



# Public Draft Environmental Impact Report

## 231 Grant Educator Workforce Housing

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## EXECUTIVE SUMMARY

This Environmental Impact Report is an informational document prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 et seq., that is intended to disclose to the public and decision-makers the environmental consequences of the proposed 231 Grant Educator Workforce Housing Project (Project).

This executive summary highlights the major areas of importance in the environmental analysis for the Project, as required by Title 14, California Code of Regulations (CCR), Section 15123 of the CEQA Guidelines (CEQA Guidelines). This executive summary includes (1) a summary description of the proposed project, (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1), a summary description of cumulative impacts (Table ES-1), (3) identification of the alternatives evaluated, and (4) a discussion of the areas of controversy associated with the Project.

### Summary of the Proposed Project

#### Project Location and Setting

The project site is at 231 Grant Avenue in the City of Palo Alto and is owned by the County of Santa Clara (County). It is approximately 1.4 acres and is bounded by Park Boulevard, Grant Avenue, and Birch Street, within the Mayfair neighborhood of Palo Alto. An approximately 6,800-square-foot single-story office building completed in 1956 and an associated parking area occupy the project site and is used by the County of Santa Clara Office of the Public Defender. The Assessor's Parcel Numbers [APN] for the project site are 132-31-074 and 984-88-004.

#### Project Description

The Project would involve demolition of the existing 6,800-square-foot (SF) office building and construction of a new four-story building, totaling approximately 115,000 SF, on the approximately 1.4-acre site. The building would be developed with approximately 110 residential units and associated amenities, resulting in a residential density of just under 79 dwelling units per acre.

#### Project Objectives

The 231 Grant Educator Workforce Housing Project is currently sponsored by the County of Santa Clara; Facebook; the City of Palo Alto; four Santa Clara County School Districts (Los Altos, Palo Alto, Mountain View Whisman, Mountain View Los Altos); and the Foothill-De Anza Community College District.

The objectives of the Project are to:

- 1) Provide at least 60 rental housing units for teachers and classified staff in targeted school districts within Santa Clara County and a sufficient number of units to meet the Facebook grant criteria, delivered at an accelerated pace.

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- 2) Provide housing that is affordable to a range of incomes from low-income to incomes at or slightly above the area median income<sup>1</sup>.
- 3) Provide housing that is high-quality and compatible with the surrounding neighborhood, while still maintaining development and operational cost efficiencies.
- 4) Provide housing that maximizes the number of units on the site.
- 5) Provide housing that is close to public transit
- 6) Incorporate innovative technologies and sustainability measures.
- 7) Provide desirable public and residential amenity spaces.
- 8) Provide easily accessible bicycle parking and encourage the use of alternative forms of transportation to nearby employment and transit.

## Summary of Environmental Impacts and Mitigation Measures

Table ES-1 summarizes all of the impacts of the proposed Project, identifies the significance determination of each impact, and presents the full text of the recommended mitigation measures for each impact. A complete discussion of impacts and associated mitigation measures is presented in Section 3, “Environmental Setting and Impact Assessment,” of this EIR.

Potentially significant environmental impacts of the proposed Project have been identified in relation to air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology, noise and vibration, transportation, and tribal cultural resources, as discussed further below. No impacts related to agricultural and forestry resources, land use and planning, mineral resources, and wildfire would occur as a result of the Project. All other impacts related to the physical environment (e.g., aesthetics, energy, greenhouse gas emissions, population and housing, public services and recreation, and utilities and service systems) would be less than significant and would not require implementation of mitigation measures.

Potentially significant environmental impacts of the Project are summarized below and fall within two categories: significant impacts that would remain significant even with mitigation (significant and unavoidable), and potentially significant impacts that could be mitigated to a less-than-significant level. See Table ES-1 for a summary of all Project and cumulative impacts, and recommended mitigation measures.

- Significant and Unavoidable Impacts:
  - Impact NOI-1: Project construction would result in generation of a substantial temporary increase in ambient noise levels (project-level and cumulative).

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<sup>1</sup> The area median income is the midpoint of a region's income distribution, meaning that half of households in a region earn more than the median and half earn less than the median. For households and families, the median income is based on the distribution of the total number of households and families including those with no income. The median income for individuals is based on individuals 15 years old and over with income.

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- Impact NOI-2: Project construction would result in generation of substantial temporary vibration levels (project-level).

Although mitigation measures have been proposed that would minimize or lessen these impacts, the impacts would not be reduced to a level that is less than significant.

- Potentially significant impacts that would be reduced to less than significant with mitigation:
  - Impact AIR-2: Project construction could result in fugitive dust emissions.
  - Impact BIO-4: Project construction could disturb nesting birds.
  - Impact CUL-1: Project construction could result in vibration damage to a potentially historic resource.
  - Impact CUL-2: Project construction could disturb previously unidentified cultural resources.
  - Impact GEO-3: Project construction could result in destabilization of the adjacent building foundations.
  - Impact GEO-6: Project construction could disturb unique paleontological resources.
  - Impact HAZ-3: Project construction could result in human health and environmental hazards if contaminated groundwater is improperly contained, treated, and discharged. Project operations could expose future residents and site users to vapor intrusion risks.
  - Impact HYD-1: Project construction could result in violation of water quality standards if contaminated groundwater is improperly contained, treated, and discharged.
  - Impact HYD-5: Project construction could conflict with the provisions of the San Francisco Bay Basin Plan if contaminated groundwater is improperly contained, treated, and discharged.
  - Impact TRA-3: Project operation could increase the potential for bicycle/vehicle or pedestrian/vehicle accidents.
  - Impact TCR-1: Project construction could disturb previously unidentified tribal cultural resources.

## Summary of Project Alternatives

The alternatives discussion of this EIR was prepared in accordance with Section 15126(d) of the CEQA Guidelines and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the Project while feasibly attaining most of the basic objectives. The following discussion summarizes the alternatives evaluated in this EIR. See Chapter 4, “Alternatives,” for additional detail.

- **No Project Alternative:** CEQA Guidelines Section 15126.6(e) requires that an EIR analyze a “No Project” alternative. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The No Project Alternative

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reflects the conditions that would reasonably be expected to occur in the foreseeable future if the project were not approved (CEQA Guidelines Section 15126.6(e)).

Under the No Project Alternative, the existing single-story office building would not be demolished, and no construction or site improvements would occur at the site.

The existing building would continue to be used by the County of Santa Clara Office of the Public Defender and various community groups.

- **Alternative 1 – Traditional Construction Methods:** Alternative 1 would be identical to the proposed Project, except that it would utilize traditional “stick-built” construction methods rather than modular construction methods. All operational components, including the number of residential units and associated amenities, flex space and public amenities, size and layout of the proposed building, landscaping, access, and utilities, would be the same as described for the Project.
- **Alternative 2 – Reduced-Scale Alternative:** Alternative 2 would demolish the existing 6,800-square-foot (SF) office building and would construct a new three-story building, totaling approximately 75,000 SF, on the approximately 1.4-acre site. The building would be developed with approximately 63 residential units (compared to the Project’s 110 units) and associated amenities, resulting in a residential density of 45 dwelling units per acre (compared to approximately 79 units per acre for the Project). Modular construction methods would be used, similar to that described for the Project.

## Environmentally Superior Alternative

CEQA requires that, among the alternatives, an “environmentally superior” alternative be selected and that the reasons for such selection be disclosed. In general, the environmentally superior alternative is the alternative that would generate the fewest or least severe adverse impacts. For the purposes of this EIR, the No Project Alternative is environmentally superior, because it would have reduced impacts compared to the Project with regard to the greatest number of environmental impact areas and would avoid the Project’s significant and unavoidable noise and vibration impacts.

When the No Project Alternative is the environmentally superior alternative, CEQA requires that an additional alternative be identified. In this case, the next environmentally superior alternative would be Alternative 2. Although Alternative 2 would still result in a substantial temporary increase in noise and vibration levels during construction that would be significant and unavoidable, the degree and duration of the substantial temporary increases would be less than for the Project. In addition, Alternative 2 would avoid the potentially significant hydrology impacts of the Project, and would avoid some less than significant aesthetics and geology impacts.

## Areas of Controversy

Section 15213 of the CEQA Guidelines requires that the lead agency identify areas of controversy and issues to be resolved, including issues raised by other agencies and the public. The Notice of Preparation and comments received in response to the Notice of Preparation are included in Appendix A and are discussed in Section 1.2.1, “Notice of Preparation and Scoping Meeting” of this Draft EIR.

The following issues were raised through scoping and comments on the Notice of Preparation that could be considered controversial:

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- Request that the Project should be designed to suit the existing development in the neighborhood.
- Request for analysis of construction activities on the potential release of volatile organic compounds from the California-Olive-Emerson regional groundwater plume and proper disposal of contaminated groundwater, if encountered during construction. The City of Palo Alto also stated that although not part of CEQA, the County would need to coordinate with the Regional Water Quality Control Board, Department of Toxic Substances Control, and/or the County Department of Environmental Health to identify appropriate measures for the safety of future Project residents/users relating to the groundwater plume.
- The City of Palo Alto provided a Comprehensive Plan conformity analysis discussing the Project's consistency with the Comprehensive Plan's land use designation of the project site and consistency of the Project with the City's Housing Element and Land Use Element. The County reviewed and considered the comments provided by the City of Palo Alto and those comments have been addressed in the discussion of Impact LUP-2.
- Recognition that the Project is a critical and needed housing complex for educator workforce employees that will serve as a model for other communities and demonstrate how partnerships can create much needed housing.
- Support for teachers and educators to be able to live within the community they serve.
- Request that the Project include some public space and green space.
- Concern regarding potential impacts from new curb cuts on Park Boulevard to bicycles using the existing bike route.
- Concern that the Project may contribute to residents' concerns regarding volume and speed of traffic in the area, and request to consider traffic calming measures if appropriate.
- Concern regarding cumulative impacts of construction from the Project and the City's Public Service Building construction.
- Request that information regarding number of truck trips, wide loads, etc. associated with the modular construction method be included as part of the environmental analysis.
- The City of Palo Alto stated that oversized vehicle and encroachment permits would be required, and that a Traffic Control Plan would need to be submitted for the City's review and approval prior to construction.
- The City of Palo Alto stated that its adopted thresholds for VMT may differ from the County's thresholds and requested that the City's thresholds be used in-lieu of, or in addition to, the County's thresholds.
- The City of Palo requested that a separate local traffic analysis be prepared (outside of CEQA) so that the local impacts of the proposed development can be understood in accordance with the City of Palo Alto's Local Transportation Impact Analysis Policy and the City's Comprehensive Plan, even though level of service analysis is not required under CEQA in accordance with SB 743 (PRC Section 21099(b)(2); CEQA Guidelines Section 15064.3).

## Issues to be Resolved

The State CEQA Guidelines require that an EIR present issues to be resolved by the lead agency. These issues include the choice among alternatives and whether or how potentially significant impacts can be mitigated. The major issues to be resolved by the County regarding the Project are whether:

- the recommended mitigation measures should be adopted or modified;
- there are any additional mitigation measures that should be applied to the proposed Project; and
- the proposed Project, a project alternative, or no project should be approved.

**Table ES-1: Summary of Impacts and Mitigation Measures**

Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact AES-1: Scenic Vistas</b>                      The Project would not have a substantial adverse effect on a scenic vista.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact AES-2: Scenic Resources</b>                      The Project would not substantially damage scenic resources.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact AES-3: Scenic Quality</b>                      The Project would not conflict with applicable zoning and other regulations governing scenic quality.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact AES-4: Light and Glare</b>                      The Project would not create a new source of substantial light or glare.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-AES-3: Cumulative Scenic Quality</b>                      The overall cumulative impact on scenic quality would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-AES-4: Cumulative Light and Glare</b>                      The overall cumulative impact for new sources of light and glare would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact AIR-1: Air Quality Plan Conflicts</b>                      The Project would not conflict with or obstruct implementation of applicable air quality plans.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact AIR-2: Net Increase in Criteria Pollutants</b>                      The Project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.</p>	<p>Before Mitigation: PS</p>

Summary of Impacts and Mitigation	Level of Significance
<p>Mitigation: <u>MM-AIR-2: Fugitive Dust Reduction Measures</u></p> <p>The Developer shall comply with all of the following BAAQMD best management practices for reducing construction emissions of uncontrolled fugitive dust (PM10 and PM2.5):</p> <ul style="list-style-type: none"> <li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, stockpiles, graded areas, and unpaved access roads) shall be watered twice daily, or as often as needed, treated with non-toxic soil stabilizers, or covered to control dust emissions. Watering shall be sufficient to prevent airborne dust from the leaving the site.</li> <li>• All haul trucks transporting soil, sand, or other loose material off site shall be covered.</li> <li>• All visible mud or dirt track-out onto adjacent public roads and paved access roads shall be removed using wet power (with reclaimed water, if possible) vacuum street sweepers at least once per day, or as often as needed. The use of dry power sweeping is prohibited.</li> <li>• All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>• Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by California airborne toxics control measure Title 13 CCR Section 2485). Clear signage shall be provided for construction workers at all access points.</li> <li>• All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</li> <li>• A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number also shall be visible to ensure compliance with applicable regulations.</li> </ul> <p>The Developer's project manager or his/her designee shall verify compliance that these measures are included in the Project's grading plan and have been implemented during normal construction site inspections.</p>	<p>After Mitigation: LTSM</p>
<p><b>Impact AIR-3: Exposure of Sensitive Receptors</b></p> <p>The Project would not expose sensitive receptors to substantial pollutant concentrations.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p><b>Impact AIR-4: Other Emissions Including Odors</b></p> <p>The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p><b>Impact C-AIR-1: Cumulative Air Quality Plan Conflicts or Net Increase in Criteria Pollutants</b></p> <p>The overall cumulative impact would be potentially significant.</p> <p>Mitigation: MM-AIR-2 (detailed for Impact AIR-2)</p>	<p>Before Mitigation: PS</p> <p>After Mitigation: LTSM</p>
<p><b>Impact C-AIR-2: Cumulative Exposure of Sensitive Receptors to Pollutants or Other Emissions</b></p> <p>The overall cumulative impact would be less than significant.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact BIO-1: Candidate, Sensitive, or Special Status Species</b></p> <p>The Project would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special-status species.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: NI</p> <p>After Mitigation: N/A</p>
<p><b>Impact BIO-2: Riparian Habitat or Other Sensitive Natural Communities</b></p> <p>The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural communities.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: NI</p> <p>After Mitigation: N/A</p>
<p><b>Impact BIO-3: State or Federally Protected Wetlands</b></p> <p>The Project would not have a substantial adverse effect on state or federally protected wetlands.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: NI</p> <p>After Mitigation: N/A</p>
<p><b>Impact BIO-4: Fish or Wildlife Movement, Migration or Nursery Sites</b></p> <p>The Project could interfere substantially with the movement of any native resident or migratory fish or wildlife species.</p> <p>Mitigation: <u>MM-BIO-4: Nesting Bird Avoidance Measures</u></p> <p>To the extent practicable, demolition and construction activities and any tree trimming/removal shall be performed from September 16 through January 14 to avoid the general nesting period for birds. If demolition or construction cannot be performed during this period, nesting bird surveys and active nest buffers (as necessary) shall be implemented as follows:</p> <ul style="list-style-type: none"> <li>• Nesting Bird Surveys: If Project-related demolition or construction work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), the Developer shall retain a qualified biologist to conduct two surveys for active nests of such birds within 14 days prior to the beginning of the demolition or construction work, with the final survey conducted within 48 hours prior to demolition or construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 50 feet for passerines; ii) 300 feet for raptors. Surveys shall be conducted at the appropriate times of day and during appropriate nesting times, as determined by the qualified biologist.</li> <li>• Active Nest Buffers: If the qualified biologist documents active nests within the project area or in nearby surrounding areas, an appropriate buffer between the nests and active demolition and construction activities shall be established. The buffer shall be clearly marked and maintained until all of the young have fledged and are foraging independently. Prior to demolition and construction, the qualified biologist shall conduct baseline monitoring of the nests to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, all demolition and construction work in the area shall cease until the young have fledged and the nest is no longer active. Work may only continue without the establishment of a buffer if a permit and authorization from USFWS are obtained in accordance with the MBTA.</li> </ul>	<p>Before Mitigation: PS</p> <p>After Mitigation: LTSM</p>
<p><b>Impact BIO-5: Local Policy or Ordinance Conflicts</b></p> <p>The Project would not conflict with any local policies or ordinances protecting biological resources.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact BIO-6: Habitat Conservation Plan or Natural Community Conservation Plan Conflicts</b>                      The Project would not conflict with the provisions of an approved local, regional, or state habitat conservation plan.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact C-BIO-4: Cumulative Impacts to Fish or Wildlife Movement, Migration or Nursery Sites</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-BIO-5: Cumulative Conflicts with Local Ordinances</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact CUL-1: Historical Resources</b>                      The Project would not cause a substantial adverse change in the significance of a historical resource.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact CUL-2: Archaeological Resources</b>                      The Project could cause a substantial adverse change in the significance of an archaeological resource.                      Mitigation: <u>MM-CUL-2: Inadvertent Discovery of Prehistoric, Historic, or Tribal Cultural Resources</u></p> <p>A. Prior to the start of earthmoving activities, the Developer shall implement a worker environmental awareness program for all construction personnel involved with excavation activities. The program shall include training to inform workers regarding the possibility of encountering buried cultural resources (including tribal cultural resources), the appearance and types of resources likely to be seen during construction, and proper notification procedures to be followed should resources be encountered.</p> <p>B. During all ground disturbing activities (e.g., excavation, grading, and utility trenching) occurring in areas of the project site and/or at depths that have not already been disturbed during prior phases of Project construction, the Developer shall retain a qualified tribal cultural resources monitor to undertake construction monitoring at the project site. Where feasible, the tribal cultural resources monitor shall be a representative of the Tamien Nation. The frequency of monitoring shall be determined based on the rate of excavation and grading activities, the materials being excavated, the depth and location of excavation, and, if found, the abundance and type of archaeological resources encountered. Monitoring activities may be curtailed if the tribal cultural resources monitor determines, in consultation with the County and Developer, that there is limited potential for encountering cultural resources.</p> <p>C. In the event that prehistoric or historic resources are encountered during project construction, all activity within a 50-foot radius of the find shall be stopped, the Developer's Project Manager or designee and the County's Project Manager or designee shall be notified, and a qualified archaeologist shall examine the find. Project personnel shall not collect or move any cultural material. The archaeologist shall evaluate the find(s) to determine if it meet the definition of a historical, unique archaeological, and/or tribal cultural resource and follow the further procedures outlined below:</p> <p>i) If the find(s) does not meet the definition of a historical resource or unique archaeological resource, no further study or protection is necessary prior to resuming Project implementation.</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>

Summary of Impacts and Mitigation	Level of Significance
<p>ii) If the find(s) does meet the definition of a historical resource or unique archaeological resource, then it shall be avoided by Project activities. If avoidance is not feasible, as determined by the County, the qualified archaeologist shall make appropriate recommendations regarding the treatment and disposition of such finds, and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist prior to resuming construction activities within the 50-foot radius.</p> <p>iii) If the find(s) is potentially a tribal cultural resource, then tribal representatives of the Tamien Nation shall be consulted. If, after consultation with the Tamien Nation, it is determined that the find(s) is a tribal cultural resource, then the find(s) shall be avoided by Project activities. If avoidance is not feasible, as determined by the County, the qualified archaeologist, in consultation with tribal representatives and the County, shall make appropriate recommendations regarding the treatment and disposition of such finds and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist prior to resuming construction activities within the 50-foot radius.</p> <p>iv) If the find(s) are human remains or grave goods, the requirements of Public Resources Code Section 5097.98 and County Ordinance Code Sections B6-18 through B6-20 shall be followed.</p> <p>Recommendations for treatment and disposition of finds could include, but are not limited to, the collection, recordation, and analysis of any significant cultural materials, or the turning over of tribal cultural resources to tribal representatives for appropriate treatment. A report of findings documenting any data recovery shall be submitted to the County Director of Planning and Development.</p> <p>D. Fill soils used for construction purposes shall not contain archaeological materials.</p>	<p>(continued)</p>
<p><b>Impact CUL-3: Human Remains</b>                      The Project would not disturb any human remains.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-CUL-1: Cumulative Impacts to Historical Resources</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-CUL-2: Cumulative Impacts to Archaeological Resources or Human Remains</b>                      The overall cumulative impact could be potentially significant.                      Mitigation: MM-CUL-2 (detailed for Impact CUL-2)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>
<p><b>Impact ENE-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</b>                      The Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact ENE-2: Conflict with or Obstruct a Renewable Energy or Energy Efficiency Plan</b>                      The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>

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<p><b>Impact C-ENE-1: Cumulative Energy Impacts</b> The overall cumulative impact would be less than significant. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p><b>Impact GEO-1: Seismic Hazards</b> The Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p><b>Impact GEO-2: Soil Erosion</b> The Project would not result in substantial soil erosion or loss of topsoil. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p><b>Impact GEO-3: Unstable Soils or Geological Units</b> The Project could be located on unstable soils. Mitigation: <u>MM-GEO-3: Prepare a Subsequent Geotechnical Report and Implement a Monitoring Program During Construction</u> Prior to the issuance of building permits, the Developer shall retain a licensed geotechnical engineer to prepare a subsequent geotechnical report for the project site to supplement and refine the recommendations in Section 7 of the Geotechnical Investigation prepared by Rockridge Geotechnical (March 25, 2021). The subsequent report shall include underground investigative testing to determine the full horizontal and lateral extent, along with the exact location in relationship to property lines and setbacks, and the foundation type(s), of the neighboring basement walls to the east. The subsequent geotechnical report shall make final recommendations for foundation design of the proposed building once foundation loads and the vertical and lateral extent of the existing neighboring buildings are known. Underpinning of the neighboring building to the southeast may be needed if excavations would occur adjacent to and extend below the elevation of the bottom of the foundation for the adjacent structure. To determine the need for underpinning and, if underpinning is needed, to provide information for design of the underpinning system, the subsequent geotechnical report shall determine the configuration and depth of existing foundations that bottom above an imaginary line extending up at an inclination of 1.5:1 (horizontal to vertical) from the proposed excavation. If as-built plans cannot be obtained, test pits shall be excavated prior to construction to determine the foundation type and depth to complete the design for an appropriate underpinning system of the neighboring building to the southeast. As determined by a geotechnical engineer, the underpinning system may consist of end-bearing piers that are designed to gain support by transferring building loads onto firm alluvium. A monitoring program shall be implemented during construction to ensure that neighboring basement walls are not destabilized during Project construction. The conditions of existing buildings within 20 horizontal feet from the sides of excavations on the project site shall be photographed and surveyed prior to the start of construction and monitored periodically during construction. In addition, prior to the start of excavation, the contractor shall establish survey points on the shoring system, on the ground surface at critical locations behind the shoring, and on adjacent buildings. These survey points shall be used to monitor the vertical and horizontal movements of the shoring and the ground behind the shoring throughout construction. If the monitoring program detects movement greater than 0.5 inch, construction shall be immediately halted and a geotechnical and structural engineer shall be consulted regarding potential remedies, which may include more aggressive underpinning of the adjacent building. Construction shall not resume until an appropriate remedy sufficient to fully stabilize the adjacent foundation has been presented to and approved by the County and the City of Palo Alto Building Department.</p>	<p>Before Mitigation: PS After Mitigation: LTSM</p>



PUBLIC DRAFT

Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact C-GEO-3: Cumulative Impacts to Unstable Soils</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-GEO-4: Cumulative Impacts to Expansive Soils</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-GEO-6: Cumulative Impacts to Geological Resources</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact GHG-1: GHG Emissions</b>                      The Project would not generate GHG emissions that may have a significant impact on the environment.                      Mitigation: none required</p>	<p>Before Mitigation: LTCC                      After Mitigation: N/A</p>
<p><b>Impact GHG-2: GHG Plan, Policy, or Regulation Conflicts</b>                      The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.                      Mitigation: none required</p>	<p>Before Mitigation: LTCC                      After Mitigation: N/A</p>
<p><b>Impact C-GHG-1: Cumulative GHG Emissions or GHG Plan, Policy, or Regulation Conflicts</b>                      The overall cumulative impact would be significant. However, the Project's contribution would be not cumulatively considerable.                      Mitigation: none required</p>	<p>Before Mitigation: LTCC                      After Mitigation: N/A</p>
<p><b>Impact HAZ-1: Use or Release of Hazardous Materials</b>                      The Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials or reasonably foreseeable upset and accident conditions involving the release of hazardous materials.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact HAZ-2: Hazardous Emissions near Schools</b>                      The Project would not emit hazardous emissions or handle hazardous emissions within a quarter mile of a school.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>



Summary of Impacts and Mitigation	Level of Significance
<p><u>MM-HAZ-3C: Incorporate Standards for HazMat Training and the Proper Handling and Disposal of Contaminated Soils into the Project's Construction Specifications</u></p> <p>Based on the results of the Site Assessment and Conceptual Site Model that are completed pursuant to Mitigation Measure MM-HAZ-3A, the Developer shall require specifications and procedures to be followed by the construction contractor for potential contact with contaminated groundwater, and the safe handling, treatment, and disposal of excavated soils from the project site (if soils are found to be contaminated), consistent with all applicable federal, State, and local requirements. The following provisions shall be included in the project's construction specifications:</p> <ul style="list-style-type: none"> <li>• All construction workers who will be involved with ground disturbance shall be trained in Hazardous Waste Operations and Emergency Response (HAZWOPER) as related to contaminated groundwater, and as related to contaminated soil if any is found to be present based on the results of the Phase II investigation.</li> <li>• If the results of the Site Assessment and Conceptual Site Model indicate that contaminated soil is present, then the Developer shall retain a licensed engineering contractor with a Class A license and hazardous substance removal certification to perform any soil removal from the project site. A California-licensed engineer shall provide field oversight on behalf of the Developer, to document the origin and destination of all removed materials. If necessary, removed materials shall be stockpiled temporarily and covered with plastic sheeting, pending relocation, segregation, or off-site hauling. To protect groundwater and surface water quality, contaminated soils shall not be stored on-site during the winter rainy season (i.e., November through April). All materials shall be disposed at an appropriately licensed landfill or facility.</li> </ul> <p>The Developer shall provide the County Facilities and Fleet Department and Selected Regulatory Agency with documentation verifying that all of these requirements have been met.</p>	<p>(continued)</p>
<p><u>MM-HAZ-3D: Prepare and Implement a Site-Specific Health and Safety Plan.</u></p> <p>To protect the health of construction workers and the environment, the Developer shall prepare and implement a site-specific Health and Safety Plan (HASP). The HASP shall be prepared in accordance with State and federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and shall be approved by a certified industrial hygienist. Copies of the HASP shall be made available to construction workers for review during their orientation training and/or during regular health and safety meetings. The HASP shall identify potential hazards (including contaminated groundwater, and the potential for stained or odiferous soils at any location where earthmoving activities would occur), chemicals of concern, personal protective equipment and devices, decontamination procedures, the need for personal or area monitoring, and emergency response procedures. The HASP shall be consistent with all applicable components of the Site Management Plan approved by the Selected Regulatory Agency pursuant to Mitigation Measure MM-HAZ-3A.</p>	<p>(continued)</p>
<p><u>MM-HAZ-3E: Install Vapor Barrier and Perform Periodic Indoor Air Quality Testing, if required</u></p> <p>The Developer shall install a Vapor Intrusion Mitigation System (VIMS) or other engineering controls if required by the Selected Regulatory Agency. The design, installation, and operation of the VIMS and all periodic indoor air quality testing shall comply with all requirements of the Selected Regulatory Agency.</p>	<p>(continued)</p>
<p><b>Impact HAZ-4: Airport-related Hazards</b></p> <p>The Project would not result in airport-related safety or noise hazards.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: NI</p> <p>After Mitigation: N/A</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact HAZ-5: Emergency Response or Evacuation Plan Impairment</b>                      The Project would not impair implementation of an emergency response plan or emergency evacuation plan.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact HAZ-6: Wildland Fire Hazards</b>                      The Project would not expose people or structures to significant risk from wildland fires.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact C-HAZ-1: Cumulative Use or Release of Hazardous Materials</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-HAZ-3: Cumulative Hazards from Cortese-List Sites</b>                      The overall cumulative impact would be potentially significant.                      Mitigation: MM-HAZ-3A through MM-HAZ-3E (detailed for Impact HAZ-3)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>
<p><b>Impact C-HAZ-5: Cumulative Emergency Response or Evacuation Plan Impairment</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact HYD-1: Water Quality Standard Violations</b>                      The Project could violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.                      Mitigation: MM-HAZ-3B (detailed in Impact HAZ-3)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>
<p><b>Impact HYD-2: Groundwater Supply and Recharge</b>                      The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact HYD-3: Alteration of Drainage Patterns</b>                      The Project would not substantially alter drainage patterns resulting in erosion or siltation, flooding, pollution, or redirection of flood flows.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact HYD-4: Release of Pollutants due to Inundation</b>                      The Project would not risk release of pollutants in flood, tsunami, or seiche hazard zones.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact HYD-5: Water Quality Control Plan or Sustainable Groundwater Management Plan Conflicts</b>                      The Project could conflict with a water quality control plan or sustainable groundwater management plan.                      Mitigation: MM-HAZ-3B (detailed in Impact HAZ-3)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact C-HYD-1: Cumulative Hydrology Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact LUP-1: Physically Divide a Community</b>                      The Project would not physically divide an established community.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact LUP-2: Land Use Plan, Policy, or Regulation Conflicts</b>                      The Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact NOI-1: Ambient Noise Levels</b>                      The Project could result in generation of a substantial temporary increase in ambient noise levels in excess of applicable standards.  <u>Mitigation: MM-NOI-1: Construction Noise Reduction Measures</u>                      The Developer shall include the following measures in contractor specifications for the Project, and such measures shall be implemented during all demolition and construction phases:</p> <p>A. In accordance with Chapter 9.10 of the City of Palo Alto Municipal Code, the hours of construction, including the loading and unloading of materials and truck movements, shall generally be limited to between the hours of 8 a.m. and 6 p.m. Monday through Friday, and between 9 a.m. and 6 p.m. on Saturday. No construction activities shall be permitted on Sundays or holidays. In limited instances where adherence to the allowable hours of construction is not feasible, the contractor shall apply for an exception permit from the City of Palo Alto (and, if the proposed construction work would occur prior to 7 a.m. or after 7 p.m., a variance from the County noise ordinance) and adhere to any conditions imposed. In addition, the Developer shall give advance notice of such instances to the owners and occupants of the all residential properties within 50 feet of the project site and provide the contact details of the dedicated disturbance coordinator (see MM-NOI-1A).</p> <p>B. In accordance with Chapter 9.10 of the City of Palo Alto Municipal Code, the hours of construction, including the loading and unloading of materials and truck movements, shall generally be limited to between the hours of 8 a.m. and 6 p.m. Monday through Friday, and between 9 a.m. and 6 p.m. on Saturday. No construction activities shall be permitted on Sundays or holidays. In limited instances where adherence to the allowable hours of construction is not feasible, the contractor shall apply for an exception permit from the City of Palo Alto (and, if the proposed construction work would occur prior to 7 a.m. or after 7 p.m., a variance from the County noise ordinance) and adhere to any conditions imposed. In addition, the Developer shall give advance notice of such instances to the owners and occupants of the all residential properties within 50 feet of the project site and provide the contact details of the dedicated disturbance coordinator (see MM-NOI-1A).</p> <p>C. A disturbance coordinator shall be designated for the duration of the construction period, and this person's number shall be conspicuously posted around the project site and in all construction notifications. The disturbance coordinator shall receive complaints about construction disturbances and, in coordination with the County, shall determine the cause of the complaint and implement feasible measures to alleviate the problem.</p>	<p>Before Mitigation: S&amp;U                      After Mitigation: S&amp;U                      (continued)                      (continued)</p>

Summary of Impacts and Mitigation	Level of Significance
<p>D. The following noise minimization measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• Construction equipment shall be properly maintained and all internal combustion engine driven machinery with intake and exhaust mufflers and engine shrouds, as applicable, shall be in good condition. During construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers, consistent with manufacturers’ standards.</li> <li>• Construction equipment shall be operated in a manner to reduce or avoid high levels of noise emissions (e.g., to the extent practical, lower—rather than drop—loads into trucks or onto platforms to reduce noise-generating impacts of contacting surfaces).</li> <li>• “Quiet” models of construction equipment, particularly air compressors, generators, pumps, and other stationary noise sources, shall be selected and used on site. For example, oil-cooled air compressors shall be used in lieu of air-cooled compressors.</li> <li>• Electrical power, rather than diesel equipment, shall be used to power tools and any temporary structures, such as construction trailers.</li> <li>• Staging areas and stationary noise-generating equipment, such as compressors, shall be located as far away from noise-sensitive uses as feasible.</li> <li>• Idling times of equipment shall be minimized by either shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.</li> <li>• Where available, mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.</li> <li>• All noise from workers’ radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity.</li> </ul>	<p>(continued)</p>
<p>E. Temporary sound barriers using sound blankets and/or an engineered acoustic barrier shall be installed and maintained along the boundaries of the construction site. The barriers shall be kept in place throughout all phases of the construction period, except during periods when they would interfere with construction activities in the vicinity. For street-frontages (Park Boulevard, Grant Avenue, and Birch Street), the barrier shall be at least 8 feet in height. For the rear (southeast) boundary of the site the barrier shall be at least 16 feet in height. Alternatively, if the owner and tenants of the buildings on the adjacent properties agree, temporary sound barriers may be installed on individual balconies and windows of the adjacent buildings in lieu of the property-line barrier previously described.</p>	<p>(continued)</p>

**Impact NOI-2: Groundborne Vibration**

The Project could result in generation of a substantial temporary or permanent increase in ambient noise levels in excess of applicable standards. Before Mitigation: S&U

Mitigation: MM-NOI-2: Vibration Reduction Measures

The Developer shall include the following measures in its contractor specifications, and such measures shall be implemented by the Contractor(s) during construction:

- A. The owners and occupants of the residential apartment building at 200 Sheridan Avenue and owners and tenants of the Courthouse Plaza office building at 260 Sheridan Avenue) and other vibration sensitive uses within 50 feet of heavy construction activity shall be notified of the construction schedule, as well as the name and contact information of the project disturbance coordinator identified under MM-NOI-1b. After Mitigation: S&U
- B. Operation of vibratory equipment, such as vibratory rollers or vibratory plate compactors, shall not be undertaken outside of the City’s allowable construction hours specified in MM-NOI-1A.

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Summary of Impacts and Mitigation	Level of Significance
<p>C. Operation of vibratory equipment, such as vibratory rollers or vibratory plate compactors, shall not be undertaken within a 15 feet buffer zone around existing buildings on adjacent residential and commercial properties, unless:</p> <ul style="list-style-type: none"> <li>• The equipment is operated in “static mode” with all vibratory functions turned off; or</li> <li>• Realtime vibration monitoring is undertaken at the adjacent buildings during all use of vibratory equipment within the buffer zone, and vibratory equipment usage is stopped, or operated in “static mode” if vibration levels exceed 0.49 in/sec PPV at those buildings; or</li> <li>• A qualified acoustic consultant is retained by the contractor to review and revise the buffer zone distance based on site-specific conditions and vibration levels generated by the actual equipment used at the site, such that vibration levels at the adjacent buildings shall not exceed 0.49 in/sec PPV during any construction activities.</li> </ul>	<p>(continued)</p>
<p><b>Impact NOI-3: Airport Noise</b>                      The Project would not expose people to excessive noise levels from nearby airports.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact C-NOI-1: Cumulative Noise Impacts</b>                      The cumulative impact would be significant and unavoidable.                      Mitigation: MM-NOI-1 (detailed in Impact NOI-1)</p>	<p>Before Mitigation: PS                      After Mitigation: S&amp;U</p>
<p><b>Impact C-NOI-2: Cumulative Vibration Impacts</b>                      The cumulative impact would be significant and unavoidable.                      Mitigation: MM-NOI-2 (detailed in Impact NOI-2)</p>	<p>Before Mitigation: PS                      After Mitigation: S&amp;U</p>
<p><b>Impact POP-1: Growth Inducement</b>                      The Project would not directly or indirectly induce substantial unplanned population growth in an area.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact POP-2: Displacement of People or Housing</b>                      The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.                      Mitigation: none required</p>	<p>Before Mitigation: NI                      After Mitigation: N/A</p>
<p><b>Impact C-POP-1: Cumulative Growth Inducement</b>                      The overall cumulative impact would be potentially significant. The Project’s contribution to the overall cumulative impact would be less than cumulatively considerable.                      Mitigation: none required</p>	<p>Before Mitigation: LTCC                      After Mitigation: N/A</p>
<p><b>Impact PSR-1: Demand for Public Services</b>                      The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>

PUBLIC DRAFT

Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact PSR-2: Existing Recreational Facilities</b>                      The Project would not increase the use of existing recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact PSR-3: New Recreational Facilities</b>                      The Project would not include or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-PSR-1: Cumulative Public Service Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-PSR-2: Cumulative Recreation Impacts</b>                      The overall cumulative impact would be potentially significant, but the Project's contribution to the cumulative impact would be less than cumulatively considerable.                      Mitigation: none required</p>	<p>Before Mitigation: LTCC                      After Mitigation: N/A</p>
<p><b>Impact TRA-1: Transportation Plan or Program Conflicts</b>                      The Project would not conflict with a program plan, ordinance or policy addressing the circulation system.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact TRA-2: Vehicle Miles Traveled</b>                      The Project would not conflict with CEQA Guidelines related to vehicle miles traveled.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact TRA-3: Traffic Safety Hazards</b>                      The Project could substantially increase traffic-related hazards.                      Mitigation: <u>MM-TRA-3A: Pedestrian/Bicycle Warning System</u>                      The Developer shall require that an audio warning be installed at all parking garage exits to warn cyclists and pedestrians when a vehicle is approaching the garage exit. Warning signs reminding exiting motorists to watch out and yield to pedestrians and cyclists shall also be provided in the garage before/near the egress.  <u>MM-TRA-3B: Maximize Site Distance</u>                      The Developer shall work with the City of Palo Alto to limit on-street parking in the immediate vicinity of the proposed site access point on Birch Streets, and to locate proposed street trees on the Birch Street and Park Boulevard so that the sight distance for vehicles exiting the project site meets City requirements.</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact TRA-4: Emergency Access</b>                      The Project would not result in inadequate emergency access.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-TRA-1: Cumulative Transportation Plan or Program Conflicts</b>                      The overall cumulative impact would be potentially significant, but the contribution of the Project would be less than cumulatively considerable.                      Mitigation: none required</p>	<p>Before Mitigation: LTCC                      After Mitigation: N/A</p>
<p><b>Impact C-TRA-2: Cumulative Vehicle Miles Travelled Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-TRA-3: Cumulative Traffic Safety Hazards and Emergency Access</b>                      The overall cumulative impact would be potentially significant.                      Mitigation: <u>MM-C-TRA-3: Coordination of Construction Traffic Plans</u>                      The Developer and its construction contractor for the 231 Grant Educator Workforce Housing project shall consult with the City of Palo Alto and its construction contractor for the Public Safety Building project to coordinate the Construction Traffic Management Plans for both projects such that:</p> <ul style="list-style-type: none"> <li>• Temporary lane and/or road closures and detour routes do not conflict;</li> <li>• Notification to local residents, bicycle and pedestrian advocacy groups, and the Valley Transit Authority are coordinated and clearly identify locations and periods of road closures, alternative routes, and other pertinent information; and</li> <li>• Emergency access is maintained to all properties in the vicinity of both projects throughout the combined construction period.</li> </ul>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>
<p><b>Impact TCR-1: Tribal Cultural Resources</b>                      The Project could cause a substantial adverse change in the significance of an as-yet unidentified tribal cultural resource.                      Mitigation: MM-CUL-2 (detailed in Impact CUL-2)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>
<p><b>Impact C-TCR-1: Cumulative Tribal Cultural Resources Impacts</b>                      The overall cumulative impact would be potentially significant.                      Mitigation: MM-CUL-2 (detailed in Impact CUL-2)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>
<p><b>Impact UTI-1: New or Expanded Utility Services</b>                      The Project would not require new or expanded utility services that could cause significant environmental effects.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact UTI-2: Water Supply Availability</b>                      The Project would have sufficient water supplies available.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact UTI-3: Wastewater Treatment Capacity</b>                      The Project would not result in determination of inadequate wastewater treatment capacity.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact UTI-4: Solid Waste Capacity</b>                      The Project would not generate solid waste in excess of local standards or capacity of local infrastructure.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact UTI-5: Solid Waste Statutes and Regulations</b>                      The Project would comply with solid waste management and reduction statutes and regulations.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-UTI-1: Cumulative Impacts to Utility Services</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-UTI-2: Cumulative Water Supply Availability Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-UTI-3: Cumulative Wastewater Treatment Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-UTI-4: Cumulative Solid Waste Capacity Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact C-UTI-5: Cumulative Solid Waste Regulations Impacts</b>                      The overall cumulative impact would be less than significant.                      Mitigation: none required</p>	<p>Before Mitigation: LTS                      After Mitigation: N/A</p>
<p><b>Impact MFS-1: Substantial Adverse Effects to Biological or Cultural Resources</b>                      The Project would not have a substantial adverse effect on wildlife or plant species or eliminate important examples of the major periods of California history or prehistory.                      Mitigation: MM-BIO-4, MM-CUL-2 (detailed in Impact BIO-4 and Impact CUL-2)</p>	<p>Before Mitigation: PS                      After Mitigation: LTSM</p>

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Summary of Impacts and Mitigation	Level of Significance
<p><b>Impact MFS-2: Individually Limited but Cumulatively Considerable Impacts</b></p> <p>The Project would have cumulative construction noise and vibration impacts that are cumulatively considerable. The Project's contribution to other cumulative impacts would be less than cumulatively considerable or would be reduced to less than cumulatively considerable with implementation of mitigation measures.</p> <p>Mitigation: MM-AIR-1, MM-CUL-2, MM-HAZ-3A through MM-HAZ-3E, MM-NOI-1 and MM-NOI-2</p>	<p>Before Mitigation: PS</p> <p>After Mitigation: S&amp;U</p>
<p><b>Impact MFS-3: Direct or Indirect Adverse Effects on Human Beings</b></p> <p>The Project would have environmental effects related to construction noise and vibration which will cause substantial adverse effects on human beings, either directly or indirectly.</p> <p>Mitigation: MM-NOI-1 and MM-NOI-2</p>	<p>Before Mitigation: PS</p> <p>After Mitigation: S&amp;U</p>

Source: Prepared by AECOM in 2021.

Acronyms: LTS = less than significant impact; LTSM = less than significant with mitigation; LTCC = less than cumulatively considerable; NI = no impact; PS = potentially significant; S&U = significant and unavoidable; N/A = not applicable.