant emissions impacts disclosed in the Comprehensive Plan EIR.

Implementation of the Comprehensive Plan, including the S/CAP implementation program, could expose sensitive receptors to substantial concentrations of air pollution through construction-related toxic air contaminants (TACs), potentially affecting sensitive receptors and operational TACs from mobile and stationary sources of diesel particulate matter. Under the S/CAP, construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure; continuing the Safe Routes to School program; green stormwater infrastructure; tree planting; salt removal facility; flood control infrastructure; building electrification; and future development projects that incorporate mixed-use and transit-oriented development could expose sensitive receptors to concentrations of air pollutant emissions. The S/CAP key actions and goals could result in construction activities that include the use of off-road diesel-powered construction equipment and temporarily increased truck hauling trips, generating temporary TAC emissions. However, these key actions from the S/CAP are consistent with the types of construction evaluated in the Comprehensive Plan EIR, and implementing the S/CAP would not substantially increase the magnitude of the construction occurring through the buildout of growth contemplated in the Comprehensive Plan. Therefore, implementation of the S/CAP would not result in construction activities that generate more severe TAC emissions or TAC concentrations compared to that contemplated in the Comprehensive Plan EIR. The

Comprehensive Plan EIR includes Mitigation Measures AIR-3a and AIR-3b to ensure that mobile sources of TACs not covered under BAAQMD permits are considered during subsequent project-level environmental review and development of individual projects would be required to achieve the incremental risk thresholds established by BAAQMD. Further, Comprehensive Plan EIR Mitigation Measures AIR-3c and AIR-3d would ensure that the placement of sensitive receptors near major sources of air pollution would achieve the incremental risk thresholds established by BAAQMD.

Implementation of the S/CAP could result in the construction of electric vehicle charging stations, bicycle infrastructure (e.g., bike lanes, bike parking), building electrification and retrofits, and tree planting that would not likely result in odorous emissions from construction equipment because these activities would require the use of handheld tools and minor construction equipment that would not result in odorous emissions. S/CAP key actions that include transit and transportation improvements, and micromobility infrastructure, a salt removal facility, flood control infrastructure and green infrastructure may result in asphalt paving and diesel truck trips, but do not represent a short- or long-term source of substantial pollutant concentrations that would affect substantial populations. Although locations for these improvements have not been identified, these types of activities would generally occur in developed areas. However, these activities would involve minimal use of heavy-duty diesel equipment and, thus, diesel PM emissions that generate odors would be minimal, temporary, and highly localized. Because odors would be temporary and would disperse rapidly with distance from the source, construction-generated odors would not adversely affect a substantial number of people.

Construction and operation of a salt removal facility within an area with sensitive receptors, a buffer or setback would be considered during the location selection process to minimize or avoid adverse air quality impacts. This approach is consistent with the policies of the Comprehensive Plan (Policy N-5.4, N-5.5 and N-5.6) to protect and enhance the environment and public health by avoiding or mitigating potential impacts of development from odors and toxic contaminants on sensitive receptors. Construction-related would generate detectable odors from heavy-duty equipment exhaust; however, this would be temporary and would cease upon construction completion. Various chemicals typically associated with the operation of a salt removal facility would be stored on site. Chemical storage and the use of chemicals during the salt removal process are not anticipated to significantly impact air quality. Additionally, the salt removal process is not classified as an odor-generating process<sup>1</sup> and would not create objectionable odors affecting a substantial number of people. The Comprehensive Plan EIR indicates BAAQMD's odor screening distances during future CEQA review, implementation of Mitigation Measure AIR-4 and compliance with BAAQMD Regulation 7 would ensure that odor impacts are minimized.

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<sup>1</sup> SCAQMD CEQA Air Quality Handbook (1993): [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))

The following table summarizes S/CAP key actions related to air quality:

**Table 3.2-2. Summary of S/CAP Key Actions Related to Air Quality**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M1, M2, M3, M8 and M9	Mixed-use, and transit-oriented development
M4	Continuing Safe Routes to School Program
M1, M2, M3 and M9	Alternative modes of transportation
W3, N1 and N11	Green stormwater infrastructure and tree planting
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings including electric vehicle charger installation

The proposed S/CAP includes a roadmap for implementing new policies, programs, incentives, requirements, projects, and initiatives designed to reduce GHG emissions and adapt to climate change impacts. The development assumptions of the adopted Comprehensive Plan were used in the GHG emissions forecasting of the S/CAP. The S/CAP key actions and goals would not change the Comprehensive Plan EIR evaluation of impacts related to conflicts with air quality plans, violations of air quality standards, exposure of sensitive receptors to substantial concentrations of air pollution, or exposure of people to objectionable odors. In addition, several S/CAP key actions and goals related to air quality would help reduce air pollutant emissions. As the S/CAP does not alter the land use designations or development assumptions of the Comprehensive Plan, the S/CAP does not alter the significant and unavoidable impact identified in the Comprehensive Plan EIR. Impacts on air quality, including development incorporating S/CAP key actions and goals, are no different from that reported under the Comprehensive Plan EIR. Therefore, impacts associated with the implementation of the S/CAP on air quality would remain **less than significant** for impacts AIR-1, AIR-3, and AIR-4 and **significant and unavoidable** for impact AIR-2.

### 3.3 BIOLOGICAL RESOURCES

Section 4.3, "Biological Resources," of the Comprehensive Plan EIR (pages 4.3-1 to 4.3-42) describes sensitive species and habitats in Palo Alto, including the urban forest. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts under the 2023 S/CAP.

**Table 3.3-1. Previously Identified Impacts in the Comprehensive Plan EIR**

<b>Impact</b>	<b>Issue</b>	<b>Significance After Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
BIO-1	Special-status species	No Mitigation Necessary	No Change
BIO-2	Riparian habitat or other sensitive natural community	No Mitigation Necessary	No Change
BIO-3	Movement corridors	No Mitigation Necessary	No Change
BIO-4	Conflict with any local policies or ordinances protecting biological resources	No Mitigation Necessary	No Change
BIO-5	Habitat Conservation Plan, Natural Community Conservation Plan or other approved habitat conservation plan	No Mitigation Necessary	No Change
BIO-6	Result in cumulative impacts on biological resources	No Mitigation Necessary	No Change

### **3.3.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.3-1 to 4.3-12).

### **3.3.2 PROPOSED S/CAP**

The S/CAP key actions and goals propose the continuation and implementation of policies, design standards, and technical assistance to increase biodiversity and soil health through tree planting (Key Action N1), enhancement of pollinator habitat (Key Action N4), maximization of biodiversity and soil health (Key Action N6) and implementation of the Urban Forest Master Plan (Key Action N7). While the planting of trees would cause minor direct disturbance to the physical environment, the resulting direct and indirect effects of additional trees and increased tree canopy could potentially provide habitat for many species of migratory birds, tree roosting bats, and other wildlife species and would generally be considered a beneficial effect on biological resources. The Comprehensive Plan has policies that enhance urban sustainability through periodic reviews regarding special status species to identify changes in listed species, updates to tree canopy policies and regulations, larger stream setbacks, careful design to minimize disturbances to natural habitats, and preservation of creeks and riparian areas as important habitats for wildlife (Programs N1.4.1 through N1.4.3, N1.5.1, N2.2.1, N2.4.1, N2.7.3, N2.10.3, N3.3.1, and N3.3.3). The Comprehensive Plan EIR indicates that the Comprehensive Plan does not propose specific development projects that would directly or indirectly impact the habitat of special-status species, riparian habitats, wetlands, or other sensitive natural communities.

Physical changes associated with implementation of the S/CAP would occur in developed and urbanized areas of the city with a low potential for candidate, sensitive natural communities, or special-status species. The S/CAP would lead to energy efficiency retrofits and investment in grid modernization, which would occur on existing buildings and renewable energy systems installed on existing and new buildings would not require ground-disturbing activities that could disturb habitat (Key Action EV5, EV6, E1 and E2). Installing solar photovoltaic (PV) panels on existing buildings may require removing or modifying nearby trees. Removal or modification could impact nesting migratory birds, protected birds of prey, or protected bat species. However, the Comprehensive Plan calls for, and the Comprehensive Plan EIR anticipated additional use of renewable energy technologies and

incorporating energy efficiency measures (Programs N7.2.1, N7.6.1, N8.1.2). As noted, “development allowed under the proposed Plan could result in the removal of existing trees on private or public properties” (Comprehensive Plan EIR, page 4.3-38). The City’s Tree Preservation and Management Regulations protect trees, and the Urban Forest Master Plan is designed to ensure no new loss of tree resource benefits.

Physical changes could occur with implementation of the S/CAP key actions and goals from roadway infrastructure improvements that better match vehicular capacity to demand and improve the quality of transportation facilities for pedestrian and bicycle use (Key Action EV5, M1, M2, M3, M8 and M9) such as mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9) and the Safe Routes to School program (Key Action M4); new construction for a salt removal facility (Key Action W2); green stormwater infrastructure; and flood control infrastructure, including bridge improvements and a levee (Key Action S3 and S4). The Comprehensive Plan EIR states that the Comprehensive Plan generally aims to control the density and intensity of future development within the existing urbanized areas of the city and encourages mixed-use and/or development within transit-rich areas through municipal code updates to include zoning changes that allow mix of retail and residential uses (Program L2.4.5). The Comprehensive Plan commits the City to improvements to the levee system and flood control infrastructure to address impacts from sea level rise (Programs N4.13.3, N8.4.1, and S2.12.2). The following table summarizes S/CAP's key actions related to biological resources:

**Table 3.3-2. Summary of S/CAP Key Actions Related to Biological Resources**

S/CAP Key Action	S/CAP Proposed Actions
N1, N4, N6	Increase biodiversity and soil health through tree planting; enhancement of pollinator habitat; and maximizing biodiversity and soil health
N7	Implementation of the Urban Forest Master Plan
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development
M4	Continuing Safe Routes to School Program
W2	New construction for a salt removal facility
W3, N11	Green stormwater infrastructure
S3 and S4	Flood control infrastructure, including bridge improvements and a levee

The S/CAP key actions and goals are within urban areas where native habitats and vegetation communities are small and highly fragmented, compromising the ability of those habitats and communities to support viable populations of most species of flora and fauna. The majority of native biological resources have been degraded or replaced through disturbances resulting from current and historical land uses. The remaining native habitat is primarily limited to isolated patches on foothills and slopes scattered throughout the city and in small riparian and wetland areas in baylands or creeks. These remaining native habitat areas are discontinuous and interspersed with nonnative, disturbed (i.e., ruderal or weedy) vegetative cover in open space areas of Palo Alto in the foothills or wetlands adjacent to the bay because these areas are protected. Thus, there are no direct impacts from adopting the S/CAP and no mitigation would be required. Impacts on biological resources, including development incorporating S/CAP key actions and goals, are no different from that reported under the Comprehensive Plan EIR. Therefore, impacts associated with the implementation of the S/CAP on biological resources remain **less than significant**.

### 3.4 CULTURAL RESOURCES

Section 4.4, "Cultural Resources," of the Comprehensive Plan EIR (pages 4.4-1 to 4.4-32) describes buildings, objects, features, structures, sites, and districts with historical or cultural value. Cultural resources typically include buildings or structures that exhibit architectural or aesthetic value that is associated with an event or a person or persons that have contributed in an important way to the shaping or development of the city, region, or nation; and objects, such as Native American artifacts discovered at a particular location or area of the city; or an archaeological, geological, or paleontological artifact, such as fossils. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts under the 2023 S/CAP.

**Table 3.4-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
CULT-1	National and/or California Register, or listed on the City’s historic inventory	Less than Significant	No Change
CULT-2	California history or prehistory	Less than Significant	No Change
CULT-3	Archaeological resources as defined in Section 15064.5 of the CEQA Guidelines	Less than Significant	No Change
CULT-4	Disturb any human remains	No Mitigation Necessary	No Change
CULT-5	Unique paleontological resource or site or unique geologic feature	Less than Significant	No Change
CULT-6	Local cultural resource	Less than Significant	No Change
CULT-7	Result in cumulative impacts on cultural resources	Less than Significant	No Change

#### 3.4.1 UPDATES TO REGULATORY SETTING

##### UPDATES TO THE REGULATORY SETTING

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.4-1 to 4.4-8).

#### 3.4.2 PROPOSED S/CAP

Implementation of S/CAP strategies and actions would involve some physical changes, which could have adverse physical environmental effects depending on their location, character, design, phasing, and other operational characteristics. Future development projects that incorporate S/CAP key actions and goals, such as the construction of additional bicycle lanes, transit terminals, traffic signal improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8 and M9); mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); and flood control infrastructure including bridge improvements and a levee (Key Action S3 and S4), would involve earth-moving construction activities that could have impacts on archaeological resources associated. Development under the Comprehensive Plan, including development influenced by the S/CAP, would involve ground disturbance that could lead to the discovery of previously unknown human remains. The S/CAP establishes policies on building

electrification of new developments and retrofits to existing buildings (Key Action EV5, EV6, E1 and E2) that have the potential to impact buildings or structures of historical age (50 years old or older) if the installation of reflective roofing and/or solar PV panels were proposed for a building that is or may be considered historic, and if the improvements are not designed in a way that avoids alterations to character-defining features of such structures. However, the Comprehensive Plan includes policies intended to reduce or avoid such impacts, such as maintaining and updating the City's Historic Resource Inventory, reassessment of the Historic Preservation Ordinance, application of current codes to older buildings, use of the State Historical Building Code for designated historic buildings, and protecting archaeological resources (Programs L7.1.1, L7.1.2, and L7.8.3).

As a part of preparing the Comprehensive Plan EIR, the City contacted the NAHC, and requested a tribal consultation list. In their response dated July 25, 2013, the NAHC provided a list of Native American tribes that might have knowledge of any traditional lands or cultural resources in the city, including Tribal Cultural Resources. The following tribes were sent letters requesting input on the proposed project to ensure consideration of Tribal Cultural Resources in accordance with Public Resources Code Section 21080.3.1:

- ▶ Amah Mutsun Tribal Band
- ▶ Amah/Mutsun Tribal Band
- ▶ Indian Canyon Mutsun Band of Costanoan
- ▶ Muwekma Ohlone Indian Tribe of the SF Bay Area
- ▶ The Ohlone Indian Tribe

The following table summarizes S/CAP's key actions related to cultural resources:

**Table 3.4-2. Summary of S/CAP Key Actions Related to Cultural Resources**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings

The Comprehensive Plan EIR determined that implementation of Comprehensive Plan EIR Mitigation Measures CULT-1a, CULT-1b, and CULT-1c would reduce impacts to less than significant. Implementation of Comprehensive Plan EIR Mitigation Measures CULT-1b and CULT-1c would require feasible project-level mitigation measures prior to construction of specific development projects that would disturb a historic structure listed or eligible to be listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or the Inventory of Historic Resources. Implementing the proposed project would not result in new impacts or impacts that would be substantially increased in severity compared to that addressed in the City's Comprehensive Plan EIR. Comprehensive Plan EIR Mitigation Measure CULT-3 requires that a cultural resources professional conduct and review a records search of the California Historical Resources Information System for



proposed new development to determine whether the site contains known prehistoric or historic cultural resources and to determine the potential presence of as-yet-undiscovered cultural resources and be either preserved at their location or adequately documented as a condition of removal. Comprehensive Plan EIR Mitigation Measure CULT-3 requires that a qualified archaeologist examine prehistoric artifacts for appropriate protection and preservation during any construction activities and if cultural resources are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented. Comprehensive Plan EIR Mitigation Measure CULT-3 requires an archaeological data recovery program to be prepared in consultation with interested Native American tribes. These mitigation measures would be required for projects that implement the S/CAP, just as they apply to other types of projects proposed to implement the Comprehensive Plan.

The implementation of S/CAP strategies and actions would involve some physical changes, which, depending on their location, character, design, phasing, and other operational characteristics, could have adverse physical environmental effects. The potential physical changes associated with the S/CAP could lead to adverse environmental effects – the same adverse effects addressed by the Comprehensive Plan EIR. Implementation of the S/CAP would not result in new impacts or impacts that would be substantially increased in severity compared to that addressed in the City’s Comprehensive Plan EIR. Impacts on cultural resources, including development incorporating S/CAP key actions and goals, are no different from that reported under the Comprehensive Plan EIR. Therefore, impacts associated with the implementation of the S/CAP would remain **less than significant with mitigation**.

### 3.5 GEOLOGY, SOILS, AND SEISMICITY

Section 4.5, "Geology, Soils, and Seismicity," of the Comprehensive Plan EIR (pages 4.5-1 to 4.5-22) describes the environmental setting for geology, soils and seismicity, summarizes applicable regulations and analyzes the potential for risks associated with geology, soils and seismicity to of people or structures, major geologic hazards, soil instability and erosion or siltation. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation and the changes to impacts under the 2023 S/CAP.

**Table 3.5-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
GEO-1	Expose people or structures to substantial adverse effects	No Mitigation Necessary	No Change
GEO-2	Expose people or property to major geologic hazards	No Mitigation Necessary	No Change
GEO-3	Geologic unit or on soil that is unstable, or in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse	No Mitigation Necessary	No Change
GEO-4	Erosion or siltation	No Mitigation Necessary	No Change
GEO-5	Result in cumulative impacts on geology, soils, and seismicity	No Mitigation Necessary	No Change

### **3.5.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.5-1 to 4.5-4).

### **3.5.2 PROPOSED S/CAP**

The S/CAP key actions and goals would retain the existing Comprehensive Plan land use designations and encourage and facilitate growth in areas that either currently accommodate such uses or have been previously planned to accommodate such uses and that are currently urbanized. However, implementing S/CAP key actions and goals would involve physical changes, which could have adverse physical environmental effects depending on their location, character, design, phasing, and other operational characteristics. Ground disturbance would occur from the construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8 and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); building electrification (Key Action EV5, EV6, E1 and E2); and future development projects that incorporate mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9). Although the proposed key actions and goals in the S/CAP would generally be small-scale construction projects and within existing developed areas, the S/CAP could lead to erosion or siltation and expose people, structures, or property to substantial adverse effects.

The S/CAP is a program of the Comprehensive Plan, and the S/CAP would not alter the direction of other programs of the Comprehensive Plan, such as the Plan’s commitment for the City periodically reviewing and updating the Seismic Hazard Ordinance and incentivizing seismic retrofits, particularly for building types with high potential impact during an earthquake; incentives for seismic bonus and Transfer of Development Rights; requiring geotechnical/seismic reports required for proposed new and redeveloped buildings in hazard areas; and prioritizing retrofits based on the Seismic Hazards Identification Program and inventory of vulnerable building types, with potential incentives (Programs S2.5.1, S2.5.2, S2.6.2, S2.7.1, and S2.7.3).

The S/CAP key actions and goals discussed above are associated with areas of the City that are urbanized and built out. The Comprehensive EIR indicated that Alquist-Priolo Earthquake Fault Zone associated with the San Andreas Fault is sparsely populated and dominated by parklands and dedicated open space, and that development is not planned in these areas. Additionally, expansive soils and landslides were indicated in the Comprehensive EIR to have a low probability of occurring in the city. Further, liquefaction would likely be limited to the designated hazard zones, which are relatively narrow areas that flank natural drainages. The Comprehensive EIR specifies that unstable geologic units or soil prone to lateral spreading, subsidence, or collapse are not known to be present in the City.

The following table summarizes S/CAP's key actions related to geology, soils, and seismicity:

**Table 3.5-2. Summary of S/CAP Key Actions Related to Geology, Soils, and Seismicity**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings, including electric vehicle charger installation
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development

Geology, soils and seismicity impacts associated with development, including development that incorporates S/CAP key actions and goals, are not any different from those reported under the Comprehensive Plan EIR. Impacts on geology, soils, and seismicity, including development incorporating S/CAP key actions and goals, are no different from that reported under the Comprehensive Plan EIR. Therefore, impacts associated with the implementation of the S/CAP remain **less than significant**.

### 3.6 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Section 4.6, "Greenhouse Gas Emissions and Climate Change," of the Comprehensive Plan EIR (pages 4.6-1 to 4.6-50) describes existing GHG emissions, provides a summary of applicable regulations, analyzes the potential short-term construction and long-term operational GHG emissions impacts from implementation of the General Plan, and identified mitigation measures to reduce significant GHG emissions impacts. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation and the changes to impacts under the 2023 S/CAP.

**Table 3.6-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance After Mitigation	Changes under the 2023 S/CAP
GHG-1	Generate greenhouse gas emissions	No Mitigation Necessary	No Change
GHG-2	Conflict with an applicable plan, policy, or regulation	No Mitigation Necessary	No Change
GHG-3	Expose people or structures to the physical effects of climate change	Less than Significant	No Change

#### 3.6.1 UPDATES TO REGULATORY SETTING

##### UPDATES TO THE REGULATORY SETTING

On September 10, 2018, the Governor signed Senate Bill (SB) 100, which raises California’s Renewable Portfolio Standard (RPS) requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of

all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

EO B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” EO B-55-18 directs the California Air Resources Board to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO<sub>2</sub>e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Signed September 16, 2022, AB 1279, the California Climate Crisis Act, codified EO B-55-18. This bill declares the policy of the State both to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. It as requires that by 2045 statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels.

In November 2008, the California Building Standards Commission established the California Green Building Standards (CALGreen) Code, which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.

EO N-79-20, which was signed by the Governor on September 23, 2020, sets the following goals for the State: 100 percent of in-state sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

The “Regulatory Setting” in the Comprehensive Plan EIR is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.6-1 to 4.6-21).

### **3.6.2 PROPOSED S/CAP**

The S/CAP is intended to mitigate the impacts of GHG emissions and describes how the S/CAP would be effective in achieving the City’s “80 x 30” goal to reduce GHGs by 80 percent below 1990 levels by 2030. The emissions reduction actions range from market-driven solutions that require low intervention but also a relatively low certainty of achievement, to government-driven solutions that require higher intervention but yield high certainty of achievement, such as citywide voter-approved mandates.

Implementing S/CAP key actions and goals would involve the construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8 and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); building electrification (Key Action EV5, EV6, E1 and E2); and future development

projects that incorporate of mixed use and transit-oriented development (Key Action M1, M2, M3, M8 and M9). The S/CAP supports the Comprehensive Plan’s policies and programs to reduce natural gas usage in existing and new buildings to reduce associated GHG emissions (Policy N-7.7, N-8.1 and N-8.2).

The Comprehensive Plan EIR concludes that the Comprehensive Plan would decrease emissions from existing conditions and would ensure the City is on a trajectory to achieve the GHG reductions targets of Executive Order B-30-15 for 2030. Additionally, the Comprehensive Plan EIR states that implementing the City’s Comprehensive Plan and S/CAP ensures that the City is consistent with the State Scoping Plan and ABAG/MTC’s Plan Bay Area.

Future development projects and the City would implement S/CAP key actions and goals, such as constructing additional bicycle lanes, transit terminals, traffic signal improvements, micromobility infrastructure, and mixed-use and transit-oriented development. The S/CAP key actions and goals, including green stormwater infrastructure; tree planting; salt removal facility (Key Action W2); and flood control infrastructure, including bridge improvements and a levee (Key Action S3 and S4), would benefit people and structures from flooding, extreme temperatures, public health, wildlife risk and other impacts resulting from climate change.

Implementing the S/CAP key actions would involve construction related GHG emissions, primarily from emissions from equipment exhaust. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. Long-term GHG emissions are typically generated from mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). The S/CAP is designed to reduce these long-term emissions.

The Comprehensive Plan EIR concluded that the development assumed during the life of the Comprehensive Plan would add to the population (residents and employees and others) that could be exposed to the effects of climate change. For this reason, the Comprehensive Plan EIR Mitigation Measure GHG-3 was implemented to monitor and respond to the risk of climate change impacts, while promoting cooperative planning with other agencies, implementing green infrastructure, preparing response strategies, and developing new requirements for shoreline development to protect from potential impacts of flooding resulting from sea level rise and significant flood events. The Comprehensive Plan EIR states that compliance with the Comprehensive Plan policies that address the topics listed in Mitigation Measure GHG-3 would ensure that the City reviews new development and requires project design features to reduce the impact of flooding, sea level rise, and other effects of climate change anticipated in the EIR Study Area.

The following table summarizes S/CAP's key actions related to greenhouse gas emissions and climate change:

**Table 3.6-2. Summary of S/CAP Key Actions Related to Greenhouse Gas Emissions and Climate Change**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6 and E2	Building electrification and energy-saving retrofits to existing buildings

S/CAP Key Action	S/CAP Proposed Actions
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development

The GHG reduction goals of the S/CAP were informed by the development assumptions of the Comprehensive Plan buildout conditions. However, the proposed S/CAP would reduce GHG emissions overall and, therefore, not make a considerable contribution to the impact of GHG emissions on the environment. Therefore, impacts associated with the implementation of the S/CAP are considered **less than cumulatively considerable**.

### **Use of the Proposed S/CAP for Tiering and Streamlining Analysis of Greenhouse Gas Emissions**

As noted, the S/CAP describes how the City would achieve the “80 x 30” goal to reduce GHGs by 80 percent below 1990 levels by 2030 through the implementation of emissions reduction actions. Based on CEQA Guidelines Section 15183.5, the City may use consistency with the S/CAP to streamline review of future projects approved under the Comprehensive Plan. The S/CAP, in combination with this Comprehensive Plan EIR Addendum, addresses each of the Plan Elements recommended for GHG reduction programs stipulated in CEQA Guidelines Section 15183.5(b)(1), including:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area (see pages 26 – 38 of the proposed S/CAP);
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable (provided below in this Comprehensive Plan EIR Addendum);
- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area (see pages 66 – 74 of the proposed S/CAP);
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level (see pages 66 – 74 of the proposed S/CAP);
- (E) Establish a mechanism to monitor the plan’s progress toward achieving the level and to require amendment if the plan is not achieving specified levels (see pages 76 – 80 of the proposed S/CAP);
- (F) Be adopted in a public process following environmental review (see pages 19 – 20 of the proposed S/CAP for a summary of the public review process; the environmental review is provided by this Comprehensive Plan EIR Addendum).

The City’s goal to reduce GHGs by 80 percent below 1990 levels by 2030 is consistent with the State legislative framework that serves as a basis for much of the climate action planning in California. In fact, the City has developed an S/CAP whose target seeks greater local emissions reduction by 2030 compared to mandates for the State as a whole. The legal framework for GHG emission reductions has come about through Executive Orders, legislation, and regulations. In April 2015, Governor Edmund Brown issued an executive order establishing a statewide GHG reduction target of 40 percent below 1990 levels by 2030. This 2030 emissions reduction target acts as an interim goal between the AB 32 goal (i.e., achieve 1990 emission levels by 2020) and Governor Brown’s Executive Order S-3-05 goal of reducing statewide emissions 80 percent below 1990 levels by 2050. In addition, the executive order

aligns California's 2030 GHG reduction goal with the European Union's reduction target (i.e., 40 percent below 1990 levels by 2030) that was adopted in October 2014. Approval of SB 32 in September 2016 extended the provisions of AB 32 from 2020 to 2030 with a new target of 40 percent below 1990 levels by 2030. Rather than using this 40 percent reduction target by 2030, the proposed S/CAP demonstrates how the City will achieve an 80 percent reduction in emissions over that same period. The City's S/CAP emissions reduction goal is consistent with, and supportive of, the State legislative framework for GHG emissions reduction. The S/CAP also sets the City on a trajectory to achieve local reductions that demonstrate substantial progress toward the most recently enacted legislation, AB 1279, the California Climate Crisis Act, which was signed September 16, 2022. AB 1279 declares the policy of the state both to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. It also requires that by 2045 statewide anthropogenic greenhouse gas emissions are reduced to at least 85 percent below statewide 1990 levels.

The S/CAP identifies a range of actions that would collectively achieve the emissions reduction goal, including both commitments by the City and requirements for new projects. When future projects are evaluated for consistency with the S/CAP, applicable emissions reduction actions would be imposed as mitigation measures, conditions of approval, or would otherwise be required through enforceable measures for projects using S/CAP consistency to streamline CEQA review. The S/CAP commits the City to monitoring the effectiveness of the emissions reduction actions with the S/CAP goal, and revising the plan, if needed, to ensure that the goal is achieved (see page 77 of the proposed S/CAP).

The S/CAP demonstrates how the City will contribute its portion of the overall greenhouse gas reductions necessary for the State to achieve its own mandates. In doing so, the S/CAP how existing development, future development, and City operations will reduce emissions and ensure a **less than cumulatively considerable contribution** to the significant cumulative impact of global climate change.

The 2016 Comprehensive Plan EIR evaluated total communitywide emissions, observing that due to the implementation of federal, State, and local regulations and programs, the proposed plan would experience a decrease in emissions in 2030 (2016 Comprehensive Plan EIR, page 4.6-37). The 2016 Comprehensive Plan EIR evaluated the effectiveness of actions included in the draft S/CAP, explaining that additional action would be required to reduce emissions by 80 percent compared to 1990 levels (2016 Comprehensive Plan EIR, page 4.6-37). The 2016 Comprehensive Plan EIR imposed Mitigation Measure GHG-2, which requires the City to set and achieve or exceed an emissions reduction target that is consistent with Executive Order S-3-05, adopt an updated GHG emission reduction plan as a part of the S/CAP to achieve or exceed the State's goals, and to monitor the City's progress on an annual basis (see page 77 of the proposed S/CAP). The proposed S/CAP fulfills these mitigation requirements. The 2016 Comprehensive Plan EIR was drafted ahead of the proposed S/CAP, and the City at that time did not have the information required to demonstrate that local emissions could be reduced by 80 percent. For this reason, the 2016 Comprehensive Plan EIR concluded that the impact related to GHG emissions would be significant and unavoidable.

In the 2017 Supplement to the Comprehensive Plan EIR, the City examined additional land use scenarios and updated the analysis. For Impact GHG-1 and GHG-2, the 2017 Supplement to the Comprehensive Plan EIR finds that implementation of the Comprehensive Plan would have a less-than-significant impact (meaning a less than cumulatively considerable contribution to the significant cumulative impact of global climate change) (2017 Supplement to the Comprehensive Plan EIR, page 4.6-16 through 4.6-20). By the time the 2017 Supplement to the Comprehensive Plan EIR was drafted, the City had approved the S/CAP Framework, Principals, and Guidelines,

“which establishes goals and strategies to achieve the City’s GHG reduction goal for reducing Palo Alto’s GHG emissions to 80 percent below 1990 levels by 2030 (“80x30”), 20 years ahead of the State of California “80x50” target” (2017 Supplement to the Comprehensive Plan EIR, page 4.6-17), which meant that Mitigation Measure GHG-2 was no longer necessary since the S/CAP Framework adoption implemented this mitigation. The 2017 Supplement to the Comprehensive Plan EIR concludes that, since the Comprehensive Plan and S/CAP would ensure emissions reductions locally that would provide emissions reductions that are consistent with, and supportive of State mandates, the impact would be less than significant. The current proposed S/CAP is an additional step toward emissions reductions for Palo Alto that support State mandates.

### 3.7 HAZARDS AND HAZARDOUS MATERIALS

Section 4.7, "Hazards and Hazardous Materials," of the Comprehensive Plan EIR (pages 4.5-1 to 4.5-38) describes hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts that could occur under the 2023 S/CAP.

**Table 3.7-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
HAZ-1	Routine transport, use, or disposal of hazardous materials	No Mitigation Necessary	No Change
HAZ-2	Release of hazardous materials	No Mitigation Necessary	No Change
HAZ-3	Hazardous emissions or the handling of hazardous or acutely hazardous material within ¼-mile of an existing or proposed school	No Mitigation Necessary	No Change
HAZ-4	Existing hazardous materials contamination listed in Government Code Section 65962.5	No Mitigation Necessary	No Change
HAZ-5	Risk of loss, injury, or death involving wildland fires	No Mitigation Necessary	No Change
HAZ-6	Safety hazard from a public airport	No Mitigation Necessary	No Change
HAZ-7	Emergency response or evacuation plan	No Mitigation Necessary	No Change
HAZ-8	Vicinity of a private airstrip	No Mitigation Necessary	No Change
HAZ-9	Result in cumulative impacts on hazards and hazardous materials	No Mitigation Necessary	No Change

#### 3.7.1 UPDATES TO REGULATORY SETTING

##### UPDATES TO THE REGULATORY SETTING

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.7-1 to 4.7-15).



### 3.7.2 PROPOSED S/CAP

Implementation of S/CAP strategies and actions would involve some physical changes, which could have adverse physical environmental effects depending on their location, character, design, phasing, and other operational characteristics. Construction of additional bicycle lanes, transit and transportation improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8 and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); new construction that incorporates mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9); and building electrification and energy-saving retrofits to existing buildings (Key Action EV5, EV6, E1 and E2) would involve the storage, use, and transport of small amounts of hazardous materials and could possibly occur on sites included on the Cortese List.

Implementation of S/CAP key actions and goals, such as tree planting on private or public property, continuing the Safe Routes to School program and construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure, could result in hazardous emissions or handling of acutely hazardous materials within 0.25 mile of schools. Future residential development projects could incorporate S/CAP key actions and goals that could emit hazardous emissions, such as new construction incorporating mixed-use and transit-oriented development. As the Comprehensive Plan EIR states, the DTSC's School Property Evaluation and Cleanup Division is responsible for assessing, investigating, and cleaning up proposed school sites. The Division's goal is to ensure that proposed school properties are free of contamination or have been cleaned to a level that protects the students and staff who will occupy the new school. The S/CAP uses land use change assumptions that are consistent with those assumed for the Comprehensive Plan EIR, so impacts associated with the use of hazardous materials within 0.25 miles of schools, including development that incorporates S/CAP key actions and goals, are not any different from those reported under the Comprehensive Plan EIR.

As stated in the Comprehensive Plan EIR, Comprehensive Plan policies would ensure the continued implementation of current regulations and support the safe handling, transport, and disposal of hazardous materials by establishing protocols to monitor the movement of hazardous materials on Palo Alto roadways and rail lines and respond effectively to spills through established truck and construction routes (Policy S-3-14 and S-3.6); regulating the transportation of hazardous materials within and through Palo Alto in compliance with state and federal regulations (Policy S-3.4, S-3.5 and S-3.6); continuing working with appropriate agencies to identify and clean up hazardous waste sites and contaminated groundwater (Policy S-3.2); as a part of development review, require property owners and private entities to disclose the presence of contaminated soil or groundwater, identify potential health impacts, prevent vapor intrusion and remediate contamination (Policy S-3.3); and minimize toxic and hazardous materials in Palo Alto by promoting the use of alternative materials and practices that are environmentally benign (Policy S-3.1). Current regulations, which are designed to avoid adverse effects associated with the use, storage, and transport of hazardous materials, would apply to action implemented under the S/CAP, just as they would apply to projects proposed under the Comprehensive Plan.

Building electrification or energy-saving retrofits could result in some exposure risk from hazardous materials, such as lead-based paint or asbestos. Building electrification, specifically solar PV panels, could be installed under S/CAP, which can contain any number of chemicals, such as arsine, arsenic compounds, copper, hydrogen fluoride, lead, nitric acid, and sodium hydroxide. However, health-related environmental issues are related to the generation

of liquid and solid wastes during the manufacturing, processing, and assembling of solar PV panels. The operation of PV systems does not produce any emissions of toxic or hazardous materials.<sup>2</sup>

Additionally, building electrification and energy-saving retrofits, including the installation of solar PV systems on rooftops or carports, would likely not be sized such that solar PV panels pose an aviation hazard from glare. As described in the Comprehensive Plan EIR, the City is currently in conformance with the Comprehensive Land Use Plan (CLUP) for the Palo Alto Airport. The CLUP includes policies intended to safeguard the general welfare of the inhabitants within the vicinity of the airport and ensure that new surrounding uses do not affect the airport’s continued safe operation. Federal, state, and local regulations, including the CLUP for the Palo Alto Airport, govern the operation of airports and the regulation of development within the Airport Influence Areas. In addition, Policy L-10.1.2 of the Comprehensive Plan requires the City to update the Airport Layout Plan in accordance with Federal Aviation Administration requirements.

The following table summarizes S/CAP's key actions related to hazards and hazardous materials:

**Table 3.7-2. Summary of S/CAP Key Actions Related to Hazards and Hazardous Materials**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings including electric vehicle charger installation
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development

The Comprehensive Plan EIR further concluded that with the implementation of federal, state, and City regulations, permits, and programs; City ordinances; and policies of the Comprehensive Plan, impacts related to hazards and hazardous materials would be less than significant and no mitigation is required. Therefore, the implementation of the S/CAP would not result in new impacts or impacts that would be substantially increased in severity as compared with that addressed in the Comprehensive Plan EIR because projects implemented under the S/CAP would implement the same federal, state, and City regulations, permits, and programs; City ordinances; and policies of the Comprehensive Plan related to hazards and hazardous materials. Therefore, impacts associated with hazards and hazardous materials would remain **less than significant**.

### 3.8 HYDROLOGY AND WATER QUALITY

Section 4.8, "Hydrology and Water Quality," of the Comprehensive Plan EIR (pages 4.8-1 to 4.8-64) describes hydrology and water quality within and adjacent to the city at the time the Comprehensive Plan was prepared. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR,

<sup>2</sup> “Photovoltaics: Life-Cycle Analyses.” V.M. Fthenakis and H.C. Kim. <https://www.sciencedirect.com/science/article/abs/pii/S0038092X09002345>.

including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts that would occur under the 2023 S/CAP.

**Table 3.8-1. Previously Identified Impacts in the Comprehensive Plan EIR**

<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
HYD-1	Violate any water quality standards or waste discharge requirements	No Mitigation Necessary	No Change
HYD-2	Degrade or deplete ground water resources or interfere substantially with groundwater recharge	Less than Significant	No Change
HYD-3	Increase the rate, volume, or flow duration of storm water runoff or alter the existing drainage pattern altering the course of a stream or river	No Mitigation Necessary	No Change
HYD-4	Stream bank instability	No Mitigation Necessary	No Change
HYD-5	Increase the rate, volume, or flow duration of storm water runoff result in new or increased flooding on-or off-site or exceedance of the capacity of existing or planned stormwater drainage systems in local streams	No Mitigation Necessary	No Change
HYD-6	Substantial additional sources of pollutants	No Mitigation Necessary	No Change
HYD-7	Impede or redirect flood flows	No Mitigation Necessary	No Change
HYD-8	Expose people or structures	No Mitigation Necessary	No Change
HYD-9	Inundation by seiche, tsunami, or mudflow	No Mitigation Necessary	No Change
HYD-10	Result in cumulative impacts on hazards and hazardous materials	No Mitigation Necessary	No Change

### **3.8.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.8-1 to 4.8-21).

### **3.8.2 PROPOSED S/CAP**

Implementation of S/CAP key actions and goals would involve some physical changes, which could have adverse physical environmental effects depending on their location, character, design, phasing, and other operational characteristics. Temporary, short-term water quality effects during earth-moving activities would occur from the construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8 and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); and building electrification or energy-saving retrofits (Key Action EV5, EV6, E1 and E2). New development accommodated under the Comprehensive Plan is anticipated to incorporate S/CAP key actions and goals, such as new construction of mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9). These S/CAP key actions and goals could interfere with groundwater resources, increase impervious surfaces, change the volume of stormwater runoff, alter drainage patterns, result in sources of pollutants associated with urban runoff or degrade surface or groundwater quality, increase sources of pollutants associated with urban runoff and expose people or structures to hazards such as

mudflows, tsunamis, or flooding if not properly designed. However, City standards related to sewer use, stormwater pollution prevention, recycled water, water efficiency, grading and erosion control, flood hazards, and stream corridor protection would require that projects are designed to avoid such impacts during construction and operations (2016 Comprehensive Plan EIR, pages 4.8-42 through 4.8-61). In addition, the City is largely built-out and new development would primarily occur in areas already extensively covered with impervious surfaces. Impacts on hydrology and water quality and increases in impervious surfaces associated with development, including development that incorporates S/CAP key actions and goals, are not any different from those reported under the Comprehensive Plan EIR.

As stated in the Comprehensive Plan EIR, the City employs many methods to reduce pollutants found in urban runoff, following the guidelines of clean water regulations, water quality permits, and water quality plans described in the Comprehensive Plan EIR. Implementation of Comprehensive Plan policies would further serve to minimize water quality impacts by maintaining construction and operation of new development to comply with the Municipal Regional Permit, which includes Provision C.3 to implement appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects. New development or redevelopment project would be required to comply with the C.3 provisions of the Municipal Regional Permit and implement best management practices (BMPs) and Low Impact Development (LID) features to minimize hydrology and water quality impacts (Policy N-4.13 and N-4.15).

S/CAP key actions and goals focus on measures that would apply to future discretionary projects as contemplated in the Comprehensive Plan, which anticipates future development concentrated along transit corridors throughout the City and on parcels that are currently paved and/or developed. The Comprehensive Plan EIR found that new development and redevelopment may increase the impervious surface and the potential diversion of groundwater to surface water if short-term construction dewatering is required due to the shallow groundwater table. As specified in the Comprehensive Plan EIR, the implementation of LID measures and onsite infiltration would increase the potential for groundwater recharge. Also, the use of site design features as per the C.3 provisions and implementation of water use efficiency measures would ensure that groundwater supplies are not depleted. Implementation of City Comprehensive Plan policies would further serve to minimize groundwater recharge by regulating and protecting groundwater use (Policy N-4.13) and conserving and maintaining subsurface water resources (Policy N-4.8).

Temporary, localized impacts to shallow aquifers (10 to 30 feet in most areas of Palo Alto) could occur with the implementation of S/CAP key actions and goals. The Comprehensive Plan EIR clarifies that the Comprehensive Plan is unlikely to have a significant impact on the deeper, confined groundwater aquifer because the City has lower permeability clay and silt deposits that separate the shallow and deep aquifer zones and restrict the downward flow of groundwater. The Comprehensive Plan EIR includes the implementation of Mitigation Measure HYD-2, which would reduce the impacts of localized lowering of the shallow aquifer during construction dewatering activities. As noted previously, S/CAP key actions and goals are designed to be within largely built-out areas of the City and new development would primarily occur in areas that are already extensively covered with impervious surfaces.

The City is mostly built-out and future development related to mixed-use and transit-oriented development would come primarily in the form of infill development on small vacant parcels and redevelopment of existing developed areas, which would not be expected to substantially increase the amount of existing impervious surfaces or substantially change the flow velocity or volume of stormwater runoff. Implementation of Comprehensive Plan

policies would further serve to minimize surface water runoff by maintaining and the City's creek from impacts of future projects (Policy N-3.3) and implementing LID measures (Policy N-4.13). Additionally, implementation of the Comprehensive Plan policies would serve to minimize streambank instability by minimizing site disturbance (Policy N-3.6).

The S/CAP focuses on built-out and developed areas of the City with low potential for alteration of existing drainage patterns and surface runoff that would result in flooding, create or contribute runoff water or expose people or structures to significant risk or loss. Future residential development projects incorporating S/CAP key actions and goals, such as new construction incorporating mixed-use and transit-oriented development, could occur in areas of the City designated as 100-year flood hazard areas or inundation areas. The Comprehensive Plan EIR states that provisions under the issued Municipal Regional Permit require the implementation of a Green Infrastructure Plan that incorporates LID drainage design into storm drain infrastructure on public and private land, including streets, roads, storm drains, parking lots, building roofs, and other storm drain infrastructure elements. The Comprehensive Plan EIR includes City regulations like property development within flood zones to adhere to flood-control regulations outlined in the NPDES permit, Construction General Permit, Santa Clara County Ordinance Code, Palo Alto Municipal Codes, policies, and guidelines. Additionally, implementing the Comprehensive Plan policies would further minimize impacts involving increased runoff, flooding, impeding or redirecting flood flows through the placement of structures within the 100-year flood hazard area and exposure to people or structures to significant risk or loss (Policy S-2.8, S-2.9, S-2.10 S-2.11 and S-2.12).

Development under the Comprehensive Plan, including as anticipated through application of the S/CAP would come primarily in the form of infill development on small vacant parcels and redevelopment of existing developed areas, which would not be expected to substantially increase the amount of existing impervious surfaces or substantially change the flow velocity or volume of runoff. The Comprehensive Plan EIR notes that existing City regulations reduce the effects of runoff during new development and redevelopment activities by implementing a Storm Water Pollution Prevention Plan with source control BMPs and preparing an erosion and sediment control plan. The City requires all development projects to retain runoff on-site and to include water-quality improvement techniques to reduce potential pollutants and hydromodification effects. In addition, implementation of Comprehensive Plan policies would further serve to minimize surface and groundwater quality impacts by ensuring regulation of groundwater use (Policy N-4.7), working with neighboring jurisdictions and regional agencies to protect groundwater (Policy N-4.9 of the Comprehensive Plan), reducing urban runoff (Policy N-4.10), encouraging LID measure to increase retention, treatment and infiltration of urban stormwater runoff (Policy N-4.13) and improving storm drainage performance (Policy N-4.14).

Per the Comprehensive Plan EIR, only the Baylands area of Palo Alto is located within a tsunami inundation zone. This is a large area of undisturbed marshlands open for recreational access and, therefore, would not be subject to future development related to S/CAP key actions and goals. Furthermore, the Comprehensive Plan EIR notes that a seiche could theoretically occur in the bay. However, the flooding impact would be no greater than that of a tsunami inundation zone, impacting only the Baylands. Mud and debris flows can occur in the southern, mountainous area of Palo Alto and its sphere of influence. However, these areas are maintained as open spaces and there is no proposed development in the Comprehensive Plan for this area (and the S/CAP does not propose any such change). The following table summarizes S/CAP key actions related to hydrology and water quality:

**Table 3.8-2. Summary of S/CAP Key Actions Related to Hydrology and Water Quality**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development

The S/CAP uses land use assumptions consistent with those assumed for the Comprehensive Plan EIR and are not any different from those reported under the Comprehensive Plan EIR. Implementing the proposed project would not result in new impacts or impacts that would be substantially increased in severity compared to that addressed in the Comprehensive Plan EIR. The proposed project would not result in changes to the conclusions in the Comprehensive Plan EIR. As with the Comprehensive Plan EIR, impacts associated with the implementation of the S/CAP on hydrology and water quality would remain **less than significant**. Mitigation Measure HYD-2 from the Comprehensive Plan EIR is required, as applicable for projects proposed under the Comprehensive Plan, and would also be required, as applicable for implementation of the S/CAP. This mitigation measure addresses impacts related to dewatering during construction.

### 3.9 LAND USE AND PLANNING

Section 4.9, "Land Use and Planning," of the Comprehensive Plan EIR (pages 4.9-1 to 4.9-35) describes the relationship between the Comprehensive Plan and adopted state, regional, and local planning goals and policies related to land use and planning and analyzed the potential impacts that the implementation of the Comprehensive Plan would have on adjacent and nearby land uses and planning. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts that would occur under the 2023 S/CAP.

**Table 3.9-1. Previously Identified Impacts in the Comprehensive Plan EIR**

<b>Impact</b>	<b>Issue</b>	<b>Significance after Mitigation</b>	<b>Changes under the 2023 S/CAP</b>
LAND-1	Change the type or intensity of existing or planned land use patterns	Less than Significant	No Change
LAND-2	Incompatible with adjacent land uses or with the general character of the surrounding area	Less than Significant	No Change
LAND-3	Conflict with established residential, recreational, educational, religious, or scientific uses of an area	No Mitigation Necessary	No Change
LAND-4	Allow new development that could conflict with any applicable City land use plan, policy, or regulation	No Mitigation Necessary	No Change
LAND-5	Physically divide an established community	Less than Significant	No Change
LAND-6	Habitat conservation plan or natural community plan	No Mitigation Necessary	No Change
LAND-7	Result in cumulative impacts on land use and planning	No Mitigation Necessary	No Change

### **3.9.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.9-1 to 4.9-13).

### **3.9.2 PROPOSED S/CAP**

The key actions and goals proposed under the S/CAP would not change the type or intensity of existing or planned land use patterns in the city, introduce incompatible land uses, conflict with applicable plans or policies, physical divide any communities, or conflict with any habitat conservation plan. The S/CAP key actions and goals include those that would serve existing and future land uses, such as actions to add bicycle lanes, transit and transportation improvements, micromobility infrastructure (Key Action EV5, M1, M2, M3 and M8) and continuing the Safe Routes to School program (Key Action M4), but not actions that would change land use patterns.

The S/CAP's tree planting (Key Action N1) would involve additional trees on public and potentially private property, but trees are not a physical improvement that would not alter the type or intensity of existing land use patterns. Many of the S/CAP key actions involve improvements to existing or new structures or facilities, which would not alter the type or intensity of existing land use patterns and would not alter the residential, recreational, educational, religious, or scientific uses of an area. Such actions include the green stormwater infrastructure (Key Action W3, N1 and N11); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); and building electrification or energy-saving retrofits (Key Action EV5, EV6, E1 and E2). The S/CAP includes strategies originally developed in the City's Comprehensive Plan to facilitate mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9), but this type of development would be consistent with that already addressed as a part of the Comprehensive Plan EIR. The Comprehensive Plan EIR adds that the implementation of Mitigation Measure LAND-2 would ensure the visual character and ensure compatibility with adjacent land uses by promoting compatibility and gradual transitions between land use; preserving the character

of residential neighborhoods; promoting high-quality, creative design and site planning that is compatible with surrounding development; maintain and periodically review height and density limits; and use the Zoning Ordinance, the design review process, design guidelines, and Coordinated Area Plans to ensure high-quality residential and commercial design.

As an implementation program of the Comprehensive Plan, the S/CAP is consistent with and builds upon the goals and policies of the Comprehensive Plan. The S/CAP itself is developed with the intent to reduce an environmental impact (GHG emissions), and does not conflict with any plan, policy, or program adopted with the intent of reducing any environmental impact.

The key actions and goals proposed under the S/CAP would similarly not include any physical barriers that could divide an established community. The S/CAP includes implementation of bicycle lanes, transit and transportation improvements, and micromobility infrastructure and continuing the Safe Routes to School program, which could involve new transportation facilities, but bicycle and pedestrian transportation facilities, unlike high-volume roadways or freight railroad lines, would be expected to connect, rather than physically divide existing communities. The S/CAP's tree planting would involve additional trees on public and potentially private property, but trees are not a physical improvement that would divide existing communities. Many of the S/CAP's key actions involve improvements to existing or new structures or facilities, which would not divide communities as they are focused on existing and built-out areas. The S/CAP includes strategies developed in the Comprehensive Plan to facilitate mixed-use and transit-oriented development, which would involve development consistent with that analyzed as a part of the Comprehensive Plan EIR. The Comprehensive Plan EIR includes the implementation of Mitigation Measure LAND-5 that would avoid potential impacts from physically dividing an established community by designing future transportation projects to improve connections, pursuing a below-grade alignment and not an elevated alignment for regional fixed rail, and ensuring future grade separation projects include a community participation and review process, and undergo environmental review. This mitigation would apply to relevant components of the S/CAP, as well.

The Comprehensive Plan EIR determined that the Comprehensive Plan would not prevent implementation of the Stanford Habitat Conservation Plan and included a variety of actions aimed at coordinating with local and regional planning efforts, and the S/CAP does not propose any actions that would change this determination.

The following table summarizes S/CAP's key actions related to land use and planning:

**Table 3.9-2. Summary of S/CAP Key Actions Related to Land Use and Planning**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
N1	Tree planting and increasing tree canopy
W3, N1, N11	Green stormwater infrastructure and tree planting
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development



Implementing the proposed S/CAP would not result in new impacts or impacts that would be substantially increased in severity compared to that addressed in the Comprehensive Plan EIR. As with the Comprehensive Plan EIR, impacts associated with implementing the S/CAP on land use and planning remain **less than significant**.

### 3.10 NOISE

Section 4.10, Noise," of the Comprehensive Plan EIR (pages 4.10-1 to 4.10-62) included a summary of noise fundamentals, a description of ambient noise conditions, and a summary of applicable regulations related to noise and vibration. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts that would occur under the 2023 S/CAP.

**Table 3.10-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
NOISE-1	Cause the average 24-hour noise level (Ldn) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the Ldn would remain below 60 dB.	Less than Significant	No Change
NOISE-2	Cause the Ldn to increase by 3 dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB	Less than Significant	No Change
NOISE-3	Cause an increase of 3 dB or more in an existing residential area where the Ldn currently exceeds 60 dB.	Less than Significant	No Change
NOISE-4	Result in indoor noise levels for residential development to exceed an Ldn of 45 dB.	Less than Significant	No Change
NOISE-5	Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.	Less than Significant	No Change
NOISE-6	Expose people to noise levels in excess of established State standards.	Less than Significant	No Change
NOISE-7	Result in the exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies.	Less than Significant	No Change
NOISE-8	Result in a potentially substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	Less than Significant	No Change
NOISE-9	Within an airport land use plan or within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels	No Mitigation Necessary	No Change
NOISE-10	Within the vicinity of a private airstrip, the project would not expose people residing or working in the project area to excessive noise levels	No Mitigation Necessary	No Change
NOISE-11	Result in cumulative impacts on noise	Less than Significant	No Change

## **3.10.1 UPDATES TO REGULATORY SETTING**

### **UPDATES TO THE REGULATORY SETTING**

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.10-1 to 4.10-16).

## **3.10.2 PROPOSED S/CAP**

Implementation of S/CAP strategies and actions would involve some physical changes, which could have noise or vibration impacts depending on their location, character, design, phasing, and other characteristics. Implementation of key actions involving construction would produce short-term noise and vibration – including S/CAP key actions related to the construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8, and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); flood control infrastructure (Key Action S3 and S4); and building electrification or energy-saving retrofits (Key Action EV5, EV6, E1 and E2). However, the S/CAP key actions include generally small-scale construction projects that would not have long construction schedules or would not involve substantial excavation or earthwork, which is typically the construction phase involving the highest levels of noise generation. As stated in the Comprehensive EIR, future activities requiring discretionary review would implement existing requirements to mitigate environmental impacts and implement Comprehensive Plan policies (Policy N-6.1, N-6.2, N-6.3, N-6.4, N-6.5, N-6.6, N-6.7, N-6.8, N-6.9, N-6.11, and N-6.12).

The Comprehensive Plan EIR concluded that, under implementation of the Comprehensive Plan, the average 24-hour noise level ( $L_{dn}$ ) could increase by 5 decibels dB or more in an existing residential area, even if the  $L_{dn}$  would remain below 60 dB; increase by three dB or more in an existing residential area, causing the  $L_{dn}$  in the area to exceed 60 dB; could increase of three dB or more in an existing residential area where the  $L_{dn}$  currently exceeds 60 dB; and would result in indoor noise levels for residential development to exceed an  $L_{dn}$  of 45 dB. Operational noise impacts were considered potentially significant. However, compliance with state and local standards and implementation of Comprehensive Plan EIR Mitigation Measures NOISE-1a, NOISE-1b and NOISE-1c, NOISE-2, NOISE-3, NOISE-4a and NOISE-4b would ensure acceptable noise environments; would require proposals to reduce noise impacts of development on adjacent properties through appropriate means; ensure compliance with the airport-related land use compatibility standard for the community noise environments; minimize noise spillover from rail related activities into adjacent residential or noise-sensitive areas; reduce impacts from noise and groundborne vibrations associated with rail operations by requiring minimum standards for future development.

The S/CAP encourages mixed use and transit-oriented development (key action M9), which could lead to stationary or mobile noise sources. However, the S/CAP uses land use assumptions consistent with those used as a part of the Comprehensive Plan EIR. According to the Comprehensive Plan EIR, future operational activities would also be required to comply with the City’s noise ordinance (City Municipal Code, Chapter 9.10 Noise). The S/CAP does not include any actions that would lead to substantial increases in operational noise levels, does not increase development capacity within the City, does not affect the absorption rate of future development, and does not propose adding any new residential, commercial, or industrial uses. The Comprehensive Plan EIR would further serve to minimize noise impacts by existing requirements of Comprehensive Plan policies (Policy N-6.1, N-6.3

through N-6.9, N-6.11 and N-6.12), which would be pursued also, as applicable, through implementation of the S/CAP. Implementation of Comprehensive Plan EIR Mitigation Measure NOISE-6 would encourage the location of land uses in areas with compatible noise environments. Prior to the initial development application for future developments near noise-sensitive land uses, the Comprehensive Plan EIR Mitigation Measure NOISE-6 requires acoustical analysis by an acoustical engineer demonstrating projected compliance with the Comprehensive Plan, the Noise Ordinance, and the state building code; and for all future residential projects greater than four dwelling units that are proposed to be within the 65 dBA Ldn noise contours, as depicted on current Comprehensive Plan mapping, an acoustical analysis prepared by a qualified acoustical consultant shall be submitted to the City as part of the entitlement review. This mitigation would apply to relevant components of the S/CAP, as well.

Some of the key actions in the S/CAP would involve small-scale construction projects like tree planting and building electrification or energy-saving retrofits. Earth-moving activities generating noise would also occur from the construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure; continuing the Safe Routes to School program; green stormwater infrastructure; salt removal facility; and flood control infrastructure. The implementation of these physical components of the S/CAP would result in noise generating construction activities. Noise generated by construction activity would be variable depending on the project and the intensity of equipment use. Roadway widening and infrastructure projects would likely require the operation of heavy-duty equipment that generates high noise levels. The Comprehensive Plan EIR found that the potential to expose persons to or generate excessive groundborne vibration or groundborne noise levels could occur, and impacts would be potentially significant. However, implementing Comprehensive Plan EIR Mitigation Measure NOISE-5a would require a detailed construction noise impact analysis for all projects requiring discretionary approval and within 100 feet of any noise-sensitive land uses. Implementation of NOISE-5b would minimize noise spillover from rail-related activities into adjacent residential or noise-sensitive areas and reduce impacts from noise and groundborne vibrations associated with rail operations by requiring future development of habitable buildings to address minimum requirements. This mitigation would apply to relevant components of the S/CAP, as well.

The Comprehensive Plan EIR found that stationary- and area-source noise levels would not exceed applicable standards of the Comprehensive Plan or the City Noise Ordinance. Implementation of Comprehensive Plan EIR Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a and NOISE-4b would ensure land uses in areas with compatible noise environments, require proposals to reduce noise impacts of development on adjacent properties through appropriate means; ensure compliance with the airport-related land use compatibility standard for the community noise environments; minimize noise spillover from rail related activities into adjacent residential or noise-sensitive areas; reduce impacts from noise and groundborne vibrations associated with rail operations by requiring minimum standards for future development. This mitigation would apply to relevant components of the S/CAP, as well.

Construction activities associated with S/CAP key actions could result in temporary or periodic increases in ambient noise levels at development sites throughout the city. Construction is performed in discrete steps, each with its mix of equipment and, consequently, its noise characteristics. These phases would change the character of the noise generated on project sites and, therefore, the noise levels surrounding the sites as construction progresses. The Comprehensive Plan EIR found that substantial temporary or periodic increases in ambient noise levels would occur, and the impact was considered potentially significant. Implementation of Comprehensive Plan EIR Mitigation Measure NOISE-8 would require a detailed construction noise and vibration impact analysis, prepared by a qualified acoustical consultant, for all projects that require discretionary approval and that are located within

100 feet of any noise- and/or vibration-sensitive land uses and continue to prioritize construction noise and vibration limits around sensitive receptors. This mitigation would apply to relevant components of the S/CAP, as well.

The S/CAP would not add new noise-sensitive land uses or increase aircraft noise levels. The Comprehensive Plan EIR indicates that the Palo Alto Airport 60 dBA CNEL noise contour does not extend into city limits. Future forecast noise contours for Palo Alto Airport and other airports are not expected to influence 2030 citywide contours. Similarly, helicopter operations associated with the Stanford University Hospital heliport operated a small number of flights and coupled with the distance to the nearest noise-sensitive receptors, is not expected to increase in the future significantly in the Comprehensive Plan. The Comprehensive Plan EIR found that implementation of the Comprehensive Plan would not expose new or existing noise-sensitive land uses or people to elevated aircraft noise levels. The S/CAP does not change this determination in the Comprehensive Plan EIR.

The following table summarizes S/CAP's key actions related to noise:

**Table 3.10-2. Summary of S/CAP Key Actions Related to Noise**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development

The S/CAP uses land use assumptions consistent with those assumed for the Comprehensive Plan EIR and are not any different from those reported under the Comprehensive Plan EIR. The Comprehensive Plan EIR determined that implementation of Mitigation Measures NOISE-1a, NOISE-1b and NOISE-1c, NOISE-2, NOISE-3, NOISE-4a, and NOISE-4b would address the impacts on long-term operational noise, permanent, increases in ambient noise levels, and interior noise levels. Implementation of Mitigation Measures NOISE-1a, NOISE-1b and NOISE-1c, NOISE-2, NOISE-3, NOISE-4a and NOISE-4b would ensure that new development and other activities accommodated under the Comprehensive Plan and S/CAP are consistent with local and applicable noise-level standards. The S/CAP would not add significant construction, transportation sources, or industrial and commercial operations beyond that of the Comprehensive Plan.

The Comprehensive Plan EIR determined that the implementation of Mitigation Measures NOISE-6 would address the impacts on excess noise levels of established state standards. The S/CAP does not increase development capacity within the City and does not affect the absorption rate of future development. The S/CAP key actions and goals would not result in the exposure of persons to noise in excess of established standards or groundborne vibration or noise, nor would it result in a temporary, periodic, or permanent increase in ambient noise levels above existing levels.

The Comprehensive Plan EIR determined that implementation of Mitigation Measures NOISE-7 would address the impacts and consistency with local/applicable noise-level standards. Implementation of Mitigation Measure

NOISE-7 would ensure that new development and other activities accommodated under the Comprehensive Plan and S/CAP are consistent with local and applicable noise-level standards and the impact would remain less than significant.

The Comprehensive Plan EIR determined that Mitigation Measure NOISE-8 would address the temporary or periodic and permanent impacts associated with ambient noise levels. Implementation of Mitigation Measure NOISE-8 would reduce ambient noise-level impacts under the buildout of the Comprehensive Plan to less than significant. The proposed S/CAP would not result in changes to the conclusions in the Comprehensive Plan EIR.

Lastly, implementation of the S/CAP would not result in an increase in aircraft noise. As with the Comprehensive Plan EIR, impacts associated with the implementation of the S/CAP on noise-level standards would remain **less than significant** with the Comprehensive Plan EIR mitigation.

### 3.11 POPULATION AND HOUSING

Section 4.11, "Population and Housing," of the Comprehensive Plan EIR (pages 4.11-1 to 4.11-17) describes the existing and projected population and housing stock within the city and analyzes the potential impacts related to population and housing attributable to the implementation of the Comprehensive Plan. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts under the 2023 S/CAP.

**Table 3.11-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
POP-1	Induce substantial population growth in an area	No Mitigation Necessary	No Change
POP-2	Displace substantial numbers of existing housing	No Mitigation Necessary	No Change
POP-3	Displace substantial numbers of people	No Mitigation Necessary	No Change
POP-4	Create a substantial imbalance between employed residents and jobs	No Mitigation Necessary	No Change
POP-5	Result in cumulative impacts on population and housing	No Mitigation Necessary	No Change

#### 3.11.1 UPDATES TO REGULATORY SETTING

##### UPDATES TO THE REGULATORY SETTING

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.11-1 to 4.11-3).

#### 3.11.2 PROPOSED S/CAP

The S/CAP uses land use assumptions consistent with those used as a part of the Comprehensive Plan EIR and consistent with ABAG development forecasts. The S/CAP does not increase development capacity within Palo Alto and does not affect the absorption rate of future development. The S/CAP does not add new residences, or

commercial or industrial uses and does not have measures that would induce substantial population growth, either directly (by proposing new homes or businesses) or indirectly (by expanding infrastructure).

The S/CAP includes strategies developed in the City’s Comprehensive Plan to facilitate mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9), which would involve development but development consistent with and analyzed as a part of the Comprehensive Plan EIR.

The Comprehensive Plan EIR found that growth under the Comprehensive Plan would occur incrementally over a period of approximately 15 years and would be guided by a policy framework in the Comprehensive Plan (Policy L-1.2, L-1.7, L-1.11, L-2.7, and L-2.8) that limits future urban development to currently developed lands within the urban service area, use coordinated area plans to guide development, and is generally consistent with many of the principal goals and objectives established in regional planning initiatives for the Bay Area.

As described above, the S/CAP does not change land use designations or propose future development, construction of facilities, or installation of infrastructure that would displace a substantial number of existing housing units or people. The S/CAP does not change land use designations or propose future development, construction of facilities, or installation of infrastructure that would create an imbalance between employed residents and jobs.

The Comprehensive Plan EIR found that there would be an improvement to the current imbalance between employed residents and jobs in Palo Alto when compared to the existing ratio of jobs to employed residents within both the city limit only and within the city limit plus the sphere of influence. However, implementation of Comprehensive Plan EIR Mitigation Measures POP-4a and POP4b further minimizes population and housing impacts by requiring a nexus study and update of the City’s affordable housing linkage fee for commercial development to ensure that new job-generating development adequately mitigates the costs of its impacts on housing affordability in Palo Alto and continue to increase the supply of housing in the City through the implementation of the adopted Housing Element policies and programs, and/or slow the rate of job growth in the city. The S/CAP does not change anything related to the Comprehensive Plan EIR discussion of jobs-housing balance or match.

The following table summarizes S/CAP's key actions related to population and housing:

**Table 3.11-2. Summary of S/CAP Key Actions Related to Population and Housing**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
N1	Tree planting and increasing tree canopy
W3, N1, N11	Green stormwater infrastructure and tree planting
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development

The S/CAP uses land use assumptions consistent with those assumed for the Comprehensive Plan EIR and are not any different from those reported under the Comprehensive Plan EIR. The S/CAP does not have measures that would induce substantial population growth, either directly (by proposing new homes or businesses) or indirectly

(by expanding infrastructure); does not change land use designations or propose future development that would displace a substantial number of existing housing units or people; and would encourage a balance between employed residents and jobs through S/CAP key actions and goals, and would not add significant construction, transportation sources, or industrial and commercial operations beyond that of the Comprehensive Plan. The Comprehensive Plan EIR determined implementation of Mitigation Measures POP-4a and POP-4b would address impacts on the substantial imbalance of employed residents to jobs when compared to the existing imbalance in the city. Impacts under the proposed S/CAP would remain **less than significant**.

### 3.12 PUBLIC SERVICES AND RECREATION

Section 4.12, "Population and Housing," of the Comprehensive Plan EIR (pages 4.12-1 to 4.12-55) describes general services, such as schools, fire departments, police departments, libraries, and parks and recreation service providers; provided the regulatory setting; and analyzed the impacts on public services and recreation associated with the implementation of the Comprehensive Plan. The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and changes to impacts that would under the 2023 S/CAP.

**Table 3.12-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
PS-1	Adverse physical impact from the construction of additional school facilities	No Mitigation Necessary	No Change
PS-2	Less-than-significant cumulative impacts with respect to school facilities	No Mitigation Necessary	No Change
PS-3	Adverse physical impact from the construction of additional fire protection facilities	No Mitigation Necessary	No Change
PS-4	Less-than-significant cumulative impacts with respect to fire protection service	No Mitigation Necessary	No Change
PS-5	Adverse physical impacts from the construction of additional police protection facilities	No Mitigation Necessary	No Change
PS-6	Less than significant cumulative impacts with respect to police protection service	No Mitigation Necessary	No Change
PS-7	Adverse physical impact from the construction of additional parks and recreation facilities	Less than Significant	No Change
PS-8	Adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities	Less than Significant	No Change
PS-9	Adverse physical impact from the construction of additional library facilities	No Mitigation Necessary	No Change
PS-10	Result in cumulative impacts on public services and recreation	No Mitigation Necessary	No Change

### 3.12.1 UPDATES TO REGULATORY SETTING

#### UPDATES TO THE REGULATORY SETTING

The “Regulatory Setting” in the Comprehensive Plan EIR has remained unchanged and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.12-1 to 4.12-8).

### 3.12.2 PROPOSED S/CAP

The S/CAP is designed to mitigate GHG emissions impacts and does not directly facilitate the development or expansion of public facilities, infrastructure, or development that would lead to any increase in demand for public services or facilities.

The Comprehensive Plan EIR compared existing service capacity, including facilities, staffing, and equipment, against anticipated future demand for school and library facilities. Future service demands were analyzed to determine if increases require new or expanded public facilities. The Comprehensive EIR found that the payment of school fees is deemed to fully mitigate the impacts of new development on school facilities and the development of library facilities would be subject to existing state, regional, and City regulations and procedures, including project-level CEQA review that would identify and mitigate potential impacts that future development would have on library services in the City.

The S/CAP is an implementation program of the Comprehensive Plan. The S/CAP does not change anything related to population growth or land use change assumptions compared to that which was used in the Comprehensive Plan and described in the Comprehensive Plan EIR.

The Comprehensive Plan EIR addressed the potential for land use change accommodated under the Comprehensive Plan that would result in an adverse physical impact from the construction of additional parks and recreation facilities in order to maintain acceptable performance standards. The Comprehensive EIR found that development anticipated under the Comprehensive Plan would increase the need for parks if the City were to meet the parkland standard. The Comprehensive Plan EIR concluded that implementation of Mitigation Measure PS-7 would address the potential impacts of necessary property acquisition and park construction/improvement.

The following table summarizes S/CAP's key actions related to public services and recreation:

**Table 3.12-2. Summary of S/CAP Key Actions Related to Public Services and Recreation**

S/CAP Key Action	S/CAP Proposed Actions
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development
EV5, M1, M2, M3, M8	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M4	Continuing Safe Routes to School Program
W3, N1, N11	Green stormwater infrastructure and tree planting
N1	Tree planting and increasing tree canopy
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings including electric vehicle charger installation



The Comprehensive Plan EIR determined impacts associated with public services and recreation would be less than significant with adherence to and implementation of applicable state and local plans and regulations, as well as the City’s Municipal Code and City Comprehensive Plan policies. The S/CAP would not result in changes to the conclusions in the Comprehensive Plan EIR; therefore, impacts associated with implementation of the S/CAP on public services and recreation would remain **less than significant**.

### 3.13 TRANSPORTATION AND TRAFFIC

Section 4.13, "Transportation and Traffic," of the Comprehensive Plan EIR (pages 4.13-1 to 4.13-75) describes the existing transportation and traffic conditions in the planning area and analyzes the changes that would occur as a result of the implementation of the Comprehensive Plan.

The Comprehensive Plan EIR identified potential impacts that may result from the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts that would under the 2023 S/CAP.

**Table 3.13-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
TRANS-1	Intersection to drop below its motor vehicle level of service standard, or deteriorate operations at representative intersections that already operate at a substandard level of service.	Significant and Unavoidable	No Change
TRANS-2	Roadway segment to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service.	No Mitigation Necessary	No Change
TRANS-3	Freeway segment or ramp to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service.	Significant and Unavoidable	No Change
TRANS-4	Impede the function of planned bicycle or pedestrian facilities.	No Mitigation Necessary	No Change
TRANS-5	Increase demand for pedestrian and bicycle facilities that cannot be met by existing or planned facilities.	No Mitigation Necessary	No Change
TRANS-6	Impede the operation of a transit system as a result of congestion.	Significant and Unavoidable	No Change
TRANS-7	Create demand for transit services that cannot be met by current or planned services.	No Mitigation Necessary	No Change
TRANS-8	Potential demand for through traffic to use local residential streets.	Less than Significant	No Change
TRANS-9	Create an operational safety hazard.	Less than Significant	No Change
TRANS-10	Inadequate emergency access.	No Mitigation Necessary	No Change

### **3.13.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

Governor Brown signed SB 743 in September 2013. This law created a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts and to recommend analysis methodology and thresholds. Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA (Public Resources Code Section 21099[b][1]). SB 743 did not change the discretion that lead agencies have to have to select methodology or define their own significance thresholds, but the guidance being developed by OPR should be carefully considered by lead agencies when they ultimately finalize their own recommended practices. Under SB 743, the focus of transportation analysis shifted from driver delay to travel demand. Measurements of transportation impacts may include vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated. Vehicle miles traveled, or VMT has long been a common metric for measuring travel demand. A VMT is one vehicle traveling on a roadway for one mile. Many communities have been estimating and developing policies related to VMT for years, including estimates and goals for VMT per person, VMT per employee, or other methods of normalization. OPR selected VMT as the preferred metric. SB 743 is not new since the 2016 Comprehensive Plan EIR or 2017 Supplement to the Comprehensive Plan EIR were published, but as of July 1, 2020, lead agencies are no longer authorized to examine the social inconvenience of traffic congestion, most commonly evaluated according to level of service or LOS, as an environmental effect under CEQA.

SB 99 (Section 65302(g)(5) of the California Government Code) requires jurisdictions to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes.

AB 747 added Section 65302.15 to the California Government Code (amended by AB 1409), which went into effect in January 2022. AB 747 requires local governments to identify the capacity, safety, and viability of evacuation routes and locations in their general plan safety element or local hazard mitigation plan.

### **3.13.2 PROPOSED S/CAP**

The S/CAP uses land use assumptions consistent with those used in the Comprehensive Plan EIR and with ABAG development forecasts. The S/CAP is an implementation program of the Comprehensive Plan intended to mitigate the impacts of GHG emissions and does not directly facilitate development. Implementation of the S/CAP would enhance pedestrian, bicycle, and transit connectivity (Key Action EV5, M1, M2, M3, M8 and M9) and commits the City to develop incentives for housing, mixed-use, and transit-oriented development (Key Action M1, M2, M3, M8 and M9). The S/CAP proposes to improve Transportation Demand Management (TDM) for employees and residents to encourage alternative modes of transportation, establish a Safe Routes for Older Adults/Aging in Place program, and continue the Safe Routes to School program (Key Action M4). The S/CAP proposes coordinating with regional transit agencies and cities to promote cohesive transit interconnections. These actions are consistent with other policies and plans intended to reduce transportation impacts.

The S/CAP promotes a reduction in VMT and is consistent with the Comprehensive Plan policies (Policy T-1.3, T-1.23 and T-2.3). The S/CAP does not increase development capacity within City and would not materially affect

the absorption rate of future development. Construction facilitated by S/CAP key actions and policies related to bicycle lanes, transit and transportation improvements, and micromobility infrastructure are anticipated to be temporary and would not impede on bicycle and pedestrian plans or functions within the city.

The Comprehensive Plan EIR found that there was an enhancement rather than degradation of bicycle and pedestrian facilities and the increased demand for pedestrian and bicycle facilities would be met by existing or planned facilities. This Comprehensive Plan EIR conclusion also applies to S/CAP key actions and goals, which include increasing active transportation and transit use for local work trips, infrastructure investments, expanding transit and shared mobility services, updating the Bicycle and Pedestrian Transportation Plan, and improving TDM to reduce vehicle traffic (Key Actions M1, M2, M3 and M4).

The S/CAP incorporates key actions and goals that promote alternatives to single occupancy car trips, including expanding the availability of transit services and improving transit and traffic flow (Key Actions M1, M2, M8, and M9). The Comprehensive Plan EIR found that the Comprehensive Plan would substantially increase demand for transit services. Implementation of Comprehensive Plan EIR Mitigation Measure TRANS-6 would provide traffic signal prioritization for buses at Palo Alto intersections, focusing first on regional transit routes and providing queue jump lanes and curbside platforms for buses. However, impacts were considered significant and unavoidable after mitigation. Additionally, the Comprehensive Plan EIR also found that the Comprehensive Plan would not create more demand than could be met by existing or planned facilities. The S/CAP key actions and goals align with Comprehensive Plan policies and programs (Policy T-1.2, T-1.6, T-1.7, T-1.8, T-1.12, T-1.13, T-1.15, T-1.25, T-2.4, T-3.10 and T-7.1), which further minimizing impacts related to transportation. The S/CAP would not result in new or increased severity of significant transportation and traffic impacts beyond what was addressed in the Comprehensive Plan. There would be no further degradation of service levels at roadway segments and intersections analyzed under the Comprehensive Plan EIR.

The Comprehensive Plan EIR found that new physical features that would create safety hazards would not be introduced and would not delay emergency vehicles or result in inadequate emergency access. The growth assumed would result in increased congestion which would cause safety hazards and Comprehensive Plan EIR Mitigation Measure TRANS-9 would be required to discourage non-local drivers from using local neighborhood streets to bypass traffic congestion on arterials. Implementation of the S/CAP would not change any conditions related to emergency access.

The following table summarizes S/CAP's key actions related to transportation and traffic:

**Table 3.13-2. Summary of S/CAP Key Actions Related to Transportation and Traffic**

S/CAP Key Action	S/CAP Proposed Actions
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development
M4	Continuing Safe Routes to School Program
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings including electric vehicle charger installation

The Comprehensive Plan EIR determined impacts associated with roadway segment LOS would be less than significant since no segments would be significantly impacted. LOS is not an impact under CEQA.

The proposed S/CAP would not result in changes to the conclusions in the Comprehensive Plan EIR; therefore, impacts associated with the implementation of the S/CAP on transportation and traffic would remain **less than significant** for impacts TRANS-2, TRANS-4, TRANS-5, TRANS-7, TRANS-8, and TRANS-10 and **significant and unavoidable** for impacts TRANS-1, TRANS-3, and TRANS-6, except to the extent that the social inconvenience of traffic congestion is not an impact under CEQA.

### 3.14 UTILITIES AND SERVICE SYSTEMS

Section 4.14, "Utilities and Service Systems," of the Comprehensive Plan EIR (pages 4.14-1 to 4.14-100) describes impacts related to water supply, wastewater, stormwater, solid waste, and energy utilities attributable to the implementation of the Comprehensive Plan. The following table summarizes the impacts identified in the Comprehensive Plan EIR, including the impact, the affected environmental resource issue, the level of significance after mitigation, and the changes to impacts that would occur under the 2023 S/CAP.

**Table 3.14-1. Previously Identified Impacts in the Comprehensive Plan EIR**

Impact	Issue	Significance after Mitigation	Changes under the 2023 S/CAP
UTIL-1	Sufficient water supplies	No Mitigation Necessary	No Change
UTIL-2	Construction of new water facilities or expansion of existing facilities	No Mitigation Necessary	No Change
UTIL-3	Physical deterioration of a water utility facility	No Mitigation Necessary	No Change
UTIL-4	Cumulative impacts with respect to water supply	No Mitigation Necessary	No Change
UTIL-5	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board	No Mitigation Necessary	No Change
UTIL-6	Result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments.	No Mitigation Necessary	No Change
UTIL-7	Adverse physical impacts from new or expanded wastewater utility facilities	No Mitigation Necessary	No Change
UTIL-8	Physical deterioration of a wastewater utility facility	No Mitigation Necessary	No Change
UTIL-9	Cumulative impacts with respect to wastewater.	No Mitigation Necessary	No Change
UTIL-10	Construction of new stormwater facilities or expansion of existing facilities	No Mitigation Necessary	No Change
UTIL-11	Adverse physical impacts from new or expanded utility facilities	No Mitigation Necessary	No Change
UTIL-12	Physical deterioration of a utility facility.	No Mitigation Necessary	No Change
UTIL-13	Cumulative impacts with respect to stormwater facilities	No Mitigation Necessary	No Change
UTIL-14	Served by landfills with sufficient permitted capacity to accommodate the proposed Plan's solid waste disposal needs	No Mitigation Necessary	No Change
UTIL-15	Fall out of compliance with federal, State, and local statutes and regulations related to solid waste	Less than Significant	No Change
UTIL-16	Cumulative impacts with respect to solid waste	No Mitigation Necessary	No Change
UTIL-17	Increase in natural gas and electrical service demands	Less than Significant	No Change

### **3.14.1 UPDATES TO REGULATORY SETTING**

#### **UPDATES TO THE REGULATORY SETTING**

On April 27, 2018, the California Public Utilities Commission (CPUC) issued Decision 18-04-007, which amended the Right-of-Way rules to provide competitive local exchange carriers with expanded access to public utility infrastructure to install antennas and wireless telecommunications equipment. Specifically, the CPUC mandated that the use of rights-of-way areas shall be limited to those necessary or useful for the provision of telecommunication services, thereby requiring a nexus between the installation and the provision of a telecommunication service.

The “Regulatory Setting” in the Comprehensive Plan EIR and is hereby incorporated by reference (Comprehensive Plan EIR, pages 4.14-1 to 4.14-9 and 4.14-78 to 4.14-94).

### **3.14.2 PROPOSED S/CAP**

The S/CAP is a policy planning document that provides a framework outlining requirements, incentives, and actions to ensure sustainable development consistent with the Comprehensive Plan. The S/CAP key actions and goals do not constitute approval for any physical improvements or development. However, implementation of the S/CAP would have some physical ramifications. The S/CAP encourages building electrification and retrofits (Key Actions EV5, EV6, E1 and E2) that would increase existing facilities' energy efficiency, electrify new residential and commercial buildings, and reduce emissions from local oil and gas use, which would not result in population growth or the construction or expansion of water, wastewater, utility, stormwater, and solid waste infrastructure improvements that could have a significant environmental effect. Most new facilities, such as solar PV panels and energy efficiency improvements, would be constructed within or on existing or proposed buildings (e.g., rooftops). Their installation would likely not result in new employees or increases in population that would result in additional infrastructure or demand for water, wastewater, utility, stormwater, or solid waste. Any future population growth and employment are anticipated to be consistent with the Comprehensive Plan growth projections analyzed in the Comprehensive Plan EIR. Furthermore, energy-efficient and renewable energy fixtures on existing buildings may require minimal water for maintenance and cleaning purposes but are not anticipated to require substantial additional water, wastewater, utility, stormwater, or solid waste demands for operation; building electrification and retrofits would reduce utility demand.

Implementation of the S/CAP would enhance pedestrian, bicycle, micromobility and transit connectivity (Key Action EV5, M1, M2, M3, M8 and M9) and commits the City to develop incentives for housing, mixed-use, and transit-oriented development (Key Action M1, M2, M3, M8, and M9). The Comprehensive EIR indicated that Comprehensive Plan policies for development would increase housing units and population in the city. However, each new development or redevelopment project would be required to comply with the C.3 provisions of the Municipal Regional Permit and implement BMPs and LID features to minimize stormwater runoff impacts. In particular, during construction, all projects must implement flow control BMPs to minimize the potential effects. Also, the Comprehensive Plan EIR states that the Comprehensive Plan would not convert open space areas, creeks, or wetlands to impervious surfaces and would alter the course of a stream or river. Furthermore, existing water, wastewater and landfill facilities would have adequate capacity to serve development anticipated under

Comprehensive Plan. The S/CAP key actions and goals would not result in the development of structures requiring increased demand or the construction of utilities and service systems.

The S/CAP key actions and goals may generate a limited number of new employees during the construction bicycle lanes, transit terminals, traffic signal improvements, and micromobility infrastructure (Key Action EV5, M1, M2, M3, M8 and M9); mixed-use and transit-oriented development (Key Action M1, M2, M3, M8 and M9); continuing the Safe Routes to School program (Key Action M4); green stormwater infrastructure (Key Action W3, N1 and N11); tree planting (Key Action N1); salt removal facility (Key Action W2); and flood control infrastructure including bridge improvements and a levee (Key Action S3 and S4). However, this would be a limited number of temporary employees that would not lead to any material increase in demand for water, wastewater, stormwater, utility, or solid waste services.

The S/CAP includes goals to divert solid waste and would reduce natural gas use through building electrification. The Comprehensive Plan EIR notes that the existing Comprehensive Plan includes policies that promote recycling and conservation help to ensure adequate waste collection and disposal facilities for the residents and workers of Palo Alto and to minimize solid waste generation for disposal. The Comprehensive Plan EIR noted that development anticipated under the Comprehensive Plan would result in a substantial increase in natural gas and electrical service demands. However, implementation of the Comprehensive Plan EIR Mitigation Measure UTIL-17 would ensure energy conservation is practiced in Palo Alto to reduce the impacts related to natural gas and electrical service demands. Implementation of the S/CAP is shown to increase energy efficiency.

The following table summarizes S/CAP key actions related to utilities and service systems:

**Table 3.14-2. Summary of S/CAP Key Actions Related to Utilities and Service Systems**

S/CAP Key Action	S/CAP Proposed Actions
EV5, EV6, E1 and E2	Building electrification and energy-saving retrofits to existing buildings
EV5, M1, M2, M3, M8 and M9	Construction activities, including construction of bicycle lanes, transit and transportation improvements, and micromobility infrastructure
M1, M2, M3, M8 and M9	Mixed-use and transit-oriented development
M4	Continuing Safe Routes to School Program
N1	Tree planting and increasing tree canopy
W3, N1, N11	Green stormwater infrastructure and tree planting
W2	New construction for a salt removal facility
S3 and S4	Flood control infrastructure, including bridge improvements and a levee

The S/CAP uses land use assumptions consistent with those assumed for the Comprehensive Plan EIR and are not any different from those reported under the Comprehensive Plan EIR. The S/CAP does not have measures that would induce substantial population growth, either directly (by proposing new homes or businesses) or indirectly (by expanding infrastructure); does not change land use designations or propose future development that would displace a substantial number of existing housing units or people; and would not add construction, transportation sources, or industrial and commercial operations beyond that of the Comprehensive Plan. The Comprehensive Plan EIR determined that implementing Mitigation Measures UTIL-15 and UTIL-17 would address impacts on solid waste and ensure that future development would maximize energy efficiency and conservation in the City. The proposed S/CAP would not result in changes to the conclusions in the Comprehensive Plan EIR and the impacts would remain **less than significant**.

## 4 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of CEQA Guidelines requires that an EIR describe significant impacts that cannot be avoided if the proposed project is implemented, including those effects that can be mitigated but not reduced to a less-than-significant level. The purpose of the S/CAP is to implement a range of actions to reduce GHG emissions and adapt to climate change impacts. The S/CAP was developed to implement the Comprehensive Plan (Policy N-8.2). As summarized throughout this EIR Addendum, the S/CAP is an implementation program of the Comprehensive Plan that does not propose substantial physical changes compared to that analyzed in the Comprehensive Plan EIR. As such, the S/CAP would not change significance conclusions identified in the Comprehensive Plan EIR, including significant and unavoidable impacts.

Chapter 1 (Executive Summary) of the 2016 Comprehensive Plan EIR contains Table 1-1, which summarizes the impacts, mitigation measures, and levels of significance before and after mitigation associated with each planning scenario of the Comprehensive Plan. Chapter 5 of the 2016 Comprehensive Plan EIR details the significant unavoidable adverse impacts. Table 1-3 of the 2017 Supplement to the Comprehensive Plan EIR summarizes the impacts, mitigation measures, and levels of significance before and after mitigation associated with each planning scenario and Chapter 5 summarizes significant and unavoidable impacts. The S/CAP does not change any of these determinations.

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## 5 ALTERNATIVES

Chapter 3 (Project Description) of the Comprehensive Plan EIR explains that the Comprehensive Plan EIR considers a “range of reasonable alternatives” throughout the document in the six scenarios. The six scenarios test different approaches to achieving the City’s objectives for the Comprehensive Plan and other methods to avoid or lessen the significant effects of various land use changes, transportation investments, and growth management strategies of the Comprehensive Plan.

There are no substantial differences in the number or extent of environmental impacts among the six scenarios evaluated in the Comprehensive Plan EIR. Most potential impacts could be mitigated to a less-than-significant level under all six scenarios. All six would have the same significant and unavoidable impacts on air quality and transportation. Moreover, these same significant and unavoidable impacts would also occur under the hypothetical No Growth Scenario, demonstrating that the impacts are primarily attributable to the cumulative effects of regional development rather than any of the six scenarios. However, there are differences in degree among the six scenarios. Of the six, Scenario 5 would have the fewest environmental impacts. Although all six scenarios would substantially increase criteria air pollutant emissions, Scenario 5 would have the lowest total and per capita emissions. Similarly, although all six scenarios result in unacceptable service levels at multiple intersections, Scenario 5 would impact four intersections, while Scenarios 1 and 4 would impact seven intersections. Scenario 5 combines the rigorous sustainability initiatives of Scenarios 4 and 6 with the modest housing growth of Scenario 3 and low job growth of Scenario 6, thereby reducing single-occupant vehicle trips relative to the other scenarios.

The proposed S/CAP would not result in any significant impacts that would be substantially increased in severity compared to that addressed in the city’s Comprehensive Plan EIR. The S/CAP is designed to reduce environmental impacts associated with GHG emissions and would have co-benefits for other environmental effects. Therefore, proposing additional alternatives for evaluation for the proposed S/CAP is not necessary, and would produce any useful information for decision makers or the public.

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