Final
Environmental Impact Report

231 Grant Educator Workforce Housing

SCH#2020120049

December 2021

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FINAL

Prepared for:

County of Santa Clara
Facilities and Fleet Department
2310 N. First Street, Suite 200
San José, CA 95131

Prepared by:

AECOM
4 North Second Street, Suite 675
San Jose, CA 95113
aecom.com

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1 Introduction

1.1 CEQA Process

On October 5, 2021, the County of Santa Clara (lead agency) released for public review a Draft Environmental Impact Report (Draft EIR) for the proposed 231 Grant Educator Workforce Housing Project (SCH# 2020120049) pursuant to the requirements of the California Environmental Quality Act (CEQA). The minimum 45-day public review and comment period on the Draft EIR began on October 5, 2021 and closed on November 19, 2021.

Section 15088(a) of the CEQA Guidelines states that:

> *The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.*

Accordingly, the County of Santa Clara (County) has evaluated the comments received on the Draft EIR for the 231 Grant Educator Workforce Housing Project (the Project) and prepared written responses to those comments. CEQA does not require the lead agency to respond to comments about the merits of the proposed project unless they involve the Draft EIR's analysis of its environmental issues.

This response to comments document, together with the Draft EIR as published, and the Mitigation Monitoring and Reporting Program attached as Appendix A, together constitute the Final Environmental Impact Report (Final EIR) for the Project.

Certification of the Final EIR as adequate and complete must take place before the County may approve the Project. Certification of the Final EIR as being complete is not approval of the Project; certification is required for ultimate project approval, but the approval is a separate action by the County.

1.2 Document Organization

Pursuant to Section 15132 of the CEQA Guidelines, a Final EIR shall consist of:

a) The Draft EIR or a revision of the draft

b) Comments and recommendations received on the Draft EIR either verbatim or in summary

c) A list of persons, organizations, and public agencies commenting on the Draft EIR

d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process

e) Any other information added by the Lead Agency.

This Final EIR is divided into the following sections and appendices:

- Section 1, “Introduction,” describes the CEQA process and the organization of this document.
- Section 2, “Agencies, Organizations and Persons Commenting on the Draft EIR,” lists all agencies, organizations and persons that submitted written or oral comments on the Draft EIR during the public review and comment period. The list also indicates the receipt date of each written correspondence and the comment code assigned to each commenter.
- Section 3, “Comments Received and Responses to Comments,” details the specific comments received during the public review period and provides the County’s response to each comment. Each substantive comment within a particular comment letter is assigned a unique number along with the comment code for that commenter, with corresponding responses similarly numbered. Verbal comments received during the public meeting held during the review period are summarized and responded to in turn.
- Section 4, “Revisions to the Draft Environmental Impact Report,” contains text changes to the Draft EIR made in response to comments received on the Draft EIR or initiated by County staff.
- Section 5, “References,” includes bibliographical details for any additional citations referenced within the Final EIR that were not included in the Draft EIR.

Appendix A contains full copies of the comment letters and emails received in their original format. Appendix B contains the Mitigation Monitoring and Reporting Program (MMRP), which identifies mitigation measures and the responsible parties, tasks, and schedule for monitoring mitigation compliance. Appendix C contains the Arborist Report, which is recommended to be added as a new appendix in response to comments received.

2 Agencies, Organizations and Persons Commenting on the Draft Environmental Impact Report

In accordance with CEQA Guidelines Section 15088, this document includes written responses to email and letter comments received by the County on the Draft EIR during the public review period, as well as to verbal comments from the public meeting held on October 14, 2020. Table 2-1 below lists all written comments received on the Draft EIR, and Table 2-2 lists all speakers at the public meeting. Each commenter is given a unique commenter code, which is used in Section 3 of this document to identify individual subtopics raised by the commenters and the County's responses to those comments.

Table 2-1: List of Written Comments Received on the Draft Environmental Impact Report

Commenter Code	Name of Commenter	Commenter Type	Comment Date
JCC	Judicial Council of California	State Agency	November 18, 2021
CITY	City of Palo Alto	Local Agency	November 19, 2021
LWV	League of Women Voters of Palo Alto	Organization	October 15, 2021
BECKETT	Jamie Beckett	Individual	November 18, 2021
GOLD	Anna Gold	Individual	October 31, 2021
GRAVES	Pria Graves	Individual	November 7, 2021
HOLZEMER	Terry Holzemer	Individual	October 30, 2021 November 18, 2021 November 19, 2021
JAMASON	Ellen E. Jamason	Individual	November 19, 2021
MA	Kevin Ma	Individual	October 31, 2021
SHULER	Peter Jon Shuler	Individual	November 18, 2021
VYAS	Vipul Vyas	Individual	November 19, 2021

Table 2-2: List of Verbal Comments Received on the Draft Environmental Impact Report

Commenter Code	Name of Commenter	Comment Date
BALDWIN-V	Teri Baldwin	October 20, 2021
DIBRIENZA-V	Jennifer DiBrienza	October 20, 2021
JAMASON-V	Ellen Jamason	October 20, 2021
KNISS-V	Liz Kniss	October 20, 2021
PENNINGTON-V	Simon Pennington	October 20, 2021
PRICE-V	Gail Price	October 20, 2021
RATNER-V	Elizabeth (Lisa) Ratner	October 20, 2021
SHEPPARD-V	Nancy Sheppard	October 20, 2021
STEINER-V	Meb Steiner	October 20, 2021
SUNG-V	Amy Sung	October 20, 2021

In addition to the written comments received during the Draft EIR public review period and verbal comments made at the public meeting, the County has been in consultation with the Tamien Nation, the tribe that is culturally and traditionally affiliated with the project area, in accordance with Assembly Bill 52. Virtual meetings were held with representatives of the Tamien Nation on September 14, November 3, and November 9, 2021, where the tribe's feedback and comments on the Draft EIR and adequacy of mitigation measures relating to tribal resources were discussed. These discussions, and associated email exchanges, are not included as official comments on the Draft EIR that require a response under CEQA but did result in revisions to mitigation measure MM-CUL-2 in Section 3.5.3 the Draft EIR. These revisions, along with other changes made in response to comments received during the public review period, are presented in Section 4 of this Final EIR.

3 Responses to Comments Received on the Draft EIR

In accordance with CEQA Guidelines Section 15088, this document includes written responses to all comments received by the County on the Draft EIR during the public review period. Written comments are presented in Section 3.1, each followed by the County's response. Oral comments and the County's responses are presented in Section 3.2. Within each section, comments and associated responses are organized alphabetically, by commenter. See Section 2 of this document for a full list of all commenters.

3.1 Written Comments and Responses to Comments

Written comments were received from one state agency, one local agency, one organization and eight individuals during the public review period, copies of which are contained in Appendix A. Each comment letter has been divided into individual comment topics requiring a response, e.g., the first topic raised in a letter is coded as [Commenter Code]-1, the second topic is coded as [Commenter Code]-2. The text of each comment topic is reproduced below, followed by the County's response to that comment topic, in turn. Where changes to the Draft EIR are made in response to a comment, the response to the particular comment states this and explains which section of the Draft EIR has been modified. All text changes to the Draft EIR are presented in Section 4, "Revisions to the Draft Environmental Impact Report," of this Final EIR.

3.1.1 JCC: Judicial Council of California

Comment JCC-1:

The Judicial Council of California ("Judicial Council") provides the following comments regarding the Draft Environmental Impact Report dated October 2021 ("EIR Report") for the 231 Grant Educator Workforce Housing Project ("Project").

The Superior Court of California, County of Santa Clara ("Court") Palo Alto Courthouse is located 270 Grant Avenue, Palo Alto, California, 94306 ("Courthouse"). The Courthouse currently remains closed due to the pandemic; however, it is expected to reopen in 2022. The Courthouse is situated directly across the street from the Project.

Response to Comment JCC-1:

The County thanks the commenter for providing information about the current and future operational status of the Courthouse. This comment does not raise any specific environmental concerns that require a response under CEQA.

Comment JCC-2:

According to the EIR Report, the Project will be developed with approximately 110 residential units. (EIR Project Characteristics § 2.3.) Residents of the Project will need ample parking. It is reasonable to expect that some units may have households with more than one vehicle. It is also reasonable to expect that residents of the Project will have visitors in need of parking. The

Project parking structure is slated to provide 112 parking spaces. (EIR Access and Circulation § 2.3.5.)

The EIR Report did not provide sufficient analysis or review of the potential parking issues at the Project. This is a matter of concern for the Court. The Courthouse parking lot is limited with designated parking spots for permit holders and Court visitors. The Courthouse parking is necessary for proper functioning of the Court. Jurors, attorneys, witnesses, and members of the general public rely on the existing Courthouse parking.

The Courthouse parking lot is directly across the street from the Project. It is foreseeable that a lack of adequate parking at the Project could result in spillover into the Courthouse parking lot. The existing Courthouse parking is necessary for the proper functioning of the Court. It is important that the Courthouse parking not be compromised by the Project.

Response to Comment JCC-2:

The commenter's concern regarding spillover parking from the Project to the Courthouse parking lot is acknowledged. Residents and employees of, and visitors to, the Project would be required to comply with all relevant public and private parking restrictions in the vicinity of the site, including those applicable to the Courthouse parking lot. However, enforcement of parking restrictions at the Courthouse parking lot and potential impacts to Courthouse functions if such restrictions are not enforced are not environmental impacts for CEQA purposes and are therefore not addressed in the EIR.

Parking shortfalls relative to demand are generally not, in and of themselves, considered to be environmental impacts under CEQA unless there are secondary environmental impacts resulting from the parking shortfall (*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco [1st Dist. 2002] 102 Cal.App.4th 656; Taxpayers For Accountable School Bond Spending v. San Diego Unified School Dist. [4th Dist 2013] 215 Cal.App.4th 1013; Save Our Access – San Gabriel Mountains v. Watershed Conservation Authority [2nd Dist. 2021] 68 Cal.App.5th 8.*)

Further, PRC Section 21099(d)(1) states that 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.

Comment JCC-3:

The Court has concerns about Project construction, staging, and traffic control. According to the EIR Report, periodic closure of Grant Avenue, including a full closure of 4–8 weeks during the setting of modular units is expected during construction. (EIR Construction Haul Routes, Staging, and Traffic Control § 2.4.2.)

The Courthouse is situated between Grant Avenue and Sherman Avenue. Currently, Sherman Avenue is closed due to a City of Palo construction project. The City project is expected to span several years. A closure of both Grant and Sherman Avenues would completely lock out Courthouse access points. As such, closure of Grant Avenue must be coordinated with existing road closures.

Furthermore, the Court has unique needs regarding the use of street space near the Courthouse. The Court conducts hearings that require the transport of in-custody individuals to

the Courthouse. The transport buses range in size from approximately 35 feet to 45 feet in length. Maintaining access for the transport buses to and from the Courthouse is essential for Court operations.

The EIR Report does not address the issue of transport bus access to and from the Courthouse during Project street closures and construction staging activities. (EIR Construction Haul Routes, Staging, and Traffic Control § 2.4.2.) The EIR Report also does not address existing construction projects in the area.

Response to Comment JCC-3:

As discussed in Section 2.4.2 of the Draft EIR, before construction begins, the construction contractor would prepare and implement a construction traffic control plan as part of the Project, in consultation with the City of Palo Alto. Revisions have been made to Section 2.4.2 of the Draft EIR to include a specific requirement that access to the Courthouse property shall be maintained throughout the construction period, particularly for buses transporting in-custody individuals.

The potential for street closures and traffic control associated with Project construction to combine with impacts of other nearby construction projects is addressed in Section 3.16.4 of the Draft EIR, under Impact C-TRA-3. In particular, the Draft EIR identifies this cumulative impact as potentially significant and recommends implementation of mitigation measure MM-C-TRA-3, which would require that the Projection contractor coordinate their construction traffic control plan with that of the nearby Public Safety Building project to ensure that temporary lane and/or road closures and detour routes do not conflict, that access is maintained to all properties throughout the combined construction period, and to notify local residents, bicycle and pedestrian advocacy groups, and the Valley Transit Authority.

Revisions have been made to MM-C-TRA-3, to include the Judicial Council of California in the list of parties to be notified about road closures, detours, and other pertinent information and to specifically state that closures of Grant and Sherman Avenues at the same time shall be avoided to the extent feasible. The County will also coordinate any Grant Avenue street closures with the Judicial Council pursuant to the Joint Occupancy Agreement between the County and Judicial Council dated December 31, 2018.

Comment JCC-4:

Finally, the EIR Report states that construction workers are required to park at nearby garages. (EIR Construction Haul Routes, Staging, and Traffic Control § 2.4.2.) Due to the proximity of the Courthouse parking lot to the Project, it should be made clear that the Courthouse parking lot is not available for worker parking.

Response to Comment JCC-4:

See response to comment JCC-2 above. The Developer will provide clear instructions to its construction contractors that the Courthouse parking lot shall not be used for worker parking.

Comment JCC-5:

In sum, the Draft Environmental Impact Report dated October 2021 for the 231 Grant Educator Workforce Housing Project did not sufficiently address the potential impacts of overflow parking related to Project, nor did it sufficiently address the impact of restricted access to the Courthouse during certain construction activities.

The Judicial Council requests further review of the Project's impact on neighborhood parking, as well as further review and coordination regarding Project construction activities impacting the Court.

Response to Comment JCC-5:
See responses to comments JCC-2 through JCC-4, above.

3.1.2 CITY: City of Palo Alto

Comment CITY-1:
The executive summary identifies the site as being within the Mayfair Neighborhood of Palo Alto. This project is located within the Evergreen Park neighborhood of Palo Alto.

Response to Comment CITY-1:
The reference to the "Mayfair" neighborhood in the Draft EIR was a typographical error. The neighborhood of the project site is known to some as the Evergreen Park neighborhood, but as the Mayfield neighborhood to others (see comment GRAVES-1). Revisions have been made to the Executive Summary and Section 2.1 of the Draft EIR to refer to the "Evergreen Park/Mayfield" neighborhood.

Comment CITY-2:
The project description indicates that two heritage trees would be removed along Grant Avenue. However, the two described trees (a coast redwood and a camphor) are not identified as heritage trees by the City (the City only has eight identified heritage trees, which are designated as such by City Council); therefore, unless they are identified as heritage trees by the County, the statement that these are heritage trees should be revised.

Response to Comment CITY-2:
The comment correctly identifies an error in the Draft EIR. The existing mature camphor tree and Coast redwood tree along the Grant Avenue frontage of the project site are considered "heritage trees" under the County's tree ordinance, not the City's. Revisions have been made to Section 2.3.4 of the Draft EIR in response to this comment.

Comment CITY-3:
Section 2, project description, indicates that noise exception permits are required for concrete pours (8-10 days 5 a.m. start), to mobilize the crane for temporary use (20-30 days), and to accommodate utility company schedules for utility work (15-20 days). Additional information would be necessary to clarify why work outside of standard construction hours would be required. The City would evaluate that information in determining whether a noise exception permit could be issued and for the hours that it could be issued for.

Response to Comment CITY-3:
The City's requirements and process for evaluating applications for noise exception permits are acknowledged and will be followed as necessary by the Developer and its contractors. Revisions have been made to Section 2.4.1 of the Draft EIR, to provide clarification that such exceptions would be subject to a noise exception permit being granted by the City.

Comment CITY-4:

For off-site improvements in our public rights of way (ROW):

- *Palo Alto requires an off-site improvement agreement for any off-site improvements in City Rights of Way.*
- *If the flex plaza proposed at the corner of Park is intended for public access, as stated in the Draft EIR, a recorded easement dedicated to public access for that area should also be proposed as part of the project. This would require coordination with City Public Works staff, to determine if the City would be a party to this easement.*

Response to Comment CITY-4:

The comment does not raise any environmental issues requiring a response under CEQA, however the City's requirement for an off-site improvement agreement is acknowledged. Revisions have been made to Section 2.5 of the Draft EIR to include this agreement in the list of permits and approvals required from the City. The County does not intend to record an easement dedicating the plaza for public access; however, the project site will remain under County ownership.

Comment CITY-5:

It is not abundantly clear whether the chosen construction method (modular construction) is less or more noisy than the alternative method of construction (traditional construction). The traditional construction alternative should be selected if it is less noisy, to lessen the significant and unavoidable noise impacts, even though the impacts will remain significant.

Response to Comment CITY-5:

Noise analysis for the proposed Project (using modular construction methods) is provided in Section 3.12.3 of the Draft EIR (see Impact NOI-1), while noise analysis for Alternative 1 (using traditional construction methods) is provided in Section 4.3.2 (Impact NOI-1). As discussed in Section 4.3.2, Phases 1, 2, and 3 of the proposed Project and Alternative 1 would be identical and, therefore, would generate the same levels of noise during these phases (which are the loudest three phases). For Phase 4, Alternative 1 could generate slightly lower levels of peak noise because the noisiest piece of equipment (crane) used during this phase would be smaller than the crane used for the Project. However, the overall duration of Phase 4 would be longer for Alternative 1 than for the Project. For Phase 5, the equipment and noise levels would be identical, but the duration of this phase under Alternative 1 would be longer. Because the three noisiest phases (Phases 1, 2, and 3) of Alternative 1 would generate the same significant and unavoidable construction noise as the Project, and because the slightly lower peak noise levels during Phase 4 would be offset by the increased duration of construction for Phases 4 and 5, Alternative 1 would not substantially reduce the level of construction noise associated with the Project.

Comment CITY-6:

Any statement of overriding considerations would need to address the considerations that support use of modular construction over traditional construction, and not just the considerations supporting the project in general.

Response to Comment CITY-6:
This comment does not pertain to the adequacy of the Draft EIR and no changes are required to the EIR in response to this comment.

Comment CITY-7:
Analysis under Impact AES-4: light and glare on page 3-8 of the DEIR indicates that there would not be an impact related to light and glare, particularly from nighttime work during construction, because the project would adhere to the required hours. However, the project description indicates that applicant's intent to request approval for early morning and late evening work hours throughout construction. If this is the intent, the analysis should be modified accordingly.

Response to Comment CITY-7:
Revisions have been made to Section 3.2.3 (Impact AES-4) of the Draft EIR to reflect that construction activities for the Project "would generally comply" with the City's construction hours, rather than the previous wording that it "would comply". Additional modifications to the analysis for Impact AES-4 are not required, because the analysis acknowledges that some nighttime lighting may be required during twilight periods or for site security, and that such light sources would be directed downwards and/or shielded to reduce spillover to neighboring properties or public rights-of-way.

Comment CITY-8:
MM-GEO-3 should clarify that consent from adjacent property owner would be required if any underpinning requires work on the adjacent property.

Response to Comment CITY-8:
Revisions have been made to MM-GEO-3 in Section 3.7.3 to clarify that the adjacent property owner's consent would be required for any work on their property.

Comment CITY-9:
Page 2-15 indicates that haul routes would be determined in coordination with the county of Santa Clara. Several of the streets listed are city streets, therefore haul routes should be determined in coordination with the City of Palo Alto as well.

Response to Comment CITY-9:
Section 2.5 of the Draft EIR identifies that the Project would require an oversized vehicle permit from the City. Revisions have been made to Section 2.4.2 of the Draft EIR to include the City as a party to consultation regarding haul routes for oversized vehicles.

Comment CITY-10:
The DEIR states "Grant Avenue would likely need to be closed periodically during the construction period to allow for crane mobilization and/or concrete pours, including a full closure for 4 to 8 weeks during crane setting of modular units. Lane closures on Birch Avenue (northbound side of median only) and Park Boulevard may also be required occasionally, including two days each for crane setting of the far southwest and far southeast modular units, respectively." Therefore, any street closures must be coordinated with the City to ensure that access to businesses can be maintained at all times. Closure of any City streets will require permits from the City of Palo Alto.

Response to Comment CITY-10:
The need for street closure permits from the City is acknowledged in Section 2.5 of the Draft EIR. No changes are required to the EIR in response to this comment. See also response to comment JCC-3.

Comment CITY-11:
The project proponent shall make sure that audio warning signs should not create excessive noise for neighboring properties.

Response to Comment CITY-11:
It is assumed that the comment refers to the audio warning that mitigation measure MM-TRA-3A requires to be provided at the parking garage exits (see Section 3.12.3 of the Draft EIR). Revisions have been made to mitigation measure MM-TRA-3A, as presented in Section 4 of this Final EIR, to clarify that the warning system should be an audio-visual system with adjustable sound and light levels, which would comply with City requirements.

Comment CITY-12:
Regarding Section 4.5.3: Lift retrieval time does not include loading and unloading time. Considering the passenger loading and unloading time per vehicle, the queuing issue may occur.

Response to Comment CITY-12:
This comment appears to refer to Section 4.5.3 of the Transportation Impact Analysis (TIA) for the Project (Appendix E-1 of the Draft EIR). Revisions have been made to that section of the TIA, as presented in Section 4 of this Final EIR, to provide additional clarification of how the parking stacker system would work and why queuing is not anticipated to extend beyond the garage.

Comment CITY-13:
Regarding Section 1.2 TIA Study: As per the city of Palo Alto's standard, a minimum of 10% of required non-residential parking must be standard parking spaces. The accessible spaces shall not be counted as one of the standard spaces for this requirement. Mechanical lift parking is not allowed for retail use. Therefore, the project does not meet the city's parking requirements.

Response to Comment CITY-13:
The "City of Palo Alto's standard" referred to in this comment appears to be from the Palo Alto Municipal Code Section 18.54.020(b)(4). This is a zoning regulation and, therefore, is not applicable to the Project for the reasons described in Section 3.11.2 of the Draft EIR. The comment does not raise any environmental issues requiring a response under CEQA. See response to comment JCC-2.

Comment CITY-14:
The Project will be implementing modular construction method. This would reduce the timeframe of construction; however, the City anticipates that it would increase the number of wide loads and total number of trucks traveling to and from the site during certain period of construction. CEQA analysis shall evaluate traffic impacts due to the modular construction method compared to on-site construction.

Response to Comment CITY-14:

The estimated number of construction truck trips for the Project (modular construction) is described in Section 2.4.1 of the Draft EIR (refer Table 2.4-2). As shown in that table, of the total estimated 2,810 one-way truck trips (i.e., 1,405 trucks making trips to and from the site) during Project construction, the large majority (2,600 truck trips) would be associated with hauling of demolition debris and soils. Only 210 truck trips (less than 7.5 percent of total truck trips) would be required for transportation of the modular units, which are anticipated to occur over a four-week period (24 working days), resulting in an average of approximately 9 truck trips per day (approximately one per hour) during that limited period for modular deliveries.

The estimated number of construction truck trips for Alternative 1 (traditional on-site construction) is described in Section 4.3.2 (page 4-9) of the Draft EIR. Because the site grading and excavation phase of Alternative 1 would be identical to the Project, it would have the same number of haul trips for demolition debris and soils (2,600 trips). Alternative 1 would not require the 210 truck trips for modular units.

Analysis of transportation impacts for the Project is provided in Section 3.16.3 of the Draft EIR, while transportation analysis of Alternative 1 is provided in Section 4.3.2 (starting on page 4-25).

Comment CITY-15:

Birch Street is called out Birch Avenue in various sections of the report. Revise this to 'Street'.

Response to Comment CITY-15:

The comment correctly identifies a typographical error in the Draft EIR. Revisions have been made to all occurrences of this error throughout the EIR.

Comment CITY-16:

Although the CEQA analysis will not include a level of service analysis at nearby intersections in accordance with SB 743, the City of Palo may require a separate local traffic analysis be prepared 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. The City requests that a proposed analysis scope discuss the anticipated trip generated by the proposed development, the anticipated distribution pattern of those trips, and estimated number of peak hour project trips at the nearby intersections where anticipated project trips may trigger the City's thresholds for additional Level of Service (LOS) analysis. This scoping and analysis are necessary for understanding traffic circulation around the site. The City of Palo Alto's intersection standards should be utilized. The City's LOS policy, which includes thresholds and standards, is provided here: https://www.cityofpaloalto.org/civicax/filebank/blobdload.aspx?t=65453.84&BlobID=77026

Response to Comment CITY-16:

A local traffic analysis in accordance with the City of Palo Alto's Local Transportation Impact Analysis Policy was prepared for the Project and is included as Appendix E-2 to the Draft EIR. Consultation with City transportation planners was undertaken regarding the intersections and cumulative projects to be included in the analysis.

Comment CITY-17:

Park Boulevard is a major bike route; therefore, the City would not recommend the addition of any new curb cuts along this frontage or a design that directs increased vehicle ingress/egress to this frontage. The City encourages reducing existing curb cuts where feasible. The project should incorporate all measures needed to improve bicycle safety on Park Boulevard, for vehicles exiting the site.

Response to Comment CITY-17:

Impacts of the Project on bicycle safety are discussed within Section 3.15.3 of the Draft EIR (see Impacts TRA-1 and TRA-3). As discussed in that section, the Project would not create any additional curb cuts along Park Boulevard, but rather, would relocate the existing curb cut approximately 25 feet north, farther from the adjacent driveway for the apartment building at 260 Sheridan Avenue. The increased distance between the two driveways proposed by the Project would meet the City's requirement of at least 20 feet separation [PAMC Section 12.08.060(9A)] and would allow cyclists more time to react to potential hazards (e.g., exiting vehicles) from each driveway. Mitigation measure MM-TRA-3A requires the Developer to install an audio-visual warning system and signage at both exits to the parking garage, which would reduce potential bicycle safety impacts from the Project to a less-than-significant level. Although not considered necessary to reduce impacts to less-than-significant, the Developer will also work with the City of Palo Alto to investigate if additional safety features would be appropriate in this location. See response to comment SHULER-1 for further discussion regarding bicycle safety.

Comment CITY-18:

In the past, the City has received concerns from the residents in this neighborhood regarding the volume and speed of traffic in this area. The environmental analysis must determine whether the project may contribute to such issues, and consider if implementing traffic calming measures as part of the project would be appropriate within the immediate vicinity of the project.

Response to Comment CITY-18:

Speeding traffic on City streets is an enforcement issue for the City and is not an environmental impact of the Project. Future project residents would be subject to the same traffic regulations and enforcement as other road users. In response to a similar comment received during the scoping period, the City was asked for more detail regarding existing traffic concerns prior to preparation of the Traffic Impact Assessment but no additional detail was provided.

As discussed in Section 3.12.3 (Table 3.12-8) and Appendix E of the Draft EIR, operation of the Project would generate a net increase of 145 average daily trips compared to existing conditions. This traffic would be distributed along the surrounding roadways in the project vicinity, resulting in an increase of between 0 and 6 percent in traffic volume on nearby road segments. Pursuant to Senate Bill 743, which came into effect in July 2018, Lead Agencies may no longer consider traffic congestion as an environmental impact under CEQA.

Comment CITY-19:

The City anticipates that construction of the City's Public Service Building could coincide with construction of this building. The traffic analysis muster [sic] the cumulative impacts of these projects, particularly during construction, so that the impacts on traffic and access to adjacent residences and businesses can be understood. Access to adjacent properties must be

maintained throughout construction. Coordination between the County and City of Palo Alto must occur to minimize potential impacts associated with street closures, vehicle deliveries, and other construction activities.

Response to Comment CITY-19:

The potential for street closures and traffic control associated with Project construction to combine with impacts of other nearby construction projects is addressed in Section 3.16.4 of the Draft EIR, under Impact C-TRA-3. In particular, the Draft EIR identifies this cumulative impact as potentially significant and recommends implementation of mitigation measure MM-C-TRA-3, which would require that the Project contractor coordinate their construction traffic control plan with that of the nearby Public Safety Building project to ensure that temporary lane and/or road closures and detour routes do not conflict, that access is maintained to all properties throughout the combined construction period, and to notify local residents, bicycle and pedestrian advocacy groups, and the Valley Transit Authority. See also response to comment JCC-3.

Comment CITY-20:

The County must obtain a permit from the City of Palo Alto for any material haul/wide truck loads as well as encroachment permit(s) for any temporary or permanent encroachment within the City's right-of-way. The City understands that the County has decided to make modular construction the proposed project, as opposed to using traditional construction methods (which are noted as the alternative). This would reduce the timeframe of construction; however, the City anticipates that it would increase the number of wide loads and total trucks traveling to and from the site during certain periods of construction. Additional information on the number of truck trips, the number of wide loads, etc. must be provided as part of the environmental analysis.

Response to Comment CITY-20:

The need for oversized vehicle and encroachment permits from the City is identified in Section 2.5 of the Draft EIR. Information regarding the number of anticipated truck trips is provided in Section 2.4.2 of the Draft EIR for the Project (modular construction method) and in Section 4.3.2 for Alternative 1 (traditional construction method). As noted in those sections, 105 loaded trucks (210 truck trips) would be required to transport the modular units for the Project, which would require oversized vehicle permits. Alternative 1 would not include any transportation of modular units. Both the Project and Alternative 1 would also require oversized vehicle permits for the mobilization of large construction equipment, such as cranes. Additional details regarding oversized vehicles would be provided to the City with permit applications. See also response to comment CITY-14.

Comment CITY-21:

The City will require that the County submit a Traffic Control Plan (TCP) for the City's review and approval prior to construction; this should be identified in the environmental analysis. The City would review the TCP to analyze and approve the routes, timing, and to determine if additional temporary traffic control measures are necessary.

Response to Comment CITY-21:

The need for a traffic control plan and consultation with the City is identified in Section 2.4.2 of the Draft EIR. Revisions have been made to this section to clarify that City review and approval

of the plan would be required, and traffic control plan approval has been added to the list of City approvals required for the Project in Section 2.5.

Comment CITY-22:

The County will need to coordinate with the city with respect to the Public Safety Building (PSB) project and this project. Matt Raschke is the main point of contact for the city for the PSB. There may be some overlap in construction activities for the Public Safety Building, starting as early as June 2022 with the tentative start of the demolition at 231 Grant, given the tentative construction schedule the County provided City Public Works staff.

Response to Comment CITY-22:

See response to comment CITY-19.

3.1.3 LWV: League of Women Voters of Palo Alto

Comment LVW-1:

The League of Women Voters believes every person and family should have decent, safe, and affordable housing. People who are unable to work, whose earnings are inadequate or for whom jobs are not available have the right to an income or services sufficient to meet their basic human needs for food, shelter, and access to health care. The League also believes that local, state, and federal governments have the obligation to act where the private market has failed to support basic human needs.

LWV Palo Alto commends Santa Clara County for making county land available to serve as desperately needed teacher and classified staff housing development which would create 110 apartments for public school district employees from Santa Clara County and South San Mateo County. The project is adjacent to Caltrain and El Camino Real, is near existing bus and rail lines, retail, office, and shopping.

Creating housing affordable to all income levels, not just market rate, is a legal obligation of our cities and counties. The proposal is consistent with the City of Palo Alto's Comprehensive Plan which encourages housing near transit centers and is consistent with the City's land-use designation at this site. It is also consistent with the City's Housing Element policy to increase housing production in transit-rich areas. (Policy L-2.5: "support creation of housing units for middle and low- income earners such as city and school district employees." Policy H-2.1.2 "Support city's fair share of regional housing needs and ensure the population remains economically diverse.")

Housing affordable to teachers and other school district employees is in extremely short supply. Not only do our public employees suffer when faced with long commutes to work, but the fabric of our community suffers when teachers and other essential workers are forced to live hours away from the communities they serve. The climate-warming consequences of long commutes are also lessened when housing is near jobs.

The project deserves the full support of the county, the city, and residents.

Response to Comment LWV-1:

The commenter's support for the Project and for use of County-owned land for the purpose of providing affordable housing is acknowledged and the County thanks the commenter for their

support. The letter acknowledges that the Project is consistent with the City of Palo Alto's Comprehensive Plan and that climate-warming consequences of long commutes are lessened when housing is near jobs. This comment does not raise any specific environmental concerns that require a response under CEQA.

3.1.4 BECKETT, Jamie

Comment BECKETT-1:

I have reviewed the EIR and I am outraged and horrified by the number of falsehoods it contains and the complete lack of concern for neighborhood residents who face added pollution, noise, traffic and parking problems -- while being robbed of precious trees and green space -- as a result of the 231 project.

The authors of the EIR were determined to show the project as having minimal impact despite the numerous red flags -- for all of the issues above -- raised in the EIR. Clearly, the county only cares about some of its residents, but not those who live near this project. As a county resident and taxpayer, I demand a true and accurate representation of the project and its impact and I demand REAL mitigation for the pollution, noise, traffic, parking and other problems this project will create. I need to know when this will be provided.

Response to Comment BECKETT-1:

The commenter's concerns are noted. Various revisions have been made to the EIR in response to comments received on the Draft EIR, as detailed in Section 4. Specific responses to the environmental issues mentioned in this comment are provided in response to comments BECKETT-2 through BECKETT-19, below.

Comment BECKETT-2:

Under Project Objectives, #3 – the statement, "compatible with the surrounding neighborhood" is false and needs to be corrected. This is a neighborhood of multi-family dwellings, none of which is zoned for higher density than RM-40, or 40 units per acre. None of the housing in this neighborhood exceeds 40 feet. This project is twice the density of RM-40 and proposed at 60 feet, meaning it will dwarf every neighborhood structure except the county building. That is not even remotely compatible with the neighborhood and will negatively affect local residents.

Questions: By what measures did you judge this project to be compatible with the neighborhood? It cannot be height, density or appearance. So what? How is this compatible when it is unlike any structure nearby? Why were local residents not included in the decision-making to determine what constitutes neighborhood compatibility?

Response to Comment BECKETT-2:

The quoted text in the comment comes from the Project Objectives, as detailed in the Executive Summary and Sections 2.2 and 4.1.1 of the Draft EIR. This is an objective for the Project and these sections of the EIR do not include judgement of whether the Project meets the objective or not.

For reference, the dictionary definition of compatible is: "*to be capable of existing or living together in harmony; to be able to exist together with something else; to be consistent or congruent with*" (Dictionary.com 2021). Compatible does not mean identical.

As discussed in Section 3.11.3 of the Draft EIR (Impact LUP-2), the City of Palo Alto has advised that the Project appears to be consistent with the City's land use designation at the site and consistent with the overarching goals outlined in the Housing and Land Use Elements of the City's Comprehensive Plan. As detailed in that section, both the Palo Alto Comprehensive Plan designation for the site — Major Institution, Special Facilities (MISP), and the California Avenue Pedestrian and Transit Oriented Development (PTOD) Combining District, acknowledge that higher density multifamily housing may be allowed near transit centers. Although the Project would have a greater residential density than nearby properties, the location of higher density housing in proximity to less dense housing is not incompatible. There are also many office and commercial buildings in the project vicinity.

With respect to building height and appearance, as discussed in Section 3.2.3 of the Draft EIR (Impact AES-3) the Project is exempt under state law from the City's land use regulations. Nonetheless, the Project would generally comply with the majority of the City's development standards and design criteria, except for building height. The proposed building would be four stories in height, which is the same number of stories as the adjacent apartment building (260 Sheridan Avenue), office building (200 Sheridan Avenue) and the Palo Alto Courthouse building (270 Grant Avenue).

Comment BECKETT-3:

2.3.3 – Flex Space and Public Amenities – as outlined, a suggested café or retail space in the northeast corner close to nearby residence is a nuisance and not a public amenity because it will create added traffic, noise, waste, parking problems and blocks streets and bike paths (e.g. during deliveries). This so-called amenity is also detrimental to the residents of the apartment building for the reasons listed. A neighborhood amenity is a park, public meeting space or other beneficial use that is available to all.

Questions: In what way is a restaurant/retail space an neighborhood amenity? How does it benefit local residents who already have a wide choice of dining and retail options on California Avenue? How will the county itself benefit? Will the county collect rent on the space? If not, who will? Will the county share a portion of the business' profits?

How is a restaurant/retail space considered a compatible use in a residential neighborhood? Why don't you build a small park for the use of the residents of your building, as well as the neighborhood? Would a café/retail business be compatible with a neighborhood of single-family homes? If not, then what makes our neighborhood different?

What mitigation measures will be put in place to address the parking problems the business will create? Will you add parking to your site? If not, where will patrons park?

Response to Comment BECKETT-3:

Although the City's zoning regulations are not applicable to the Project (see response to comment BECKETT-2) mixed-use developments that include multifamily residential uses as well as eating and drinking services or retail/personal services are permitted uses within the California Avenue Pedestrian and Transit Oriented Development (PTOD) Combining District (PAMC 18.34.030).

The comments regarding parking and business profits are not environmental issues requiring a response under CEQA. See response to comment JCC-2 for more discussion regarding parking.

Analyses of traffic, noise, and solid waste impacts are provided in Sections 3.15.3, 3.12.3, and 3.17.3 of the Draft EIR, respectively. These analyses include an assumption that the 1,100 SF of "flex space" could be used for café or retail purposes. As discussed within those sections, the operational impacts of the Project relating to these topics would either be less than significant or would be reduced to less than significant with the implementation of mitigation measures MM-TRA-3a and MM-TRA-3b. In particular, with respect to increased traffic generation associated with the "flex space," because this space would qualify as a "small local-serving retail" of less than 10,000 square feet, it would meet the City's VMT screening criteria #5, and therefore a significant VMT impact would not be anticipated for this component of the Project.

Comment BECKETT-4:

2.3.4 – Landscaping, Utilities, and Other Site Improvements – the original plans for this project called for mature trees to be preserved. Now you plan to remove more than half of the trees on the site, including two mature trees (#64 and #67) in violation of the County's own Tree Protection Ordinance (https://library.municode.com/ca/santa_clara_county/codes/code_of_ordinances?nodeId=TITCCODELAUS_DIVC16TRPRRE).

This is a neighborhood with no real public parks and very little green space. Yet rather than "green" the neighborhood – or provide open space for the residents of the housing you propose to build – you deplete the environmentally beneficial features of your property, worsen pollution, and deprive the neighborhood of precious green space.

Questions: Why is it necessary to remove so many trees, including protected trees? Why were no neighborhood residents consulted? Why not get the opinion of an independent arborist (not paid by the developer) before you remove these precious resources? Why did your plans change? Why was the neighborhood neither informed of this removal decision /////// and excluded from the tree removal decision-making process? How can you justify removing environmentally beneficial resources and replacing them with more concrete and cars? The county may own this land but the taxes of county residents fund county projects. By rights, county residents "own" these trees, not the county itself.

Questions: How do you plan to make up for the trees you plan to remove? What measures will you take to compensate local residents for the removal of these precious resources? Why did you not create a plan that would, in accordance with the county's own law, protect as many trees as possible? Do you plan a park or other plantings in the neighborhood to make up for the removal of these trees? Please state exactly which trees will be planted as replacements, how large they will be initially and their anticipated growth within the first year.

Questions: Why is it necessary to remove ALL OF THE STREET TREES near the project? What sort of trees will replace these? Will you plant mature trees that will match the size of those being removed? Please state exactly which types of trees will be planted as replacements, how large they will be initially and their anticipated growth within the first year.

Response to Comment BECKETT-4:

As discussed in response to comment HOLZEMER-1 below, the Draft EIR has been revised to include the Arborist's Report as a new appendix and a copy is attached as Appendix C to this Final EIR. The Arborist's Report describes the reasons why certain trees are recommended to

be removed during construction, including a detailed discussion of the two mature trees (#64 and #67) mentioned in the comment.

The suitability of the mature redwood (Tree #64) for preservation is discussed on page 9 of the Arborist Report. Key reasons contributing to the recommendation for its removal include: proposed development work within the critical root zone; the existing soil moisture deficit due to years of drought conditions and lack of regular supplemental irrigation; poor pruning practices (tipping pruning) which have caused irreparable damage to the canopy; and structural stability concerns due to a codominant mainstem fork.

The suitability of the mature camphor (Tree #67) for preservation is discussed on pages 10 and 11 of the Arborist Report. Key reasons contributing to the recommendation for its removal include: proposed development work within the critical root zone; the existing soil moisture deficit due to years of drought conditions and lack of regular supplemental irrigation; poor pruning practices (lion tail pruning) which have caused irreparable damage to the canopy.

The condition of the existing street trees is discussed on page 8 of the Arborist Report. The Chinese pistache trees along Birch Street are generally in good condition, but for the most part cannot be retained due to proposed construction of transformer pads, utilities, parking garage ingress/egress routes, and building entrance paths. The two valley oak trees within the project site close to Birch Street would be protected in place.

The London plane trees along Park Boulevard are identified as experiencing fungal issues from sycamore anthracnose. Nonetheless, four of these six street trees are proposed to be retained. The other two need to be removed to allow for parking garage ingress/egress.

The trees along the Grant Avenue frontage are not technically street trees, as this section of Grant Avenue between Birch Street and Park Boulevard is not a public street. All five of these trees are proposed for removal due to the need for construction staging access within this area. The Arborist Report identifies the southern magnolia trees along Grant Avenue as being in decline due to years of drought and lack of piped irrigation.

The Arborist's Report also includes tree removal and replacement plans (Sheets L3.00 and L3.10) showing the proposed size and species of replacement plantings, although these details may change in order to meet any conditions of the City's permit for city trees or County approval process. Proposed species recommended for replanting include:

- peppermint willow (*Agonis flexuosa*) and fernleaf Catalina ironwood (*Lyonthamnus floribundus asplenifolius*) along the Grant Avenue sidewalk;
- California buckeye (*Aesculus californica*), silktassel tree (*Garrya elliptica*), and mountain lilac (*Ceanothus 'Ray Hartman'*) within the Grant Avenue setback;
- coast live oak (*Quercus agrifolia*) and valley oak (*Quercus lobata*) within the Birch Street setback and two public plazas; and
- Mediterranean cypress (*Cupressus sempervirens*) along the southern boundary of the project site.

Comment BECKETT-5:

2.4.2 - Street closures around the project site – Several large residential complexes housing thousands of people surround the site. Blocking neighborhood streets will affect residents' ability to easily and safely access their homes and could hinder access to homes by emergency vehicles. Park, Birch and Sheridan are all feeder streets to the Oregon Expressway/Page Mill Road. All are two-lane roads with limited street parking. It is also possible that the street closures anticipated in your EIR will occur at the same time the city has closed Sherman Street and California Avenue. Any discussion of street closures and their impacts needs to include existing street closures and should involve neighborhood residents.

Questions: How will you ensure that residents have safe and unobstructed access to their homes? How will you avoid traffic delays and how will you mitigate any that occur? How will you ensure that emergency vehicles have unobstructed access to neighborhood homes? What traffic control measures will be put in place to mitigate street closures? How will you coordinate street closures with existing closures by the city of Palo Alto? How will you inform neighborhood residents of street closures and how will you ensure adequate notice? Exactly which residential complexes will be included in your notifications? Will you inform individual residents or use some other method? How do you plan to reduce the impact these closures will have on delivery trucks, moving trucks, postal deliveries? How will you compensate neighboring residents for delays in receiving scheduled deliveries or for costs incurred in having to reschedule moving trucks and other time-sensitive deliveries that require clear, unimpeded access to neighborhood streets?

Response to Comment BECKETT-5:

Please see responses to comments JCC-3 and CITY-19, and Sections 2.4.2, 3.15.3 (Impact TRA-4), and 3.15.4 (Impact C-TRA-3) of the Draft EIR. In particular, the Project would include a construction traffic management plan, prepared in accordance with the City of Palo Alto's latest *Traffic Control Plan Requirements and Public Works Standard Specifications*, which would require:

- Development and implementation of a process for communicating with affected residents and landowners about the Project, with at least 72 hours advance notice to abutting property owners and tenants prior to commencing work on the project. Written notification shall include the construction schedule, the exact location and duration of activities on each roadway, detours and alternative routes that may be available to avoid delays, and contact information for questions and complaints.
- Access for emergency vehicles in and/or adjacent to roadways affected by construction activities would be maintained at all times.

In addition, mitigation measure MM-C-TRA-3 requires the Developer and its construction contractor to consult with the City and its construction contractor for the Public Safety Building project to coordinate the construction traffic management plans for both projects to avoid conflicts and ensure coordinated notifications. See also response to comment BECKETT-11.

As described in Section 2.5 of the Draft EIR, the Project would require street closure and encroachments permit from the City of Palo Alto. In response to comment CITY-4, this section has been revised to clarify that the traffic control plan would also require City approval. The Developer will undertake any public consultation and/or notification required by the City as part of these permitting and approval processes.

In addition to the minimum notification procedures required by the City's, the Developer would also establish an email notification list and website where Project construction updates would be regularly posted, including street or lane closures. Comments relating to compensation are not an environmental impact requiring a response under CEQA.

Comment BECKETT-6:

Table 2.4.2. The EIR estimates that construction will involve more than 2,800 truck trips to the construction site yet it deems this to be "less than significant" The EIR (p 3-168) also estimates during the most traffic-intensive phase of construction the project will generate 65 vehicle trips per hour.

Questions: How was it determined that 2800 truck trips – and 65 per hour at times -- is "less than significant"? Significant to who? What measure did you use and what would you consider to be significant? We are at a time when more people are working and attending school at home. How did you determine that the noise, pollution and congestion caused by these truck trips is "less than significant"?

What measures will you take to mitigate the increased noise, pollution and congestion this will create? What traffic control measures will be in place during construction? How much exhaust, fumes and will these truck trips and other vehicle traffic generate? How much will it impact air quality? If you cannot estimate the impact on air quality, how do you know it will not be significant? What mitigation measures will you take to ensure the health of local residents living in the midst of all this added pollution?

Response to Comment BECKETT-6:

The 2,810 one-way truck trips (i.e., 1,405 trucks making round trips to/from the site) is the total number of trucks throughout the 15- to 18-month construction period, with the majority of these trips (2,600) occurring over the six-week site clearing, grading, and excavation phase (Phase 1). This equates to an average of 72 one-way truck trips (36 trucks) per workday during Phase 1, or approximately 9 one-way truck trips per hour, as shown in Table 3.12-5 of the Draft EIR. Other phases of construction would have much lower levels of truck traffic, with approximately 18 one-way truck trips per day during Phase 3 (concrete work) and 9 one-way truck trips per day during Phase 4 (modular placement). Daily truck trips associated with Phases 2 and 5 would be negligible.

During peak hours, the Project would also generate passenger vehicle trips associated with worker commutes. During Phase 1, worker commutes would generate approximately 15 one-way passenger car trips to the site during the morning and 15 one-way passenger car trips from the site during the afternoon. Phase 5 would require the largest number of construction workers, generating approximately 65 one-way passenger car trips during morning and afternoon peak hours over that 33-week phase. Passenger car trips outside of these hours would be negligible.

The impact that construction-related traffic would have on air quality is analyzed in Section 3.3 of the Draft EIR. See response to comment BECKETT-8 below for more detailed response relating to construction-related air quality emissions.

The impact that construction-related traffic will have on noise is analyzed in Section 3.12 of the Draft EIR. However, the Draft EIR accidentally applied an incorrect passenger vehicle equivalence factor to convert truck trips to passenger vehicles for the purpose of analyzing traffic

noise. Table 3.1 below shows the estimated increase in traffic noise along the proposed haul route (Grant Avenue, Birch Street, and Oregon Expressway) during Phase 1 of Project construction using the correct vehicle equivalence factor of 19.1[1]. It is anticipated that the majority of trucks would use these three roads, however the table also includes other local streets (Park Boulevard, Sherman Avenue and Sheridan Avenue) in case changes to the haul routes are required by the City, County Roads and Airports, or Caltrans. The table conservatively assumes that all construction-related traffic would travel on each of the roads, and therefore reflects a worst-case scenario.

Table 3-1 Estimated Increase in Traffic Noise from Project Construction Traffic

Road	Existing Traffic Volume (vehicles per hour)	Phase 1 Construction Truck Traffic (truck trips per hour)	Phase 1 Construction Worker Traffic (vehicles per hour)	Total Phase 1 Construction Traffic (equivalent vehicles per hour)	Existing Plus Construction Traffic (equivalent vehicles per hour)[a]	Percent Increase	Estimated Increase in Traffic Noise (dBA)
Grant Avenue	161	9	15	187	348	**116%**	**3.4**
Birch Street	686	9	15	187	873	27%	1.1
Oregon Expwy	3,214	9	15	187	3401	6%	0.3
Park Boulevard	*793*	*9*	*15*	*187*	*980*	*24%*	*0.9*
Sherman Avenue	*159*	*9*	*15*	*187*	*346*	***118%***	***3.4***
Sheridan Avenue	*289*	*9*	*15*	*187*	*476*	*65%*	*2.2*

Acronyms: dBA = A-weighted decibels; Expwy = expressway

Notes: Total Phase 1 construction traffic is sum of truck and worker trips for Phase 1, with a factor of 19.1 applied to convert truck trips to vehicle equivalents, per Caltrans 2013.

Source: Compiled by AECOM 2021 using existing traffic volumes from Traffic Impact Analysis (Appendix E), construction estimates from Mercy Housing and Abode Communities, and vehicle equivalence factors from Caltrans 2013.

As described in Section 3.12 of the Draft EIR, it is generally accepted that for environmental noise exposure the average healthy ear can barely perceive changes of 3 dBA or less (increase or decrease) and that a change of 5 dBA is readily perceptible (Caltrans 2013). An increase of 5 dBA or more is generally considered to be a significant increase. For traffic noise, it is generally accepted that a doubling (or halving) of traffic volumes would result in a 3 dBA change in noise levels, which is barely perceptible to most people. As shown in Table 3-1, construction traffic along the anticipated haul route would not cause a perceptible increase in traffic noise on Birch Street or Oregon Expressway, but would cause an approximately 3.4 dBA increase in traffic noise on Grant Avenue, which could be perceptible but would not be considered a significant increase. In the unlikely event that construction trucks are required to travel along other local streets, the increase in traffic noise would be imperceptible on Park Boulevard and Sheridan Avenue, and would be perceptible, but not significant, on Sherman Avenue. Revisions have been made to Section 3.12.3 of the EIR to reflect the analysis above.

Senate Bill 743, which came into effect in July 2018, means that Lead Agencies may no longer consider traffic congestion as an environmental impact under CEQA. Therefore, the impact of

[1] Per Caltrans Technical Noise Supplement (2013), a heavy truck traveling at 35 miles per hour (the lowest speed for which a vehicle equivalent is provided) generates similar noise levels to the equivalent of 19.1 automobiles traveling at the same speed. The speed limit along the proposed haul route is 35mph on Oregon Expressway and 25 mph on Grant Avenue and Birch Street.

construction-related traffic on intersection delay and traffic congestion is not included in the EIR. The impacts of construction-related traffic on emergency access and traffic safety are addressed in Section 3.15 of the Draft EIR.

Comment BECKETT-7:

3.1.2 – Cumulative Impact Assessment Methodology – Your "List of Cumulative Projects" is inadequate and needs to be revised. Your list excludes several major projects that are currently planned in the surrounding neighborhood of the project site. These projects include major developments at 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real. All of these projects – plus the two you mention – will dramatically affect the quality of life in the Mayfield neighborhood where your project resides.

Questions: Why were these projects ignored in the cumulative impact assessment? Please include all of the projects in the surrounding area and revise your estimation of the cumulative impact and then measure the change in the quality of life.

Response to Comment BECKETT-7:

The cumulative projects listed in Table 3.1-1 of the Draft EIR was based on a list of cumulative projects provided by City of Palo Alto staff on December 22, 2020 and includes those reasonably foreseeable probable future projects in the project vicinity that either:

- were partially occupied or under construction at the time of the Notice of Preparation (NOP),
- had received final discretionary approvals at the time of the NOP, or
- had applications accepted as complete by local agencies and were undergoing review at the time of the NOP.

The NOP for the 231 Grant Educator Workforce Housing was released on December 2, 2020. The majority of the additional developments mentioned in the above comment did not meet the above criteria at the time of NOP release, as noted in Table 3-2 below. Although the City's list of projects included the 123 Sherman Avenue and 2951 (2955) El Camino Real projects, these two projects were pre-screening requests and the City specifically stated that it would be speculative to assume that they would move forward as formal projects, and that even if they did, it would be speculative to assume that the project details would remain the same. As shown in Table 3-2, three of the five projects mentioned by the commenter are still in a pre-screening or pre-application status.

Of the two remaining projects, 380 Cambridge is approximately 1,000 feet from the project site, on the north side of Cambridge Avenue, south of Birch Street. The 123 Sherman project is approximately 130 feet north of the project site, to the north of Park Boulevard between Grant and Sherman Avenues. No information regarding potential construction timeframes or anticipated environmental impacts for these two projects is currently available. Revisions have been made to Table 3.1-1 in Section 3.1 of the Draft EIR to include details of these projects.

Please also see responses to comments BECKETT-11 (emergency access), HOLZEMER-36 and -37 (air quality), HOLZEMER-42 (biological resources), HOLZEMER-45 (historic resources), HOLZEMER-47 (energy), HOLZEMER-51 and -52 (geological resources), HOLZEMER-55 (GHG emissions), HOLZEMER-58 (hazardous materials), HOLZEMER-69 (hydrology), HOLZEMER-70 and -72 (Land Use and Planning), HOLZEMER-92 (cumulative noise and

vibration), HOLZEMER-104 (public services), HOLZEMER-105 (recreation), HOLZEMER-113 and -114 (transportation) for additional discussion regarding potential cumulative impacts related to specific environmental topics.

Table 3-2 Additional Projects in Project Vicinity

Project Name & Location	Current Status (December 2021)	Project Details
123 Sherman/150 Grant/2501 Park (130 feet north of project site)	Major architectural review application	Demolition of existing buildings to allow the construction of a new three-story commercial building (approximately 4,000 SF retail and 48,000 SF office) with two levels of below grade parking and one level at grade parking.
300 Lambert Avenue (2,228 feet south of project site)	Pre-screening request	Rezone from Service Commercial (CS) to a Planned Community Zone District to allow demolition of existing commercial building and construction of new multi-family residential with 49 units and underground garage.
380 Cambridge Avenue (1,075 feet west of project site)	Approved	Merge Three Existing Parcels to Construct one Three-Story Commercial Building (35,000 square feet) with Parking Garage. Project exempt from CEQA.
200 Portage Road (1350 southeast of project site)	SB330 pre-application	Redevelopment an approximately 4.65-acre site (former Fry's Electronics site) with 85 3-story residential townhomes.
2951 (2955) El Camino Real (1,350 south of project site)	Pre-screening request	Rezoning to a Planned Community (PC) to allow a mixed-use project with approximately 113 new residential units, 5000 SF of office space, and 1,000 SF retail space.

Source: https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Current-Planning/Pending-and-Approved-Projects/

Comment BECKETT-8:

3.3.3 – Project Impacts and Mitigation – It is clear from all of the materials (MM-AIR, MM-AIR-2, AIR-3, etc.) included in this section that there will be a major impact to neighborhood air quality, especially during and after construction. Nearly 3,000 truck trips to the site will increase air pollution and dust particles in the area. The added pollution will impact all local residents, especially children and seniors. The mitigation measures mentioned in the EIR – watering exposed areas, covering trucks, speed limits, maintaining equipment ARE INADEQUATE TO PROTECT THE HEALTH OF NEIGHBORHOOD RESIDENTS.

Questions: How much exhaust, fumes and air pollution will construction trucks and other construction vehicles generate? How much will it impact air quality? What is the current air quality in the neighborhood? How will you monitor air quality during construction? How will you monitor the health of local residents, especially vulnerable populations, during construction? What ADDITIONAL mitigation measures will you take to ensure the health of local residents living in the midst of all this added pollution? How will you ensure that vulnerable populations such as infants, the elderly and those with breathing difficulties are not harmed by this pollution? What compensation will you provide neighborhood residents for the health impacts of this pollution?

Response to Comment BECKETT-8:

The ambient air quality for the project vicinity as well as impacts of the Project on air quality, including exhaust from construction trucks and other construction vehicles and equipment, are discussed in Section 3.3.3 of the Draft EIR. In particular, a summary of the local ambient air

quality in the project vicinity is included in Table 3.3-3 and an estimate of construction-related criteria pollutant emissions is included in Table 3.3-6.

The estimated emissions for ROG, NOx, PM10 (exhaust) and PM2.5 (exhaust) are substantially below the regional thresholds of significance established by BAAQMD. These thresholds were designed to identify those projects that could result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards. The ambient air quality standards were established using health-based criteria to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. Because the BAAQMD regional thresholds of significance were established with these factors in mind, the Project's compliance with the BAAQMD thresholds indicates that the Project's construction emissions would not expose sensitive receptors to substantial concentrations of ozone or any other criteria air pollutant.

BAAQMD does not have quantitative mass emissions thresholds for fugitive PM_{10} and $PM_{2.5}$ dust, instead recommending that fugitive dust emissions from all projects should be considered to be significant unless the project implements BAAQMD's BMPs for fugitive dust control during construction. These BMPs have been incorporated into mitigation measure MM-AIR-2 for the Project, therefore air quality impacts from Project construction would be less than significant with mitigation. Appendix D (Threshold of Significance Justification) of the BAAQMD 2017 Guidelines states that the BMPs have been a "*pragmatic and effective approach to the control of fugitive dust emissions. Studies have demonstrated (Western Regional Air Partnership, U.S.EPA) that the application of best management practices at construction sites have significantly controlled fugitive dust emissions. Individual measures have been shown to reduce fugitive dust by anywhere from 30 percent to more than 90 percent. In the aggregate best management practices will substantially reduce fugitive dust emissions from construction sites. These studies support staff's recommendation that projects implementing construction best management practices will reduce fugitive dust emissions to a less than significant level*" (BAAQMD 2017).

With respect to Toxic Air Contaminants (TACs) associated with diesel particulate matter from construction equipment, the Project would comply with all applicable Airborne Toxics Control Measures (ATCMs), which were adopted by CARB to reduce emissions of particulate matter from engines and which include requirements for fleet average emissions and idling limits for diesel engines. The BAAQMD BMPs included in mitigation measure MM-AIR-2 also require that all construction equipment be maintained and properly tuned in accordance with manufacturer's specifications, and that all equipment be checked by a certified mechanic and determined to be running in proper condition prior to operation.

Existing air quality conditions are described in Section 3.3.1 on both a regional level and for the project vicinity. Because estimated construction emissions for criteria pollutants are substantially below BAAQMD's regional thresholds of significance, no air quality monitoring is proposed as part of the Project. However, mitigation measure MM-AIR-2 does require the posting of a sign with contact details of a person to contact if there are dust complaints and requires this person to respond and take corrective action within 48 hours.

Comment BECKETT-9:

3.3.3 – "Idling times shall be minimized either by shutting them down or limiting them to five minutes." Five minutes is too long for heavy equipment to idle, spewing exhaust that is dangerous to children, pregnant women, the elderly and other sensitive populations.

Questions: Why can't you further limit idling time in the interest of public health? Who will monitor the truck and other equipment idling time? How will it be done and what will be the consequences for exceeding it?

Response to Comment BECKETT-9:

The maximum idling time of 5 minutes is based on CARB ATCM, Title 13 CCR Section 2485, which was chosen based on engine manufacturers' recommendations for start-up and cool down times and idling limit consistency with California's school bus idling limiting ATCM, and many idling restrictions in other states.[2] In addition, most construction equipment would be subject to CARB's Regulation for In-Use Off-Road Diesel-Fueled Fleets (Off-Road Regulation), which contains a limit on unnecessary idling. The Off-Road Regulation states: "No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes." The Off-Road Regulation also requires that all medium and large fleets create a written idling policy that informs operators of the fleets' vehicles that idling is limited to 5 consecutive minutes or less, and make the policy available to operators. As described in the CARB Advisory Number 377 New Idling Limits for Owners, Operators, Renters or Lessees of In-Use Off-Road Diesel Vehicles (Idling Limits Advisory)[3], the idling limits are effective and enforceable as of June 15, 2008. As described in the Idling Limits Advisory, Health and Safety Code Section 39674 (a) authorizes civil penalties for the violation of the programs for the regulation of TACs not to exceed one thousand dollars ($1,000) for each day in which the violation occurs. Health and Safety Code Section 39674(b) authorizes civil penalties for the violation of the programs for the regulation of TACs not to exceed ten thousand dollars ($10,000) for each day in which the violation occurs. As a matter of policy, each first-time violation of the idling requirements will be assessed a minimum civil penalty of $300. Subsequent penalties can be up to $1,000 to $10,000. The standard for assessing penalties is one of strict liability. Idling time will be monitored by construction equipment operators and site supervisors. In addition, mitigation measure MM-AIR-2 requires clear signage for idling limits for construction workers at all access points.

Comment BECKETT-10:

3.3.3 "Impact AIR-3: Exposure of Sensitive Receptors" – The neighborhood is home to several senior living facilities and facilities for disadvantaged or disabled residents. Yet The EIR excludes several senior living facilities in the Mayfield neighborhood, including the Sunrise Assisted Living Facility.

Questions: Why were these living facilities excluded? Any neighborhood facility which has a large senior population (within a six-block radius) should be examined and reviewed for possible impacts.

[2] https://ww2.arb.ca.gov/sites/default/files/barcu/regact/idling/fsor.pdf
[3] https://ww2.arb.ca.gov/sites/default/files/classic/enf/advs/advs377.pdf

Response to Comment BECKETT-10:

The nearest senior living facility to the project site is the Sunrise of Palo Alto facility at 2701 El Camino Real, approximately 900 feet to the south. No other senior living facilities are located within a mile of the project site.

As described in the BAAQMD CEQA Guidelines, BAAQMD defines sources of TACs and/or $PM_{2.5}$ to include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. Land uses that contain permitted sources, such as a landfill or manufacturing plant, may also contain non-permitted TAC and/or $PM_{2.5}$ sources, particularly if they host a high volume of diesel truck activity. The Project, which involves residential and retail land uses, is not considered to be a source of TACs and/or $PM_{2.5}$ as the Project does not contain any BAAQMD permitted sources nor would introduce a new land use that would attract high numbers of diesel-powered on-road trucks or use off-road diesel equipment on site, such as a distribution center, a quarry, or a manufacturing facility. Therefore, operation of the Project would not expose the surrounding sensitive receptors, including the senior living facility, to substantial pollutant concentrations of TAC and/or $PM_{2.5}$ emissions.

While construction activities would generate temporary emissions of diesel PM, construction activities would occur intermittently throughout the day and would not serve as a constant source of emissions from the project site. Emissions associated with construction activities would vary day to day and would also occur at varying distances from the surrounding sensitive receptors, depending on the location of machinery and equipment within the project site. Concentrations of diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet from freeways, which are continuous emission sources and therefore more impactful than the Project (CARB 2005). Studies also indicate that diesel PM emissions and the associated health risks can decrease substantially within 300 feet (CARB 2005). Because off-road, heavy-duty equipment would be used for a relatively short time period, construction activities would also not be anticipated to expose sensitive receptors, including the senior living facilities located approximately 900 feet away from the project site, to substantial TAC concentrations.

In addition, as described in Section 3.3.3, the Project would not exceed the BAAQMD regional thresholds of significance for criteria air pollutants, which were established to assist the region in attaining the applicable state and federal ambient air quality standards (CAAQS and NAAQS). The ambient air quality standards were established using health-based criteria to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. Specifically, two types of NAAQS have been established, primary and secondary standards. Primary standards set limits to protect public health, especially that of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protections against decreased visibility and damage to animals, crops, and buildings. Since the Project would not exceed the thresholds of significance, which were established with these factors in mind, construction and operation of the Project would also not expose the surrounding sensitive receptors, including the senior living facilities, to substantial pollutant concentrations. Revisions have been made to Section 3.3.3 (Impact AIR-3) to identify the Sunrise of Palo Alto senior living facility as a sensitive receptor. No other changes to the analysis or conclusions of the Draft EIR are required in response to this comment.

Comment BECKETT-11:

Cumulative Impact C-HAZ-5 – In this section you state that "the only known past, present, or reasonably foreseeable project is the Public Safety Building." This is a false statement. Your own EIR mentions one other project, and as noted earlier, you fail to mention other projects in the neighborhood, including 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real.

Questions: Why did you fail to include these other projects? When can we expect to see a revised EIR that includes the cumulative impact of ALL of these projects?

Response to Comment BECKETT-11:

Please see response to comment BECKETT-7. As discussed in that response, the anticipated construction periods for the projects mentioned by the commenter are not known. If the construction period for the 123 Sherman Avenue project were to overlap with that of the Project, there would be potential for increased disruption to emergency access on local streets. Revisions have been made to the cumulative analysis in Impact C-HAZ-5, Impact C-TRA-3, and mitigation measure MM-C-TRA-3 to address this potential impact, as detailed in Section 4 of this Final EIR.

Comment BECKETT-12:

3.12, Impact NOI-1: Ambient Noise Levels The EIR says that the increase in neighborhood noise due to construction is "significant" and "unavoidable." Tell that to anyone working or going to school at home, at anyone trying to enjoy a lunch hour outdoors or anyone walking down the street. According to the World Health Organization (Burden of disease from environmental noise, 2011) and numerous peer-reviewed studies, exposure to prolonged or excessive noise has been shown to cause a range of health problems ranging from stress, poor concentration, productivity losses in the workplace, and communication difficulties and fatigue from lack of sleep, to more serious issues such as cardiovascular disease, cognitive impairment, tinnitus and hearing loss.

Questions: What measures will you take to mitigate construction noise? How will you monitor construction noise? How will you protect the health of neighborhood residents? What recourse do residents have if they are unable to work or enjoy their homes because of construction noise?

Response to Comment BECKETT-12:

The measures proposed in the Draft EIR to mitigate the significant construction noise impact are presented in Section 3.12.3 (mitigation measures MM-NOI-1, starting on page 3-170) and are considered to be the most effective noise mitigation measures that can feasibly be implemented at the project site given the site constraints and logistical considerations (e.g., access and maneuvering space for construction equipment). As explained in the Draft EIR, these measures would reduce construction noise for nearby receptors but would not reduce noise levels to below the threshold of significance, hence the conclusion that the Project would have a significant and unavoidable impact from construction noise. If the County Board of Supervisors decides to approve the proposed Project, it would need to adopt a Statement of Overriding Considerations finding that the benefits of the proposed Project outweigh the significant effects on the environment (Public Resources Code Section 21081).

Noise monitoring is not proposed as part of the Project or as a mitigation measure, as monitoring would not, in and of itself, reduce noise levels. However, MM-NOI-1 requires that a disturbance coordinator be designated to receive complaints about construction disturbances and to implement additional measures to alleviate specific problems that may arise during construction, if feasible.

Comment BECKETT-13:

MM-NOI-1, statement – "staging areas and stationary noise-generating equipment, such as compressors, shall be located – as far away – from noise-sensitive uses as feasible"

Questions: What does this mean? What do you mean, specifically, about "as far away"? What do you consider a noise-sensitive use? Does that include residences? If not, how will you shield neighborhood residences from the impact of this noise? Where exactly will you locate this noise-generating equipment?

Response to Comment BECKETT-13:

Noise-sensitive uses are defined in Section 3.12.1 of the Draft EIR (under subheading "Sensitive Land Uses" on page 3-156). In the vicinity of the project site, identified noise-sensitive uses include the multifamily residential apartment building at 200 Sheridan Avenue and other multifamily residences to the northeast of Park Avenue and southwest of Birch Street.

The wording of the mitigation measure text quoted in the comment is intended to allow the contractor operational flexibility during construction. The intention of the mitigation measure is so that in situations where the contractor could locate staging areas or stationary noise generating equipment in several different locations for a particular task, they would be required to choose the location that is farthest from nearby residences. It is not feasible for the mitigation measure to specify the exact location of all staging areas and stationary noise-generating equipment throughout the entire construction period.

The main staging area for the Project would be along the Grant Avenue frontage of the site, which is the part of the project site farthest from residential uses. Other staging areas, such as along the Park Boulevard or Birch Street frontages or within the project site, may be needed during certain stages of construction. Mitigation measure MM-NOI-1 would require that these staging areas, which are closer to residential uses than the Grant Avenue frontage, only be used when operationally necessary. As discussed in Section 3.12.3 of the Draft EIR, even with implementation of mitigation measure MM-NOI-1, the Project would still cause a substantial temporary increase in ambient noise levels above applicable significance standards; therefore, the Draft EIR identified construction noise as a significant and unavoidable impact.

Comment BECKETT-14:

MM-NOI-1, statement, "smart back-up alarms will automatically adjust to ambient noise levels." These noises are incredibly disruptive and can be heard far away. Back-up alarms on construction equipment should be silent and replaced with human spotters.

Response to Comment BECKETT-14:

Mitigation measure MM-NOI-1 specifically included the language quoted in the above comment to address the annoyance that traditional back-up alarms, which emit a repetitive, piercing,

single-tone beep at a fixed (non-adjusting) volume, can cause for nearby residents. The full text of this requirement within MM-NOI-1 is:

- 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.

This requirement prohibits the use of traditional (non-adjusting) back-up alarms, and instead requires the developer to either use equipment with "smart" back-up alarms that automatically adjust to ambient noise levels or, if such "smart" alarms are not available, that the traditional back-up alarms be disabled and human spotters be used instead to indicate to equipment operators that it is safe to reverse the equipment. Such flexibility is allowable by OSHA workplace safety requirements[4] which prohibit the use of earthmoving equipment and construction vehicles in a reverse gear unless the vehicle or equipment has in operation a reverse signal alarm that is audible above the surrounding noise level OR the vehicle is backed up only when an observer signals that it is safe to do so.

There are several different makes and models of "smart" back-up alarms, which are typically designed to focus the noise to a certain area (e.g., directly behind the equipment) or to be only slightly louder (typically 5 to 10 dBA) than the ambient noise in the vicinity of the vehicle[5].

Comment BECKETT-15:

MM-NOI-1, D. "Temporary sound barriers" … "shall be installed." Questions: You propose eight-foot barriers along Park Boulevard because it is "street frontage," but you forgot that the largest residential complex in the neighborhood is directly across Park Boulevard. Eight-foot barriers are inadequate. What measures will you take to ensure that ALL nearby residences – not just those at the southeast boundary – are protected by deafening construction noise? Why not use the larger and thicker barriers around the entire construction site?

Response to Comment BECKETT-15:

The required temporary sound barriers specified in mitigation measure MM-NOI-1 represent the maximum feasible to be installed at the project site, given the available space, engineering design factors, and logistical requirements. Because these feasible mitigation measures would not reduce construction noise levels to below the applicable thresholds of significance, the Draft EIR identified construction noise as a significant and unavoidable impact. For the three street frontages, an 8-foot-high chain link fence with sound blankets attached is proposed by the contractor. For the southern boundary, a higher 16-foot-high barrier of pre-engineered sound panels supported by a double-row of k-rails is proposed.

The higher 16-foot-high pre-engineered barrier would not be feasible along the three street frontages of the site, as it would be obstructive to construction means and methods. For example, the additional supporting infrastructure for a higher barrier that would be needed to support increased lateral loads due to wind shear would require approximately 5 feet of space, which would either block the adjacent sidewalks and/or leave insufficient maneuvering space between the sound barrier and proposed building perimeter. Furthermore, a higher barrier would

[4] https://www.osha.gov/laws-regs/standardinterpretations/2004-09-27
[5] https://cpwrconstructionsolutions.org/heavy_equipment/solution/792/self-adjusting-and-directional-backup-alarms.html

not be able to be easily moved to allow for temporary access for equipment access or to undertake tasks adjacent to the site boundaries, and the additional barrier height would limit the operation of equipment such as cranes which would need to be staged on the street and reach over the barrier onto the site.

The distance between the three site frontage boundaries and nearby sensitive receptors such as the residential complexes at 2585 Park Boulevard (approximately 74 feet from the project site boundary) and at 302-326 Grant Avenue (approximately 110 feet from the project site boundary) is substantially greater than that of the adjacent apartment building at 200 Sheridan Avenue (approximately 5 feet from the southern project site boundary). Therefore, a higher fence is required at the southern boundary in order to provide line-of-sight obstruction for upper-level units of the adjacent apartment building, than is required to provide the same line-of-sight obstruction for upper-level units of more distant apartment buildings.

Comment BECKETT-16:

3.14 Public Services and Recreation – under "Parks." This material is false. There is no usable park space in the neighborhood for children. The Stanford/Palo Alto Community Playing Fields is NOT a Park or usable for the "walk-up" resident to use. This facility is by "reservation only" and is only for use for soccer and field hockey type games/practices. No one has ever, ever picnicked there as you state in the ERI – this is absolutely false. The Sara Wallis Park is also falsely described as a park. This is not a park for children. It has no play facilities and is too small for children to use. It's also so small as to render it unusable even for the elderly residents who live in the adjacent building.

Bowden Park is not an appropriate park for children because it is adjacent to the train tracks and is impacted by all of the noise, pollution and dirt generated by the train. It is also difficult to access because it requires travelling under the train tracks.

Response to Comment BECKETT-16:

The Draft EIR provides information about all types of parks and recreational facilities in the vicinity of the project site, not just those with children's play areas. The description of existing recreational facilities in Section 3.14.1 of the Draft EIR is largely based on information from the City of Palo Alto's Parks, Trails, Natural Open Space and Recreation Master Plan, as well as observations of the existing facilities. With the exception of one error (incorrectly stating that the project site is within a half-mile of an indoor recreational facility, when it is not), the information is factually correct.

The Stanford/Palo Alto Community Playing Fields (also known as the Mayfield Playing Fields) provide space for organized recreational activities such as sports leagues and are available for walk-up use by local residents on a first-come, first-served basis whenever they are not reserved by youth and adult sports leagues (City of Palo Alto Community Services Department, pers. comm. 2021). The fields are typically used by reserved leagues on weekday afternoons and weekends. The Draft EIR does not state that people picnic at the playing fields, as alleged by the commenter, only that picnic tables are present, which is factually accurate (picnic tables are present just south of the "snack shack" and restrooms).

Sara Wallis Park is described in the Draft EIR as a mini-park that provides a peaceful spot for locals and workers in the community. The Draft EIR does not state that this park contains

children's play facilities. This small park includes several benches and grassed areas, as illustrated by the photograph below. Reviews of this park on public forums mention its use as a place where people sit and relax, eat a quiet lunch, walk dogs, or meditate (Google Maps 2021).

Figure 3-1 Photograph of Sara Wallis Park from Ash Street, Palo Alto

Proximity to train tracks does not make Bowden Park inappropriate for children, as evidenced by several public reviews which describe the park as being good for children, for example, "perfect cozy neighborhood park for babies, toddlers and big kids" (Google Maps 2021). The presence of the train and tunnel were even mentioned in some reviews as positive features, e.g., "great base for kids and a trip through the tunnel to the farmers' market," or "it has a great toddler play area with some shade and is a nice place to check out the train." Only one review mentioned noise from the park's proximity to the train tracks and highway.

In addition to the four parks described in the Draft EIR, there are also two other parks within a half mile of the project site: Mayfield Park, approximately 0.4 miles to the southwest; and Cameron Park, approximately 0.5 miles to the southwest.

Revisions have been made to Section 3.14.1 of the EIR to correct the above-mentioned error and to provide additional clarifying information on the types and nature of recreational facilities available in the vicinity of the project site. See also response to comment VYAS-6 for additional details regarding the proposed children's play area on the project site.

Comment BECKETT-17:

3.15.3, Impact of TRA-1, under "Transit" – You state that the project will create only 11 additional transit riders out of a potential 275 residents. Not only does that put even MORE people on the

roads, but it fails to justify your woefully inadequate parking, which is inadequate to meet the needs of building residents.

Additionally, under Impact-TRA, all of your assumptions are false.

Questions: Because you have not provided enough parking spaces for the project and anticipate only 11 transit riders among all residents in the new building, where do you expect residents to park? How can you justify inadequate parking? And how can you assert (in Impact TRA-2) that the project, which will add at least 100 cars to neighborhood streets, will fit into a "low VMT area"?

Response to Comment BECKETT-17:

The estimate of 11 transit riders mentioned in Section 3.15.3 of the Draft EIR was based on the 2018 county-wide average ridership rate of 4.1 percent published by the Metropolitan Transportation Commission[6]. However, given the Project's close proximity to the Palo Alto Caltrain Station and available bus routes, a higher percentage of transit users would be expected for this Project than the county-wide average. The 2018 transit ridership rate within Census Tract 6085511500 (containing the project site) was only 3.2 percent, however this census tract extends to include the College Terrace neighborhood and areas further west toward Juniper Serra Boulevard which are not as well served by public transit as the project site and Evergreen Park/Mayfield neighborhood. The area immediately north of the Caltrain corridor (Census Tract 6085511400) had a 2018 transit ridership rate of 8.9 percent which is considered to be more representative of the project vicinity. At this higher level of transit ridership, the Project would be anticipated to generate approximately 24 transit riders. Even with this higher number of new transit users associated with Project operation, adverse effects to public transit services would not be anticipated. Revisions have been made to Section 3.15.3 of the Draft EIR to include the updated transit ridership estimate; however, the less than significant conclusion for Impact TRA-1 remains unchanged.

3.1.5 GOLD, Anna

Comment GOLD-1:

We request NO project should be approved due to the following destructive impacts to the environment and the neighborhood.

Response to Comment GOLD-1:

A thorough analysis of various environmental topics has been conducted as part of the Draft EIR (see Section 3, "Environmental Setting and Impact Analysis"), including identification of mitigation measures to avoid or reduce potentially significant impacts, and identification of some impacts (NOI-1, C-NOI-1 and NOI-2) as significant and unavoidable where feasible mitigation measures would not reduce potential impacts to a less-than-significant level. In accordance with Section 15093 of the CEQA Guidelines, the County Board of Supervisors, when considering the Project, will need to decide whether the economic, legal, social, technological, or other benefits of the Project, including region-wide or statewide environmental benefits, outweigh the significant and unavoidable impacts of the Project identified in the EIR.

[6] https://www.vitalsigns.mtc.ca.gov/commute-mode-choice

More detailed discussion of each of the specific environmental impacts raised by the commenter is given in response to the following comments GOLD-2 through GOLD-6, below.

Comment GOLD-2:

[The Project will] Damage hydrology and water quality because it is located above the California-Olive-Emerson regional groundwater plume, which is listed on the National Priorities List.

Response to Comment GOLD-2:

The comment expresses concern regarding hydrological damage and impacts to water quality due to the potential risks associated with contamination from the California-Olive-Emerson regional groundwater plume. The Draft EIR (page 2-18) acknowledges that the project site is located above the California-Olive-Emerson regional groundwater plume and that the plume is on the National Priorities List. The Draft EIR identifies the potentially significant impacts to hydrology and water quality that may occur as a result (see discussion of Impacts HYD-1 and HYD-5 in Section 3.10 of the Draft EIR). In addition, the Draft EIR identifies that the presence of the COE plume beneath the project site could result in potentially significant impacts to construction workers and future site users (e.g., residents and employees) from contact with contaminated soils, groundwater, and/or soil gas, as discussed in Section 3.9 of the Draft EIR (Impact HAZ-3).

As discussed in the Draft EIR, mitigation measure MM-HAZ-3B is proposed to reduce these potentially significant impacts relating to hydrology and water quality. Additional mitigation measures (MM-HAZ-3A, MM-HAZ-3C, MM-HAZ-3D, and MM-HAZ-3E) are proposed to address other impacts associated with the presence of the regional groundwater plume beneath the project site. For the reasons detailed in Sections 3.9 and 3.10 of the Draft EIR, implementation of mitigation measures MM-HAZ-3A through MM-HAZ-3E would reduce the impacts of the Project being located above the regional groundwater plume to a less-than-significant level.

Comment GOLD-3:

[The Project will cause] Damage to the soils and other biological resources due to the multi-years construction.

Response to Comment GOLD-3:

The comment raises general concern regarding damage to soils and biological resources due to multi-year construction, but does not explain why Project construction would damage soils or biological resources, nor the types of biological resources that might be damaged.

As discussed in Section 2.4.1 of the Draft EIR, construction of the Project is anticipated to take a total of 15 to 18 months. The modular construction method proposed by the Project results in a shorter construction period than traditional construction methods. The impacts of Project construction on soils and biological resources are discussed in Sections 3.7.3 (Impacts GEO-2 through GEO-5) and 3.4.3 (Impacts BIO-1 through BIO-6) of the Draft EIR, respectively. All of these impacts were determined to be either no impact, less than significant, or less than significant with implementation of recommended mitigation measures.

In particular, as discussed for Impact GEO-2, as part of the NPDES construction general permit requirements, the Developer must prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) and implement Best Management Practices (BMPs) designed to control

construction-related stormwater runoff and reduce soil erosion. As discussed for Impact GEO-3, mitigation measure MM-GEO-3 requires that a subsequent geotechnical report be prepared prior to the issuance of building permits, and that geotechnical monitoring be implemented during construction to address and mitigate potential impacts of construction within the poorly compacted fill soils that are present in some parts of the site.

As discussed for Impact BIO-4, mitigation measure MM-BIO-4 requires that all active bird nests with the potential to be impacted by construction activities would be identified, appropriate avoidance buffers would be applied to active nests, and biologists would monitor active nests and bird behavior during construction so that the effectiveness of the buffer zone can be determined, and the buffer distance can be adjusted if needed.

Comment GOLD-4:

[The Project will cause] increased traffic and environmental degradation. It has a very dense population already. There are buses to and from California Avenue Caltrain Station. And we want to keep the streets biker friendly.

Response to Comment GOLD-4:

The proposed increase in traffic that would occur as a result of the Project, and potential impacts resulting from that increase, are discussed in several locations throughout the Draft EIR, including air quality (Section 3.3), noise (Section 3.12) and transportation (Section 3.15). In particular, impacts to transit services such as buses are discussed under Impact TRA-1, and impacts to bicycle infrastructure and bicycle safety are addressed under Impacts TRA-1 and TRA-3. See also response to comment BECKETT-17.

Comment GOLD-5:

The worsened air quality would severely hurt many elders and have longterm impacts on many young children who live near the development.

Response to Comment GOLD-5:

The impacts of the Project on air quality are discussed in Section 3.3, “Air Quality” of the Draft EIR. In particular, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations is discussed under Impact AIR-3. The Draft EIR (page 3-29) identifies the nearest sensitive receptors to the project site as including the multifamily residential apartment building on the adjacent parcel immediately southeast of the project site and other multifamily residences to the northeast of Park Avenue and southwest of Birch Street. As discussed in that section, impacts to sensitive receptors were found to be less than significant for both Project construction and operation.

As discussed in the response to comment BECKETT-10, revisions have been made to Section 3.3.3 (page 3-29) of the Draft EIR to include the Sunrise Assisted Living facility at 2701 El Camino Real (approximately 1,000 feet south of project site) in the list of sensitive receptors in the project vicinity. The addition of this facility to the list of sensitive receptors does not change the conclusions of the Draft EIR for Impact AIR-3 because studies such as that of Zhu et al (2002)[7] found that concentrations of particulate matter tend to be reduced substantially at a distance 1,000 feet downwind from sources such as freeways or large distribution centers. As

[7] Zhu, Yifang, William C. Hinds, Seongheon Kim and Constantinos Sioutas (2002). Concentration and Size Distribution of Ultrafine Particles Near a Major Highway, Journal of the Air & Waste Management Association, 52:9, 1032-1042, DOI: 10.1080/10473289.2002.10470842

discussed in Section 3.3.3, operation of the Project would involve residential and retail land uses that would not be a substantial source of toxic air contaminant and/or $PM_{2.5}$ emissions. In addition, long-term operational activities associated with the Project primarily involves vehicle trips from visitors and residents. Vehicle trips by visitors and residents would be primarily light-duty vehicles, which are not substantial sources of toxic air contaminant emissions. Therefore, sensitive receptors such as the surrounding residential receptors and senior living facilities would not be exposed to substantial pollutant concentrations.

Comment GOLD-6:
Concern regarding the noise and vibration levels. The construction will add devastative burden on top of the traffic noise from Oregon expressway and vibration from the Caltrain.

Response to Comment GOLD-6:
Impacts of construction-related noise and vibration from the Project are discussed in Section 3.12 of the Draft EIR. The Draft EIR (page 3-157) identifies existing vehicular traffic on Oregon Expressway and other local roadways as the primary contributor to the existing noise environment.

The Draft EIR does not specifically acknowledge Caltrain as a source of existing vibration in the Project area. Revisions have been made to Section 3.12.1 (page 3-160) of the Draft EIR to acknowledge this existing vibration source, as presented in Section 4 of this Final EIR. As discussed in Section 3.12.3 of the Draft EIR, temporary noise and vibration impacts during Project construction would be significant and unavoidable.

3.1.6 GRAVES, Pria

Comment GRAVES-1:
Page 3 refers to the "Mayfair" neighborhood. It's actually "Mayfield".

Response to Comment GRAVES-1:
The reference to the "Mayfair" neighborhood in the Draft EIR was a typographical error. The neighborhood of the project site is known to some as the Mayfield neighborhood, but as the Evergreen Park neighborhood to others (see comment CITY-1). Revisions have been made to the Executive Summary and Section 2.1 of the Draft EIR to refer to the "Evergreen Park/Mayfield" neighborhood.

Comment GRAVES-2:
Describing housing allocation as including "a sufficient number of units to meet the Facebook grant criteria" which had not been mentioned in earlier public meetings is confusing. That statement fails to make it clear that this is not housing for Facebook staff but for educators in San Mateo county.

Response to Comment GRAVES-2:
As discussed in Section 1.3 of the Draft EIR, in October 2019, Facebook announced a commitment of $25 million in funds to support the project and increase the number of units that could be built, which would also allow the project to serve public and nonprofit schools in southeastern San Mateo County, including the Cities of Menlo Park and East Palo Alto.

Additional details regarding the allocation of proposed units are provided in Section 2.3.2. None of the Project's residential units would be available for employees of Facebook.

Revisions have been made to Project Objective 1 within the Executive Summary, Section 2.2 and Section 4.1.1 of the Draft EIR to provide additional clarification as presented in Section 4 of this Final EIR. Further details regarding the Facebook grant criteria are available on the County's website for the Project at www.sccgov.org/231grant/ under the Related Files tab.

Comment GRAVES-3:

Furthermore, there is a discrepancy between unit allocations in Exec Summary vs. section 2.3.2. The latter states that "the other 32 units would be set aside for school employees… in San Mateo County" and that "approximately 78 units would serve teachers" in the participating districts [Santa Clara County] while the Executive Summary states that the project would provide "at least 60 rental housing units for teachers and classified staff in targeted school districts within Santa Clara County." This discrepancy needs to be cleared up.

Response to Comment GRAVES-3:

This comment raises concern about a perceived discrepancy between housing unit allocations in the Executive Summary and in Section 2.3.2 of the Draft EIR. The perceived discrepancy is due to the difference between a generalized project objective versus the actual number of rental housing units proposed by the Project.

As discussed in both the Executive Summary and in Section 2.2 of the DEIR, one of the project objectives is to 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. This is a minimum target for the County, as specified in the original Request for Proposals for the Project.

Section 2.3.2 of the Draft EIR describes the actual number of rental housing units proposed to be built, based on the latest Project design, which would be a total of 110 units. Of these, 78 would be allocated to targeted school districts in Santa Clara County and the remaining 32 would be used to meet the Facebook Grant criteria.

Revisions have been made to the Executive Summary of the Draft EIR to provide additional clarification of the actual number of units proposed to be allocated to targeted school districts within Santa Clara County, as presented in Section 4 of this Final EIR, "Revisions to the Draft Environmental Impact Report."

Comment GRAVES-4:

AIR-2 Net Increase in Criteria Pollutants, MM-AIR-2 - Provision must be made to allow watering to control dust to continue 7 days a week despite Palo Alto's construction days/hours. Clouds of dust were witnessed during construction on the Stanford Campus on several Sundays when the piles of dirt were allowed to dry out. It would also be beneficial for surrounding residents if excavation and grading were suspended when high winds occur.

Response to Comment GRAVES-4:

The commenter's concerns regarding dust during construction are acknowledged. Air Quality impacts, including fugitive dust, are discussed within Section 3.3 of the Draft EIR (in particular, Impact AIR-2). As discussed in that section, the Bay Area Air Quality Management District

requires that all construction projects implement Best Management Practices (BMPs) to reduce fugitive dust emissions. These BMPs include, but are not limited to, a requirement that all exposed surfaces be wetted, covered, or treated with soil stabilizers to prevent airborne dust from leaving the site, and that a publicly visible sign be posted on the project site with the telephone number and person to contact regarding dust complaints. These BMPs have been incorporated into Mitigation Measure MM-AIR-2, and would be implemented throughout the entire construction period of the Project, including during non-work days such as Sundays and holidays, and during periods of high wind. It is noted that Sunday construction activities are prohibited by the City's noise ordinance, therefore construction personnel would not be onsite to undertake wetting of exposed surfaces on Sundays. However, as discussed above, the BAAQMD BMPs (and MM-AIR-2) provide for alternative practices, such as covering or treating with soil stabilizers, that do not require construction personnel to be on site every day.

Furthermore, because the Project would require limited import of fill or reuse of excavated spoils, there is unlikely to be substantial stockpiling of loose soils on the project site like there might have been for the Stanford project, as referenced in the comment. The majority of soils excavated from the project site would be loaded directly into trucks and hauled offsite, due to limited space on the project site for staging and stockpiling, although some small stockpiles may be maintained on the site for up to a few weeks at a time. These would be wetted, covered, or treated to prevent airborne dust from leaving the site, as required by the BAAQMD BMPs and MM-AIR-2.

Comment GRAVES-5:

HAZ-3 Hazards from Cortese List Sites - The potential for water flow entering surface waters and/or to percolate into clean groundwater is real. Much of this area sits above a compacted subgrade and during times of even moderate rainfall, the soil saturates to the surface and the water migrates gradually downhill until it reaches a point where it can drain down into the water table. This flow could carry a variety of contaminants and deposit them into the groundwater farther toward the bay.

Response to Comment GRAVES-5:

As described in Section 3.10.3, the Project would comply with the provisions of the SWRCB's NPDES Construction General Permit, which regulates stormwater discharges for construction activities and requires implementation of a Storm Water Pollution Prevention Plan (SWPPP)and appropriate Best Management Practices (BMPs) to prevent violations of water quality standards and substantial degradation of water quality. These measures, which are mandatory for the Project because it would disturb more than 1 acre of land, would protect water quality from degradation associated with erosion or accidental spills during construction, as required by the San Francisco Bay Basin Plan.

In particular, the Developer would be required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters; implement permanent post-construction BMPs that would remain in service to protect water quality throughout the life of the project; implement construction and operational design features and BMPs specifically intended to reduce the potential for downstream hydromodification; implement BMPs designed to prevent accidental spills of hazardous materials during the construction phase to the maximum extent practicable, and include procedures for immediate cleanup if any releases occur.

Comment GRAVES-6:

TRA-3 Traffic Safety Hazards - I'm pleased to see the proposed mitigations MM-TRA-3A and 3B but I'm still concerned that this is creating a potential for collisions with bicyclists using Park Boulevard. I would request that provision be made for additional measures should such an increase in collisions occur.

Response to Comment GRAVES-6:

The commenter's concern for bicycle safety and support for mitigation measures MM-TRA-3A and MM-TRA-3B are acknowledged. Please see response to comment SHULER-1 for additional discussion regarding bicycle safety and associated revisions to these mitigation measures.

Comment GRAVES-7:

UTI-2 Water Supply Availability - California is in the midst of a long-term drought, a situation that is occurring with increasing frequency. In addition, it is possible that our Individual Supply Guarantee me be reduced in the future. While this project meets the letter of the water code, I find the statement that sufficient water supplies are available to be questionable considering that we're currently being told that we must significantly reduce our water use! This project is worthwhile, but to blithely state that the impact on water would be less than significant seems absurd.

Response to Comment GRAVES-7:

The commenter's concerns regarding drought and water supply are acknowledged. Drought is an ongoing concern throughout California and in response, the state legislature enacted Senate Bill (SB) 610 and SB 221 to promote sustainable long-term water planning. Collectively, SB 610 and SB 221 require public agencies to determine whether adequate water supply exists for certain large development projects as part of the CEQA process by, in part, requesting water supply assessments (WSAs) from water service providers.

This Project does not trigger the requirements for a project-specific WSA, as the proposed 110 units are well below the residential threshold of 500 units specified by SB 610 and SB 221. As discussed in Section 3.17.3 (Impact C-UTI-2), the City has determined that there are sufficient water supplies to serve demand generated by residents within Palo Alto under buildout of the City's 2030 Comprehensive Plan. The City provided comments during the Project's scoping period (see Appendix A of the Draft EIR) which stated that construction of a multi-family housing project in this location and other common space associated with the multi-family residential use appears to be consistent with the City's land use designation at this site, and that the Project's goals and general program description appear to be consistent with overarching goals outlined in the Comprehensive Plan's Housing Element and Land Use Element, which encourage housing production.

Further, as discussed in Section 3.17.1 of the Draft EIR, if water restrictions are imposed by SFPUC, the City will implement its Water Shortage Contingency Plan and deploy action plans depending on the severity of the drought. The City also maintains several critical interconnections with neighboring water utilities including East Palo Alto, City of Mountain View, Stanford University, and Purissima Hills Water District, that can be activated during critical events to ensure water supplies are not impacted.

Comment GRAVES-8:

NOI-2 Ground borne Vibration - This impact is concerning, especially since even with mitigations, it is still expected to be significant. Since this project is to be located on an alluvium consisting of "medium dense to very dense gravel and sand", the sound and vibration from compaction equipment is likely to be transmitted through the ground to nearby areas. I do not know if there are any inhabited basement areas nearby, but my personal experience with a much smaller project near my home in College Terrace taught me that such compaction rendered my basement uninhabitable for the duration of the project. This transmission through the ground may prove seriously problematic for nearby residents working from home and/or the occupants of the courthouse.

Response to Comment GRAVES-8:

The commenter's concerns regarding vibration impacts are acknowledged. It is unknown if any inhabited basements are present in proximity to the Project; however, none are visible from public vantage points within a 1-block radius of the site. Underground parking garages are present at several of the nearby residential apartment buildings, including the one at 200 Sheridan Avenue, immediately adjacent to the project site.

Vibration impacts of the Project are discussed in Section 3.12.3 of the Draft EIR, in particular under Impact NOI-2. As discussed in that section, estimated vibration levels during Project construction could exceed the threshold of human annoyance at several nearby properties even with implementation of mitigation measure MM-NOI-2, hence the conclusion within the Draft EIR that these temporary vibration impacts would be significant and unavoidable.

As discussed in the Draft EIR, vibration levels exceeding the threshold of human annoyance would not occur constantly throughout the entire construction period, but only when certain equipment is operating in proximity to sensitive receptors. For the most vibration-generating piece of equipment (vibratory roller), vibration levels could exceed the threshold of human annoyance within approximately 140 feet of the equipment[8]. For smaller vibratory equipment, such as jackhammers, vibration levels would be expected to attenuate to below the threshold of human annoyance within a distance of approximately 45 feet.

3.1.7 HOLZEMER, Terry

Comment HOLZEMER-1: (Email 10/30/2021)

I'm currently reviewing the DEIR report and on several pages (3-43, bottom of page, for example) there is mention of a City of Palo Alto report on the landscape/trees on the 231 Grant site. However, this letter or report is not included anywhere in the DEIR -- in fact, there is little or no documentation in the EIR about the status of any of the trees or other landscaping on site. I would to see this City of Palo Alto report or communication and ask why it is not in the EIR.

Response to Comment HOLZEMER-1:

The requested arborist report was sent to the commenter on November 5, 2021 along with email communications from the City of Palo Alto's (former) arborist, Mr. Walter Passmore, regarding the Project. The EIR will be revised to include the arborist report as a new Appendix, as

[8] Based on the reference vibration level for a vibratory roller of 94 VdB at a distance of 25 feet [CITATION], and standard vibration attenuation rates from [CITATION], the estimated vibration level would be 71.5 VdB at a distance of 140 feet, which is below the 72 VdB threshold of human annoyance for residential properties.

presented in Section 4 of this Final EIR, “Revisions to the Draft Environmental Impact Report.” A copy of the report is attached to this FEIR in Appendix C.

Comment HOLZEMER-2: (Webform submission, 11/18/2021)

Can you please tell me if there is a video online of the October 20th public meeting on the 23 [sic] Grant DEIR. I would like to see it. I would like to know the "next steps" in the process, after tomorrow's comments deadline on the DEIR. When do you anticipate the EIR to be finalized and the comments to be responded to? Will this EIR then go to the County's Planning Commission for a hearing? I assume sometime early next year. Please let me know and keep me posted on any updates.

Response to Comment HOLZEMER-2:

The County responded to the questions raised in this comment by email and mail on January 6, 2022. This comment does not raise any specific environmental concerns that require a response under CEQA.

Comment HOLZEMER-3: (Email 11/19/2021)

The importance of the County (not its "paid agents" -- e.g. the Developer, etc.) establishing a real dialogue and listening segment with the neighborhood on all project activities. It's a shame, for example, that the neighbors -- who live here every day -- weren't invite [sic] to participate or comment on the original Project Objectives (EIR Page iii) and provide some constructive feedback on what the proposed building design would be.

Contrary to what some might believed, [sic] our neighborhood does support the idea of "teacher housing" and we think the 231 Grant location is an excellent spot for such housing. However, we do have some deep concerns about the project's size, density, toxic plume exposure, construction noise, lack of parking, and other important issues that seemingly have fallen on deaf County ears. No one from the County seems to take our concerns seriously and or is listening to us. Please no more fake "community meetings" -- have real meetings with those who live here each day in this neighborhood.

The question that one of our residents asked at the very first so-called "Community Meeting" remains -- "What, if anything, is the County/Developer willing to compromise on in regards to this project?" So far we have heard only silence.

Response to Comment HOLZEMER-3:

The County has fulfilled its obligations for public consultation under CEQA. As detailed in Section 1.2 of the Draft EIR, a Notice of Preparation was circulated on December 2, 2020, which began a 30-day scoping period that ended on January 6, 2021. A public scoping meeting was held by the County on December 16, 2020, which was hosted and presented by County staff, with a welcome from County Supervisor Simitian. Residents within a minimum 1,000 feet radius of the project site were sent notice of the scoping period and scoping meeting by mail, and email notifications were sent to all persons that had previously expressed an interest in the Project to the County, in addition to other parties required to be notified under CEQA. Two written comments and one verbal comment were received during the scoping period, only one of which was from a resident living within a half-mile of the project site.

The Notice of Completion/Notice of Availability for the Draft EIR was circulated on October 5, 2021, which included notice of the Draft EIR public meeting held on October 20, 2021. Again, residents within a minimum 1,000 feet radius of the project site were sent notice of the scoping period and scoping meeting by mail, and email notifications were sent to all persons that had previously expressed an interest in the Project. At least 17 members of the public attended this public meeting, with 10 making verbal comments. Many commenters were Palo Alto residents although it is unknown if they reside within the project's immediate neighborhood.

In addition to the required public consultation under CEQA, the County also presented information about the Project during a study session held by the Palo Alto City Council, which was also advertised and open to members of the general public.

Comment HOLZEMER-4:

I would like to add a few comments about the Virtual DEIR Comments Meeting, held October 20th, which I attended, but didn't speak. On purpose, I wanted to listen to all the public speakers who spoke that evening, but was surprised by their seemingly lack of detail or knowledge of the DEIR documents or its contents. The only public comments I heard (several times, repeatedly) were about the virtues of creating "teacher housing" and how much it was needed. But, where were the public comments on the DEIR document itself? Shouldn't the public speakers be talking about the DEIR and its contents? Not one of the public speakers talked about the potentially hazardous exposure of contaminated groundwater to neighbors or even the increased traffic in the area, as clearly outlined in the DEIR. Instead, it seemed as if everyone was promoting the idea that anyone against this project was somehow against "teacher housing" or being anti-teacher (I'm certainly not -- I'm a school teacher myself). It's time to focus on the project itself and the details involved in its construction and future operation.

Response to Comment HOLZEMER-4:

This comment does not raise any specific environmental concerns that require a response under CEQA. The County has no control over who chooses to present verbal comments at its public meetings, nor on the content of their comments. The County clearly explained during the meeting that the purpose of the meeting was to discuss the Draft EIR and that comments should be focused on the adequacy of the Draft EIR.

Comment HOLZEMER-5:

Your agents/the Developer has been very vague or has never disclosed the real details of how this facility will be run. As a publicly-funded facility, these facts should be known to the general public. Although not a complete list, the following information should be included:

A)1 What will be the specific rents in the building?

B) Will the building have BMR units (how many and what variety)?

C) How will the distribution of units be handled (will it be a strictly lottery system each year?, how many units will go to Palo Alto Unified, to Mountain View/Whisman? etc.)?

Since the City of Palo Alto (its taxpayers) put in several million for the project, do they get some say in who lives there?

What will be the rental restrictions or conditions attached to each rental unit -- example, what happens if a unit tenant retires or leave her Santa Clara County teaching job, does he/she get to stay indefinitely in 231 Grant or can they even sublease it? What happens if a teacher moves from one district to another (in Santa Clara County) -- does she or he get to stay at 231 Grant? Are these rental restrictions the same for both the Santa Clara County units and the San Mateo (Facebook) ones? Is the San Mateo/Facebook grant restrictive forever (meaning is there any "grandfathering" of the time frame where eventually all the units in the building could become Santa Clara County ones?) The details of the rental restrictions -- who lives there, how long, etc. -- should be clear and understood and disclosed to the public (this is public money, you know).

Response to Comment HOLZEMER-5:

This comment does not raise any environmental concerns that require a response under CEQA. The County is still negotiating details with the Developer and participating school districts, but the results of the negotiations will not alter the analysis of the Project's environmental impacts.

Comment HOLZEMER-6: (attachment to 11/19/2021 email)

The comments below and those on the following pages are my own, however, they do reflect the thoughts of many individuals in the Mayfield neighborhood who feel their voices have been ignored and/or dismissed by County officials as unwarranted. It's unfortunate that feeling persists and continues today. It's long overdue that the County (not the Developer, its representatives, or its PR firms) meet with our neighborhood to discuss our concerns listed below. PLEASE no more "Developer-led, so-called Community Meetings", inviting every special interest group from San Jose to San Francisco to speak about the virtues of teacher housing. No one is against teacher housing – I'm a teacher myself. Instead focus on the concerns of the residents, who live in this neighborhood – no more than a five or six-block radius of the project site.

Response to Comment HOLZEMER-6:

Please see responses to comments HOLZEMER-3 and HOLZEMER-4, above.

Comment HOLZEMER-7:

Under Executive Summary, Project Objectives – who specifically created the project objectives and when were they created? Was it a selected committee? This was never identified in the EIR. I know residents and the Mayfield neighborhood were never consulted, requested to comment on, nor a part of selecting these objectives. EIR page iii.

Response to Comment HOLZEMER-7:

This comment does not raise any specific environmental concerns that require a response under CEQA. CEQA does not require public consultation regarding Project objectives or disclosure of the procedure for development of Project objectives.

Comment HOLZEMER-8:

Under Project Objectives, #1 – who or how was the specific number of "60" selected for rental housing units for teachers within Santa Clara County? Why not 30 or 50? How was this specific number selected and what was the process in selecting this – is 60 really the only choice? EIR page iii.

Response to Comment HOLZEMER-8:

This comment does not raise any specific environmental concerns that require a response under CEQA. The Project objective to provide at least 60 rental housing units is a minimum target for the County, as specified in the original Request for Proposals for the Project. See also response to comment HOLZEMER-7.

Comment HOLZEMER-9:

Under Project Objectives, #1 – what is the Facebook grant criteria? – this is not disclosed anywhere in the DEIR. Any project document should be publicly known, especially to all parties, including County residents. Why weren't these criteria, I assume negotiated by the County, made public or disclosed to the public in the EIR, especially to the neighborhood? Who agreed to the Facebook criteria – was there a County Supervisor vote on the criteria or a signed agreement with Facebook? If so, when? EIR page iii.

Response to Comment HOLZEMER-9:

This comment does not raise any specific environmental concerns that require a response under CEQA. The Facebook grant criteria that pertain to unit occupancy qualifications are explained in sections 1.3 and 2.3.2 of the Draft EIR. See also response to comments GRAVES-2 and GRAVES-3.

Comment HOLZEMER-10:

Under Project Objectives, #1 – what does the words "accelerated rate" mean? No definition provided. Does this mean this is the only way the project can be built? What happens if a significant earthquake happens during construction or groundwater/soil contamination is found on-site, does "accelerated rate" mean construction continues non-stop? The public – especially the neighborhood (a five-block radius) – should be consulted first and throughout the project. EIR page iii.

Response to Comment HOLZEMER-10:

The objective to deliver the Project at an accelerated pace reflects the County's desire to provide solutions to the current housing crisis as quickly as possible. The objectives are non-binding, and if an event such as a major earthquake were to occur during construction the Project schedule would be adjusted accordingly. Impacts relating to seismic hazards are addressed in Section 3.7.3 of the Draft EIR (Impact GEO-1). Impacts relating to the potential for encountering contaminated groundwater or soil during construction are addressed in Section 3.9.3 (Impact HAZ-3). In particular, mitigation measure MM-HAZ-3A requires a Site Assessment and Conceptual Site Model to be developed for the project site prior to issuance of building permits, under the oversight of either the County of Santa Clara Department of Environmental Health, the San Francisco Bay Regional Water Quality Control Board, or the California Department of Toxic Substances Control through a Voluntary Cleanup Program or similar oversight agreement. Furthermore, mitigation measures MM-HAZ-3B through MM-HAZ-3E require additional measures to reduce impacts associated with contaminated materials, based on the findings of the Site Assessment and Conceptual Site Model. The County, Developer, and its contractors would comply with any consultation requirements under the Voluntary Cleanup Program or oversight agreement.

As discussed for response to comment HOLZEMER-7, CEQA does not require consultation regarding the development of Project objectives.

Comment HOLZEMER-11:

Under Project Objectives, #3 – the statement, "compatible with the surrounding neighborhood" is an incorrect, untrue statement of fact and needs to be corrected. All the residential multi-family complexes in the Mayfield area are zoned RM-40 (40 units per acre). The proposed 231 Grant project is DOUBLE that density (around 80 units per acre). That is not compatible (or even close) with the surrounding residential complexes. EIR page iv.

Response to Comment HOLZEMER-11:

See response to comment BECKETT-2.

Comment HOLZEMER-12:

2.2 -- Project Objectives – again, who specifically decided these "objectives", who had "input" or "say" into the design of these objectives? The Mayfield neighborhood – the area most affected by the Project -- was never invited, asked to comment on, or requested to participate in the design of these "project objectives". EIR page 2-4.

Response to Comment HOLZEMER-12:

This comment does not raise any specific environmental concerns that require a response under CEQA. See response to comment HOLZEMER-7.

Comment HOLZEMER-13:

2.2 -- Project Objectives, #1 -- the number "60" seem arbitrary (no basis in any EIR fact or detail) and the statement, "compatible with neighborhood" is just simply false. What facts do you have to base the number "60" on and why is that so vital? The above statement is incorrect and needs to be changed. EIR Page 2-4.

Response to Comment HOLZEMER-13:

See responses to comments BECKETT-2 and HOLZEMER-8.

Comment HOLZEMER-14:

2.3.1 – Building Design and Site Layout, roof height, extends beyond 50' to approx. 60' – this exceeds the City of Palo Alto's height limitations by 10'. All residential buildings in the Mayfield neighborhood are limited to 40'. Why can't this standard height for the project building remain? What can be done to reduce the height on the sides of the building (facing Park and Birch) nearest residential complexes? The EIR's Alternative #2 does meet this height standard. EIR Page 2-5.

Response to Comment HOLZEMER-14:

As discussed in Section 3.2.3 of the Draft EIR (Impact AES-3) the Project is exempt under state law from the City's land use regulations. Nonetheless, the Project would generally comply with the majority of the City's development standards and design criteria, except for building height. The comment does not raise any particular environmental concerns that would be reduced or avoided by lowering the proposed height overall or along the Park Boulevard and Birch Street frontages. As stated within the comment, a lower height alternative (Alternative 2) was analyzed in the Draft EIR (see Section 4.3.3). The Draft EIR concluded that although Alternative 2 would

have a lower level of significance for some environmental impacts than the Project, it would not avoid the significant and unavoidable noise and vibration impacts, would not achieve all of the Project Objectives, and may not be economically feasible (see Section 4.4).

Comment HOLZEMER-15:

2.3.3 – Flex Space and Public Amenities – as outlined, a suggested café in this northeast corner, close to nearby residences, would have major daily operational problems, being along Park and Grant – where would patrons park? how would food deliveries be handled (blocking streets, bike paths, etc.)? Not a good location, -- as street parking is only for residents -- for any type of restaurant (recently a new restaurant went out of business in the new Park Place Apartment building, down on the corner of Park and Page Mill). EIR Page 2-5.

Response to Comment HOLZEMER-15:

See response to comment BECKETT-3.

Comment HOLZEMER-16:

10) 2.3.4 – Landscaping, Utilities, and Other Site Improvements – the removal of two, beautiful, native mature trees (#64 and #67) are of deep concern to Mayfield neighborhood residents. These trees are landmarks in our neighborhood and beloved by many residents. Why was the neighborhood not informed of this removal decision and excluded from the tree removal decision-making process? Until an arborist report was requested (not included in the EIR) no one in the neighborhood knew of the trees removal (they were in the original Project plans to keep these trees). EIR Page 2-6.

Response to Comment HOLZEMER-16:

See response to comment BECKETT-4.

Comment HOLZEMER-17:

11) 2.4 – Project Construction – "modular construction" is the Project's preferred method of construction yet nothing in the EIR describes the safety aspects of doing this construction. What happens in strong wind conditions? Nothing is described or detailed. Has this type of construction been done in Palo Alto before? No specifics provided. EIR Page 2-13.

Response to Comment HOLZEMER-17:

As described in Section 2.4 of the Draft EIR, modular construction uses the same materials and is required to meet the same codes and standards as conventionally built facilities, including the California Building Code (CBC). The CBC includes design requirements relating to the ability of the structure to withstand shear and lateral forces from both seismic events and wind.

With respect to safety considerations during lifting of the modular units into place by crane, construction safety is regulated by a comprehensive framework, overseen by the federal Occupational Health and Safety Administration (OSHA) and the California Division of Occupational Safety and Health (Cal-OSHA). In particular, the use of cranes during construction activities is regulated by *29 CFR Part 1926 Subpart CC—Cranes and Derricks in Construction*. Crane operations would be suspended during high wind conditions in accordance with the crane load charts within the crane's manufacturer specifications.

Comment HOLZEMER-18:

12) 2.4 – "parking stackers and podium will be built on-site", however no detail on the parking stackers or system is provided. How will it be constructed "on site"? Again, no safety details on the parking stackers provided in the EIR. EIR Page 2-13.

Response to Comment HOLZEMER-18:

The Project, including the parking stacker system, would be required to comply with the California Building Code and other applicable building safety regulations. The statement within Section 2.4 of the Draft EIR to the system being "site-built" refers to the fact all Level 1 improvements, including parking, parking stackers and podium components of the Project would not be modular components constructed off-site and then transported to and assembled on-site, as would some of the other components described in the preceding paragraph of the Draft EIR. This comment does not raise any specific environmental concerns that require a response under CEQA.

Comment HOLZEMER-19:

13) 2.4.1 – Construction Phasing – a "15-18 month" construction period is mentioned through the EIR. Why is this "accelerate rate" necessary (who said so?) and what are the sacrifices in safety and quality construction? Who is responsible for overseeing the overall safety and quality workmanship? If local residents see "safety conditions" being sacrificed, who do we contact and how quickly will they respond? EIR Page 2-13.

Response to Comment HOLZEMER-19:

As discussed in response to comment HOLZEMER-10, the objective to deliver the Project at an accelerated pace reflects the County's desire to provide solutions to the current housing crisis as quickly as possible. The 15- to 18-month construction period described in the Draft EIR represents the best estimate of the Developer's construction contractor based on the information available at the time of Draft EIR preparation. However, as noted in Section 2.4.1 of the Draft EIR, the schedule is subject to change dependent on market conditions, regulatory approvals, and other factors. The Project would comply with all applicable health and safety regulations relating to construction activities (e.g., OSHA Title 29 CFR and Cal-OSHA Title 8 CCR), building safety (e.g., California Building Code), and ongoing operations (e.g., California Fire Code). The responsibilities of the various parties (County, the Developer, and its contractors) are governed by contractual agreements. The Draft EIR requires the Developer to post a contact name and number for noise and dust complaints during construction (see MM-AIR-2 and MM-NOI-1) and this person would also respond to any complaints or concerns regarding safety and workmanship.

Comment HOLZEMER-20:

14) 2.4.1 – Construction hours – the City's construction hours must be strictly adhered to for the peaceful and quality of life enjoyment of the neighborhood. "Early starts/late finishes" work is NOT ACCEPTABLE, without neighborhood involvement. What steps will the County take to ensure that the neighborhood (within a five-block radius) is involved in setting any special construction hours, so everyone can be aware – in advance -- of any changes to the City's allowable hours? EIR Page 2-13.

Response to Comment HOLZEMER-20:

As discussed in response to comment CITY-3 and described in Section 2.5 of the Draft EIR, a noise ordinance exception permit would be required from the City for the limited occurrences when construction activities would need to be undertaken outside of the City's permitted construction hours. If an exception permit is granted by the City, the Developer would comply with all permit conditions, including any requirements for public notice or consultation. In addition, mitigation measure MM-NOI-1 requires the Developer to give advance notice to owners and occupants of residential properties within 50 feet of the project site for any construction activities undertaken outside of the permitted hours. Revisions have been made to MM-NOI-1 in Section 3.12.3 of the Draft EIR to extend the distance of required notification to include several surrounding city blocks, as detailed in Section 4 of this Final EIR.

Comment HOLZEMER-21:

15) 2.4.1 – "abatement of hazardous materials" – what information methods and/or notification will be made to the neighborhood (five-block radius) about the discover of hazardous materials or contaminated soil found on the project site? Those most affected in the neighborhood need to know if any hazardous material/contaminated soil is found, the type, and the significant potential health issues these that materials or soil may have for residents in the area. EIR Page 2-13.

Response to Comment HOLZEMER-21:

As described in Section 2.4.1 of the Draft EIR, abatement of asbestos-containing materials, lead-based paint, or other hazardous building materials that might be present in the existing office building which is proposed for demolition would be undertaken in accordance with construction worker health and safety regulations and applicable federal and state standards, including the California Division of Occupational Safety and Health and the Bay Area Air Quality Management District (BAAQMD) regulations. The Developer and its contractors would follow the notification requirements, if any, of the applicable regulations.

Please see response to comment HOLZEMER-10 with respect to the potential for contaminated soil to be encountered during construction.

Comment HOLZEMER-22:

16) 2.4.2 – Construction Haul Routes/Staging/Traffic Control – "workers would park in public parking lots within a quarter mile of the site" – Do you have a service agreement with the City of Palo Alto to provide this "worker parking"? When was this established and by who? The only Parking Garage/structure with a quarter mile is meant strictly for the commercial businesses on California Avenue (I participated in the planning of this Garage since it is in my neighborhood). This Garage is not for 'construction workers to park in all day'. What specific City parking lots are you planning to park in? Street parking is for residents only. EIR Page 2-15.

Response to Comment HOLZEMER-22:

This comment does not raise any specific environmental concerns that require a response under CEQA or that would require any revisions to the Draft EIR. As discussed in response to comment JCC-2, parking is not an environmental impact under CEQA.

Comment HOLZEMER-23:

17) 2.4.2 – street closures around project site – Sheridan, Birch, Grant, Park and Sherman are all narrow, connector or feeder streets to multi-family residences in this neighborhood. All are

narrow two-lane roads with some limited street parking. Grant Avenue, specifically, is a major connector street for several residential complexes, including Birch Court, Grant Avenue, and especially Palo Alto Central. Literally, hundreds of residents use these streets -- Grant, Sheridan, Sherman (when it is open – which it isn't) to connect to Park Blvd., Oregon Expressway, and El Camino. Question – why isn't the neighborhood involved in the decision-making process of any of these street closure decisions? Neighbors insist on being part of this decision-making process. Lane and street closures are not acceptable when it affects the ability of residents to get to and from their homes each and every day. Delays, which could be critical, getting out or coming back to their homes is simply not acceptable and both the County and City should be aware of these issues. EIR Page 2-15.

Response to Comment HOLZEMER-23:

Please see response to comment BECKETT-5.

Comment HOLZEMER-24:

18) Table 2.4-2 -- Estimated Material Import/Export Volumes – the estimated (not exact) # of truck trips is literally shocking for our quiet Mayfield neighborhood – nearly 3,000 truck visits, back and forth, throughout the project's building cycle. What will be done to reduce this huge level of truck traffic on our small neighborhood streets (Birch, Grant, Sherman, Park)? This level is not acceptable to the neighborhood. What will be done to reduce the truck noise and diesel exhaust from these trucks on a daily basis? Children, who live very close by and throughout our neighborhood, will be exposed to these trucks on a daily basis – what is being done to protect them from this diesel exhaust and noise on a daily basis? EIR Page 2-15.

Response to Comment HOLZEMER-24:

Please see responses to comments BECKETT-6 and BECKETT-8.

Comment HOLZEMER-25:

19) 2.4.2 – "a traffic control plan will be implemented in consultation with the City of Palo Alto" – why doesn't the "traffic plan" have any input from or outreach to the neighborhood – the folks most affected by any plan? The neighborhood, MUST have input in any traffic plan that impacts them. No outreach or input from the neighborhood has been requested by the County or the City. EIR Page 2-17.

Response to Comment HOLZEMER-25:

Please see response to comment BECKETT-5.

Comment HOLZEMER-26:

20) 2.4.2 – "72 hour advance notice to abutting property owners" – who selected this time frame of 72 hours and why weren't residents a part of this decision on notification time? 72-hour notice is simply not enough notification for road closures and changes. In addition, "abutting property owners" should not be the only ones notified of changes. It is not enough to notify the "abutting residents of the project" about road closures/modifications. EIR Page 2-17.

Response to Comment HOLZEMER-26:

The requirement for at least 72 hours advance notice to abutting property owners and tenants prior to commencing work on the project is specified within the City of Palo Alto's Traffic Control

Plan Requirements.[9] Additional notification may be required by the City's Public Works Department, depending on the location and scale of the project. See also response to comment BECKETT-5.

Comment HOLZEMER-27:

21) 3.1.2 – Cumulative Impact Assessment Methodology – Under "List of Cumulative Projects" this table is significantly incomplete and excludes several major projects that being currently planned by the City of Palo Alto in the surrounding neighborhood of the project site. The project list includes 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real. All these projects should have been included in your cumulative analysis because together they will impact the quality of life, traffic, parking, and congestion of the Mayfield neighborhood, where the project resides. Why were these projects ignored in the cumulative impact assessment and if they were for some "technicality", please explain why these projects should not be examined now as part of "cumulative impact" now? EIR Page 3-2.

Response to Comment HOLZEMER-27:

Please see response to comment BECKETT-7.

Comment HOLZEMER-28:

22) 3.2 – Aesthetics, Impact AES-1, Scenic Vistas – Analysis that there is "no impact" is incorrect. Being a 55-60-foot tall structure, immediately across the street, will severely impact and block the scenic view/vista of many residents who live in the Palo Alto Central residential complex, who face the Stanford foothills, looking west from Park Blvd. The statement, "construction would not obstruct background views of scenic resources", is simply a false statement. How will this statement be corrected? The impact and loss of these scenic vistas will be significant to the residents facing the project from the east. EIR Page 3-6.

Response to Comment HOLZEMER-28:

As described in Section 3.2.1 of the Draft EIR, there are no designated scenic vistas in Palo Alto. The City identifies the forested foothills of the Santa Cruz Mountains to the southwest as character-defining elements that frame the city; however, these foothills are barely visible from public vantage points in the vicinity of the project site. Although there may be a few nearby residents whose private views of the foothills from upper-level apartments may be partially or fully obscured by the Project, for CEQA purposes impacts on scenic vistas are typically assessed from public vantage points.[10] Furthermore, CEQA is typically concerned about impacts on the environment generally, rather than impacts on a small set of persons.[11] Therefore, the project would have no impact on scenic vistas.

Comment HOLZEMER-29:

23) 3.2 – Impact AES-3, Scenic Quality – In the "Impact Analysis" section, the statement, "the project site is surrounded by urban development and the 50 feet (this is an error, the building is 55-60) is similar to existing buildings" excludes the fact that all other residential buildings in the area are 40-feet or below. This project is not like other residential buildings in the area – it

[9] https://www.cityofpaloalto.org/civicax/filebank/documents/6918
[10] See, e.g., Stanford University 2018 General Use Permit Final EIR, p. 5.1-11 ("a scenic vista is defined as a distant public view along or through an opening or corridor that is recognized and valued for its scenic quality"), available at: https://stgenpln.blob.core.windows.net/document/SU_GUP2018_CDEIR.pdf.
[11] https://ceqaportal.org/tp/CEQA%20Portal%20Topic%20Paper_Thresholds%20of%20Signifcance_2020%20Update.pdf

exceeds it in height and density. This project will standout and not fit in with existing residences. Why is it necessary to exceed the existing residential neighborhood standards? This is not explained anywhere in the EIR? EIR Page 3-7.

Response to Comment HOLZEMER-29:

As stated in Section 3.2.3 (Impact AES-3), the threshold of significance for impacts to scenic quality in urbanized areas is whether a project would conflict with applicable zoning and other regulations governing scenic quality. As discussed in that section, the County is sponsoring the Project and the Project would primarily serve a public purpose. Thus, under state law, the Project is exempt from the City's land use regulations. County General Plan policies and regulations governing scenic quality apply only to unincorporated areas of the County and, therefore, are not applicable to the Project, which is within the incorporated city limits of Palo Alto. Therefore, the Project would not conflict with any zoning or other regulations governing scenic quality.

Comment HOLZEMER-30:

24) 3.3.3 – Project Impacts and Mitigation – Impact AIR-2: Net Increase in Criteria Pollutants – it clear from this section that there will be "potentially significant" impacts to the residents who live in this neighborhood, especially air quality during and after construction. Nearly 3,000 truck visits to the site will increase air pollution in the area, including the amount of dust particles in the air, affecting all the neighboring residences. What will be done to decrease the amount of truck trips to the site – 3,000 is just excessively high? Why weren't residents consulted or made aware of the level of truck visits required before this project's design was finalized? What can be done to reduce the number of truck visits? EIR Page 3-26.

Response to Comment HOLZEMER-30:

See response to comment BECKETT-8.

Comment HOLZEMER-31:

25) 3.3.3 – "MM-AIR-2: Fugitive Dust Reduction Measures" – why no clear involvement by the neighborhood in monitoring the level of dust in the area and ways to report it back to the parties responsible of reducing it for the neighborhood? These measures don't go far enough in involving the neighborhood. EIR Page 3-27.

Response to Comment HOLZEMER-31:

As discussed in response to comment BECKETT-8, because estimated construction emissions for criteria pollutants are substantially below the BAAQMD's regional thresholds of significance, and because MM-AIR-2 requires the Project to implement the BAAQMD's BMPs for fugitive dust control, no air quality monitoring is proposed. Mitigation measure MM-AIR-2 also requires the posting of a sign with contact details of a person to contact if there are dust complaints and requires this person to respond and take corrective action within 48 hours.

Comment HOLZEMER-32:

26) 3.3.3 – "Idling times shall be minimized either by shutting them down or limiting them to 5 mins" – 5 mins is way too long of time for "idling equipment" – dangerous exhaust for children and young people to breathe in. Why can't this time be reduced to 2 minutes? Who will monitor the time for idling trucks and equipment? How will it be done and what will be the consequences for exceeding it? EIR Page 3-27.

Response to Comment HOLZEMER-32:
See response to comment BECKETT-9.

Comment HOLZEMER-33:
27) 3.3.3 "Impact AIR-3: Exposure of Sensitive Receptors" – EIR exclusion of several senior living facilities in the Mayfield neighborhood, like the Sunrise Assisted Living Facility, which has residents who are particularly sensitive receptors to the project site. Why were they excluded? Any neighborhood facility, which has large senior population, (within a five-block radius) should be examined and reviewed for possible impacts. EIR Page 3-29.

Response to Comment HOLZEMER-33:
See response to comment BECKETT-10.

Comment HOLZEMER-34:
28) 3.3.3 "Impact AIR-3", 'the greatest potential for toxic air contaminant emissions would be diesel particulate matter" – the need to reduce the level of truck visits and the use of heavy equipment is critical to people's safety. What will the County do to reduce these truck visits and minimize the use of heavy equipment? Again, numerous trucks idling for 5 minutes every day for 15 or 18 months is NOT acceptable to the Mayfield neighborhood and their air quality. EIR Page 3-30.

Response to Comment HOLZEMER-34:
See responses to comments BECKETT-8 and BECKETT-9.

Comment HOLZEMER-35:
29) 3.3.3 "Impact AIR-3", Operation section – No discussion in the EIR on the parking stacker equipment air emissions standards or the air quality impact inside the garage while cars are "queuing up" to either leave or come into the garage area while waiting to park. How will the vehicle exhaust exposure inside the garage area be measured? EIR Page 3-31.

Response to Comment HOLZEMER-35:
The proposed parking stacker system would be powered by electric motors; therefore, there would be no emissions associated with operation of the stacker system itself. As discussed in Section 4.5.3 of the Traffic Impact Analysis for the Project (Appendix E-1 of the Draft EIR), vehicles arriving at the garage would park in an empty surface-level parking space before the vehicle is moved by the lift to its final parking space. Similarly, when retrieving a vehicle, the lift would move the requested vehicle to an empty surface-level parking space for subsequent access by the driver. Vehicle engines would not be operating while vehicles are on the lift. Therefore, the use of a parking stacker system would be expected to result in lower vehicle emissions and shorter duration of exposure within the parking garage than a traditional garage layout where drivers would have to drive down to a lower level and/or idle circle to look for an available parking space. Additionally, consistent with Title 24 requirements, the enclosed parking garage would provide an adequate mechanical ventilation system, minimizing vehicle exhaust exposure.

Comment HOLZEMER-36:
30) Cumulative Impact C-AIR-1, Air Quality Plan Conflicts or Net Increase in Criteria Pollutants, -- again the EIR fails to take into account several neighborhood projects that have been approved

or going through the approval process. These projects – should all be examined together before any cumulative impacts can be dismissed. EIR Page 3-33.

Response to Comment HOLZEMER-36:

Please see response to comment BECKETT-7. As discussed in Section 3.3.4 of the Draft EIR, the potential for cumulative impacts related to nonattainment status of regional pollutants as a result of past and present development in the SFBAAB is identified as potentially significant, but for the reasons explained within that section, the Project's incremental contribution would not be cumulatively considerable. Consideration of the additional projects mentioned by the commenter would not change the analysis or conclusions in the Draft EIR.

Comment HOLZEMER-37:

31) Cumulative Impact C-AIR-2 – same as above. Needs to examine more than two proposed additional projects that are planned in our neighborhood. The EIR analysis is flawed, incomplete and inaccurate today. EIR Page 3-34.

Response to Comment HOLZEMER-37:

Please see responses to comments BECKETT-7 and GOLD-5. Because construction of the 123 Sherman Avenue and 380 Cambridge projects could potentially overlap with Project construction, these could also contribute to cumulative impacts relating to exposure of sensitive receptors that are within 1,000 feet of the project site and one or more of those sites. Revisions have been made to Section 3.3.4 to include discussion of these projects. The other cumulative projects mentioned in the comment are at pre-screening or pre-application stages and are therefore unlikely to have construction periods that overlap with that of the Project. Furthermore, the other projects are more than 1,000 feet from the project site and therefore are outside the geographic context for cumulative impact C-AIR-2.

Comment HOLZEMER-38:

32) 3.4, Biological Resources – "nesting habitats for common bird species would be reduced because of the mature tree removals" – Instead of the proposed mitigation measure suggested in the DEIR, why can't these mature trees remain and a construction "work-around" be done to save these valuable mature trees? Who will monitoring the conditions of MM-BIO-4 measure? No monitoring system is established in the EIR. Who is the "qualified biologist" and how will residents be able to contact him/her? EIR Page 3-42.

Response to Comment HOLZEMER-38:

Please see response to comment BECKETT-4 regarding the need for proposed tree removal.

The Mitigation Monitoring and Reporting Plan (MMRP) for the Project is included in Appendix B of this Final EIR. This MMRP sets out the monitoring and reporting action, implementation timeframe, implementation responsibility, and implementation oversight for each of the mitigation measures that will be required to be implemented if the Project is approved, including MM-BIO-4. Public Resources Code Section 21081.6, requires public agencies to adopt a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment."

As required by mitigation measure MM-BIO-4, the qualified biologist would be retained by the Developer only if project-related demolition or construction activities would occur during the

nesting season. Because the CEQA process has not yet concluded, the Project schedule is unknown, and a biologist has not been retained. If the qualified biologist would need to access private property in order to conduct the nesting bird surveys or subsequent monitoring, they would contact the landowner ahead of time to make appropriate arrangements.

Comment HOLZEMER-39:

33) 3.4, Impact BIO-5: Local Policy or Ordinance Conflicts – no neighborhood group or residents were ever contacted about the removal of street or property mature trees in their neighborhood – why? Residents disagree with the tree(s) conditions both on the property (Tree #64 and #67) on the street. Removal of the street trees is certainly not justified nor warranted and should be protected – explain the need for the street tree(s) removal? We understand Mr. Passmore is no longer with the City of Palo Alto and his opinion carries no official City capacity at this point or time. EIR Page 3-43.

Response to Comment HOLZEMER-39:

Please see response to comment BECKETT-4 regarding the need for the proposed tree removal, including specific discussion of Trees #64 and #67. As discussed in Section 3.4.3 (Impact BIO-5) of the Draft EIR, the County or Developer would obtain all necessary permits and approvals for the proposed tree removals and would adhere to any conditions, including any public consultation required as part of the permitting/approval process.

Comment HOLZEMER-40:

34) 3.4, Impact BIO-5: Local Policy or Ordinance Conflicts – the two mature, "heritage" trees on the project site (#64 and #67) were both an original part of the design plans for the project and should remain in place. There is no need to remove these trees, except for the benefits of the project's construction – which could be modified to save these beautiful and majestic trees. Both the coastal redwood (#64) and the camphor (#67) are landmark trees in our neighborhood and we want them retained. Why weren't the residents who love these trees consulted before any decision was made about their removal? No one from the project team or the County or City every contacted the neighborhood. EIR Page 3-44.

Response to Comment HOLZEMER-40:

See response to comment HOLZEMER-39.

Comment HOLZEMER-41:

35) 3.4, Impact BIO-5, If the coastal redwood tree (#64) and Camphor (#67) are to be removed, neighborhood residents insist on the following steps: 1) it is mandatory that each replacement native tree in the area be given at least 1,200 sq.ft. of rootable soil surrounding each tree, with a 25-foot radius of space to grow new canopy. The maximum level of soil volume should be verified by the City and/or a professional arborist serving the new landscape. An engineered soil area (Silva cells or equivalent technology) for each tree should be used to energize and keep the trees healthy for long term sustainability and 2) the proposed recycled water level and its use must be carefully maintained and adjusted so as to not damage the trees' lifespan. The maximum is 500 ppm salt content – if this is compromised, replacement trees will die over time. Will you accept these terms? EIR Page 3-44.

Response to Comment HOLZEMER-41:

As discussed in response to comment HOLZEMER-39, the County or Developer would obtain all necessary permits and approvals for the proposed tree removals and would adhere to any conditions imposed by the reviewing agency for replacement trees, including any conditions regarding the volume of rootable soil or watering.

Comment HOLZEMER-42:

36) Cumulative Impact C-BIO-4: Fish or Wildlife Movement, Migration or Nursery Sites – again, the issue is not including these other planned projects that are proposed for the Mayfield neighborhood. All these projects mentioned earlier – 300 Lambert, 123 Sherman, 380 Cambridge, etc. are not included in this EIR analysis and should be as they affect the cumulative effects of our neighborhood. EIR Page 3-45.

Response to Comment HOLZEMER-42:

Please see response to comment BECKETT-7. Consideration of the additional projects mentioned by the commenter does not require any revisions to the analysis or discussion of cumulative impacts to nesting birds.

Comment HOLZEMER-43:

37) 3.5, Historical Resources, under "Built Environmental Survey" – statement made that two other additional resources (the Courthouse building and the Courthouse Plaza office building) were identified as potential historical resources due "to their age". Question – why wouldn't 231 Grant, the project – because of its age as well – be considered as a potential historical resource as well? Not explained nor detailed in the EIR. EIR Page 3-50.

Response to Comment HOLZEMER-43:

As discussed in Section 3.5.1 of the Draft EIR, in the paragraph preceding the one referenced in this comment, a historical resource evaluation of the office building at 231 Grant Avenue was undertaken (Appendix C-2 of the Draft EIR), which concluded that the building is not eligible for listing in the NRHP or CRHR and does not meet the criteria as a historical resource for the purposes of CEQA.

Comment HOLZEMER-44:

38) 3.5, Impact CUL-1: Historical Resources – potential vibration damage due to construction equipment is studied only for abutting properties, but neighborhood concerns also arise from numerous residential buildings and underground garages that are close to the project site -- less than 100 yards away. What will be the process if damage occurs to these near-by residences because of vibration from project construction equipment? Who will be responsible for responding to vibration damage issues and how quickly will they respond? What mitigation steps will be taken if damage is found? EIR Page 3-60.

Response to Comment HOLZEMER-44:

As discussed in Section 3.12.3 of the Draft EIR (Impact NOI-2), most types of construction equipment that would be used for the Project (with the exception of vibratory equipment such as vibratory rollers, discussed further below) would not generate levels of vibration that would exceed the threshold for building damage (0.5 PPV in/sec) at the nearest receptors (refer Table 3.12-2). Because vibration energy dissipates with increased distance from the source of

vibration, the use of such construction equipment would also not generate levels of vibration that would exceed the threshold for building damage at receptors that are further from the project site.

Use of vibratory rollers would be anticipated to cause vibration levels of 1.160 PPV in/sec at a distance of 8 feet (the closest distance between adjacent buildings and the project site boundary), which exceeds the 0.5 PPV threshold for building damage for modern residential buildings and modern steel or reinforced-concrete buildings (FTA 2018; Caltrans 2020). Mitigation measure MM-NOI-2 prohibits the use of vibratory equipment within 15 feet of buildings on adjacent properties unless additional measures are taken so that the threshold for building damage is not exceeded. At a distance of 15 feet, the level of vibration anticipated from use of a vibratory roller would be 0.37 to 0.45 PPV in/sec[12] which is below the 0.5 PPV threshold for building damage. Other buildings mentioned by the commenter are more than 15 feet from the project site, and therefore building damage from construction vibration would not be expected.

Mitigation Measure MM-NOI-1 requires that a disturbance coordinator 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 will receive complaints about construction disturbances (including complaints regarding vibration) and, in coordination with the County, will determine the cause of the complaint and implement feasible measures to alleviate the problem. See also response to comment GRAVES-8.

Comment HOLZEMER-45:

39) Cumulative Impact C-CUL-1: Historical Resources – again the omission of several proposed and planned projects in the area makes for a flawed EIR. Why can't the cumulative effects of these other projects – which are in the planning process – be studied now? EIR Page 3-65.

Response to Comment HOLZEMER-45:

Please see response to comment BECKETT-7. The project at 123 Sherman Avenue would be across Park Boulevard from the potentially historic Palo Alto Courthouse. However, the proposed construction of a three-story commercial building in that location is unlikely to materially impair the setting of the Courthouse, as it would be lower in height and would not alter the Courthouse's relationship to the surrounding area, large setback, or mature vegetation. None of the other additional projects are in proximity to the Courthouse or Courthouse Plaza office building, and therefore would not contribute to cumulative impacts on these potentially historic resources. Therefore, the conclusion in Section 3.5.4 of the Draft EIR (Impact C-CUL-1) that the overall cumulative impact to historic or potentially historic resources would be less than significant is still valid

Comment HOLZEMER-46:

40) 3.6.3 Impact ENE-1: Wasteful, Inefficient or Unnecessary Consumption of Energy Resources – under "construction", it clear that additional truck trips (nearly 3,000) will be need for the modular construction being planned – why can't this number of truck trips be minimized

[12] Estimated vibration level (Vest) calculated using following equation from FTA 2018: Vest = Vref (25/D)^N, where Vref = reference vibration level at a distance of 25 feet (0.21 PPV in/sec for vibratory roller); D = distance between source and receptor (15 feet); and N = soil transmissibility factor (1.1 for "hard soils" or 1.5 for "competent soils").

or reduced. Idling time up to 5 minutes is not acceptable to residents – this type of diesel fume exposure on a regular, daily basis needs to be reduced. What specific steps will the County take to reduce this fume/particle exposure to neighborhood residents? Reduction of truck trips is critical for residents. EIR Page 3-72.

Response to Comment HOLZEMER-46:

See responses to comments BECKETT-8 and BECKETT-9.

Comment HOLZEMER-47:

41) Cumulative Impact C-ENE-1 – again, no study of the additional proposed projects in the Mayfield neighborhood. Two proposed projects the EIR included (one on El Camino and the other, the Public Safety Building) do not show the full impact of these proposed projects that are now in the pipeline to be built. These projects include: 300 Lambert, 123 Sherman, 2955 El Camino, 200 Portage and 380 Cambridge. All are within a 10-minute walk from the project site. EIR Page 3-75.

Response to Comment HOLZEMER-47:

Please see response to comment BECKETT-7. As discussed in Section 3.6.4 of the Draft EIR, the study area for cumulative analysis relating to energy is the state of California, and the analysis within that section discusses future projects in general. Therefore, the projects mentioned by the commenter would not change the conclusion of the Draft EIR that the overall cumulative impact relating to energy consumption and consistency with energy plans would be less than significant.

Comment HOLZEMER-48:

42) 3.7.3 Impact GEO-1: Seismic Hazards – under "impact analysis", it's clear that the project site is in a very seismically active area/neighborhood. A major quake and resulting damage are nearly a certainty in the lifetime of 231 Grant. Why then no details in the EIR about how seismically safe and strong is the 231 "modular" construction to withstand a 7 or 8 magnitude earthquake? Nothing specific is in there about the construction details. In addition, why are there is no details in the EIR on the seismic abilities of the parking "stacking" system that will be enclosed under the living areas of the building? What specific steps are being taking to ensure the seismic capabilities of the parking stackers? What steps will be taken if the parking stackers collapse in an earthquake? What fire prevention steps will be taken in regard to the parking stackers in an earthquake? No facts or information on the parking stackers provided in the EIR. What are the environmental effects to the entire neighborhood if a major fire erupts when a stacker collapses (after an earthquake) that is enclosed in the garage area of 231 Grant? No professional fire support will be available, after a major quake. EIR Page 3-85.

Response to Comment HOLZEMER-48:

As discussed in Section 2.4 of the Draft EIR, modular construction uses the same materials and is required to meet the same codes and standards as conventionally built facilities. This includes the California Building Code (CBC) requirements addressing seismic design, such as the ability of the structure to withstand shear and lateral forces, and the California Fire Code (CFC) which contains regulations consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire, explosion, and hazardous materials. The parking stacker system would also be required to comply with the CBC and CFC. As discussed

in Section 3.7.3 of the Draft EIR, the CBC requires an evaluation of seismic design that is focused on "collapse prevention," meaning that structures are designed for prevention of collapse for the maximum level of ground shaking that could reasonably be expected to occur at a site. Analysis of potential impacts from possible structure fires, whether associated with a parking stacker system or a building in general, is not required under CEQA given the speculative nature of such an event occurring and the comprehensive framework of building and fire design requirements applicable to all developments, specifically enacted to reduce the likelihood of such occurrences.

Comment HOLZEMER-49:

43) 3.7.3 Impact GEO-3: Unstable Soils or Geological Units – "under Impact Analysis", it's clear that the soil beneath the site is not very stable, so footings/foundations must be deeper than originally planned. There are concerns over the soil, so that a deepening of the foundation may be necessary, affecting abutting buildings. What specific steps will be taken to ensure the safety of all future building occupants? Concern is also raised about the need to go 'deeper" into the ground – 27 feet bags – 10 feet below ZOI – which is where the contaminated groundwater is located from the hazardous waste toxic plume which is a Super Fund site. What steps will be taken if this groundwater is contacted by construction activities and how will residents be notified of this discovery? It's vital to inform residents of any contact by construction crews with this groundwater and its impact on the neighborhood. EIR Page 3-87.

Response to Comment HOLZEMER-49:

As discussed in Section 3.7.3 (Impact GEO-3) of the Draft EIR, impacts related to the poorly compacted fill present in some parts of the project site are identified as potentially significant, and mitigation measure MM-GEO-3 is recommended to reduce these impacts to a less-than-significant level.

Comment HOLZEMER-50:

44) MM-GEO-3: Preparation of the Geotechnical Report and Implementation of a Monitoring Program" – vital that such a "geotechnical report" be made available to the public and distributed to the neighborhood residents. Explain that this will be done. In addition, any monitoring program should be fully disclosed and details provide to the residents in the neighborhood. Please provide details on the monitoring program. EIR Page 3-88.

Response to Comment HOLZEMER-50:

This comment does not raise any specific environmental concerns that require a response under CEQA.

Comment HOLZEMER-51:

45) Cumulative Impact C-GEO-1: Seismic Hazards – again, the cumulative effects of proposed projects in the neighborhood have not been studied in the EIR. Why? There are several projects being planned in our neighborhood that are not included in the EIR analysis. List of projects already mentioned. The dangers of parking stackers (being planned beyond 231 Grant – 123 Sherman plans "stackers" too) is not fully understood with regards to "seismic hazards" and this should be provided in the EIR. If a major quake occurs (which is likely) in the next 30 years, what will be parking stackers impact on the environment and the neighborhood? Not explained in the EIR. EIR Page 3-93.

Response to Comment HOLZEMER-51:

Please see responses to comments BECKETT-7 and HOLZEMER-48. As discussed in Section 3.7.4 (Impact C-GEO-1) the cumulative context for seismic hazards encompasses the western San Francisco Bay area. All future projects, including those specifically mentioned by the commenter, are required by law to implement the design and engineering requirements of the CBC and local building regulations, which would also apply to parking stacker systems. Therefore, for the reasons discussed in Section 3.7.4 of the Draft EIR, the overall cumulative impact related to seismic hazards would be less than significant.

Comment HOLZEMER-52:

46) Cumulative Impact C-GEO-3: Unstable Soils – under "cumulative impact analysis", statement that "none of the identified cumulative projects (only two) are in the immediate vicinity" is true, but only because there is a clear EIR omission of several planned, proposed projects in the immediate area – 300 Lambert, 200 Portage, 123 Sherman, etc. These projects should be part of any "cumulative analysis". EIR page 3-94.

Response to Comment HOLZEMER-52:

Please see response to comment BECKETT-7. As discussed in Section 3.7.4 (Impact C-GEO-3) the geographic context for cumulative impacts relating to unstable soils would be limited to those projects in the immediate vicinity of the project site with the potential to contribute to potential destabilization of foundations for the existing apartment building at 200 Sheridan Avenue. Such potential would exist if cumulative projects also involved excavations within the zone-of-influence (ZOI) of neighboring basement walls (defined as the zone above an imaginary line projected up at an inclination of 1.5:1 horizontal to vertical from the basement finished floor of the adjacent building), as described in Section 3.7.3 (Impact GEO-3).

The closest of the projects mentioned by the commenter is the 123 Sherman Avenue project, which is approximately 130 feet north of the Project site and approximately 240 feet from the 200 Sheridan Avenue apartment building. Because all of the cumulative projects are outside of the "zone of influence" for the 200 Sheridan Avenue parking garage, such projects would not contribute to additional destabilization of the apartment building.

Comment HOLZEMER-53:

47) 3.8.3 Impact GHG-1: GHG Emissions – Why has the County not established "thresholds" for determining whether a project's GHG emissions are significant? That's inexcusable to residents who are concerned about global warming and its impacts on our environment. EIR Page 3-106.

Response to Comment HOLZEMER-53:

As stated in Section 3.8.3 of the Draft EIR (Impact GHG-1 under "Standard of Significance") lead agencies have flexibility to develop their own significance thresholds or to determine significance thresholds on a case-by-case basis, but may also consider thresholds of significance adopted or recommended by other public agencies or experts, provided that the thresholds are supported by substantial evidence. (CEQA Guidelines, Sections 15064, 15064.7.) For this project, the County has used the thresholds developed by BAAQMD, with appropriate updates to consider longer-term (post-2020) State emissions goals, as explained in more detail in the Draft EIR.

Comment HOLZEMER-54:

48) 3.8.3 under "Impact Analysis", construction – it's clear that significant GHG emissions will occur from construction equipment during the project's construction. Why are these emissions allowed to be "amortized" over the life of the project? Construction emissions should remain separate from "operational" emissions. What can be done to reduce this sizeable net increase in CO2 emissions from construction and future operations as indicated in this section? EIR Page 3-110.

Response to Comment HOLZEMER-54:

As described in Section 3.8.3 of the Draft EIR, construction of the Project would generate approximately 555 metric tons of carbon dioxide equivalent (MT CO_2e). BAAQMD has not adopted thresholds for evaluating GHG emissions from construction activities. Nevertheless, the BAAQMD recommends that the lead agency quantify and disclose GHG emissions that would occur during construction and make a determination on the significance of these construction-generated GHG emission impacts in relation to meeting GHG reduction goals. Since BAAQMD does not have a construction-specific threshold, amortizing construction-related emissions over the project lifetime to be combined with the annual operational GHG emissions, allows for a single comparison of project emissions to an annual emissions threshold. This approach is consistent with CEQA guidelines adopted by other lead agencies and air districts throughout the state, such as South Coast Air Quality Management District and San Luis Obispo County Air Pollution Control District. Specifically, the San Luis Obispo County Air Pollution Control District recommends amortizing construction-related GHG emissions over the life of the project and adding amortized construction emissions to annual operational emissions for the purpose of providing a mechanism for the project to mitigate these impacts alongside operational impacts. As such, amortizing construction-related emissions and combining these emissions with the operational emissions of the Project, allows for a comparison of the Project's total emissions to the BAAQMD-recommended threshold of significance for GHG emissions.

Nevertheless, in response to the comment, the analysis also reviewed other construction-specific thresholds adopted by other lead agencies throughout the state. For example, the Sacramento Metropolitan Air Quality Management District has identified an annual threshold of 1,100 MT CO_2e for the construction phase of all project types. SMAQMD recognizes that, although there is no known level of emissions that determines whether a single project will substantially impact overall GHG emission levels in the atmosphere, a threshold must be set to trigger a review and assessment of the need to mitigate project GHG emissions (SMAQMD 2021). The threshold set by SMAQMD was developed to allow lead agencies to assess the consistency of proposed projects with AB 32 and SB 32 reduction goals. As stated previously, the Project's construction-related GHG emissions would be approximately 555 MT CO_2e; thus, these emissions would not be considered to be cumulatively considerable under the SMAQMD guidance. As shown in Table 3.8-4 of the Draft EIR, the Project's annual GHG emissions, including the emissions associated with construction activities, would not exceed the BAAQMD efficiency threshold established under AB 32 nor the local service population efficiency 2030 target and no mitigation is required. No changes to the analysis or conclusions of the EIR are required.

Comment HOLZEMER-55:

49) Cumulative Impact C-GHG-1: GHG Emissions – again, there are several proposed projects omitted by this EIR design that should have been studies in this EIR – including 123 Sherman,

380 Cambridge, 200 Portage, etc. These projects are listed previously in these comments. EIR Page 3-113.

Response to Comment HOLZEMER-55:

Please see response to comment BECKETT-7. As described in Section 3.8.4 of the Draft EIR, the geographic scope of consideration for GHG emissions is on a global scale, because such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. The GHG emissions impact analysis in C-GHG-1 constitutes a cumulative analysis, in that it considers global, statewide, and regional projections of GHG emissions, as well as the contribution of the Project, to GHG emission impacts. The additional projects mentioned in the comment therefore do not change the analysis or conclusions regarding cumulative GHG emissions.

Comment HOLZEMER-56:

50) 3.9.3 Impact HAZ-3: Hazards from Cortese-List Sites – major concerns by neighborhood residents regarding construction and possible release of contaminated groundwater from the Super Fund toxic groundwater plume under the project site. As stated in EIR, this groundwater is located at 16.5 to 18 feet bags, which is the range of where the project's foundation (between 17-27 feet bags) is to be built. This means that contaminated groundwater is likely to be encountered during construction. What is the process (in detail) that will be done when contaminated soil is found? How will residents in the neighborhood be informed and what steps will be taken to minimize any residential contact with the contaminated soil? The California-Olive-Emerson contaminant plume is a Federal Super Fund site and therefore is a major concern to all neighborhood residents. Residents must be informed whenever this contaminated soil is encountered. EIR Page 3-124.

Response to Comment HOLZEMER-56:

The potentially significant impacts of the Project relating to the presence of the California-Olive-Emerson (COE) regional groundwater plume are identified and discussed in Section 3.9.3 of the Draft EIR (Impact HAZ-3), and mitigation measures are detailed to reduce the impacts to less-than-significant. Mitigation measure MM-HAZ-3A requires that additional assessment (Site Assessment and Conceptual Site Model) be undertaken to characterize the extent of any soil, groundwater, and soil gas at the project site, identify potential exposure pathways, evaluate hazards, and make recommendations for soil handling and construction dewatering and develop a Site Management Plan, based on the results of the characterization. This process will be overseen by the Selected Regulatory Agency (either the County of Santa Clara Department of Environmental Health, the San Francisco Bay Regional Water Quality Control Board, or the California Department of Toxic Substances Control, depending on which agency claims jurisdiction over the voluntary cleanup program). The Developer will undertake any public notification and consultation required by the Selected Regulatory Agency, or by applicable federal, state or local regulations, as part of that process.

Comment HOLZEMER-57:

51) MM-HAZ-3A: Perform Site Assessment and Implement Associated Recommendations – a statement reads – that "The Developer shall provide the results from a completed Site

Assessment and Conceptual Site Model to a "selected regulatory agency" – BUT, this isn't enough for residents. Why aren't residents involved in getting the results from a completed Site Assessment and Conceptual Site Model? It's vital that the neighborhood be involved and aware of what the Site Assessment says and have an opportunity to comment on it. Who is this "selected regulatory agency" and who do they represent --- the County? No, it needs to be the residents who live in the neighborhood. EIR Page 3-125.

Response to Comment HOLZEMER-57:

See response to comment HOLZEMER-56. This comment does not raise any specific environmental concerns that require a response under CEQA.

Comment HOLZEMER-58:

52) MM-HAZ-3B: "Obtain permit for construction dewatering of contaminated groundwater" (as needed) – the neighborhood needs to be informed and be asked to comment on any construction permit – before it is issued -- regarding the removal of any toxic plume soil and/or its groundwater. Details on what is being dewatered, where on the site it is being done, the amount of dewatering that will be done, and for how long a period of time must be provided residents. The correct federal or state agencies and developer must contact and inform the neighborhood and its residents about any contact the construction crews encounter with contaminated soil or groundwater immediately. EIR Page 3-126.

Response to Comment HOLZEMER-58:

See response to comment HOLZEMER-56. .

Comment HOLZEMER-59:

53) MM-HAZ-3D: Prepare and Implement a Site-Specific Health/Safety Plan – this plan must be available for review and inspection by all residents in the neighborhood, not just the proper federal and state responsible agencies. It is not enough to have this plan reviewed by the proper agencies – the local neighborhood should also be aware of any safety plan involving hazardous materials. EIR Page 3-127.

Response to Comment HOLZEMER-59:

This comment does not raise any specific environmental concerns that require a response under CEQA.

Comment HOLZEMER-60:

54) MM-HAZ-3D, under "operation", the statement reads "groundwater contamination from the Superfund plume has migrated beneath the project site" – clearly this presents a dangerous situation for not only the project's residents, but all neighborhood residents as well. The statement continues, "volatile organic compounds present in the groundwater could migrate upward through soil pores and potentially impact air quality in the new building" – this is MAJOR warning about the dangers of this toxic groundwater plume. EIR Page 3-127.

Response to Comment HOLZEMER-60:

The potentially significant impacts of the Project relating to the presence of the California-Olive-Emerson (COE) regional groundwater plume, including from vapor migration, are identified and discussed in Section 3.9.3 of the Draft EIR (Impact HAZ-3), and mitigation measures are detailed to reduce the impacts to less-than-significant.

Comment HOLZEMER-61:

55) MM-HAZ-3E: Install vapor barrier and perform periodic indoor air testing -- Installation of a building vapor barrier is critically important for not only the project residents, but the entire neighborhood. Details on the vapor barrier, how it will be installed, by whom, and when are all details critically for the neighbors to be aware about. Who is doing the monitoring of the air quality is important as well – how often will this be done, by who, will a report be issued? EIR Page 3-128.

Response to Comment HOLZEMER-61:

As discussed in Section 3.9.3 of the Draft EIR (Impact HAZ-3), the design, installation, and operation of any vapor intrusion management system or other engineering controls installed at the project site and any periodic testing or monitoring of indoor air quality, if required, would be reported to the Selected Regulatory Agency overseeing the voluntary cleanup program and would meet any requirements specified by the Selected Regulatory Agency or applicable federal, state, or local regulations.

Comment HOLZEMER-62:

56) Impact HAZ-5: Emergency Response or Evacuation Plan Impairment – under "construction", residents are extremely sensitive and concerned about lane or street closures. Sherman, Grant, Park, and Sheridan are all connector streets to our residences and are major pathways to our jobs and other activities throughout our daily routines. Closing streets and not allowing for quick and easy access to these streets will not be acceptable to the neighborhood. It vital that emergency vehicles (Fire trucks, ambulances and police) have total access, at all times of the day or night on these streets. With the construction of the Public Safety Building (new headquarters for Police and Fire in Palo Alto), it's of vital necessity that our roads -- Sherman, Sheridan, Grant, and especially Park, be open and available all day, everyday. Park, especially, is a major connector to Oregon Expressway and the 101 freeway and its closure is not acceptable at any time of the day and won't be by residents. Any discussion of a "Traffic Control Plan" or TCP needs to have discussion with neighborhood residents – NOT just the City Staff, who don't live here. Residents and the Mayfield neighborhood need to be involved on any traffic control process or decisions. EIR Page 3-129.

Response to Comment HOLZEMER-62:

Please see response to comment BECKETT-5.

Comment HOLZEMER-63:

57) Impact HAZ-5 – under "operation", no impacts are discussed in the EIR about the stacked parking operation or its impact on emergency situations – why? It's obvious that there will be potential car fires in the garage and in an emergency situation (earthquake or just a car fire), what will happen to the other cars that are "stacked" there? How will a major power failure (for hours or days) or a major collapse of the stacking system be handled? What is the potential for a fire to spread to other cars and what preventative steps are being taken since fire personnel will be in an enclosed garage space, with poisonous gases? Again, neighbors should be aware of how these emergency problems will be handled as it could affect them. EIR Page 3-129.

Response to Comment HOLZEMER-63:

See response to comment HOLZEMER-48.

Comment HOLZEMER-64:

58) 3.9.4 Cumulative Impacts/Mitigation -- under C-HAZ-3 -- the statement, "any measures necessary to protect construction and operation related to health and environment at other cumulative sites would be "confined" to those sites and would not be an additive in nature" is totally false and misleading. It's been known for over 30 years that this toxic plume does affect our residents and the future health of its people, children, especially. Again, not all the proposed projects in the area are being examined in this EIR in a cumulative way. EIR Page 3-131.

Response to Comment HOLZEMER-64:

Please see response to comment BECKETT-7. As discussed in Section 3.9.4 (Impact C-HAZ-3) of the Draft EIR, the COE regional groundwater plume is being remediated by a variety of parties with regulatory oversight from several agencies. Any future projects, including the ones previously mentioned in earlier comments, that are located within the area affected by the plume would be evaluated and remediated on a case-by-case basis, with mitigation measures recommended as needed to reduce potential impacts. The oversight agencies would require any mitigation measures to address potential impacts both on that specific project site as well as adjacent properties. For example, a vapor barrier or extraction system on one property would need to be designed to avoid transferal of vapor migration issues onto another property. Furthermore, measures taken to reduce potential exposures to construction workers (e.g., fugitive dust controls, soil and water handling procedures) would also serve to reduce potential impacts to nearby residents during construction. Exposure limits for construction workers, as required by federal and state OSHA regulations, are developed to be protective of health from both short-term, acute exposures and long-term, chronic exposures, and therefore account for cumulative exposure over a workers' career or lifetime.

Comment HOLZEMER-65:

59) Cumulative Impact C-HAZ-5 – in this section you have a totally false statement -- "the only known past, present, or reasonably foreseeable project is the Public Safety Building". Not true, not even close. As mentioned earlier, there are at least 5 or 6 other neighboring projects being planned for in this neighborhood that are not a part of the cumulative study of this EIR. EIR Page 132.

Response to Comment HOLZEMER-65:

Please see responses to comments BECKETT-7 and BECKETT-11.

Comment HOLZEMER-66:

60) 3.10.3 Impact HYD-1: Water Quality Standard Violations, under "construction", construction dewatering "may be necessary". It's vital that any dewatering process be fully disclosed to the neighborhood before the process is allowed to start. Full disclosure of the process, who is doing it, how long it will take, how many gallons are being extracted, and the dewatering process details need to be made public. What specific steps will the County take to ensure that any dewatering process is full disclosed to the neighborhood? EIR Page 3-142.

Response to Comment HOLZEMER-66:

See response to comment HOLZEMER-56.

Comment HOLZEMER-67:

61) Impact HYD-2 Groundwater Supply and Recharge, under "construction" – that in the eastern portion of the project site, excavation would occur up to a max. depth of 17-27 feet bags, which is below the current known position of the toxic Super Fund plume. Any excavation or penetration of the contaminated soil or the toxic plume needs to disclosed publicly and communicated quickly to local residents and the entire neighborhood. Dewatering is not considered "minor" in Palo Alto and it certainly is not considered. "short term" as the EIR states. Dewatering is a major concern in any construction project and we take its impacts very seriously. We consider any dewatering to be significant and the neighbors need to be made aware of this potential activity and the process. EIR Page 3-143.

Response to Comment HOLZEMER-67:

Impact HYD-2 relates to the impacts of the project on groundwater supply and recharge. The threshold of significance for this impact, as described in Section 3.10.3 (Impact HYD-2), is that the project would have a significant impact if it would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. As discussed in the Draft EIR, the Project would not require dewatering that would exceed this threshold. See response to comment HOLZEMER-56 for discussion relating to the COE regional groundwater plume.

Comment HOLZEMER-68:

62) Impact HYD-5, under "Impact Analysis", any dewatering of the project needs public awareness and what the process will be. During construction, any contact with contaminated soil or groundwater should be automatically disclosed to the neighborhood and all residents. Having just a "Plan", as outlined in MM-HAZ-3B is not enough – disclosure to residents must happen. EIR Page 3-146.

Response to Comment HOLZEMER-68:

See response to comment HOLZEMER-56.

Comment HOLZEMER-69:

63) 3.10.4, Cumulative Impact C-HYD-1, again, there were a range of proposed projects that were never studied or analyzed in this EIR. There are 5 or 6 projects in the immediate area – 300 Lambert, 200 Portage, 123 Sherman, etc. which were never studied nor included in this EIR. EIR Page 3-147.

Response to Comment HOLZEMER-69:

Please see response to comment BECKETT-7. The additional projects mentioned by the commenter would be subject to the same regulations and requirements relating to stormwater control, non-stormwater discharges, hydromodification management measures, and groundwater contamination as described for other cumulative projects in Section 3.10.4 of the Draft EIR. The analysis and conclusions within this section are therefore still valid and no changes to the EIR are required in response to this comment.

Comment HOLZEMER-70:

64) 3.11.3, Impact LUP-1: Physically Divide A Community, under "construction", residents believe that the impacts would be "unavoidable" and "more than significant" if changes in the

road closures are not made. EIR claims that the road closures would be "temporary disruption" is totally false and not acceptable to residents. For example, Grant is one of the main connector roads to Park Blvd., which is a main pathway to Oregon Expressway (freeways, 101 and 280). Hundreds of residents in our neighborhood use this road to connect to jobs in Silicon Valley and beyond. These are not "short-term" inconveniences that is portrayed in the EIR – did anyone from AECOM (the EIR authors) contact the neighbors about their thoughts on road closures – never once! These are not "temporary disruptions" AT ALL! It's a falsehood. A "traffic control plan or TCP" is ridiculous without serious discussion, communication involving the neighborhood. It's a falsehood of lies to say that there is "no impact". County and AECOM officials should be ashamed of themselves. EIR Page 3-150.

Response to Comment HOLZEMER-70:

As discussed in Section 3.11.3, the threshold of significance for Impact LUP-1 is whether the project would physically divide an established community. Although the Project would include complete closure of Grant Avenue between Birch Street and Park Boulevard for a 4- to 8- week period during crane setting of modular units, this one-way section of Grant Avenue is not a public street. Furthermore, the project site is in an urbanized area of Palo Alto where the street grid pattern provides alternate travel routes throughout the City, for example, Sheridan or Sherman Avenues could be used as alternative routes to travel from Birch Street to Park Boulevard, during the period when Grant Avenue would be temporarily closed. As required by MM-C-TRA-3 (as amended in response to comments JCC-3 and BECKETT-11) the Project contractor would coordinate their construction traffic control plan with that of the nearby Public Safety Building project and any other construction projects occurring nearby at the same time, to ensure that temporary lane and/or road closures and detour routes do not conflict, and to specifically state that closures of Grant and Sherman Avenues at the same time shall be avoided to the maximum extent feasible.

Comment HOLZEMER-71:

65) Impact LUP-1, under "operation", the EIR has a false and misleading statement – "proposed land uses are compatible with the existing development in the surrounding area". It's false and misleading statement because all other residential complexes in the Mayfield area are zoned RM-40 (40 units per acre). There are no RM-80's (the density of 231 Grant is approx., 80 units per acre) in the Mayfield area. This should be clarified and corrected in the final EIR. EIR Page 3-150.

Response to Comment HOLZEMER-71:

See response to comment BECKETT-2. In addition, the analysis of Impact LUP-1 in Section 3.11.3 of the Draft EIR addresses the potential of the project to physically divide the community. The proposed Project, although at a higher level of residential density than surrounding residential developments, would not introduce a use or physical feature that would create a barrier, divide, or separate adjacent uses.

Comment HOLZEMER-72:

66) 3.11.4, Cumulative Impacts/Mitigation – this project will have "significant and unavoidable" impacts to the community, especially during the construction timeframe. Why didn't the EIR include any analysis of the road closure impacts of the Public Safety Building (Sherman is closed now) or is the on-going, possible permanent closure of California Avenue (due to COVID

concerns) a part of the cumulative impacts that the EIR should have studied. These road and street closures are going on now and impacting residents daily. EIR Page 3-152.

Response to Comment HOLZEMER-72:

Please see responses to comments BECKETT-7 and HOLZEMER-70.

Comment HOLZEMER-73:

67) 3.12, Noise and Vibration, under "Ambient Noise-Level Surveys", statement reads, "ambient noise levels in the vicinity of the project site were measured between February 3rd and February 4th, 2021 (this year)". These ambient noise levels were taken during the worst COVID months of the past year (there was a major lock-downs of many businesses going on at the same time). Obviously, these measures – however accurate they may be – do not reflect the true noise level measure of the surrounding area. At this time, travel was discouraged –except for essential workers. These measures are inaccurate by normal standards and need to be changed or adjusted, using more correct measurements in the area. EIR Page 3-157.

Response to Comment HOLZEMER-73:

As correctly stated by the commenter, the ambient noise measurements taken in February 2021 occurred at a time when traffic and other activity in the area may have been at lower levels than pre-Covid conditions or how conditions may be at this point in time or in the future as the world continues to recover from the global pandemic. However, as shown in Table 3-3, the ambient noise levels measured at the site are in a similar range to those measured in 2017 for the nearby Public Safety Building project[13] at the corner of Birch Street and Sherman Avenue (approximately 500 feet west of the Project's long-term measurement location), except that the day/night average sound level (L_{dn}) was lower in 2021 than in 2017.

Table 3-3 Comparison of Ambient Noise Levels in Project Vicinity in 2017 and 2021

Date	Measurement Location	L_{dn}/ CNEL (dB)	Daytime L_{eq} (dB)	Daytime L_{max} (dB)	Nighttime L_{eq} (dB)
September 2017	Corner of Birch Street and Sherman Avenue	63.2	55.1 – 62.2	87.6	46.4 – 60.6
February 2021	Near center of 231 Grant Avenue property	55	58	88	52

Source: 2017 data from Public Safety Building Draft EIR; 2021 data from 231 Grant Educator Workforce Housing Draft EIR.

Acronyms: dB = decibels; Ldn = day-night average noise level; Leq = equivalent noise level; Lmax = maximum instantaneous noise level during a specific period of time;

Furthermore, because the ambient noise levels measured at the site are expected to be lower than what might be "normal" without Covid-related reductions in activity levels, this represents a more conservative baseline against which to compare anticipated Project noise levels. For example, one of the significance thresholds for operational noise impacts is whether existing ambient noise levels at the nearest sensitive receptor would be increased by more than 5dBA (Section 3.12.3 of the Draft EIR). Using the (assumed lower) values measured in February 2021 would therefore yield a lower dBA threshold for measuring the Project's noise impacts than using higher values that weren't affected by Covid-related reductions in activity levels. The analysis of construction traffic noise and operational traffic noise did not use the measured ambient noise levels. Instead, the proposed increase in traffic volume associated with project construction and

[13] https://www.cityofpaloalto.org/files/assets/public/public-works/engineering-services/webpages/pe-15001-public-safety-building/palo-alto-public-safety-building-draft-eir_jan2018-reduced-file-size.pdf

operation were compared with the existing traffic volumes on local roadways (see response to comment HOLZEMER-126 for discussion of the method used to estimate existing traffic volumes).

Comment HOLZEMER-74:

68) 3.12, under "Existing Vibration", Were there any accurate measurements of the vibrations taken around the project site currently? Not clear if the data presented was from 2018, which would not be accurate to today's measurement of vibration surrounding the project site. Were any measurements taken during our most severe COVID-impacted months? If so, when exactly? No clarification in the EIR about how these measurements were taken -- in COVID months? EIR Page 3-160.

Response to Comment HOLZEMER-74:

No measurements of existing vibration levels were taken as part of the EIR analysis. The description of existing vibration environment in Section 3.12.1 is based on observations of the project vicinity and information about typical vibration levels associated with vehicular traffic from the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment Manual*[14]. As discussed in response to comment GOLD-6, this section has been revised to include additional information regarding vibration associated with the Caltrain railroad tracks, approximately 410 feet north of the project site but this additional information does not change the conclusions of the Draft EIR.

Comment HOLZEMER-75:

69) 3.12, Impact NOI-1: Ambient Noise Levels, clearly a major problem (found to be "significant" and "unavoidable" in EIR). NOT ACCEPTABLE. Construction traffic and the volume of truck visits is simply not acceptable by the residents. Contrary to the EIR, it's clear that the addition of at least 65 construction related vehicle trips PER HOUR would generate several major traffic noise congestion issues and an endless bottleneck of honking horns for residents, given the already road closures of Sherman (for the Public Safety Building) and California Avenue (due to COVID-related decisions). The falsehood that somehow because traffic volume is not "doubled", it wouldn't cause any perceptible increase in traffic noise" is a simply totally false and a misunderstanding EIR statement of the neighborhood noise levels today (remember these noise levels were not measured correctly anyways). EIR Page 3-167.

Response to Comment HOLZEMER-75:

See response to comment BECKETT-6 and revisions made to Section 3.12-3 (Impact NOI-1) in response to that comment. In addition, as discussed in Section 3.12-3, construction worker commute trips would be concentrated in the morning and afternoon peak hours, whereas construction truck trips would be spread throughout the workday. During the construction phase with 65 worker commute trips during peak hours (Phase 5, interior finishes/landscaping) there would be negligible truck trips. For Phase 1 (site clearing, grading, and excavation) there would be an average of 9 truck trips per hour during the workday during this 6-week phase, plus 15 worker commute trips in the morning and peak hours. See response to comment HOLZEMER-73 regarding the adequacy of existing noise levels.

[14] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Comment HOLZEMER-76:

70) Impact NOI-1, under "construction equipment" – the noise impacts on residents, especially construction hour changes (some starting as early as 5 a.m.) are unacceptable and will not be tolerated. At no time, has County or City officials come to the neighborhood to discuss these possible extreme construction hours or the impacts on their daily quality of life in the neighborhood. Construction work must be conducted during the normal construction hours (8 a.m. to 6 p.m.) each weekday. Why isn't the neighborhood involved or outreach done on any extreme construction hours? This is a "residential neighborhood" and the project designers, engineers, construction crews, need to understand that fact each and every day they come to work. The City/County must contact the neighborhood and residents about any extreme construction hours, outside the normal ones. EIR Page 3-168.

Response to Comment HOLZEMER-76:

As discussed in Section 3.12-3 of the Draft EIR, mitigation measure MM-NOI-1 requires that in the limited instances where adherence to the City's allowable hours of construction is not feasible, an exception permit shall be required from the City of Palo Alto (and a variance from the County if work is proposed outside of the County's allowable hours of construction). The Developer and construction contractor would comply with any conditions imposed by the permit/variance and would undertake any public consultation or notification required as part of the permit/variance process. In addition, the mitigation measure requires advance notice to owners and occupants of residential properties in proximity to the project site. As discussed in response to comment HOLZEMER-20, the distance for such notification has been extended.

Comment HOLZEMER-77:

71) MM-NOI-1: Construction Noise Reduction Measures – as indicated in the EIR, these impacts would be significant and unavoidable, but not just to abutting residences, but to the entire neighborhood. Question – who wrote the section on "construction hours"? – certainly not the EIR authors, since they don't know that adherence to the City construction hours is paramount for residents. Any advance notice for extreme construction hours should go to residences first beyond 50 feet (which is a ridiculous #). The distance should be at least 150 feet or within a two/three block distance from the project site. Many residents, outside 50 feet, will be affected by the extreme construction hours. How was this number (50 feet) established, and by who? What is this number based on? Explain in detail how the 50 feet was decided upon. EIR Page 3-170.

Response to Comment HOLZEMER-77:

As discussed in responses to comments HOLZEMER-20 and HOLZEMER-76, the required notification distance in MM-NOI-1 has been increased.

Comment HOLZEMER-78:

72) MM-NOI-1, statement – "staging areas and stationary noise-generating equipment, such as compressors, shall be located – as far away – from noise-sensitive uses as feasible" – what does this mean? What do you mean, specifically, about "as far away"? Not clear. EIR Page 3-171.

Response to Comment HOLZEMER-78:

See response to comment BECKETT-13.

Comment HOLZEMER-79:
73) MM-NOI-1, statement, "Idling times of equipment, up to 5 minutes" – who is monitoring this? How will this be accurately measured? Who is responsible? Phone #'s, etc.? EIR Page 3-171.

Response to Comment HOLZEMER-79:
See response to comment BECKETT-9.

Comment HOLZEMER-80:
74) MM-NOI-1, statement, "smart back-up alarms will automatically adjust to ambient noise levels" -- all back-up alarms on construction equipment should be silent and replaced with human spotters, period – no back-up alarms activated on project site. Back-up alarms are too loud and disturb residents. EIR Page 3-171.

Response to Comment HOLZEMER-80:
See response to comment BECKETT-14.

Comment HOLZEMER-81:
75) MM-NOI-1, D. "Temporary sound barriers" – Sound barriers should be used and maintained around the entire project site. Street frontage barriers MUST be higher than 8 feet (not only up to 8 feet) – recommend the height of these barriers be discussed and adjusted with residential/neighborhood input and outreach. No neighborhood outreach on these barriers have been made. EIR Page 3-171.

Response to Comment HOLZEMER-81:
See response to comment BECKETT-15.

Comment HOLZEMER-82:
76) MM-NOI-1, "even with implementation of MM-NOI-1A through NOI-1D, the construction noise will be significant and unavoidable" – this is a major and very concerning statement by the EIR. Most neighborhood residents are not even aware of this statement – no neighborhood outreach has been done – why? Community meetings are NOT neighborhood meetings – inviting the entire "community" (from Palo Alto and beyond) is not inviting the neighborhood. Why can't County officials (not the PR firm of the Developer's) meet with the neighborhood (defined by a five-block radius from the project site) and explain these concerns and what their impacts are? No County officials have met with the neighborhood exclusively. EIR Page 3-172.

Response to Comment HOLZEMER-82:
See response to comment HOLZEMER-3 regarding public consultation. In accordance with Section 15093 of the CEQA Guidelines, the County Board of Supervisors, when considering the Project, will need to decide whether the economic, legal, social, technological, or other benefits of the Project, including region-wide or statewide environmental benefits, outweigh the significant and unavoidable impacts of the Project identified in the EIR.

Comment HOLZEMER-83:
77) MM-NOI-1, under "Project-Generated Traffic" – the problem with the EIR's entire Traffic Impact Assessment is that assumes that daily traffic patterns remain consistent and regular each day. The increase suggested – 145 average daily trips – is totally underestimated because many residents who live in the project building will take several car/vehicle trips each and every day –

trips to the grocery store, trips to the kids to school and bring them back, trips to soccer practices, etc. etc. These trips are irregular and do not represent a true reflection of the vehicle trips this project will present to the neighborhood. To say that only because the "project doesn't double the existing traffic volume – volumes which was measured during COVID and/or more than 5 years ago (during the Public Safety Building traffic study) – so there will be no imperceptible increase in traffic-related noise" is simply a false and misleading statement by the EIR/County authors. EIR Page 3-173.

Response to Comment HOLZEMER-83:

Section 3.12-3 of the Draft EIR, under the heading "Project-Generated Traffic" contains an error. The Project is estimated to generate 145 vehicle trips in the AM peak hour, as described in Section 4.1 of the Traffic Impact Assessment (Appendix E-2 of the Draft EIR); not 145 trips per day, as stated in Section 3.12-3 of the Draft EIR. However, the Existing plus Project peak-hour traffic volumes shown for each roadway in Table 3.12-8 of the Draft EIR are correct; and it is these volumes which were used to analyze potential noise impacts from project-generated traffic. Revisions are proposed to correct the error in the first sentence of this section of the Draft EIR.

Project generated trips were estimated using trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation Manual (10th Edition) for residential and café land uses, with a 9 percent reduction due to proximity to transit, in accordance with VTA's guidelines. The TIA focuses on the traffic conditions during both AM and PM peak hours as these times would have the highest number of trips generated by the Project. The Project would generate trips throughout the day, but at a lower rate than the peak hours. In addition, the surrounding streets will also have lower traffic volumes during the non-peak times. See response to comment HOLZEMER-129 for discussion of the adequacy of the existing traffic volumes used in the analysis.

Comment HOLZEMER-84:

78) MM-NOI-1, under "Delivery and Trash/Recycling Trucks" – several points, why would delivery or trash trucks ever be allowed to "idle" at all? What warnings do you give? At many residences in the neighborhood, trucks are asked to "turn off" their engines when delivering food or other services. Statement – "driveway design positions the delivery vehicles under the upper floors of the building creates a physical noise barrier for residents" – however, what are the sound barriers for the residents surrounding the building? What are the plans to deal with idling delivery trucks that surround the building? The neighborhood should be considered first and the noise impacts from these vehicles. No delivery vehicles should limit residential access to Grant, Birch, or Park at any time. EIR Page 3-173.

Response to Comment HOLZEMER-84:

Operational decisions of delivery and trash/recycling truck drivers is outside of the control of the County or Developer; therefore, the EIR analysis is based on the assumption that some idling of such trucks would occur. As discussed in Section 3.12.3 of the Draft EIR, the noise impacts from delivery and trash/recycling trucks would be consistent with existing noise levels and would not significantly contribute to an increase in ambient noise levels at sensitive receptors near the project site. With respect to blocking access to residential properties, truck drivers would be required to adhere to existing traffic regulations and City ordinances.

Comment HOLZEMER-85:

79) MM-NOI-1, under "Outdoor Courtyards" – concern over loud music and/or voices coming into the neighborhood from the courtyards. No parties, with amplified music, should be allowed in these courtyards at anytime, day or night. What rules will residents have to follow in regards to these courtyards? These rules should be disclosed to the neighborhood residents. EIR Page 3-174.

Response to Comment HOLZEMER-85:

As discussed in Section 3.12.3 of the Draft EIR, noise from music or parties is regulated by the City's noise ordinance and enforced by the City's code enforcement division. As the Project would be located on property owned by the County, this noise would also be subject to the County noise ordinance.

Comment HOLZEMER-86:

80) MM-NOI-1, under "Summary of Operational Noise Impacts" – once again, any information on the daily noise levels of the parking stacking system is omitted by the EIR. Why? What are the noise impacts on a daily basis? No mention of this system or its operational capabilities are even mentioned by the EIR authors. EIR Page 3-175.

Response to Comment HOLZEMER-86:

WAITING ON MORE INFO RE PARKING STACKER

A noise study of an installed parking system similar to that proposed for the Project measured noise levels of between 50 and 63 dBA Leq at a distance of 5 feet from the motor,[15] depending on the type of lift action (e.g., no movement, vertical or horizontal lowering vehicle movement). Specifications for another similar model indicate maximum sound levels of between 41 and 59 dB measured 15 inches from the front of the system[16]. Without accounting for any screening from physical barriers, noise from the parking stacker system would attenuate to 54 dBA within a distance of less than 15 feet.[17] The edge of the parking garage would be approximately 10 feet from the rear boundary of the project site and approximately 20 feet from the adjacent residential building, and more than 50 feet from any other residential property boundary. Actual noise levels from the parking stacker systems at the boundary of nearby residential properties would be substantially less than this due to the screening effects of the parking garage walls. Operational noise from the parking stacker system therefore would not exceed the County's daytime (60 dBA) and nighttime (55 dBA) standards for operational noise at residential site boundaries and would also comply with the City's noise standard of no more than 5 dBA above the existing ambient noise levels of 58 dBA (daytime) or 52 dBA (nighttime) at the nearest sensitive receptor.

Comment HOLZEMER-87:

81) Impact NOI-2: Groundborne Vibration – again, EIR states, this impact is "significant and unavoidable" to the neighborhood. Has this fact been communicated or any outreach done to the neighborhood – nothing by either the County or its Developer has been done. Most neighborhood residents (those in a 5-block radius) are not even aware of this "significant or

[15] Veneklasen Associates, Sound Measurements of Parking Lift Operation, CityLift Puzzle, 2018.
[16] Klaus Multiparking Inc., Acoustic Data, TrendVario 4xxx Parking System.
[17] Based on a standard noise attenuation rate of 6 dBA per doubling of distance from stationary equipment.

unavoidable" impact and why hasn't this outreach been done? Doing nothing to inform the neighborhood is NOT ACCEPTABLE. EIR Page 3-175.

Response to Comment HOLZEMER-87:

See response to comment HOLZEMER-3.

Comment HOLZEMER-88:

82) NOI-2, under "Construction" – "structural damage occurs only when certain types of construction activity – earth moving, heavy truck traffic – occur very close to existing structures". There are many residential structures next to or within 100 yards of the project site which could experience structural damage due to vibration activities at the project site – what kind of process will be put in place to not only minimize vibrations, but to ensure that abutting or near-by residential structures are not damaged? Who is responsible for the vibration issue during construction? If damage does occur to either residential buildings or our underground garages, how will that process be handled? By whom and when will the damage be fixed? EIR Page 3-176.

Response to Comment HOLZEMER-88:

See response to comment HOLZEMER-44.

Comment HOLZEMER-89:

83) MM-NOI-2: Vibration. Reduction Measures, A. In this section, the only neighborhood residents considered are those in either 200 Sheridan or the Courthouse Plaza office building. Construction vibration and its affects are well known to travel beyond simply 50 feet from any construction project. All of the surrounding residential properties, around the project site – on Birch, Park, and Sheridan – should be included in these vibration reduction measures. B. No vibration equipment usage outside City construction hours – who is monitoring and how will it be enforced – by who? EIR Page 3-179.

Response to Comment HOLZEMER-89:

As discussed in Section 3.12-3 of the Draft EIR and response to comment HOLZEMER-44, the potential for Project construction equipment to cause vibrations that would exceed the applicable threshold for building damage would not extend beyond a distance of 15 feet, and therefore would only have the potential to cause significant impacts to the adjacent properties at 200 and 260 Sheridan Avenue.

With respect to human annoyance, the Draft EIR acknowledges that there would be a significant and unavoidable impact to nearby residents. The most vibration-intensive construction equipment for the Project would be a vibratory roller, which has a reference vibration level of 94 VdB at a distance of 25 feet. Vibration from this equipment would be expected to attenuate to a level below the 72 VdB threshold for human annoyance at residential buildings within a distance of approximately 150 feet[18]. Revisions have been made to mitigation measure MM-NOI-2 to increase the distance for required notification regarding the construction schedule and project disturbance coordinator contact details from 50 feet to 150 feet. These revisions to the mitigation measure would not reduce vibration impacts to a less-than-significant level; therefore, the

[18] Calculated for vibratory rollers with a reference value of 94 VdB at 25 feet, using the following equation: Vest = Vref-30*LOG(D/25) where Vest = estimated vibration level and D = distance between source and receptor.

conclusion in the Draft EIR that vibration impacts during construction would be significant and unavoidable remains valid.

Comment HOLZEMER-90:

84) MM-NOI-2, "real-time vibration monitoring" – how often and by who (names, phone #'s)? by a "qualified acoustic consultant" (again, who is this and how is he/she to be contacted?). EIR Page 3-180.

Response to Comment HOLZEMER-90:

The Mitigation Monitoring and Reporting Plan (MMRP) for the Project is included in Appendix B of this Final EIR. This MMRP sets out the monitoring and reporting action, implementation timeframe, implementation responsibility, and implementation oversight for each of the mitigation measures that will be required to be implemented if the Project is approved, including MM-NOI-2.

Comment HOLZEMER-91:

85) Impact NOI-2, under "operation" – once again, total lack of omission on any information on the parking stacker system or its vibrations on the neighborhood. What are these details? Nothing provided in the EIR or to the neighborhood. EIR Page 3-180.

Response to Comment HOLZEMER-91:

The parking stacker system would operate using electric motors, which are not anticipated to be a substantial source of vibration.

Comment HOLZEMER-92:

86) 3.12.4 Cumulative Impacts and Mitigation – once again, the omission of many of the proposed projects in the area – 300 Lambert, 200 Portage, 123 Sherman, 380 Cambridge is surprising in this EIR given the cumulative impacts all these projects will have to our Mayfield neighborhood. Some of these projects will be going on at the same time and will impact traffic noise and vibrations in the area. EIR Page 3-180.

Response to Comment HOLZEMER-92:

Please see response to comment BECKETT-7. None of the additional projects mentioned in the comment have any information available regarding anticipated construction dates, construction traffic volumes, or construction equipment. In addition, all but one of these projects are more than 1,000 feet from the project site and therefore are unlikely to generate noise and vibration impacts that would combine with those of the Project, even if their construction periods did overlap. The 123 Sherman project is approximately 130 feet north of the project site, and if the construction periods of this project were to overlap with Project construction, residents in the area could be subject to noise and vibration impacts from both projects at the same time. Because the 123 Sherman project has not yet undergone environmental review, the exact nature of any noise and vibration impacts that would be generated by that project are unknown.

The project plans for the 123 Sherman project do not include any information regarding the volume of demolition debris or soil export that would be required, however given the size of the existing buildings on site and the two-level underground parking garage proposed, it would be reasonable to assume that this project would generate more construction traffic than the 231 Grant Project, which has a smaller existing building to be demolished and would only excavate

to 5-feet depth for most of the building footprint (excluding deep foundations/drilled columns in the eastern corner).

As discussed in Section 3.12.3 of the Draft EIR, an increase in ambient noise levels of more than 5 dBA is typically considered to be a significant increase. In order for traffic noise to increase by 5 dBA, existing traffic volumes would need to increase by more than three times (i.e., an approximately 200 percent increase)[19].

As discussed in response to comment BECKETT-6 and shown in the revisions made to Section 3.12-3 of the Draft EIR (Table 3.12-5A), the most traffic-intensive phase of Project construction (Phase 1, site clearing, grading, and excavation) could temporarily increase existing traffic noise by approximately 3.4 dBA on Grant Avenue, 1.1 dBA on Birch Street, 0.9 dBA on Park Boulevard and 0.3 dBA on Oregon Expressway. If construction of the 123 Sherman project were to overlap with this phase of Project construction, and were to involve similar or higher volumes of construction traffic, it is likely that the cumulative increase in traffic noise could be significant on Grant Avenue, and possibly on Birch Street or Park Boulevard. However, Phase 1 of the 231 Grant Project is scheduled begin in mid-2022 and would take approximately six weeks to complete. Given the current status of the 123 Sherman project (yet to undergo environmental review), it is unlikely that construction of that project would begin prior to completion of Phase 1 of the 231 Grant Project.

Later construction phases for the 231 Grant Project would have substantially lesser traffic volume than Phase 1, as shown in Table 3.12-5 (as revised in response to comment BECKETT-6), but could still make a cumulatively considerable contribution to the cumulative impact if they overlapped with construction of the 123 Sherman project. In addition, residential land uses within approximately 300 feet[20] of both project sites could receive noise generated by construction equipment on both sites, which could be potentially significant.

Revisions have been made to the analysis in Section 3.12-4 to reflect the discussion above; however, because the Draft EIR already identifies cumulative noise impacts from construction as a significant and unavoidable impact, these edits do not change the significance conclusion for Impact C-NOI-1.

With respect to cumulative vibration impacts (Impact C-NOI-2), although there is no available information regarding construction equipment for the 123 Sherman project, it would be reasonable to assume that the 123 Sherman project would use similar equipment to the Project. As discussed in response to comment HOLZEMER-89, vibration levels from heavy equipment such as vibratory rollers would dissipate to below the threshold of building damage (0.5 in/sec PPV) within a distance of approximately 15 feet, and to below the threshold for human annoyance for residential land uses (72 VdB) within a distance of approximately 150 feet. There are no buildings within 15 feet of both project sites. The residential building at 2581 Park Boulevard is within 150 feet of both the 123 Sherman and 231 Grant project sites, and therefore could be subjected to vibrations above the threshold of human annoyance from both projects.

[19] Anticipated increase in traffic noise calculated using N = 10*log[(Ve+Vc)/Ve] where N = increase in traffic noise (in dBA); Ve = existing traffic volume; and Vc = cumulative traffic volume.

[20] Phases 2 through 5 of the Project could result in combined noise from construction equipment of up to 80 dBA at 50 feet (Table 3.12-6 of the Draft EIR). Using a standard noise attenuation rate of 6 dB per doubling of distance, this would attenuate to less than 65 dBA at a distance of 300 feet (conservatively assuming no screening from buildings or vegetation).

Revisions have been made to the analysis in Section 3.12-4 to reflect the discussion above; however, because the Draft EIR already identifies cumulative vibration impacts from construction as a significant and unavoidable impact, these edits do not change the significance conclusion for Impact C-NOI-2.

Comment HOLZEMER-93:

87) Cumulative Impact C-NOI-1, EIR states this impact is "significant and unavoidable". Has this impact been communicated or outreach done to the neighborhood (six-block radius) area? So far, no one from the County or Developer has contacted this neighborhood or has done any outreach about any "significant or unavoidable" impacts in this area. Why? EIR Page 3-181.

Response to Comment HOLZEMER-93:

See responses to comments HOLZEMER-3 regarding project outreach and consultation and HOLZEMER-92 regarding cumulative impacts.

Comment HOLZEMER-94:

88) Cumulative Impact C-NOI-1, under "Operation" – given the Public Safety Building position as the main police headquarters and primary vehicle station, plus being the fire department's headquarters as well, the amount of traffic noise and vibration will like increase to double or triple the current traffic noise levels. We believe the current Table 3.12-14 to be inaccurate based on police traffic (study of traffic in and around Palo Alto's City Hall, where the current police headquarters is) and additional demands if California Avenue re-opens fully for commercial use. Cumulative traffic will increase significantly once the Public Safety Building is in place and 231 Grant will only increase it further. A new cumulative traffic and noise study should be conducted using the current police traffic information from the area around City Hall in downtown Palo Alto. EIR Page 3-182.

Response to Comment HOLZEMER-94:

The cumulative traffic analysis takes account of operational traffic from both the PSB project and 2755 El Camino Real Redevelopment (2755 ECR project), and also applies a growth factor to extrapolate anticipated traffic volumes out to the year 2030 (the horizon year established for the Project in consultation with City of Palo Alto staff), as explained in Section 3.7 of the Intersection Level of Service Analysis (Appendix E-2 of the Draft EIR).

Although the California Avenue closure came into effect in June 2020, prior to preparation of the traffic study, the closure was initially only approved for a 3-month period[21]. The closure period has been extended several times since, most recently through to June 2022[22], which is prior to Project construction is scheduled to begin. Therefore, the traffic study did not account for the California Avenue closure in existing, background, or cumulative conditions. Further extension of the California Avenue closure beyond June 2022 would be speculative and is therefore not appropriate to include in the cumulative analysis.

Comment HOLZEMER-95:

89) Cumulative Impact C-NOI-2: Vibration – EIR states, "significant and unavoidable". Has any outreach or communicate been done to the neighborhood about this impact? None has been to

[21] https://www.cityofpaloalto.org/files/assets/public/city-clerk/resolutions/reso-9909.pdf?t=64949.04
[22] https://www.cityofpaloalto.org/files/assets/public/agendas-minutes-reports/agendas-minutes/city-council-agendas-minutes/2021/09-september/20210913/20210913amccs.pdf

our knowledge. Other cumulative projects should be considered and their impacts – 300 Lambert, 200 Portage, etc. EIR Page 3-183.

Response to Comment HOLZEMER-95:

Please see response to comment HOLZEMER-3 regarding project outreach and consultation and responses to comments BECKETT-7 and HOLZEMER-92 regarding cumulative impacts.

Comment HOLZEMER-96:

90) 3.13 Impact POP-1: Growth Inducement – contrary to the EIR conclusion of at the end of this section, this project is "oversized" for the neighborhood (it exceeds the normal City height limitations, and its density is double what is currently allowed in the area). In addition, the impact on traffic, congestion, and the connector roads will be significant and not minor, as the EIR claims. Obviously, this project is "growth inducing" to this residential neighborhood. EIR Page 3-187.

Response to Comment HOLZEMER-96:

Although the Project is at a higher density than surrounding residential developments and would introduce approximately 273 additional residents to the area, the Project is located within the "California Avenue" priority development area (PDA). PDAs are locally-identified infill opportunity areas located near public transit, that are planned for developing more housing, employment opportunities, and community amenities. The Project would be consistent with overall planned growth in the City and region and would contribute toward the City's fulfillment of its RHNA allocation. As discussed in Section 3.13.3 of the Draft EIR, the City has stated that the Project appears to be consistent with the City's land use designation at this site and with several goals and policies of the City's Housing Element and Land Use Element, because it would increase housing production in a transit rich location, create more affordable housing options for teachers and public employees, and utilize new strategies to help increase housing density and diversity within the City.

Furthermore, the Project would not induce further growth in the City or surrounding areas by removing a barrier to growth or creating a jobs-housing imbalance that would increase the number of employees seeking housing in the area. In fact, by supplying housing to local teachers, full-time school district employees, and other public safety employees that are already employed within the local area, the Project would have a positive effect on the jobs-housing balance with the City of Palo Alto, as discussed in Section 3.13.4 of the Draft EIR.

Comment HOLZEMER-97:

91) 3.14 Public Services and Recreation – under "Parks" – misstatement of facts in EIR – the Stanford/Palo Alto Community Playing Fields is NOT a Park or usable for the "walk-up" resident to use. This facility is by "reservation only" and is only for use for soccer and field hockey type games/practices. It is NOT a Park! No one "picnics" there – a total misrepresentation of what is there and how it is used. The Sarah Wallis Park is also misrepresented at a "park". No kids play there – is not a park for kid to play in. Too small and no playground equipment there. Bowden Park has a small playground but requires kids/parents to go underground (thru a tunnel by the Cal Avenue Train Station) to get there –not acceptable to most parents. NO useable park space for kids, within a half mile from the project site – this is not pointed out in the EIR. EIR Page 3-190.

Response to Comment HOLZEMER-97:
See response to comment BECKETT-16.

Comment HOLZEMER-98:
92) 3.14 Public Service and Recreation – under "Parks" – EIR statement, "With these four recreation areas, the nearest being less than a quarter mile away, the project site is considered relatively well served with park and recreational facilities." Who wrote this misstatement? Where are such words in the City's Parks Master Plan? This is totally inaccurate and a misrepresentation of the current conditions in the Mayfield neighborhood and its lack of park space in the area. Another fact – where is the community indoor recreation center, within a half mile of the project site, that is quoted in the EIR? What are you talking about and where is it located (be specific)? EIR Page 3-190.

Response to Comment HOLZEMER-98:
See response to comment BECKETT-16.

Comment HOLZEMER-99:
93) Impact PSR-1: Demand for Public Services – under Operation, Fire Protection – no mention of the additional fire resources needed or the fire suppression plan for the project's car stacker system or how fire control would work in the event of a major earthquake or collapse of the building structure (due to poor construction)? Details need to be known to the neighborhood so to prevent fires from getting out of control in the building and spreading to neighboring residential complexes/buildings. The car stacker system is a total mystery and the details of how fire suppression will work in this type of situation must be known by the entire neighborhood (especially if professional fire fighters are not available to assist, such as in a major earthquake situation). City Fire officials should meet with neighbors about the fire suppression plans for the building. EIR Page 3-193.

Response to Comment HOLZEMER-99:
See response to comment HOLZEMER-48. The proposed installation of a parking stacker system would have similar fire-protection demand to traditional parking garages and would not require the construction of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.

Comment HOLZEMER-100:
94) Impact PSR-2: Existing Recreational Facilities, under "Operation" – although the EIR does acknowledge an "increase" in the use of existing par and recreational facilities, it does recognize the fact that the City of Palo Alto, including the Mayfield neighborhood, has a huge deficit in existing park space for its residents. Palo Alto should have at least 4 acres of available park space for every 1,000 residents – a standard and practice well known in park space management. The City does not meet this standard today. If you truly exclude the park space that is outside the six-block radius of our neighborhood (which is likely the furthest distance any parents and kids would walk to a park) and the Stanford Playing Fields (which are not a Park), you come up with only 2.3 acres of park space for more than 1,500 residents who live in the Mayfield neighborhood. Anyway you cut it, it means there is a deficit of park space in Mayfield. Why are these data excluded from the EIR? EIR Page 3-195.

Response to Comment HOLZEMER-100:

As described in Section 3.14-3 of the Draft EIR, the significance threshold for Impact PSR-2 is whether a Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

As described in Section 3.14.3 of the Draft EIR, the Project is not anticipated to exceed this threshold of significance, as the approximately 273 residents living at the project site would not cause a substantial increase in the use of existing park and recreation facilities nearby. The proposed 10,000 square feet of usable private open space would include three landscaped courtyards with a variety of passive and active facilities for resident use, such as dining areas with tables and barbeque grills, seating and lounge areas, ping pong and shuffleboard tables, a children's play area, and a dog run. See response to comment VYAS-6 for additional details regarding the proposed children's play area. The presence of these facilities on-site would partially serve the demand for park facilities by Project residents.

Revisions have been made to Section 3.14.1 to acknowledge the City's parkland goals. See also response to comment BECKETT-16.

Comment HOLZEMER-101:

95) Impact PSR-2, under "Operation" – EIR statement says, that "the project would provide approx. 10,000 square feet of private open space to residents". However, using these data and the ratio that all cities should have at least 4 acres of park space for every 1,000 residents, means that the project site should have 1.2 acres of park space for its approx. 300 residents. This means that that the 10,000 square feet of open space is totally inadequate and an underestimate of the amount of park/open space that that building should have. EIR Page 3-195.

Response to Comment HOLZEMER-101:

City standards, although not technically applicable to this Project, generally require at least 75 square feet per unit of common open space for multi-family residential land uses within the city. The 10,000 square feet of usable open space proposed by the Project equates to approximately 91 square feet per unit. The City's standard for common open space for multi-family residential developments is different from the City's goal for public parkland and open space.

Comment HOLZEMER-102:

96) Impact PSR-2, under "Operation" – EIR statement that states, "residents will be dispersed among existing parks and recreational facilities, thereby minimizing substantial impacts on a single existing recreational area" is based on what actual facts? This is an obviously an opinion – with no basis in any facts about Palo Alto. On what basis you do you have any evidence of this "dispersion"? In fact, the truth is most residents – including those in the Mayfield neighborhood -- gravitate toward the "nearest park" and do not travel to distance parks. Most residents will use the nearest parks that are close to their homes – period. EIR Page 3-195.

Response to Comment HOLZEMER-102:

Because the Project would include recreational facilities in the courtyards, including picnic tables and barbeque grills, seating and lounge areas, ping pong and shuffleboard tables, a children's play area, and a dog run, the demand for neighborhood parks for common daily recreational

needs such as dog-walking or children's play would be lower for Project residents compared to those living in developments without such amenities. Project residents would still visit local neighborhood parks, but would also be anticipated to frequent larger parks with unique amenities not available in the development or neighborhood parks, such as the Magical Bridge accessible play area at Mitchell Park, the open space at Baylands Preserve, and the many parks, trails, and other recreational amenities provided by the County and other public agencies such as the Midpeninsula Regional Open Space District.

Comment HOLZEMER-103:

97) Impact PSR-3: New Recreational Facilities, under "Operation" – again, the same false statement about "dispersion", based on no facts about Palo Alto or how we use our parks here. Undoubtedly, as I have spoken to several in our own City's Parks Department, an increase in demand for parks and park space is already clearly a need for our City. The City already has a major deficit in park space, which the EIR never pointed out. Contrary to what is stated in the EIR, more residents will require more dedicated park space. This impact is significant and unavoidable, unlike what the EIR states. Why is the park space deficit in Palo Alto omitted and not stated correctly in the EIR? EIR Page 3-196.

Response to Comment HOLZEMER-103:

See response to comment HOLZEMER-100.

Comment HOLZEMER-104:

98) Cumulative Impact C-PSR-1: Public Services – again, the cumulative effects of a variety of proposed Mayfield neighborhood projects were omitted from the EIR. No acknowledgement was given to projects that are on the planning table – 300 Lambert, 200 Portage, 380 Cambridge, 123 Sherman. All these projects should have been reviewed and studied for this EIR for their cumulative impacts on the neighborhood. EIR Page 3-197.

Response to Comment HOLZEMER-104:

See response to comment BECKETT-7. The cumulative analysis for C-PSR-1 in Section 3.14.4 of the Draft EIR is based on the cumulative growth anticipated by building out of the City's Comprehensive Plan, rather than the "list approach" of cumulative analysis. Both the "buildout" and "list" approaches, or a combination thereof, are permitted by Section 15130(b)(1) i) of the CEQA Guidelines.

Comment HOLZEMER-105:

99) Cumulative Impact C-PSR-2: Existing or New Recreational Facilities – same as #97 above, cumulative effects of the proposed projects on existing or the need for new park space or recreational facilities should have been studied. Why were these projects omitted from this EIR review? EIR states the following – "that cumulative impacts to parks and recreational facilities would be less than significant through compliance with the City's Municipal Code, which requires the provision of recreational space or payment of applicable park impact fees" – is the County or its 231 Grant Developer going to create this additional park space or pay the impact fees for this project? What will the in-lieu fee be and when will it be paid by the County? EIR Page 3-197.

Response to Comment HOLZEMER-105:

See responses to comments HOLZEMER-102 through -104 above. This Project is not subject to the City's development impact fees. However, provision of recreational space or payment of

applicable park impact fees by other cumulative projects within the City's jurisdiction would mean that such projects would not result in impacts that could combine with the less-than-significant impacts of the Project.

Comment HOLZEMER-106:

100) 3.15 Transportation, under "Existing Road Network" – errors in this section for the street closures of both California Avenue (due to COVID decisions) and Sherman Avenue (lasting for another year through the Public Safety Building construction project). Why were these closures, which could be permanent, excluded from this EIR analysis? EIR Page 3-199.

Response to Comment HOLZEMER-106:

See response to comment HOLZEMER-94.

Comment HOLZEMER-107:

101) 3.15.3, Impact TRA-1: Transportation Plan or Program Conflicts, under "Construction" – it states that "a construction traffic management plan would be established and implemented in accordance with City requirements". However, nowhere does it stress the importance of direct communication and involvement with the neighborhood about such a plan. It's vital that such plan have residential input and decisions made based on this neighborhood input. Closure of roads or lane changes cannot be made without neighborhood approval and to give residents a say in what happens on the project site, when, and where. EIR Page 3-206.

Response to Comment HOLZEMER-107:

See response to comment BECKETT-5.

Comment HOLZEMER-108:

102) 3.15.3, Impact of TRA-1, under "Transit" – can someone explain why they anticipate only 11 new transit riders from a potential 275 residents in the project building? How will this be measured and by whom? This means that almost all of the building residents will drive and have multiple vehicle trips between home and work. EIR 3-207.

Response to Comment HOLZEMER-108:

See response to comment BECKETT-17.

Comment HOLZEMER-109:

103) 3.15.3, Impact TRA-2: Vehicle Miles Traveled – the EIR states, "Because the project site is within a low-VMT area, and because the Project would have a "similar density", mix of uses, and transit accessibility, the Project meets the City's Screening Criteria 2 and therefore, a significant VMT impact would not be anticipated". The key part of this message is "similar density" which is inaccurate since the planned project has a density that is double the existing densities in the entire residential area (the project density is nearly 80 units per acre, when all the other residential areas are zoned RM-40). The density is not the same, so it doesn't meet the same standard. EIR 3-209.

Response to Comment HOLZEMER-109:

Although the density of the Project is higher than nearby developments, higher density housing is anticipated for the "California Avenue" Priority Development Area and the Project would have a similar mix of uses and transit accessibility to other developments. Nevertheless, as stated in

Section 3.15-3 of the Draft EIR (Impact TRA-3), although both the retail and residential portions of the Project are considered to meet the City's screening criteria, VMT for the Project was still calculated using the Santa Clara Countywide VMT Evaluation Tool. Based on the key Project characteristics, the calculated VMT rate for the Project would be 5.45 VMT per capita. This is significantly lower than the applicable threshold of 11.33 (i.e., 15 percent less than the countywide average of 13.33); therefore, the Project would have a less than significant impact on VMT.

Comment HOLZEMER-110:

104) Impact TRA-3: Traffic Safety Hazards, under "Construction" – EIR states "the contractor would prepare and implement a traffic control plan a part of the Project, in consultation with the City of Palo Alto", however, there is no mention of involvement of the residents in the neighborhood in such a plan. Communication and involvement and have a voice in this plan is critical. Residents need to have a voice in what happens in their neighborhood and any plan needs to be approved by the neighborhood. Why wouldn't the neighborhood have a say in this traffic control plan? EIR Page 3-210.

Response to Comment HOLZEMER-110:

See responses to comments BECKETT-5 and HOLZEMER-3.

Comment HOLZEMER-111:

105) MM-TRA-3B, Maximize Site Distance – the neighborhood and its residents need to be involved and participate in any discussion eliminating on-street parking in their neighborhood. Parking is a premium in the Mayfield neighborhood and eliminating parking spaces need to have neighborhood involvement and discussion. Safety is important, but so too is the issue around eliminating parking spaces. EIR Page 3-211.

Response to Comment HOLZEMER-111:

As discussed in response to comment JCC-2, parking is not an environmental impact under CEQA.

Comment HOLZEMER-112:

106) Impact TRA-4: Emergency Access – again, the major concern by residents is quick and easy access to our connector roads (Park, Grant, Birch, Sheridan, Sherman, and even California Avenue) which lead to work, hospitals, medical appointments, and other important daily activities that affect our lives. At no time, can quick assess be denied by construction work. Traffic delays could mean lives in danger and this needs to be recognized by all parties. Road closures, even for short period of time, could impact resident's lives. A traffic control plan must have neighborhood involvement and a say in what happens on our neighborhood streets. EIR Page 3-212.

Response to Comment HOLZEMER-112:

Maintenance of emergency access is stated as a requirement of the traffic control plan, along with advance notification to nearby residents regarding the construction schedule, the exact location and duration of activities on each roadway, detours and alternative routes that may be available to avoid delays. See response to comment BECKETT-5 regarding notification procedures for potential traffic delays.

Comment HOLZEMER-113:

107) 3.15.4, Cumulative Impact C-TRA-1: Transportation Plan or Program Conflicts – again, there are a number of proposed projects – 300 Lambert, 200 Portage, etc. that were not studied or examined for their cumulative impacts in this EIR. Needs to be. EIR Page 3-214.

Response to Comment HOLZEMER-113:

As explained in Section 3.7 of the Intersection Level of Service Analysis (Appendix E-2 of the Draft EIR), the cumulative traffic analysis applies a growth factor to "existing plus background" conditions in order to extrapolate anticipated traffic volumes out to the year 2030 (the horizon year established for the Project in consultation with City of Palo Alto staff). The growth factor was based on the "2030 Scenario 5" from the City's Comprehensive Plan, and therefore utilizes the "plan approach" to cumulative analysis, rather than the "list approach". Consideration of individual cumulative projects is therefore not appropriate.

Comment HOLZEMER-114:

108) 3.15.4, Cumulative Impact C-TRA-3: Traffic Safety Hazards and Emergency Access – EIR states, "Along with the Project, construction-related traffic and road closures associated the PSB project could cause additional detours, lane closures . . . overall cumulative impact could be potentially significant. This NOT ACCEPTABLE to residents! EIR Page 3-214.

Response to Comment HOLZEMER-114:

See response to comment BECKETT-11.

Comment HOLZEMER-115:

109) MM-C-TRA-3: Coordination of Construction Traffic Plans – this mitigation is critical and essential to all residents who live in the Mayfield neighborhood. However, beyond just emergency access to all neighborhood properties, residents need to be involved In the planning of any traffic control plan that is implemented between the PSB project and 231 Grant. It is not enough to simply "notify" residents what is happening – they need to be involved in the entire planning process. EIR Page 3-215.

Response to Comment HOLZEMER-115:

See response to comment BECKETT-11.

Comment HOLZEMER-116:

110) 3.17.3, Impact UTI-1: New or Expanded Utility Services – under "Construction and Operation" – EIR states, "Construction of new connections to existing utilities would result in the potentially significant environmental impacts identified in relevant sections of this document". This section concerns residents because digging into the project site soil and ground means possible exposure and release of contaminated toxic groundwater – previously discussed in these comments. All measures need to be taken to ensure groundwater exposure doesn't happen and if it does, it is reported not only to the relevant state and local agencies, but the neighborhood residents as well. Communication and quick outreach to the neighborhood is essential for this project. EIR Page 3-228.

Response to Comment HOLZEMER-116:

As discussed in Section 3.10-1 (subheading "Groundwater") of the Draft EIR, the historic groundwater level in the project area is approximately 15 feet below ground surface, and recent

measurements were approximately 20 to 23 feet below ground surface. The majority of Project excavation, including all utility connections, would take place at less than 5 feet below ground surface; therefore, they would not encounter the contaminated groundwater plume. Deeper excavation and/or drilling will be required for foundation construction in the eastern corner of the project site, and mitigation measures MM-HAZ-3a through MM-HAZ-3d are proposed to reduce the potentially significant impacts associated with contaminated groundwater to a less than significant level.

Comment HOLZEMER-117:

111) 3.17.4, Cumulative Impact C-UTI-2: Water Supply Availability – as residents and believers in a sustainable future for our children, we believe this issue "water supply availability" is nothing less than "significant" and "unavoidable" for California and for the Bay Area. Water is becoming a major issue in California and having enough for the residents who already live here is a concern. The cumulative effect of more buildings, especially office development, should be studied in this EIR and how the project impacts our water supply for future generations. EIR Page 3-229.

Response to Comment HOLZEMER-117:

The cumulative analysis for water supply impacts in Section 3.17.4 of the Draft EIR is based on buildout of the City's 2030 Comprehensive Plan, which would include future office development. See also response to comment GRAVES-7.

Comment HOLZEMER-118:

112) 3.19.1, Impact MFS-2: Individually Limited but Cumulatively Considerable Impacts – as the EIR points to "the Project would have a significant and unavoidable" cumulative impact. Even with the suggested mitigations (MM-NOI-1 and MM-NOI-2), these cumulative impacts will affect hundreds of neighborhood residents who call Mayfield their "home". It's a shame how the County has handled this project because it shows a total lack of caring for the people most affected by it. There's an attitude of "we don't care", that seems clear to everyone. Obviously, more communication, listening to the neighborhood residents should be an essential part for the future -- especially by County officials. A real constructive, give- and-take is needed. As one of our long-time residents asked at one of the project's "community meetings" sponsored by the Developer and Architects – "what are you willing to compromise on"? No one responded.

Response to Comment HOLZEMER-118:

See response to comment HOLZEMER-3.

Comment HOLZEMER-119:

113) 3.19.1, Impact MFS-3: Direct or Indirect Adverse Effects on Human Beings – again, the EIR says, "the impact of construction noise and vibration will be significant and unavoidable. For the neighborhood, this means more than a year of living every day (some extreme construction hours) with construction noises and vibrations that could affect the health and safety of not only us, but all the children who live here. The County need to take some responsibility here for the safety and well-being of our neighborhood and review what can or should be done to reduce construction noise and vibrations to the minimum levels possible. Will the County have strict adherence to the City's normal construction hours, for example? Once again, what is the County willing to compromise on?

Response to Comment HOLZEMER-119:

See responses to comments BECKETT-12 and HOLZEMER-20.

Comment HOLZEMER-120:

114) 4. Alternatives – For a whole variety of reasons, the best Alternative for the Mayfield neighborhood would be Alternative #2 – Reduced Scale Alternative. Alternative #2 would not only produce the new and essential teacher housing which everyone (including our neighborhood) agrees needs to be built, but also would be more environmentally friendly and still maintain the density and height standards for residential housing in the neighborhood. Specifically, this Alternative is superior in many ways – 1) it's density would be around 45 units per acre, similar to all the RM-40 residences in the area; 2) it's building height of 35 feet would be similar to all the other residential housing units around it; 3) no danger of potentially excavating into the California-Olive-Emerson toxic plume or contaminated groundwater; 4) fewer construction truck trips to and from the project site (minimizing air pollution), 5) less construction time (14 months versus 15 to 18) and less traffic/road closures during construction. Although it builds fewer new units than the Project, it is a much better Alternative for the neighborhood and fits in well with the goal providing housing to our most valued teachers and support staff that work in our schools. Will Alternative #2 be seriously considered? By whom? The EIR says Alternative #2 doesn't meet the #1 Objective of the Project, but questions remain – who decided these "project objectives" and were any neighborhood residents invited to participate or give their opinions on this "objectives list"? Why wasn't the neighborhood asked about these objectives? We live here each and every day. Was there a County Supervisor vote on these "objectives"? When and where was it? Again, why is "60" the number of units that has to be built in Santa Clara County? Who decided that number? What is the Facebook grant and where are the details of that grant? Could the grant be changed or renegotiated with Facebook? None of the details are provided in the EIR. EIR pages 4-28 to 4-61(?) – pages are misnumbered in EIR!

Response to Comment HOLZEMER-120:

The commenter's support for Alternative 2 is acknowledged. The Draft EIR acknowledges that Alternative 2 would have a lower level of significance for hydrology, aesthetics, and geology, and would have a slightly lesser magnitude of impact (but the same significance level) for some air quality, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise and vibration, and public services and recreation impacts. As discussed in Section 4.3.3, Alternative 2 would not achieve all the Project Objectives and may not be economically feasible. The decision to approve or deny the Project or one of its alternatives will be made be made by the County Board of Supervisors.

Comment HOLZEMER-121:

115) 4.4, Environmentally Superior Alternative – the EIR clearly states that beyond the "no alternative" option being the best one, the next best is Alternative #2. Alternative #2 is the next best because the "degree and duration of construction noise would be less" and it would avoid the potential significant hydrology impacts of excavation and impacting a Super Fund toxic groundwater/soil site. Alternative #2 would take less truck trips (reducing diesel particles in the air) and less construction time than the other reviewed Alternatives. If building the project at an "accelerated rate" is Objective #1 (which the own Objectives state), then Alternative #2 is the best one. EIR Page 4-61(?) – again, these pages in the Alternatives section are "misnumbered" in the EIR.

Response to Comment HOLZEMER-121:

See response to comment HOLZEMER-120. Revisions have been made to the Draft EIR to correct the page numbering in Section 4.

Comment HOLZEMER-122:

116) Appendix E – Traffic Impact Analysis, 1.2 Site Access and Circulation – EIR claims the maneuverability of vehicles is unlikely to be affected in the garage because they would be "nicely" arranged by the proposed stacked parking system. What evidence in the EIR support that claim? There's nothing. There is no information provided in the EIR on the stacked parking system, its capabilities, or what it can "nicely" handle. A very poor choice of words. EIR Page 1-2.

Response to Comment HOLZEMER-122:

The statement within the traffic study regarding parked vehicles being "nicely" arranged refers to the fact that the parking stacker system requires vehicles to be pulled forward properly into the parking stall so that mechanical lift can operate. Because of this requirement, vehicles within the spaces associated with the stacker system would not protrude into the aisle. Minimum aisle widths for parking garages are based on traditional (non-stacked) garages and include a factor of safety to allow for poorly parked vehicles that protrude slightly into the aisle space. Although the Project is exempt from City zoning and land use regulations, the City's standard requirements for parking aisle width are useful as an indicator of whether sufficient maneuvering space would be provided. For parking areas with a minimum parking space width of more than 9 feet, City standards require a minimum aisle width of 24 feet (PAMC Section 18.54.070, Table 3). Updated Project plans show that the minimum parking space width proposed in the garage would be greater than 9 feet and the proposed aisle width along the entire parking garage would be 24 feet and 3-1/8 inches. Therefore, the Project would include sufficient maneuvering space for vehicles entering and exiting parking spaces within the garage. Revisions have been made to Section 4.5.2 of the Transportation Impact Analysis (Appendix E-1 of the Draft EIR) to reflect the updated aisle width.

Comment HOLZEMER-123:

117) Appendix E, 1.2, Site Access and Circulation -- On street parking in the Mayfield neighborhood is an essential need. We have a residential parking permit program. Removing any current parking along Park, Birch, Grant, Sherman, or Sheridan must be weighed very carefully and have residential input before any final decision is made. Most people in the Mayfield area do not have adequate parking now (most families have two cars, two incomes) and taking away street parking, without residential involvement, is not acceptable. What will the County do to ensure residential opinions are involved in any street parking decisions? EIR Page 1-2.

Response to Comment HOLZEMER-123:

As discussed in response to comment JCC-2, parking is not an environmental impact under CEQA.

Comment HOLZEMER-124:

118) Appendix E, 1.3, Parking -- Again, no information on the stacked parking system included in this EIR – nothing about its safety, nothing about its capabilities, queuing information, etc. Facts

in this EIR section are based on what evidence? The EIR claim – "no adverse queuing is expected" is based on what evidence? Again, nothing is provided to show these statements are true. EIR Page 1-3.

Response to Comment HOLZEMER-124:

See response to comment CITY-12.

Comment HOLZEMER-125:

119) Appendix E, 1.3, Parking – Although the EIR states that the City's minimum parking requirements have been met, there is nothing in the EIR about visitor or service parking needs. Where will visitors (who undoubtedly come) to the building park? Where will service providers park? Has there been any provision(s) made for this type of parking need? Neighborhood residents are concerned about what will happen when these folks want to park? We have a residential street parking permit program in Mayfield and we want this strictly enforced and maintained. EIR Page 1-3.

Response to Comment HOLZEMER-125:

As discussed in response to comment JCC-2, parking is not an environmental impact under CEQA.

Comment HOLZEMER-126:

120) Appendix E, 1.4, VMT – Although the data says we are in a low-VMT area, the traffic counts that are basis for these traffic conclusions were made either during COVID (last year) or made in the pre-COVID years of 2016 or 2017 (5+ years ago). These are not accurate traffic counts to our neighborhood today and the conclusions reached are not the same as we actually face today or will into the future. EIR Page 1-3.

Response to Comment HOLZEMER-126:

See response to comment HOLZEMER-129.

Comment HOLZEMER-127:

121) Appendix E, 1.5, TDM – Again, no TDM presented in the EIR. EIR states that such a TDM will be shared with the County and City "in due course" (whatever that means?) – However, why isn't this TDM being shared with neighborhood residents – the folks most affected by any TDM? This must be shared and have discussion with the neighborhood. EIR Page 1-3.

Response to Comment HOLZEMER-127:

The traffic study for the Project (Appendix E of the Draft EIR) included a 9 percent reduction over the standard trip generation rates for the residential portion of the Project because it is considered a transit-oriented development. The VTA guidelines allow housing developments, where the walking distance from the unit or the front door of the housing complex to a light rail, bus rapid transit, or Caltrain station is 2,000 feet or less, to reduce their trip generation volumes by nine percent. While TDM programs are also encouraged for transit-oriented developments, they are not required in order to qualify for this standard trip reduction.

The conclusions of the Draft EIR that transportation impacts of the Project would be less than significant or less than significant with mitigation do not rely on the implementation of any TDM measures; therefore, the details of such measures do not need to be included in the EIR.

Comment HOLZEMER-128:

122) Appendix E, 1.6, Construction Traffic – Once again, the Traffic Construction Plan (TCP) is mentioned, but nothing is presented. Working closely with the City is not enough – communication and input from residents in the neighborhood is critically important as well. Nothing is spelled out about the neighborhood in the EIR – why? EIR Page 1-3.

Response to Comment HOLZEMER-128:

Because the TCP requires detailed information regarding the construction schedule and logistics in order to determine the need for specific road and lane closures in order to determine appropriate traffic control measures, it is not appropriate to develop the TCP at this point in time. As stated in Section 2.4.1 of the Draft EIR, the construction contractor would prepare the TCP prior to the commencement of construction, and it would be reviewed and approved by the City of Palo Alto. See also response to comment BECKETT-5.

Comment HOLZEMER-129:

123) Appendix E, 3.2, Existing Traffic Conditions – No current data on traffic volume or traffic counts was presented in the EIR. Relying on old traffic data (most of it over 5 years old), even during pre-COVID days, leads to false assumptions and theorical conclusions. Question – why did the County only present "PM" peak hour data for the ECR/Page Mill Road and Middlefield Road/Oregon Expressway intersections? Where is the "AM" data? Most of the "traffic count" intersections in our neighborhood (Park/Page Mill, etc.) were based on data from 2016 or 2017 – 5 years ago. In my view, old data represents a very bad analysis.

Response to Comment HOLZEMER-129:

As described in Section 3.2 of the Traffic Impact Assessment (Appendix E-1 to the Draft EIR), the County provided the PM traffic counts for two of the study intersections (El Camino Real/Page Mill Road and Middlefield Road/Oregon Expressway), while the rest of the information—AM traffic counts for those two intersections and both AM/PM traffic counts for other intersections—were obtained from traffic studies undertaken for other proposed developments in the project vicinity. [23] The TIA looked at traffic conditions during both AM and PM peak hours, not just the PM peak.

As also described in Section 3.2 of the TIA, the older AM and PM traffic counts (obtained between 2016-2018, from different sources mentioned above), were not directly used in the analysis. These 2016-2018 volumes were used as a base from which the 2020 "Existing" volumes were extrapolated using a growth factor of approximately 1.7 percent per year. This is a conservative approach as the growth factor was based on pre-pandemic trends.

Prior to the Covid-19 pandemic, this step would be replaced by actual traffic counts collected on site. However, as described in the TIA, because traffic volume was lower under the COVID conditions, actual traffic counts, if collected, would not be representative of normal conditions and would be misleading. Therefore, the extrapolated traffic volumes used in the analysis are considered to be the best available information to represent the "Existing Condition" for the Project.

[23] 2755 El Camino Real (Hexagon Transportation Consultants, Inc., January 2018) and the Palo Alto Public Safety Building and Public Parking Structure (Fehr & Peers, May 2018). Full reference details provided in the Draft EIR.

Comment HOLZEMER-130:

124) Appendix E, 3.6, Cumulative Conditions – Any Traffic Analysis should include real, proposed projects – not just the ones approved by City. There are a number of proposed projects in the area – 123 Sherman, 200 Portage, 300 Lambert, 380 Cambridge, 2955 El Camino, etc. and none of these were presented in the traffic analysis. These traffic impacts should be included and reviewed in a cumulative way so neighborhood residents understand them. EIR Page 3-5.

Response to Comment HOLZEMER-130:

See response to comment HOLZEMER-113.

Comment HOLZEMER-131:

125) Appendix E, 4.1, Trip Generation – The conservative estimate that the project will generate 145 AM additional vehicle trips and 81 PM vehicle trips is likely much too low. Given the number of residents residing in the building (273+) and knowing the vast majority will drive to and from their schools, it's clear the connector roads – Park, Grant, Birch, Sheridan, and Sherman -- will all become more congested with cars throughout each day. Will the County put in traffic calming measures to deal with the increased traffic flow? Will the County come back in 3 years, after the building is complete, and do another traffic analysis? Only then, will we know if these estimates are correct. I will guarantee that Park Blvd. will have a major backup of cars on a regular basis, driving south from California Avenue to Oregon Expressway. EIR Page 4-2.

Response to Comment HOLZEMER-131:

Please see response to comment HOLZEMER-126, above. As discussed in response to comment BECKETT-7, traffic congestion is not an environmental issue under CEQA. In any case, installation of traffic calming measures on collector streets are typically for the purpose of reducing traffic speed[24] not reducing traffic congestion. Park Boulevard and Birch Street are both identified as "collector streets" by the City of Palo Alto.[25]

Comment HOLZEMER-132:

126) Appendix E, 4.5.3, Stacked Parking – No real information on the stacked parking provided in the EIR. Don't understand the logical of the number of the in-bound vehicles in the morning (claiming to be 64 – number based on?) would be "equally" distributed between the two garage driveways. Unfortunately, that assumption is totally incorrect. For example, if someone needs to go south on Park to reach either 101 or Oregon Expressway, they are not going go out the Birch Court garage entryway. Most cars will NOT go in or out of the garage entryways "equally". With no details or facts to back up what is said in this section, the EIR authors should not include their own opinions like -- "it is unlikely that the stacking process would result in a significant queuing along the streets".

Response to Comment HOLZEMER-132:

See response to comment CITY-12 and revisions made to Section 4.5.3 of the Transportation Impact Analysis (Appendix E-1 of the Draft EIR) in response to that comment, which provides clarification on operation of the parking stacker system and anticipated distribution of inbound

[24] https://www.cityofpaloalto.org/files/assets/public/transportation/traffic-safety-projects/2001_neighborhood-traffic-calming-program.pdf
[25] https://www.cityofpaloalto.org/files/assets/public/transportation/traffic-safety-projects/roadway-classification-map.pdf

trips to the garage. No additional revisions to the Draft EIR are required in response to this comment.

Comment HOLZEMER-133:

127) Appendix E, 4.6.1, Automobile Parking – Although, the EIR claims the project is meeting the minimum parking requirements (providing 112 spaces, versus the City's minimum of 108), the real City minimum of having 154 parking spaces for 110 units and a commercial space is being ignored for so-called "20% parking reductions due to having a TDM or shared parking facilities". The fact that there is no TDM (or any evidence of one), should be alarming to everyone. Because of these facts, it's clear this residential building will be "underparked" (the reality is many residents have 2 cars per unit, two incomes to support the rent, etc.) and it will force both residents, visitors, and service providers to double park, enter the garage illegally, or worst yet -- park out on the same city streets where our neighborhood is already experiencing a shortage of parking spaces. EIR Page 4-14.

Response to Comment HOLZEMER-133:

See response to comment JCC-2 regarding parking not being an environmental issue under CEQA, and response to comment HOLZEMER-127 regarding TDM.

Comment HOLZEMER-134:

128) Appendix E, 4.7.2, Evaluation Results – the following EIR statement is false and misleading --, that "because the project site is within a low-VMT area, and because the project would have a – similar density – mix of uses, and transit accessibility . . ., the project meets the City's Screening Criteria 2." This is false sentence because the project building does not have a "similar density" to its residential surrounding neighbors, which is RM-40. As you know, the building has double the density of all surrounding neighboring residential structure. In addition, it is misleading in the EIR to state the building has a "mix of uses". Although it does have a very small, 1,000 square foot commercial or flex space, nearly 100% of the square footage is residential – this fact should be stated in the EIR. I don't believe the project meets the City's Screening Criteria 2, given these facts. EIR Page 4-17.

Response to Comment HOLZEMER-134:

See response to comment HOLZEMER-109.

Comment HOLZEMER-135:

129) Appendix E, 4.8, TDM – No TDM or details provided in the EIR. Nothing. The EIR statement, "that a monitoring program of the proposed TDM measures should be in place" is essential for the neighborhood. Who will do this monitoring, how often, and how can residents participate in ensuring that the TDM is followed? It is not enough for City staff to be the sole responsible part here. EIR Page 4-18.

Response to Comment HOLZEMER-135:

See response to comment HOLZEMER-127.

Comment HOLZEMER-136:

130) Appendix E, 4.9, Construction Traffic – As pointed out earlier in previous comments, it is not enough for the project developer to be "committed to work with the City of Palo Alto" alone. Neighborhood residents should not only be informed as to what is happening on a regular basis

but have input into decisions that affect them directly – especially any lane adjustments and/or road closures. The idea that a TCP will be developed or not involve residents or neighbors that surround the project is simply not acceptable. Just putting up some signs and/or passing out some flyers is totally inadequate.

Response to Comment HOLZEMER-136:

See response to comment BECKETT-5.

Comment HOLZEMER-137:

131) Appendix E, 5: Conclusions – for numerous reasons, as outlined previously, I do not feel this traffic analysis and its conclusions were done well. Using data from 5+ years ago does not feel like accurate traffic information to base your traffic analysis on. I don't feel this project meets the City's Screening Criteria 2 (for the reasons listed earlier) and I hope this analysis could be redone using new, accurate data and an understanding of the true traffic impacts we have in our area. EIR Page 5-1.

Response to Comment HOLZEMER-137:

See responses to comments HOLZEMER-109 regarding VMT screening criteria and HOLZEMER-129 regarding adequacy of existing traffic volumes.

3.1.8 JAMASON, Ellen E.

Comment JAMASON-1:

I am writing to express my support for the development of workforce and affordable housing at 231 Grant Avenue, in Palo Alto.

As a resident of the San Mateo and Santa Clara County for over than 20 years (including 14 years in Mountain View and Palo Alto), I applaud the County and Supervisor Joseph Simitian for embarking on this innovative project that will help address the housing crisis in our region. Teachers and educators in the area are often median income earners - earning too much to qualify for low-income housing, but not enough to afford market rents. This new project specifically addresses this special housing need.

We all know and recognize that having teachers live in the neighborhoods in which they work is a huge benefit to our communities. This vibrant location-with nearby public transportation, parks and other amenities--is the ideal location for this type of housing. It will offer numerous opportunities for residents to be active members of the neighborhood and the extended school communities that they serve.

Keeping educators living local will reduce long commute hours to locations where teachers and staff are being forced to relocate to afford housing. Retaining the quality of educators in Santa lara and San Mateo County is vital to achieve excellence in education. Our ability to do so is significantly impacted by our area's high costs of living, particularly with respect to housing. Building this project will serve to keep educators connected to the students they teach.

Again, I fully support the project and urge the Board of Supervisors to approve the 231 Grant Ave Educator Workforce Housing.

Response to Comment JAMASON-1:

The commenter's support for the Project and for provision of teacher housing in the neighborhoods within which they work is acknowledged and the County thanks the commenter for their support. The comment does not raise any specific environmental concerns that require a response under CEQA.

3.1.9 MA, Kevin

Comment MA-1:

As a former resident of the neighborhood containing 231 Grant and a continuing resident of the county, I think that the provided Draft EIR is adequately extensive and sufficiently mitigates the potential significant impacts of the project.

Response to Comment MA-1:

The commenter's statement that the EIR is adequate and support of the mitigation measures proposed in the Draft EIR is acknowledged. The letter does not raise any specific environmental concerns that require a response under CEQA.

3.1.10 SHULER, Peter Jon

Comment SHULER-1:

There is a lot to hate about your proposed project for someone living directly across the street who will bear the full brunt of its impacts. But I want to focus on one topic -- traffic safety and the BIG LIE about the dangerous curb cuts outlined in the report. 3.15.1, 3.15.3, TRA-3, MM-TRA-3A, MM-TRA-3B

How can you brag that you are reducing total curb cuts, when in fact you are adding curb cuts on two heavily used streets (Birch Street with 686 vehicles per hour) and Park Boulevard with 793 vehicles per hour), while reducing curb cuts mainly on Grant which has the least traffic? One of the new curb cuts crosses a major Class II bike lane (Park). The current curb cut on Park is barely used at all compared to the heavy use it will get after full build-out of this project. Three curb cuts you are eliminating are on a far less busy one-way street (Grant Avenue with 161 vehicles per hour) which is apparently not a public street unless it suits your purpose to pretend it is. So yes, you have a net decrease of two curb cuts, but the EIR glosses over the true impact of your smoke-and-mirrors claims on local traffic. How can you justify these false and misleading statements that will allow you to add traffic and potential collisions on already busy streets? What will you do to provide MEANINGFUL mitigation for potential collisions with bicycles, pedestrians and motor vehicles on Park and Birch? Your dishonest boilerplate findings that the impacts are "less than significant" with the woefully inadequate proposed mitigations make you potential accomplices to manslaughter.

Your project is a deadly collision waiting to happen. What's to prevent a resident of your project, late for work, from barreling out into cyclist cross-traffic on Park? Or another vehicle? What happens when motorists cannot hear the proposed warning alarm? What happens when the alarm doesn't work? And maximizing site distance sounds more like easily ignored, easily discarded wishful thinking. In addition, any discussion about reducing the number of parking spaces along Birch should involve neighborhood residents. Street parking is already at a premium in the area and will only be made worse by this project.

Solution: Keep all your curb cuts on Grant where they will have the least impact on local traffic - especially bicycle and pedestrian traffic. Incidentally, your proposal to put curb cuts on Park and Birch cuts across a total 1,479 vehicle trips per hour. The current configuration (with far less traffic flow) interferes with 1,169 vehicle trips per hour. Putting two curb cuts on Grant would conflict with only 322 vehicle trips per hour, and virtually no bike trips.

Response to Comment SHULER-1:

The commenter's concerns regarding traffic safety are acknowledged. Section 3.15.3 (Impact TRA-3) of the Draft EIR describes that the Project would result in an increase in traffic using the relocated Park Boulevard curb cut, and a new curb cut on Birch Street, and identifies that there would be potentially significant traffic safety impacts related to the increased volume of traffic crossing the Park Boulevard cycle lane and sidewalk and the Birch Street sidewalk.

As discussed in response to comment CITY-17, the Project would increase the distance between the project site's curb cut on Park Boulevard and the existing curb cut for the entrance to the parking garage for the adjacent apartment building to meet the City's requirement of at least 20 feet separation [PAMC Section 12.08.060(9A)]. This increased distance between curb cuts would allow cyclists (and pedestrians) more time to react to potential hazards (e.g., exiting vehicles) from each driveway. Furthermore, mitigation measures MM-TRA-3A and MM-TRA-3B would require additional features to be installed to make cyclists and pedestrians aware of vehicles exiting the parking garage, and to remind exiting drivers to yield to approaching pedestrians and cyclists. The adjacent parking garage entrance for the 260 Sheridan Avenue apartment building does not appear to have any audio-visual warning or other safety features installed.

As discussed in response to comment CITY-11, revisions have been made to MM-TRA-3A to specify that the required warning system should also include visual components, and that both audio and lighting levels should be adjustable and comply with City requirements, so as to not cause unnecessary disturbance to nearby residents. The required audio-visual warnings, coupled with stop control at the accesses, are considered adequate to reduce the potential traffic safety impact to a less than significant level, for the reasons described in Section 3.15.3 of the Draft EIR.

Although not considered necessary to reduce impacts to less-than-significant, the Developer will also work with the City of Palo Alto to investigate if additional measures to further improve pedestrian/bike safety at garage entrances would be appropriate in this location as these measures would affect City streets and would require approval by the City of Palo Alto.

3.1.11 VYAS, Vipul

Comment VYAS-1:

I am writing to you ahead of the deadline for public comment on the county's 231 Grant Avenue, Palo Alto development environmental impact report (EIR). I am incredibly enthusiastic about 231 Grant Avenue. It's a wonderful idea and concept. However, I have several notable concerns:

Response to Comment VYAS-1:

The commenter's enthusiasm for the Project concept is acknowledged. Detailed discussion of each of the specific environmental concerns raised by the commenter is given in response to the following comments VYAS-2 through VYAS-6, below.

Comment VYAS-2:

I fear there is insufficient bike storage allocated for the development. Bicycle theft is an issue in the Bay Area. With that in mind, people living at 231 Grant will have easy access to the business district at California Avenue and any of the many public schools in Palo Alto (should they world [sic] at a Palo Alto Unified School District school). Encouraging and making bicycle use convenient is critical. Indoor, designated, and even allocated bicycle storage with up to 3 bicycles per family seems critical to me. I would hope that at a minimum 330 convenient bicycle storage spaces would be available inside the contemplated parking garage structure or other indoor and secure location. Otherwise, bicycle usage will be a missed opportunity. Given there is an allocation of 1 car spot per residence, even greater allocation should be given to alternatives such as bikes.

Response to Comment VYAS-2:

As discussed in Section 2.3.5 of the Draft EIR, the Project would include a secure ground-floor bike room with capacity for 134 bicycles and at least 12 short-term bike spaces. This exceeds the standard requirements for multi-family residential development within the City of Palo Alto (1 long-term bicycle parking space per dwelling unit and 1 short-term space per 10 dwelling units). As described in Table 2.3-1 of the Draft EIR, approximately 85 of the proposed 110 dwelling units would be either studio or 1-bedroom apartments; therefore, these units are unlikely to require storage for three bicycles.

Comment VYAS-3:

Further, areas immediately around the development should have protected bicycle lanes. Again, given the proximity to the business district and likely traffic, it's critical that residents feel safe using non-automobile transportation modalities in and around the development.

Response to Comment VYAS-3:

The City of Palo Alto has exclusive jurisdiction over the provision of bicycle infrastructure on City streets, such as protected cycle lanes. The potential impacts of the Project on existing bicycle infrastructure are discussed in Section 3.15.3, in particular with respect to Impacts TRA-1 and TRA-3. Mitigation measures MM-TRA-3a and MM-TRA-3b are recommended to reduce potential safety impacts to cyclists using the existing bike lane on Park Boulevard from vehicles entering or exiting the Project's parking garage. See response to comment SHULER-1 for additional discussion regarding bike safety and recommended revisions to these mitigation measures.

Comment VYAS-4:

I fear there is insufficient retail space allocated given the volume of residents contemplated for the development. A coffee shop is a wonderful idea. However, it's insufficient. More space should be allocated to improve convenience for residents, enhance the local economy, and keep local dollars in the community. The current retail space allocation is anemic at best, unfortunately. I believe the development planners can do better and allocate a substantially greater portion of the space to more retail.

Response to Comment VYAS-4:

The commenter's concerns about retail space are acknowledged. The comment does not raise any specific environmental concerns that require a response under CEQA.

Comment VYAS-5:

I fear there is insufficient garden space allocated. Garden box space is at a premium in Palo Alto with long wait lists. Having access to community garden opportunities would be a substantial miss. I love the concept of common. areas and courtyards. However, many of the residents will have children, and they should have an opportunity to grow their own food and learn about gardening. A substantial amount of space whether around the development or on the rooftop should be allocated to gardening space. Again, gardening is a popular activity that is part of the culture of Palo Alto. Ideally, much of the landscaped area could be converted to community gardening opportunities. The residents should have a connection with the building and landscaping will simply be an operational cost burden versus community garden boxes which will really create a true sense of community and connection.

Response to Comment VYAS-5:

The commenter's support for community gardening and the suggestion for including garden boxes as part of the Project are acknowledged. The comment does not raise any specific environmental concerns that require a response under CEQA.

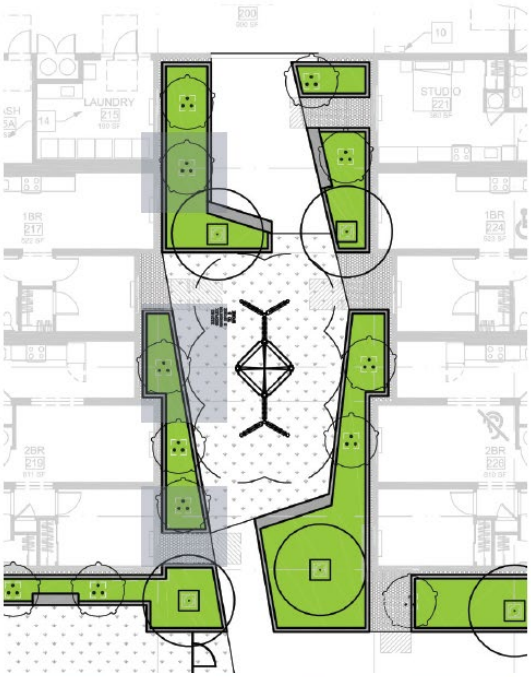
Comment VYAS-6:

I fear there is not enough play space for children in the current plan. I believe play space should be in the central courtyard space of the development. If it is not, then parents may be anxious about their children being too far out of sight. Could we make accommodations for secure common playspace.

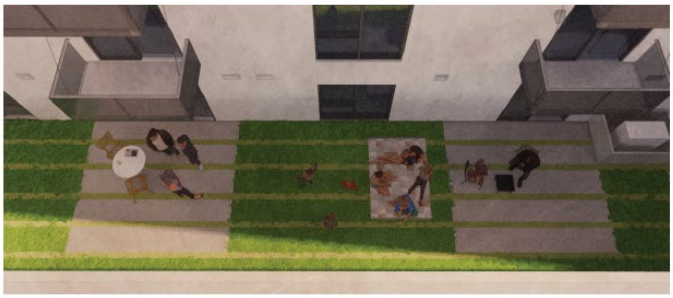
Response to Comment VYAS-6:

As discussed in Section 2.3.2 of the Draft EIR, the three landscaped courtyards would provide a variety of passive and active facilities for residents' use, including a children's play area. The detailed design for the courtyards is yet to be finalized; however, it is intended that some type of children's play structure would be installed in the center courtyard, as conceptually indicated in Figure 2.3-2 of the Draft EIR. Additional conceptual drawings and an example of the type of play structure that might be installed are provided in Figure 3-2 below.

Figure 3-2 Conceptual Plans and Artist Impressions for Center Courtyard



Landscape Structures - Geoplex Climber



3.3 Verbal Comments and Responses to Comments

Verbal comments received at the public meeting on October 14, 2020 are summarized below, followed by the County's response to each comment.

3.3.1 BALDWIN, Teri

Summary of Verbal Comment BALDWIN-V1

The commenter is the president of the Palo Alto Educators Association and a teacher. They described that even as a veteran school employee, they cannot afford to live in Palo Alto at fair market rates. They described how it is important for teachers to live near their workplaces so that they can more easily attend events at the school outside of normal school hours.

Response to Comment BALDWIN-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA.

3.3.2 DIBRIENZA, Jennifer

Summary of Verbal Comment DIBRIENZA-V1

The commenter is a Palo Alto resident and serves on the Palo Alto School Board (but is not speaking for the School Board). They expressed support for the Project, describing how housing is unaffordable, especially for teachers starting their careers. They stated that everybody benefits when essential workers are able to live in the community in which they work.

Response to Comment DIBRIENZA-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA.

3.3.3 JAMASON, Ellen

Summary of Verbal Comment JAMASON-V1

The commenter has lived on the Peninsula for 20 years and their children graduated from Palo Alto schools. They expressed full support for the Project and agreed with many of the statements made by previous commenters. They stated that the project site is the perfect location for this Project.

Response to Comment JAMASON-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA.

3.3.4 KNISS, Liz

Summary of Verbal Comment KNISS-V1

The commenter is the president of the League of Women Voters of Palo Alto, a former elected official of the City of Palo Alto and former president of the Palo Alto Unified School District. They expressed support for the Project and for the comments made earlier in the meeting by Elizabeth Ratner. They stated that the fabric of the community suffers when teachers are unable to live in or near the communities they serve, and that providing housing near jobs reduces climate-warming impacts.

Response to Comment KNISS-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA.

3.3.5 PENNINGTON, Simon

Summary of Verbal Comment PENNINGTON-V1

The commenter is a resident of Barron Park and an employee at the Foothill-De Anza Community College District. They expressed full support for the Project, which will allow teachers to live close to their jobs. They stated that the project site is close to transit, and will enhance the economy and aesthetics of the surrounding area.

Response to Comment PENNINGTON-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA. The impacts of the Project relating to aesthetics are addressed in Section 3.2, “Aesthetics” of the Draft EIR. Impacts relating to public transit are addressed in Section 3.15, “Transportation.”

3.3.6 PRICE, Gail

Summary of Verbal Comment PRICE-V1

The commenter is a former school board employee, City Council member, and environmental/transportation planner. They expressed support for the Project and stated that the Draft EIR was comprehensive and thorough.

Response to Comment PRICE-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA.

3.3.7 RATNER, Elizabeth (Lisa)

Summary of Verbal Comment RATNER-V1

The commenter leads the Advocacy team of the League of Women Voters of Palo Alto. They expressed strong support for the Project and stated that the analysis of environmental impacts in the EIR is adequate. They described how the EIR states that the Project will reduce vehicle trips

by 9 percent and will support the Comprehensive Plan goals, reduce greenhouse gas emissions, and enrich the fabric of the community. They commend the use of public land for housing, stating that housing is a basic need.

Response to Comment RATNER-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA. The impacts of the Project relating to vehicle miles traveled and greenhouse gas emissions are addressed in Sections 3.15, “Transportation” and Section 3.8, “Greenhouse Gas Emissions” of the Draft EIR, respectively. Consistency with the City’s Comprehensive Plan is discussed in Section 3.11, “Land Use and Planning.”

3.3.8 SHEPPARD, Nancy

Summary of Verbal Comment SHEPPARD-V1

The commenter is a former mayor and mother of two Palo Alto Unified School District Staff. They expressed support for the Project which will have a positive impact by reducing commute distances. They stated that the project site is close to transit, and that the Project is consistent with many provisions of the Comprehensive Plan.

Response to Comment SHEPPARD-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA. The impacts of the Project relating to vehicle miles traveled are addressed in Section 3.15, “Transportation” of the Draft EIR. Consistency with the City’s Comprehensive Plan is discussed in Section 3.11, “Land Use and Planning.”

3.3.9 STEINER, Meb

Summary of Verbal Comment STEINER-V1

The commenter is a long-term Palo Alto and Los Altos Hills resident, a Palo Alto Unified School District employee, and president of the union for classified staff. They expressed full support for the Project, particularly because it will serve both teaching staff and classified staff. They gave two specific examples of classified staff working at PAUSD schools but living in the Central Valley. The commenter also expressed support for the use of modular construction methods and maximizing the number of residential units.

Response to Comment STEINER-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA. Impacts relating to vehicle miles traveled are addressed in Section 3.15, “Transportation” of the Draft EIR.

3.3.10 SUNG, Amy

Summary of Verbal Comment SUNG-V1

The commenter is a resident of Palo Alto and a realtor. They expressed support for the Project which will allow teachers to live close to their jobs. They gave a specific example of the bond

that forms between students and staff when staff are able to live in the neighborhood that they work in. They also described the rising costs of housing in Palo Alto.

Response to Comment SUNG-V1

The County acknowledges the comment and thanks the commenter for their support. The commenter did not raise any specific environmental concerns that require a response under CEQA.

4 Revisions to the Draft Environmental Impact Report

This section contains revisions to the text of the 231 Grant Educator Workforce Housing Draft EIR dated October 5, 2021. These revisions include both (1) revisions made in response to comments on the Draft EIR, as discussed in Section 3 of this Final EIR, and (2) County staff-initiated text changes to correct minor inconsistencies, to add minor updates to information or clarification related to the Project, and to provide updated information where applicable.

Revised or new language is underlined. All deletions are shown in ~~strikethrough~~.

4.1 Changes to the Executive Summary

In the first paragraph under the subheading "Project Location and Setting" on page iii of the Draft EIR, the following change is proposed in response to comment CITY-1 and GRAVES-1:

> 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 Mayfield~~fair~~ neighborhood of Palo Alto.

Under the subheading "Project Description" on page iii of the Draft EIR, the following change is proposed in response to comment GRAVES-3:

> The Project would involve demolition of the existing 6,800-square-feet (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. The residential units would be intended to serve teachers and classified staff from schools in Santa Clara County (approximately 78 units) and southern San Mateo County (approximately 32 units).

Under the subheading "Project Objectives" on page iii of the Draft EIR, the first objective of the Project shall be revised as follows in response to comment GRAVES-2:

> 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 for other school staff, public service employees or non-profit employees to meet the Facebook grant criteria, delivered at an accelerated pace.

The first bullet point on page v of the Draft EIR shall be revised as follows to correct an error:

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

Table ES-1 shall be updated to reflect the revisions made to proposed mitigation measures in response to various comments, as described in Section 4.4 of this report.

The entry for Impact C-HAZ-5 in Table ES-1 shall be updated as follows:

Impact C-HAZ-5: Cumulative Emergency Response or Evacuation Plan Impairment The overall cumulative impact would be ~~less than~~ potentially significant.	Before Mitigation: ~~LT~~PS
Mitigation: ~~none required~~ MM-C-TRA-3 (detailed in Impact C-TRA-3)	After Mitigation: LTSM~~N/A~~

4.2 Changes to Section 1 of the Draft EIR

None.

4.3 Changes to Section 2 of the Draft EIR

In the first paragraph of Section 2.1 on page 2-1 of the Draft EIR, the following change is proposed in response to comment CITY-1 and GRAVES-1:

> The project site is at 231 Grant Avenue in the City of Palo Alto and is owned by the County of Santa Clara (**Error! Reference source not found.**). It is approximately 1.4 acres and is bounded by Park Boulevard, Grant Avenue, and Birch Street, within the Mayfield~~fair~~ neighborhood of Palo Alto.

In Section 2.2, the first objective of the Project shall be revised as follows in response to comment GRAVES-2:

> 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 for other school staff, public service employees or non-profit employees to meet the Facebook grant criteria, delivered at an accelerated pace.

In Section 2.3.4, the following sentence in the first paragraph shall be revised as follows in response to comment CITY-2:

> The existing mature camphor tree and Coast redwood tree along the Grant Avenue frontage, which are considered “heritage trees” under the ~~City of Palo Alto’s~~ County’s tree protection ordinance, were originally planned to be retained as part of the development. However, the arborist report prepared for the Project determined that both trees are in poor condition and would be unlikely to survive.

In Section 2.4.1, the last sentence of the second paragraph shall be revised as follows in response to comment CITY-3:

> Early starts or late finishes may be required on occasion to accommodate major concrete pours, crane mobilization, or other logistical needs (subject to noise exception permits from the City and/or County, if required).

In Section 2.4.2, the second paragraph shall be revised as follows in response to comment CITY-9:

For the transportation of modular components from the factory in Vallejo, typical haul routes are anticipated to be along Interstate-80 North, Interstate-680 South, State Route 237 West, US-101 North, Oregon Expressway, and Birch ~~Avenue~~ Street to Grant Avenue, however this route is subject to change per approval by the permitting agencies, including the City of Palo Alto, Caltrans, and County Roads and Airports. Trucks transporting some of the wider modular units would require full police escorts. Figure 2.4-1 shows anticipated haul routes.

In Section 2.4.2, the first paragraph following Figure 2.4-1 shall be revised as follows in response to comment CITY-21:

Before construction begins, the construction contractor would prepare and implement a traffic control plan as part of the Project, ~~in consultation with~~ which would require review and approval by the City of Palo Alto. The traffic control plan would be prepared in accordance with the City's latest Traffic Control Plan Requirements and Public Works Standard Specifications, and would include the following:

In Section 2.4.2, a new bullet point is proposed to be added to the list of traffic control plan requirements on page 2-17 in response to comment JCC-3, as follows:

- Access to the Palo Alto Courthouse property shall be maintained throughout the construction period, including access for buses up to 45 feet in length. Closures and traffic control affecting the Courthouse property shall be coordinated with other traffic controls from construction of the nearby Public Safety Building.

In Section 2.5, the fifth bullet point shall be revised as follows in response to comment CITY-4:

- City of Palo Alto encroachment permit, utility permits, tree removal permit, oversized vehicle permit, noise ordinance exception permit, traffic control plan approval, off-site improvement agreement, and street closure permit.

4.4 Changes to Section 3 of the Draft EIR

In Section 3.1, the following revisions have been made to Table 3.1-1 in response to comment BECKETT-7:

Table 4.4-1 List of Cumulative Projects

Project Name	Status	Project Location	Details
Public Safety Building	*Approved, Under Construction*	*250 Sherman Avenue (approximately 400 feet northwest of project site)*	*New 50-foot-tall, approximately 56,000 SF building to house the Palo Alto Police Department, 911 Emergency Dispatch Center, Emergency Operations Center, Office of Emergency Services, and administration services for the Fire Department.*
2755 El Camino Real Multi-Family Residential Project	*Approved*	*2755 El Camino Real (approximately 1,000 feet south of project site)*	*New 50-foot-tall, 4 story building totaling 41,304 SF with up to 60 residential units, and a zoning code text change amendment to create a Special Purpose Combining District overlay for the Public Facilities zone.*
380 Cambridge	*Approved*	*380 Cambridge Avenue (1,075 feet west of project site)*	*Merge Three Existing Parcels to Construct one Three-Story Commercial Building (35,000 square feet) with Parking Garage. Project exempt from CEQA.*
123 Sherman	*Major Architectural Review application*	*123 Sherman/150 Grant/2501 Park (130 feet north of project site)*	*Demolition of existing buildings to allow the construction of a new three-story commercial building (approximately 4,000 SF retail and 48,000 SF office) with two levels of below grade parking and one level at grade parking.*
300 Lambert	*Pre-Screening Request*	*300 Lambert Avenue (2,228 feet south of project site)*	*Rezone from Service Commercial (CS) to a Planned Community Zone District to allow demolition of existing commercial building and construction of new multi-family residential with 49 units and underground garage.*
200 Portage	*SB330 pre-application*	*200 Portage Road (1350 southeast of project site)*	*Redevelopment an approximately 4.65-acre site (former Fry's Electronics site) with 85 3-story residential townhomes.*
2951 El Camino Real	*Pre-screening request*	*2951 -2955 El Camino Real (1,350 south of project site)*	*Rezoning to a Planned Community (PC) to allow a mixed-use project with approximately 113 new residential units, 5000 SF of office space, and 1,000 SF retail space.*

Source: Patel, pers. comm. 2020. City of Palo Alto, 2021 (https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Current-Planning/Pending-and-Approved-Projects/)

Acronyms: SF = square feet

In Section 3.2.3, Impact AES-4: Light and Glare, the following revisions have been made to the first sentence under the subheading "construction," in response to comment CITY-7:

> *Construction activities for the Project would generally comply with the City's construction hours, which are limited to daytime (8am to 6pm on weekdays; 9am to 6pm on Saturdays and holidays; no construction allowed on Sundays).*

In Section 3.3.3, Impact AIR-3, the following sentence has been added at the end of the subsection titled "Standards of Significance" in response to comment BECKETT-10:

> *The nearest senior living facility is the Sunrise of Palo Alto Assisted Living Facility at 2701 El Camino Real, which is approximately 900 feet south of the project site. No other senior living facilities and no childcare facilities or schools are located within 1,000 feet of the project site.*

In Section 3.3.4, Impact C-AIR-2, the following revisions have been made to the section under the subheading “Cumulative Impact Analysis” in response to comment HOLZEMER-37:

As identified in Table 3.1-1, the City’s Public Safety Building located at 250 Sherman Avenue, approximately 400 feet west of the Project site, is currently under construction. Construction of the Public Safety Building is anticipated to be completed in Summer 2023, overlapping with the construction activities for this Project. Construction of the Public Safety Building began in June 2021 and demolition/removal of existing water and sewer systems and preliminary soil off-haul activities are currently underway (City of Palo Alto 2021e). Since construction of the Project is anticipated to begin in Summer 2022, it is anticipated that the construction activities of the Public Safety Building that would involve intensive construction activities that have the potential to generate higher toxic air contaminant emissions (e.g., grading activities [haul trucks for soil import/export and concurrent use of multiple heavy-duty equipment units]) would be complete. As such, the intensive phases of construction for the two projects are not anticipated to overlap. In addition, construction of the Public Safety Building requires the use of construction equipment that meets USEPA Tier IV Final emissions standards (for equipment greater than 25-horsepower). As stated in the EIR for the Public Safety Building, the use of Tier IV equipment for all diesel-powered construction equipment greater than 25-horsepower was estimated to reduce $PM_{2.5}$ exhaust emissions by approximately 89% (City of Palo Alto 2018a).

The 123 Sherman Avenue project, approximately 130 feet north of the project site, could also potentially overlap Project construction, although no information about proposed construction periods or anticipated air quality impacts is currently available for this project. However, Phase 1 of the 231 Grant Project (the most intensive phase for use of off-road construction equipment and on-road diesel trucks) is scheduled begin in mid-2022 and would take approximately six weeks to complete. Given the current status of the 123 Sherman project (yet to undergo environmental review), it is unlikely that construction of that project would begin prior to completion of Phase 1 of the 231 Grant Project. Later construction phases for the 231 Grant Project would have substantially lesser truck traffic and large construction equipment use than Phase 1. As such, the intensive phases of construction for these two projects are also not anticipated to overlap.

The 380 Cambridge Avenue project, approximately 1,075 feet west of the project site, could also potentially commence construction prior to completion of the 231 Grant Project, although no information is available regarding anticipated air quality impacts or proposed construction equipment use.

Construction activities and the associated emissions would occur at varying distances from the surrounding receptors as construction moves across ~~both~~ the various project sites. Therefore, any overlapping activities and associated emissions would not be generated from the same location or concentrated on a single receptor for an extended period of time. As such, it is not anticipated that the cumulative cancer risk associated with overlapping construction activities in the project vicinity would exceed the BAAQMD cumulative threshold for cancer risk of 100 in a million. Therefore, criteria pollutant, toxic air contaminant, or odorous emissions from the Project combined with other nearby construction emissions would not adversely affect nearby sensitive receptors.

In addition, since the Project would not add any new substantial sources of toxic air contaminant emissions during operation, and operation of the Public Safety Building, which primarily consists of safety, office and administration services (e.g., Police Department, Emergency Dispatch Center, Emergency Operations Center), the 123 Sherman Avenue development (comprising retail and office uses), or the 380 Cambridge Avenue redevelopment (comprising commercial uses), would also not add any substantial sources of toxic air contaminant emissions, the cumulative cancer risk in the project vicinity would also not exceed the BAAQMD cumulative threshold for cancer risk of 100 in a million. Therefore, the overall impact to sensitive receptors from pollutant or other emissions (such as those leading to odors) from cumulative projects, including the Project, would be ***less than significant****.*

In Section 3.5.3, the following revisions have been made to mitigation measure MM-CUL-2 in response to consultation undertaken with the Tamien Nation:

MM-CUL-2: Inadvertent Discovery of Prehistoric, Historic, or Tribal Cultural Resources

A. *Prior to the start of earthmoving activities, the Developer shall implement a worker archaeological ~~environmental~~ awareness training and Tribal Cultural Resources Sensitivity Training by the Tamien Nation ~~program~~ for all construction personnel involved with excavation activities. The ~~program~~ training shall include ~~training to~~ informing 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.*

B. *During all ground disturbing activities (~~e.g.,~~ excavation, grading, ~~and~~ utility trenching, and landscaping that occurs in previously undisturbed soil) ~~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 and an on-call qualified archaeologist to undertake construction monitoring at the project site. ~~Where feasible, t~~ The tribal cultural resources monitor shall be a representative of the Tamien Nation who will be given at least 5 days' notice prior to the start of ground disturbing activities. If, in the event that the Tamien Nation is given such notice and cannot provide the required monitors at an hourly rate not to exceed $150 (with an annual increase of no more than 3 percent per year), the Developer may contract with an alternative tribal cultural resources monitor. No reimbursement for travel, fuel, or lodging shall be provided.*

   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 i~~ If the tribal cultural resources monitor determines~~, in consultation with the County and Developer,~~ that there is limited potential for encountering cultural resources (e.g., if remaining ground disturbing activities would only occur in areas and depths that were previously disturbed by Project construction), monitoring may be reduced or curtailed.

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, in collaboration with a Tamien Nation Tribal representative, 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:

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.

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, in collaboration with a Tamien Nation Tribal representative, 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, in collaboration with a Tamien Nation Tribal representative, prior to resuming construction activities within the 50-foot radius.

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 treatment and disposition of such finds and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, and reasonably agreed upon by the Tamien Nation, prior to resuming construction activities within the 50-foot radius.

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.

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 Northwest Information Center (NWIC). A redacted report of findings shall be submitted to the County Director of Planning and Development.

D. Fill soils used for construction purposes shall not contain archaeological materials.

In Section 3.7.3, the following revisions have been made to mitigation measure MM-GEO-3 in response to comment CITY-8:

MM-GEO-3: Prepare a Subsequent Geotechnical Report and Implement a Monitoring Program During Construction

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. The recommendations of the subsequent geotechnical report shall be incorporated into final project design and implemented during construction.

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. Any work on the adjacent property would require the consent of the landowner. 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.

In Section 3.9.4, Impact C-HAZ-5, the following changes have been made under the subheading "Cumulative Impact Analysis" in response to comment BECKETT-11:

> *The ~~only known past, present or reasonably foreseeable project in the immediate vicinity of the project site that would have an overlapping~~ construction period ~~with the Project would be~~ for the Public Safety Building ~~that is currently under construction~~ at 350 Sherman Avenue would overlap with Project construction and the construction period for the proposed 123 Sherman Avenue project could possibly also overlap. Construction of the Public Safety Building and associated parking garage may result in intermittent closure of streets surrounding Parking Lots C-6 and C-7 during construction. The streets potentially affected could include portions of Sherman Avenue, Birch Street, Ash Street, and Jacaranda Lane. To a lesser degree, construction activities associated with the Public Safety Building could also result in intermittent reduced service on Park Boulevard. Construction of the Project would also result in lane closures that could impede emergency vehicles on local streets adjacent to the project site, and to maintain emergency access to all properties.*
>
> *However, construction-related traffic and road closures associated with the PSB project (and possibly the 123 Sherman Avenue project) could require additional detours or other temporary disruptions to emergency response that could combine with Project impacts. The overall cumulative impact to emergency response could be* ***potentially significant.***
>
> *Mitigation Measure MM-C-TRA-3 is recommended to reduce this potentially significant impact to emergency response.*
>
> > ***MM-C-TRA-3: Coordination of Construction Traffic Plans.*** *See Section 3.15.3 for full details of this measure.*
>
> *With implementation of MM-C-TRA-3, the project's contribution to the cumulative impact would be* ***less than significant with mitigation****.* ~~*including portions of Birch Street and Park Boulevard. However, a traffic control plan for the Project would be implemented as described in Section 2.3.2, "Construction Staging, Haul Routes, and Traffic Control," to minimize the disruption to local traffic on streets adjacent to the project site. Furthermore, the project site is in an urbanized area of Palo Alto where the street grid pattern provides alternate travel routes throughout the City, including the areas around the Public Safety Building site and the project site where temporary land closures may be required. For the reasons listed above, the overall cumulative impact to emergency response and access would be*~~ ~~***less than significant***~~*.*

In Section 3.12.1, the following new paragraph and associated footnote have been added after Figure 3.12-4 in response to comment GOLD-6:

> *The Caltrain tracks are approximately 410 feet north of the project site. Based on Figure 3.12-4, vibrations generated by trains traveling along these tracks at 50 miles per hour[26] would be anticipated to attenuate to 75 VdB at a distance of approximately 150 feet and to below 65 VdB at a distance of approximately 400 feet. As described previously, vibration levels below 65 VdB are typically not perceptible to humans, whereas vibration levels above 75 VdB are distinctly perceptible (FTA 2018).*

[26] Caltrain trains have a maximum speed of 79 miles per hour; however, because most trains would be slowing down or speeding up as they approach or depart the California Avenue station, they are unlikely to be traveling at maximum speed in the project vicinity.

In Section 3.12.3, revisions have been made to Impact NOI-1 under the subheading "Construction Traffic" in response to comment BECKETT-6, as follows:

Table 3.12-5 shows the estimated construction traffic for each phase of construction, with truck trips converted to passenger-vehicle equivalent trips[38]. The most traffic-intensive phase of Project construction would be Phase 1 (site clearing, grading and excavation) ~~5 (interior finishes/landscaping)~~ with up to 127~~65~~ peak hour passenger-vehicle equivalent trips.

Table 3.12-5 Estimated Construction Traffic by Phase

Construction Phase	Number of Peak Hour Worker Commute Trips[1]	Average Number of Daily Truck Trips[2]	Average Number of Peak Hour Truck Trips[3]	Total Peak Hour Traffic (number of vehicles)	~~Average~~ Passenger-Equivalent Peak Hour Trips[4]
Site Clearing, Grading, and Excavation	15	72	9	24	187~~33~~
Underground Utilities	15	negligible[5]	negligible[5]	15	15
Ground Floor Concrete Work	30	18	2	32	68~~34~~
Modular Placement, Wood Framing and Structural Connections	30	9	1	31	49~~32~~
Interior Finishes/ Landscaping	65	negligible[5]	negligible[5]	65	65

Source: Calculated by AECOM in 2021.

Notes:

1. *It is conservatively assumed that all workers would arrive at the worksite within the same hour in the morning and would leave within the same hour in the afternoon. Worker numbers provided by Developers (see Table 2.4-1).*
2. *Average daily truck trips were generally calculated by dividing the total number of truck trips for each phase (from Table 2.4-2) divided by the number of workdays in the phase (from Table 2.4-1). For Phase 3, a truck trip estimate was not provided by the Developers so CalEEMod default assumptions for daily truck trips (9 round trips per day) were used. For Phase 4, it is conservatively assumed that the truck trips for delivery of modular units would occur over a shorter 4-week (24 workday) period not the entire 11-week phase.*
3. *Peak hour truck trips were calculated by dividing the daily truck trips by an 8-hour workday.*
4. *Truck trips were converted to passenger car-equivalent trips by applying a passenger car-equivalent factor of 19.0 ~~2.0~~ then added to the number of worker commute trips, per Caltrans 2013.*
5. *Although there would be some truck trips for deliveries of materials during Phases 2 and 5, the number of daily trips would be low and would be distributed throughout the workday, resulting in a negligible contribution to peak-hour traffic.*

Table 3.12-5A below shows the estimated increase in traffic noise along the proposed haul route (Grant Avenue, Birch Street, and Oregon Expressway) during Phase 1 of Project construction. It is anticipated that the majority of trucks would use these three roads, however the table also includes other local streets (Park Boulevard, Sherman Avenue and Sheridan Avenue) in case changes to the haul routes are required by the City, County Roads and Airports, or Caltrans. The table conservatively assumes that all

construction-related traffic would travel on each of the roads, and therefore reflects a worst-case scenario.

Table 3.12-5A Estimated Increase in Traffic Noise from Project Construction Traffic

Road	Existing Traffic Volume (vehicles/ hour)	Phase 1 Construction Truck Traffic (truck trips/hour)	Phase 1 Construction Worker Traffic (vehicles/ hour)	Total Phase 1 Construction Traffic (equivalent vehicles/hour)	Existing Plus Construction Traffic (equivalent vehicles/hour)[a]	Percent Increase	Estimated Increase in Traffic Noise (dBA)
Grant Avenue	161	9	15	187	348	**116%**	**3.4**
Birch Street	686	9	15	187	873	27%	1.1
Oregon Expwy	3,214	9	15	187	3401	6%	0.3
Park Boulevard	793	9	15	187	980	24%	0.9
Sherman Avenue	159	9	15	187	346	**118%**	**3.4**
Sheridan Avenue	289	9	15	187	476	65%	2.2

Acronyms: dBA = A-weighted decibels; Expwy = expressway

Notes: Total Phase 1 construction traffic is sum of truck and worker trips for Phase 1, with a factor of 19.1 applied to convert truck trips to vehicle equivalents, per Caltrans 2013.

Source: Compiled by AECOM 2021 using existing traffic volumes from Traffic Impact Analysis (Appendix E), construction estimates from Mercy Housing and Abode Communities, and vehicle equivalence factors from Caltrans 2013.

As described in Section 3.12 of the Draft EIR, it is generally accepted that for environmental noise exposure the average healthy ear can barely perceive changes of 3 dBA or less (increase or decrease) and that a change of 5 dBA is readily perceptible (Caltrans 2013). An increase of 5 dBA or more is generally considered to be a significant increase. For traffic noise, it is generally accepted that a doubling (or halving) of traffic volumes would result in a 3 dBA change in noise levels, which is barely perceptible to most people. As shown in Table 3.1-1, construction traffic along the anticipated haul route would not cause a perceptible increase in traffic noise on Birch Street, Oregon Expressway, but would cause an approximately 3.4 dBA increase in traffic noise on Grant Avenue, which could be perceptible but would not be considered a significant increase. In the unlikely event that construction trucks are required to travel along other local streets, the increase in traffic noise would be imperceptible on Park Boulevard and Sheridan Avenue, and would be perceptible, but not significant, on Sherman Avenue.

~~*As discussed under "Environmental Setting" above, traffic volumes would need to double in order to result in a 3 dBA change in noise levels, which would be an incremental change that can barely be perceived (Caltrans 2013). As discussed in Section 3.16, "Transportation," existing traffic volumes ranges from approximately 150 to 300 vehicles per hour on Sherman, Grant, and Sheridan Avenues; between 500 and 800 vehicles per hour on Park Boulevard, Birch Street, Page Mill Road, and California Avenue; and more than 3,000 vehicles per hour on Oregon Expressway and El Camino Real. The additional 65 construction-related vehicle trips per hour generated during the most traffic-intensive phase of Project construction would therefore not double existing traffic volumes on any local roads and, therefore, would not cause a perceptible increase in traffic noise during the construction period.*~~

[38]Per Caltrans Technical Noise Supplement (2013), a heavy truck traveling at 35 miles per hour (the lowest speed for which a vehicle equivalent is provided) generates similar noise levels to the equivalent of 19.1 automobiles traveling at the same speed. The speed limit along the proposed haul route is 35mph on Oregon Expressway and 25 mph on Grant Avenue and Birch Street.

In Section 3.12.3, revisions have been made to mitigation measure MM-NOI-1 in response to comment HOLZEMER-20, as follows:

MM-NOI-1: Construction Noise Reduction Measures

The Developer shall include the following measures in contractor specifications for the Project, and such measures shall be implemented during all construction phases:

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 the area bounded by Oregon Expressway, El Camino Real, California Avenue, and the Caltrain corridor, ~~50 feet of the project site~~ and provide the contact details of the dedicated disturbance coordinator (see MM-NOI-1b).

B. 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.

C. The following noise minimization measures shall be implemented:

- *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.*
- *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).*
- *"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.

- *Electrical power, rather than diesel equipment, shall be used to power tools and any temporary structures, such as construction trailers.*
- *Staging areas and stationary noise-generating equipment, such as compressors, shall be located as far away from noise-sensitive uses as feasible.*
- *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.*
- *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.*
- *All noise from workers' radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity.*

D. *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.*

In Section 3.12.3 (Impact NOI-1), revisions have been made to the first paragraph under the subheading "Project-Generated Traffic" in response to comment HOLZEMER-83, as follows:

As described in the Traffic Impact Assessment prepared for the Project (Appendix E), conversion of the project site from a small office building to a 110-unit mixed use building would result in a net increase of 145 ~~average daily~~ AM peak hour trips, compared to existing conditions. This Project-related traffic volume would be distributed along the surrounding roadways adjacent to the project site.

In Section 3.12.3 (Impact NOI-2), revisions have been made to mitigation measure MM-NOI-2 in response to comment HOLZEMER-89, as follows:

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 150 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.

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.*

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:*

- *The equipment is operated in "static mode" with all vibratory functions turned off; or*
- *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*
- *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.*

In Section 3.12.4 (Impact C-NOI-1) revisions have been made to the first paragraph under the subtitle "Construction" in response to comment HOLZEMER-92, as follows:

Construction of ~~The only cumulative project identified in Section 3.1.2 in the immediate vicinity of the project site is~~ the Public Safety Building (PSB) project at 250 Sherman Avenue, approximately 400 feet to the northwest would overlap with construction of the Project. Therefore, sensitive receptors between the two construction sites, such as the residential apartment buildings on Birch between Grant and Sherman could be subjected to combined construction noise from both projects.

In Section 3.12.4 (Impact C-NOI-1) revisions have been made to the last paragraph under the subtitle "Construction" in response to comment HOLZEMER-92, as follows:

In addition, it is possible that construction of the 123 Sherman project, approximately 130 feet north of the project site, could also overlap with later phases of the Project.

Available information for the 123 Sherman project does not include demolition debris or soil export volumes; however, given the size of the existing buildings on site and the two-level underground parking garage proposed, it would be reasonable to assume that this project would generate more construction traffic than the 231 Grant Project and would use similar types of construction equipment.

As discussed in Section 3.12.3, an increase in ambient noise levels of more than 5 dBA is typically considered to be a significant increase. In order for traffic noise to increase by 5

dBA, existing traffic volumes would need to increase by more than three times (i.e., an approximately 200 percent increase).

As shown in Table 3.12-5A, the most traffic-intensive phase of Project construction (Phase 1, site clearing, grading, and excavation) could temporarily increase existing traffic noise by approximately 3.4 dBA on Grant Avenue, 1.1 dBA on Birch Street, 0.9 dBA on Park Boulevard and 0.3 dBA on Oregon Expressway. If construction of the 123 Sherman project were to overlap with this phase of Project construction, and were to involve similar or higher volumes of construction traffic, it is likely that the cumulative increase in traffic noise could be significant on Grant Avenue, and possibly on Birch Street or Park Boulevard. However, Phase 1 of the 231 Grant Project is scheduled begin in mid-2022 and would take approximately six weeks to complete. Given the current status of the 123 Sherman project (yet to undergo environmental review), it is unlikely that construction of that project would begin prior to completion of Phase 1 of the 231 Grant Project.

Later construction phases for the 231 Grant Project would have substantially lesser traffic volume than Phase 1, as shown in Table 3.12-5, but could still make a cumulatively considerable contribution to the cumulative impact if they overlapped with construction of the 123 Sherman project. In addition, residential land uses within approximately 300 feet of both project sites could receive noise generated by construction equipment operating on both project sites, which could also be ***potentially significant****.*

Both the Project and PSB project would be subject to mitigation measures that would reduce construction noise. The 123 Sherman project would also be anticipated to either adhere to the City's noise ordinance or to undertake noise mitigation measures. However, due to uncertainty regarding the efficacy of the mitigation measures, and the timing of the 123 Sherman project, this cumulative impact is conservatively identified as ***significant and unavoidable****.*

In Section 3.12.4 (Impact C-NOI-2) revisions have been made to the section under the subheading "Cumulative Impact Analysis" in response to comment HOLZEMER-92, as follows:

~~The only cumulative project identified in Section 3.1.2 in the immediate vicinity of the project site is~~ Construction of the PSB project at 250 Sherman Avenue, approximately 400 feet to the northwest, would overlap with the Project construction period. Vibration-sensitive receptors between the two construction sites, such as the Palo Alto Courthouse, could be subjected to vibration from both projects. However, although the overall construction periods for the two projects would overlap, the most intensive vibration activities for the PSB project would occur during earlier phases of construction (demolition and site grading/excavation) which would not overlap with construction of the Project (City of Palo Alto 2018). Therefore, vibration from the two projects would not combine.

In addition, it is possible that construction of the 123 Sherman project, approximately 130 feet north of the project site, could also overlap with later phases of the Project. Although there is no available information at this time regarding construction equipment for the 123 Sherman project, it would be reasonable to assume that the 123 Sherman project would use similar equipment to the Project. As discussed in Section 3.12.3 (Impact NOI-2) above, vibration levels from heavy equipment such as vibratory rollers would be expected

to dissipate to below the threshold of building damage for modern residential buildings or concrete and steel buildings (0.5 in/sec PPV) within a distance of approximately 15 feet, and to below the threshold for human annoyance for residential land uses (72 VdB) within a distance of approximately 150 feet. There are no buildings within 15 feet of both project sites, however the residential building at 2581 Park Boulevard is within 150 feet of both the 123 Sherman and 231 Grant project sites, and therefore could be subjected to vibrations above the threshold of human annoyance from both projects.

~~However~~Therefore, because the Project would cause significant and unavoidable vibration impacts during construction that could not be reduced to a less-than-significant level by implementation of mitigation measures, and because vibrations from the Project could potentially combine with vibrations from other construction projects to cause annoyance to nearby residential land uses, the overall cumulative impact would also be ***significant and unavoidable****.*

In Section 3.14.1, the following revisions have been made to the first paragraph under the subheading “Parks” in response to comment HOLZEMER-100:

The City of Palo Alto Open Space and Parks Division provides parks, recreational facilities, and other public spaces to Palo Alto. The City of Palo Alto includes approximately 4,000 acres of open space, including the 1,940-acre Baylands Preserve. The Open Space and Parks Division maintains ~~over 162 developed~~ 174 acres of urban park lands throughout the city including baseball fields, tennis courts, dog runs, and a lawn bowling green, which equates to approximately 2.5 acres per 1,000 residents. The City has a goal of expanding parkland inventory to meet and maintain a standard of 4 acres per 1,000 residents and a maximum service area of a half-mile (City of Palo Alto 2021d~~c~~).

In Section 3.14.1, the following revisions have been made to the last bullet point item and following paragraph under the subheading “Parks” in response to comment BECKETT-16:

- *Stanford/Palo Alto Community Playing Fields, approximately 0.2~~5~~-mile northwest of the project site (El Camino Real and Page Mill Road). The Stanford/Palo Alto Community Playing Fields are 5.9 acres and include two turf soccer/rugby fields ~~open to the public~~ for adult and youth use with lights, a practice area, and picnic tables. The fields are typically reserved for youth and adult leagues from on weekday afternoons and weekends and are available for walk-up use on a first-come, first-served basis when not reserved.*
- *Mayfield Park, approximately 0.4 mile southwest of the project site (2300 Wellesley Street) is a 1.1-acre property containing the College Park library and a small (approximately 0.3-acre) grassed area.*
- *Cameron Park, approximately 0.5 mile southwest of the project site (2101 Wellesley Street) is a 1.1-acre park which includes a children’s play area and picnic tables.*

With these ~~four~~ six recreation areas, the nearest being less than a quarter mile away, the project site is considered relatively well served with park and recreational facilities compared to some other parts of Palo Alto. ~~,~~ ~~a~~According to the City’s Parks Trails Natural Open Space & Recreation Master Plan, t~~T~~he project site is not within a “park search

area," which are areas identified by the City as being in greatest need for expansion of recreational facilities~~. Additionally, the project site is in an area where community indoor recreation centers are within a half mile or less walking distance~~ (City of Palo Alto 2017d).

In Section 3.15.3 (Impact TRA-1), revisions have been made to the first paragraph under the subheading "Transit" in response to BECKETT-17, as follows:

According to the Metropolitan Transportation Commission, in 2018 (the latest year for which data was available) approximately 4.1 percent of Santa Clara County residents commuted by public transit (MTC 2020). However, given the Project's close proximity to the Palo Alto Caltrain Station and available bus routes, a higher percentage of transit users would be expected for this Project than the county-wide average. The 2018 transit ridership rates within Census Tract 6085511500 (containing the project site) was only 3.2 percent; however, this census tract extends to include the College Terrace neighborhood and areas further west toward Juniper Serra Boulevard which are not as well served by public transit as the project site and Evergreen Park/Mayfield neighborhood. The area immediately north of the Caltrain corridor (Census Tract 6085511400) had 2018 transit ridership rates of 8.9 percent which is considered to be more representative of the project vicinity. At this level of transit ridership~~Therefore~~, it is anticipated that the Project would generate approximately 24 ~~11~~ new transit riders. This small number of new transit passengers would be distributed across multiple existing bus routes, shuttles, and Caltrain, which are expected to be able to accommodate this small ridership increase. Based on observations of existing use, the existing bus and shuttle services and Caltrain would continue to have adequate capacity to serve the project vicinity and the new transit users from the Project are not expected to adversely affect public transit services.

In Section 3.15.3, revisions have been made to mitigation measure MM-TRA-3A in response to comment CITY-11, as follows:

MM-TRA-3A: Pedestrian/Bicycle Warning System

The Developer shall require that an audio-visual warning system with adjustable audio and lighting levels be installed at all parking garage exits to warn cyclists and pedestrians when a vehicle is approaching the garage exit. The audio-visual warning system shall meet the requirements of the City of Palo Alto. 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.

In Section 3.15.4 (Impact C-TRA-3), revisions have been made to the first paragraph under the subheading "Cumulative Impact Analysis" in response to comment BECKETT-11, as follows:

None of the cumulative projects identified in Section 3.1.2 would introduce permanent changes to the road network that would cause increased potential for traffic hazards or permanently obstruct emergency access in the project vicinity. However, the construction period for the nearby PSB project would overlap with Project construction, and the construction period for the 123 Sherman Avenue project could possibly also overlap. Therefore, construction-related traffic and road closures associated with the PSB project could cause additional detours, lane or road closures, and other temporary impacts to the local pedestrian and bicycle network and disruptions to emergency access that could

combine with Project impacts. The overall cumulative impact could be potentially significant.

In Section 3.15.4 (Impact C-TRA-3), revisions have been made to mitigation measure MM-C-TRA-3 in response to comment JCC-3 and BECKETT-11, as follows:

MM-C-TRA-3: Coordination of Construction Traffic Plans

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 and construction contractors for other active construction projects in the immediate vicinity of the project site to coordinate the Construction Traffic Management Plans for ~~both~~ all projects such that:

- *Temporary lane and/or road closures and detour routes do not conflict;*
- *Temporary road closures on Grant and Sherman Avenues at the same time shall be avoided to the extent feasible, to maintain connectivity between Birch Street and Park Boulevard and allow access to the Courthouse;*
- *Notification to local residents, bicycle and pedestrian advocacy groups, the Judicial Council of California, and the Valley Transit Authority are coordinated and clearly identify locations and periods of road closures, alternative routes, and other pertinent information; and*
- *Emergency access is maintained to all properties in the vicinity of the ~~both~~ projects throughout the combined construction period.*

4.5 Changes to Section 4 of the Draft EIR

In Section 4.1.1, the first objective of the Project shall be revised as follows in response to comment GRAVES-2:

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 for other school staff, public service employees, or non-profit employees to meet the Facebook grant criteria, delivered at an accelerated pace.

In Section 4, from the page containing Figure 4.3-1 through to the pages containing Table 4.4-1, the pages shall be renumbered from 4-1 through 4-30 to 4-30 through 4-63.

4.6 Changes to Section 5 of the Draft EIR

None.

4.7 Changes to Section 6 of the Draft EIR

None.

4.8 Changes to Section 7 of the Draft EIR

None.

4.9 Changes to the Appendices of the Draft EIR

In response to comment HOLZEMER-122, the following revisions have been made to Section 4.5.2 of the Transportation Impact Analysis (Appendix E-1 of the Draft EIR):

> The project proposes 90 degree at-grade parking along both sides of a single aisle of the garage, using a stacked system described in more detail~~s~~ below. Based on the proposed width of the ~~8.5 feet wide~~ 90-degree parking stalls provided (at least 9.3 feet), a minimum aisle width of ~~25~~24 feet is needed to meet the City's design requirement. The proposed aisle width is 24 feet and 3 1/8 inches and therefore meets the City's design standards. ~~at least 26 feet for the entire span except for the section with ADA compliant stalls which measured to be about 24 feet. This section of under-provision is unlikely to cause any operational issues since the (regular) cars will be mechanically parked and would fit 'nicely' in each stall, giving ample space for vehicles to maneuver. As the parking aisle spans across the entire building (more than 330 feet) and a stacked parking system is proposed, it is recommended that variable message signs displaying parking availability be installed at both entrances to provide advanced information to drivers, avoiding the need to drive down the aisle and turn around unnecessarily.~~

In response to comment CITY-12, the following revisions have been made to Section 4.5.3 of the Transportation Impact Analysis (Appendix E-1 of the Draft EIR):

> The project proposes to implement a stacked parking system for its street-level garage. While the five (5) ADA compliant spaces will be accessed directly at-grade, the remaining 107 spaces will be stacked over two levels. ~~Mechanical lifts with pit will be installed. The project would determine the most efficient way to assign each individual space to the user.~~ There are 7 groups of parking stackers proposed for the project. Each group would serve a range of 9 to 25 parking spaces. The lift spaces would be assigned by households. For drivers wishing to leave the parking garage, if their vehicle is already at surface level, they would use their FOB to open the gate at ground level and then access their car. They would then exit the garage in the same manner as a traditional parking garage. If their vehicle is not already at the surface level, they would prompt the system to retrieve their vehicle, and the system would move the specified vehicle to ground level so that the driver could enter their vehicle as described above. Vehicles leaving the parking garage (e.g., in the AM peak hour when residents leave for work) would not cause queuing impacts outside of the garage because the volume of traffic leaving the garage would be determined by the lift retrieval speed as well as the ability of exiting vehicles to pull out of the driveways onto the adjacent streets. All passenger and goods loading would occur within the surface level parking space, away from the aisle, and therefore would not block other vehicles using the aisle.
>
> When vehicles arrive at the parking garage (e.g., during the PM peak hour when residents return from work) drivers would enter the controlled access garage with a FOB and then prompt the system for the stacker to shuffle to their assigned spot. The gate to the stacker system would then open and the driver would pull into their assigned parking spot. If

vehicles entering the garage are accessing different parking groups, the wait time will be minimal: each vehicle would just need to wait for their assigned spot to move to the ground level. If several vehicles are attempting to access the same group, the wait time would be increased as the second vehicle would need to wait for the first vehicle to move into its spot before accessing their spot. However, due to the size of the parking garage and the number of different groups, the queuing of cars is not expected to spill out into the street.

Because the parking garage would only be utilized by Project residents, up to 27 inbound vehicles could enter the garage during the PM peak hour, based on the residential portion of the trip generation shown in Table 4-2 (with 9 percent trip reduction for TOD). Of these 27 trips, approximately 16 would be expected to enter via Birch Street (an average of one vehicle approximately every 4 minutes) and 11 via Park Boulevard (an average of one vehicle approximately every 5 minutes). The lift system proposed for use at the Project site has a retrieval time of approximately 60 seconds. Because the lift retrieval time would be shorter than the average time between arriving vehicles, queuing of in-bound vehicles would not be expected to occur such that vehicles would back-up beyond the garage entrances to create a potential traffic safety issue on Park Boulevard or Birch Street.

~~A vehicle would drive up to an open space provided in the lift to park. When requested to retrieve a vehicle, the lift will move it to the ground level where the driver would be able get it and drive out like a standard at-grade parking space.~~

~~During the worse-case scenario, the project could see up to 64 inbound vehicles to the site during the morning peak hour. These 64 vehicles would be distributed about equally between the 2 driveways (34 vehicles via Birch Street and 30 vehicles via Park Boulevard, see Figure 4-1 for project trips assignment), which means an average of one vehicle entering each driveway almost every 2 minutes. While more details on the stacked parking system, it operation and efficiency will be provided in due course, some systems can park a car in about half a minute[2]. Given the average arrival time of one vehicle per two minutes, it is unlikely that the stacking process would result in significant queuing along the streets.~~

In response to comment HOLZEMER-1, a new appendix has been added to the EIR, containing the arborist report that was prepared for the Project. The report is attached to this Final EIR as Appendix B.

4.10 Global Changes throughout the Draft EIR

In response to comment CITY-15, all instances of “Birch Avenue” have been corrected to “Birch Street.”

Appendix A – Comment Letters

Commenter JCC

JUDICIAL COUNCIL OF CALIFORNIA

2860 Gateway Oaks Drive, Suite 400 • Sacramento, California 95833-4336
Telephone 916-263-7885 • Fax 916-263-1966 • TDD 415-865-4272

TANI G. CANTIL-SAKAUYE
Chief Justice of California
Chair of the Judicial Council

MARTIN HOSHINO
Administrative Director

JOHN WORDLAW
Chief Administrative Officer

PELLA MCCORMICK
Director, Facilities Services

VIA FIRST CLASS MAIL & EMAIL

November 18, 2021

County of Santa Clara
Facilities and Fleet Department
Attn: Emily Chen
2310 N. First Street, Suite 200
San Jose, California 95131
Email: Emily.F.Chen@faf.sccgov.org

Re: Comments to Draft Environmental Impact Report
231 Grant Educator Workforce Housing Project

Dear Ms. Chen:

JCC-1 The Judicial Council of California ("Judicial Council") provides the following comments regarding the Draft Environmental Impact Report dated October 2021 ("EIR Report") for the 231 Grant Educator Workforce Housing Project ("Project").

The Superior Court of California, County of Santa Clara ("Court") Palo Alto Courthouse is located 270 Grant Avenue, Palo Alto, California, 94306 ("Courthouse"). The Courthouse currently remains closed due to the pandemic; however, it is expected to reopen in 2022. The Courthouse is situated directly across the street from the Project.

JCC-2 *Parking*

According to the EIR Report, the Project will be developed with approximately 110 residential units. (EIR Project Characteristics § 2.3.) Residents of the Project will need ample parking. It is reasonable to expect that some units may have households with more than one vehicle. It is also reasonable to expect that residents of the Project will have visitors in need of parking. The Project parking structure is slated to provide 112 parking spaces. (EIR Access and Circulation § 2.3.5.)

The EIR Report did not provide sufficient analysis or review of the potential parking issues at the Project. This is a matter of concern for the Court. The Courthouse parking lot is limited with designated parking spots for permit holders and Court visitors. The Courthouse parking is necessary for proper functioning of the Court. Jurors, attorneys, witnesses, and members of the general public rely on the existing Courthouse parking.

The Courthouse parking lot is directly across the street from the Project. It is foreseeable that a lack of adequate parking at the Project could result in spillover into the Courthouse parking lot. The existing Courthouse parking is necessary for the proper functioning of the Court. It is important that the Courthouse parking not be compromised by the Project.

JCC-3 *Construction / Staging / Traffic Control*

The Court has concerns about Project construction, staging, and traffic control. According to the EIR Report, periodic closure of Grant Avenue, including a full closure of 4–8 weeks during the setting of modular units is expected during construction. (EIR Construction Haul Routes, Staging, and Traffic Control § 2.4.2.)

The Courthouse is situated between Grant Avenue and Sherman Avenue. Currently, Sherman Avenue is closed due to a City of Palo construction project. The City project is expected to span several years. A closure of both Grant and Sherman Avenues would completely lock out Courthouse access points. As such, closure of Grant Avenue must be coordinated with existing road closures.

Furthermore, the Court has unique needs regarding the use of street space near the Courthouse. The Court conducts hearings that require the transport of in-custody individuals to the Courthouse. The transport buses range in size from approximately 35 feet to 45 feet in length. Maintaining access for the transport buses to and from the Courthouse is essential for Court operations.

The EIR Report does not address the issue of transport bus access to and from the Courthouse during Project street closures and construction staging activities. (EIR Construction Haul Routes, Staging, and Traffic Control § 2.4.2.) The EIR Report also does not address existing construction projects in the area.

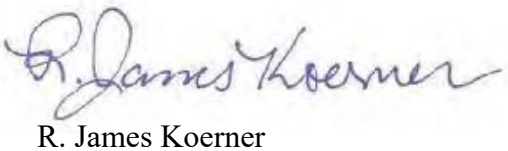
JCC-4 Finally, the EIR Report states that construction workers are required to park at nearby garages. (EIR Construction Haul Routes, Staging, and Traffic Control § 2.4.2.) Due to the proximity of the Courthouse parking lot to the Project, it should be made clear that the Courthouse parking lot is not available for worker parking.

JCC-5 In sum, the Draft Environmental Impact Report dated October 2021 for the 231 Grant Educator Workforce Housing Project did not sufficiently address the potential impacts of overflow parking related to Project, nor did it sufficiently address the impact of restricted access to the Courthouse during certain construction activities.

The Judicial Council requests further review of the Project's impact on neighborhood parking, as well as further review and coordination regarding Project construction activities impacting the Court.

Please contact the undersigned with any questions or concerns.

Very truly yours,



R. James Koerner
Senior Facilities Analyst, Real Estate

RJK/KK

Commenter CITY

PLANNING & DEVELOPMENT SERVICES
CITY OF PALO ALTO
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
(650) 329-2441

November 19, 2021

Emily Chen, Project Manager
City of East Palo Alto, Planning Division
2310 North First Street, Suite 200
San Jose, CA 95131
Email: Emily.F.Chen@faf.sccgov.org

RE: Draft Environmental Impact Report, 231 Grant Educator Workforce Housing

Thank you for including the City of Palo Alto in the environmental review process for the above-referenced project.

Project Understanding
The Project, 231 Grant Educator Workforce Housing, is located on Assessor's Parcel Number (APN) 132-31-074, a 1.4-acre County-owned parcel within the City of Palo Alto bounded by Park Boulevard, Grant Avenue, and Birch Street. The project is the demolition of an existing 6,800 square foot (sf) office building and associated parking lot and reconstruction of the site with a new four-story building totaling approximately 112,000 sf. The new building would include 110 multi-family residential rental units, approximately 2,000 sf of community living space, and approximately 1,200 sf of "flex space:" which could be utilized as a café or other retail or commercial use. The City understands that 112 vehicle parking spaces and 134 bicycle parking spaces would be provided.

The zoning designation on the site is Public Facilities (PF) and the Comprehensive Plan land use designation of the site is Major Institution, Special Facilities (MISP). However, the City understands that the County intends to use preemptive authority for governmental immunity on this project. The City understands that, therefore, the City's zoning code and associated permit requirements would not apply to the proposed project. The County will serve as the lead agency and the County's applicable regulations would apply in-lieu of the City's requirements.

The City of Palo Alto provides the following comments in response to the Draft EIR.

General Comments/Project Description

CITY-1
- The executive summary identifies the site as being within the Mayfair Neighborhood of Palo Alto. This project is located within the Evergreen Park neighborhood of Palo Alto.

CITY-2
- The project description indicates that two heritage trees would be removed along Grant Avenue. However, the two described trees (a coast redwood and a camphor) are not identified as heritage trees by the City (the City only has eight identified heritage trees, which are designated as such by City Council); therefore, unless they are identified as heritage trees by the County, the statement that these are heritage trees should be revised.

CITY-3
- Section 2, project description, indicates that noise exception permits are required for concrete pours (8-10 days 5 a.m. start), to mobilize the crane for temporary use (20-30 days), and to accommodate utility company schedules for utility work (15-20 days). Additional information would be necessary to clarify why work outside of standard construction hours would be required. The City would evaluate that information in determining whether a noise exception permit could be issued and for the hours that it could be issued for.

CITY-4
- For off-site improvements in our public rights of way (ROW):
  - Palo Alto requires an off-site improvement agreement for any off-site improvements in City Rights of Way.
  - If the flex plaza proposed at the corner of Park is intended for public access, as stated in the Draft EIR, a recorded easement dedicated to public access for that area should also be proposed as part of the project. This would require coordination with City Public Works staff, to determine if the City would be a party to this easement.

Noise

CITY-5
- It is not abundantly clear whether the chosen construction method (modular construction) is less or more noisy than the alternative method of construction (traditional construction). The traditional construction alternative should be selected if it is less noisy, to lessen the significant and unavoidable noise impacts, even though the impacts will remain significant.

CITY-6
- Any statement of overriding considerations would need to address the considerations that support use of modular construction over traditional construction, and not just the considerations supporting the project in general.

Aesthetics

CITY-7
- Analysis under Impact AES-4: light and glare on page 3-8 of the DEIR indicates that there would not be an impact related to light and glare, particularly from nighttime work during construction, because the project would adhere to the required hours. However, the project description indicates that applicant's intent to request approval for early morning and late evening work hours throughout construction. If this is the intent, the analysis should be modified accordingly.

Geology

CITY-8
- MM-GEO-3 should clarify that consent from adjacent property owner would be required if any underpinning requires work on the adjacent property.

Transportation

CITY-9
- Page 2-15 indicates that haul routes would be determined in coordination with the county of Santa Clara. Several of the streets listed are city streets, therefore haul routes should be determined in coordination with the City of Palo Alto as well.

CITY-10
- The DEIR states "Grant Avenue would likely need to be closed periodically during the construction period to allow for crane mobilization and/or concrete pours, including a full closure for 4 to 8 weeks during crane setting of modular units. Lane closures on Birch Avenue (northbound side of median only) and Park Boulevard may also be required occasionally, including two days each for crane setting of the far southwest and far southeast modular units, respectively." Therefore, any street closures must be coordinated with the City to ensure that access to businesses can be maintained at all times. Closure of any City streets will require permits from the City of Palo Alto.

CITY-11
- The project proponent shall make sure that audio warning signs should not create excessive noise for neighboring properties.

CITY-12
- Regarding Section 4.5.3: Lift retrieval time does not include loading and unloading time. Considering the passenger loading and unloading time per vehicle, the queuing issue may occur.

CITY-13
- Regarding Section 1.2 TIA Study: As per the city of Palo Alto's standard, a minimum of 10% of required non-residential parking must be standard parking spaces. The accessible spaces shall not be counted

as one of the standard spaces for this requirement. Mechanical lift parking is not allowed for retail use. Therefore, the project does not meet the city's parking requirements.

CITY-14 • The Project will be implementing modular construction method. This would reduce the timeframe of construction; however, the City anticipates that it would increase the number of wide loads and total number of trucks traveling to and from the site during certain period of construction. CEQA analysis shall evaluate traffic impacts due to the modular construction method compared to on-site construction.

CITY-15 • Birch Street is called out Birch Avenue in various sections of the report. Revise this to 'Street'.

Local Traffic Analysis

CITY-16 Although the CEQA analysis will not include a level of service analysis at nearby intersections in accordance with SB 743, the City of Palo may require a separate local traffic analysis be prepared 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. The City requests that a proposed analysis scope discuss the anticipated trip generated by the proposed development, the anticipated distribution pattern of those trips, and estimated number of peak hour project trips at the nearby intersections where anticipated project trips may trigger the City's thresholds for additional Level of Service (LOS) analysis. This scoping and analysis are necessary for understanding traffic circulation around the site. The City of Palo Alto's intersection standards should be utilized. The City's LOS policy, which includes thresholds and standards, is provided here: https://www.cityofpaloalto.org/civicax/filebank/blobdload.aspx?t=65453.84&BlobID=77026

CITY-17 *Bicycle and Vehicle Circulation*

Park Boulevard is a major bike route; therefore, the City would not recommend the addition of any new curb cuts along this frontage or a design that directs increased vehicle ingress/egress to this frontage. The City encourages reducing existing curb cuts where feasible. The project should incorporate all measures needed to improve bicycle safety on Park Boulevard, for vehicles exiting the site.

CITY-18 Traffic Calming

In the past, the City has received concerns from the residents in this neighborhood regarding the volume and speed of traffic in this area. The environmental analysis must determine whether the project may contribute to such issues, and consider if implementing traffic calming measures as part of the project would be appropriate within the immediate vicinity of the project.

CITY-19 *Coordination*

The City anticipates that construction of the City's Public Service Building could coincide with construction of this building. The traffic analysis muster the cumulative impacts of these projects, particularly during construction, so that the impacts on traffic and access to adjacent residences and businesses can be understood. Access to adjacent properties must be maintained throughout construction. Coordination between the County and City of Palo Alto must occur to minimize potential impacts associated with street closures, vehicle deliveries, and other construction activities.

Permits

CITY-20 The County must obtain a permit from the City of Palo Alto for any material haul/wide truck loads as well as encroachment permit(s) for any temporary or permanent encroachment within the City's right-of-way.

The City understands that the County has decided to make modular construction the proposed project, as opposed to using traditional construction methods (which are noted as the alternative). This would reduce the timeframe of construction; however, the City anticipates that it would increase the number of wide loads and total trucks traveling to and from the site during certain periods of construction. Additional information on the number of truck trips, the number of wide loads, etc. must be provided as part of the environmental

CITY-21 analysis. The City will require that the County submit a Traffic Control Plan (TCP) for the City's review and approval prior to construction; this should be identified in the environmental analysis. The City would review the TCP to analyze and approve the routes, timing, and to determine if additional temporary traffic control measures are necessary.

CITY-22 The County will need to coordinate with the city with respect to the Public Safety Building (PSB) project and this project. Matt Raschke is the main point of contact for the city for the PSB. There may be some overlap in construction activities for the Public Safety Building, starting as early as June 2022 with the tentative start of the demolition at 231 Grant, given the tentative construction schedule the County provided City Public Works staff:

Should you have any questions regarding this letter and the City's comment, please contact me at Jonathan.Lait@cityofpaloalto.org. Additionally, please copy Madina.Klicheva@cityofpaloalto.org to ensure the message is received and distributed.

Sincerely,

DocuSigned by:
293CF322E1294F6...

Jonathan Lait, AICP
Director, Planning & Development Services

Commenter LWV

LEAGUE OF WOMEN VOTERS OF PALO ALTO

October 15, 2021

Emily F. Chen, Sr. Planner
County of Santa Clara
Facilities and Fleet Department
2310 N. First St. Ste 200
San Jose, CA

Via email: Emily.F.Chen@faf.sccgov.org

Comment on Santa Clara County's draft EIR for 231 Grant Educator Workforce Housing Project

LWV-1

The League of Women Voters believes every person and family should have decent, safe, and affordable housing. People who are unable to work, whose earnings are inadequate or for whom jobs are not available have the right to an income or services sufficient to meet their basic human needs for food, shelter, and access to health care. The League also believes that local, state, and federal governments have the obligation to act where the private market has failed to support basic human needs.

LWV Palo Alto commends Santa Clara County for making county land available to serve as desperately needed teacher and classified staff housing development which would create 110 apartments for public school district employees from Santa Clara County and South San Mateo County. The project is adjacent to Caltrain and El Camino Real, is near existing bus and rail lines, retail, office, and shopping.

Creating housing affordable to all income levels, not just market rate, is a legal obligation of our cities and counties. The proposal is consistent with the City of Palo Alto's Comprehensive Plan which encourages housing near transit centers and is consistent with the City's land-use designation at this site. It is also consistent with the City's Housing Element policy to increase housing production in transit-rich areas. (Policy L-2.5: "support creation of housing units for middle and low-income earners such as city and school district employees." Policy H-2.1.2 "Support city's fair share of regional housing needs and ensure the population remains economically diverse.")

Housing affordable to teachers and other school district employees is in extremely short supply. Not only do our public employees suffer when faced with long commutes to work, but the fabric of our community suffers when teachers and other essential workers are forced to live hours away from the communities they serve. The climate-warming consequences of long commutes are also lessened when housing is near jobs.

The project deserves the full support of the county, the city, and residents.

Very truly yours,

Liz Kniss

President

From:	Jamie Beckett
To:	Chen, Emily F
Cc:	Peter Shuler; Supervisor Simitian; Terry Holzemer
Subject:	[EXTERNAL] Comments on EIR for 231 Grant
Date:	Thursday, November 18, 2021 9:49:41 PM

Dear Ms. Chen,

BECKETT-1 I have reviewed the EIR and I am outraged and horrified by the number of falsehoods it contains and the complete lack of concern for neighborhood residents who face added pollution, noise, traffic and parking problems -- while being robbed of precious trees and green space -- as a result of the 231 project.

The authors of the EIR were determined to show the project as having minimal impact despite the numerous red flags -- for all of the issues above -- raised in the EIR.

Clearly, the county only cares about some of its residents, but not those who live near this project. As a county resident and taxpayer, I demand a true and accurate representation of the project and its impact and I demand REAL mitigation for the pollution, noise, traffic, parking and other problems this project will create. I need to know when this will be provided.

Please see below for my comments and questions about the EIR.

Jamie Beckett
Park Boulevard, Palo Alto

BECKETT-2 Under Project Objectives, #3 – **the statement, "compatible with the surrounding neighborhood" is false and needs to be corrected.** This is a neighborhood of multi-family dwellings, none of which is zoned for higher density than RM-40, or 40 units per acre. None of the housing in this neighborhood exceeds 40 feet. This project is twice the density of RM-40 and proposed at 60 feet, meaning it will dwarf every neighborhood structure except the county building.
That is **not even remotely compatible with the neighborhood and will negatively affect local residents.**

Questions: By what measures did you judge this project to be compatible with the neighborhood? It cannot be height, density or appearance. So what? How is this compatible when it is unlike any structure nearby? Why were local residents not included in the decision-making to determine what constitutes neighborhood compatibility?

BECKETT-3 2.3.3 – Flex Space and Public Amenities – as outlined, **a suggested café or retail space in the northeast corner close to nearby residence is a nuisance and not a public amenity** because it will create added traffic, noise, waste, parking problems and blocks streets and bike paths (e.g. during deliveries). This so-called amenity is also detrimental to the residents of the apartment building for the reasons listed. A neighborhood amenity is a park, public meeting space or other beneficial use that is available to all.

Questions: In what way is a restaurant/retail space an neighborhood amenity? How does it benefit local residents who already have a wide choice of dining and retail

options on California Avenue? How will the county itself benefit? Will the county collect rent on the space? If not, who will? Will the county share a portion of the business' profits?

How is a restaurant/retail space considered a compatible use in a residential neighborhood? Why don't you build a small park for the use of the residents of your building, as well as the neighborhood? Would a café/retail business be compatible with a neighborhood of single-family homes? If not, then what makes our neighborhood different?

What mitigation measures will be put in place to address the parking problems the business will create? Will you add parking to your site? If not, where will patrons park?

BECKETT-4

2.3.4 – Landscaping, Utilities, and Other Site Improvements – the original plans for this project called for mature trees to be preserved. Now you plan to remove more than half of the trees on the site, including two mature trees (#64 and #67) in violation of the County's own Tree Protection Ordinance (https://library.municode.com/ca/santa_clara_county/codes/code_of_ordinances?nodeId=TITCCODELAUS_DIVC16TRPRRE).

This is a neighborhood with no real public parks and very little green space. Yet rather than "green" the neighborhood – or provide open space for the residents of the housing you propose to build – you deplete the environmentally beneficial features of your property, worsen pollution, and deprive the neighborhood of precious green space.

Questions: Why is it necessary to remove so many trees, including protected trees? Why were no neighborhood residents consulted? Why not get the opinion of an independent arborist (not paid by the developer) before you remove these precious resources? Why did your plans change? Why was the neighborhood neither informed of this removal decision /////// and excluded from the tree removal decision-making process? How can you justify removing environmentally beneficial resources and replacing them with more concrete and cars?

The county may own this land but the taxes of county residents fund county projects. By rights, county residents "own" these trees, not the county itself.

Questions: How do you plan to make up for the trees you plan to remove? What measures will you take to compensate local residents for the removal of these precious resources? Why did you not create a plan that would, in accordance with the county's own law, protect as many trees as possible? Do you plan a park or other plantings in the neighborhood to make up for the removal of these trees? **Please state exactly which trees will be planted as replacements, how large they will be initially and their anticipated growth within the first year.**

Questions: Why is it necessary to remove ALL OF THE STREET TREES near the project? What sort of trees will replace these? Will you plant mature trees that will match the size of those being removed? **Please state exactly which types of trees will be planted as replacements, how large they will be initially and their**

anticipated growth within the first year.

BECKETT-5 2.4.2 - Street closures around the project site – **Several large residential complexes housing thousands of people surround the site. Blocking neighborhood streets will affect residents' ability to easily and safely access their homes and could hinder access to homes by emergency vehicles.** Park, Birch and Sheridan are all feeder streets to the Oregon Expressway/Page Mill Road. All are two-lane roads with limited street parking. It is also possible that the street closures anticipated in your EIR will occur at the same time the city has closed Sherman Street and California Avenue. Any discussion of street closures and their impacts needs to include existing street closures and should involve neighborhood residents.

Questions: How will you ensure that residents have safe and unobstructed access to their homes? How will you avoid traffic delays and how will you mitigate any that occur? How will you ensure that emergency vehicles have unobstructed access to neighborhood homes? What traffic control measures will be put in place to mitigate street closures? How will you coordinate street closures with existing closures by the city of Palo Alto? How will you inform neighborhood residents of street closures and how will you ensure adequate notice? Exactly which residential complexes will be included in your notifications? Will you inform individual residents or use some other method? How do you plan to reduce the impact these closures will have on delivery trucks, moving trucks, postal deliveries? How will you compensate neighboring residents for delays in receiving scheduled deliveries or for costs incurred in having to reschedule moving trucks and other time-sensitive deliveries that require clear, unimpeded access to neighborhood streets?

BECKETT-6 Table 2.4.2
The EIR estimates that construction will involve **more than 2,800 truck trips** to the construction site yet it deems this to be "less than significant" The EIR (p 3-168) also estimates during the most traffic-intensive phase of construction the project will generate **65 vehicle trips per hour.**

Questions: **How was it determined that 2800 truck trips – and 65 per hour at times -- is "less than significant"? Significant to who? What measure did you use and what would you consider to be significant?** We are at a time when more people are working and attending school at home. How did you determine that the noise, pollution and congestion caused by these truck trips is "less than significant"? What measures will you take to mitigate the increased noise, pollution and congestion this will create? What traffic control measures will be in place during construction?

How much exhaust, fumes and will these truck trips and other vehicle traffic generate? How much will it impact air quality? If you cannot estimate the impact on air quality, how do you know it will not be significant? **What mitigation measures will you take to ensure the health of local residents living in the midst of all this added pollution?**

BECKETT-7 3.1.2 – Cumulative Impact Assessment Methodology – **Your "List of Cumulative Projects" is inadequate and needs to be revised.** Your list excludes several major

projects that are currently planned in the surrounding neighborhood of the project site. These projects include major developments at 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real. All of these projects – plus the two you mention – will dramatically affect the quality of life in the Mayfield neighborhood where your project resides.

Questions: Why were these projects ignored in the cumulative impact assessment? Please include all of the projects in the surrounding area and revise your estimation of the cumulative impact and then measure the change in the quality of life.

BECKETT-8 3.3.3 – Project Impacts and Mitigation –

It is clear from all of the materials (MM-AIR, MM-AIR-2, AIR-3, etc.) included in this section that there will be a major impact to neighborhood air quality, especially during and after construction. Nearly 3,000 truck trips to the site will increase air pollution and dust particles in the area. The added pollution will impact all local residents, especially children and seniors. The mitigation measures mentioned in the EIR – watering exposed areas, covering trucks, speed limits, maintaining equipment **ARE INADEQUATE TO PROTECT THE HEALTH OF NEIGHBORHOOD RESIDENTS.**

Questions: How much exhaust, fumes and air pollution will construction trucks and other construction vehicles generate? How much will it impact air quality? What is the current air quality in the neighborhood? How will you monitor air quality during construction? How will you monitor the health of local residents, especially vulnerable populations, during construction? **What ADDITIONAL mitigation measures will you take to ensure the health of local residents living in the midst of all this added pollution?** How will you ensure that vulnerable populations such as infants, the elderly and those with breathing difficulties are not harmed by this pollution? What compensation will you provide neighborhood residents for the health impacts of this pollution?

BECKETT-9 3.3.3 – “Idling times shall be minimized either by shutting them down or limiting them to five minutes.” **Five minutes is too long for heavy equipment to idle, spewing exhaust that is dangerous to children, pregnant women, the elderly and other sensitive populations.**

Questions: Why can’t you further limit idling time in the interest of public health? Who will monitor the truck and other equipment idling time? How will it be done and what will be the consequences for exceeding it?

BECKETT--10 3.3.3 “Impact AIR-3: Exposure of Sensitive Receptors” – The neighborhood is home to several senior living facilities and facilities for disadvantaged or disabled residents. Yet The EIR excludes several senior living facilities in the Mayfield neighborhood, including the Sunrise Assisted Living Facility.

Questions: Why were these living facilities excluded? Any neighborhood facility which has a large senior population (within a six-block radius) should be examined and reviewed for possible impacts.

BECKETT--11 Cumulative Impact C-HAZ-5 – In this section you state that “the only known past,

present, or reasonably foreseeable project is the Public Safety Building."

This is a false statement. Your own EIR mentions one other project, and as noted earlier, you fail to mention other projects in the neighborhood, including 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real.

Questions: Why did you fail to include these other projects? When can we expect to see a revised EIR that includes the cumulative impact of ALL of these projects?

BECKETT-12

3.12, Impact NOI-1: Ambient Noise Levels
The EIR says that the increase in neighborhood noise due to construction is "significant" and "unavoidable." Tell that to anyone working or going to school at home, at anyone trying to enjoy a lunch hour outdoors or anyone walking down the street. According to the World Health Organization (Burden of disease from environmental noise, 2011) and numerous peer-reviewed studies, exposure to prolonged or excessive noise has been shown to cause a range of health problems ranging from stress, poor concentration, productivity losses in the workplace, and communication difficulties and fatigue from lack of sleep, to more serious issues such as cardiovascular disease, cognitive impairment, tinnitus and hearing loss.

Questions: What measures will you take to mitigate construction noise? How will you monitor construction noise? How will you protect the health of neighborhood residents? What recourse do residents have if they are unable to work or enjoy their homes because of construction noise?

BECKETT-13

MM-NOI-1, statement – "staging areas and stationary noise-generating equipment, such as compressors, shall be located – as far away – from noise-sensitive uses as feasible"

Questions: What does this mean? What do you mean, specifically, about "as far away"? What do you consider a noise-sensitive use? Does that include residences? If not, how will you shield neighborhood residences from the impact of this noise? Where exactly will you locate this noise-generating equipment?

BECKETT-14

MM-NOI-1, statement, "smart back-up alarms will automatically adjust to ambient noise levels." **These noises are incredibly disruptive and can be heard far away. Back-up alarms on construction equipment should be silent and replaced with human spotters.**

BECKETT-15

MM-NOI-1, D. "Temporary sound barriers" … "shall be installed."

Questions: You propose eight-foot barriers along Park Boulevard because it is "street frontage," but you forgot that **the largest residential complex in the neighborhood is directly across Park Boulevard.** Eight-foot barriers are inadequate. What measures will you take to ensure that ALL nearby residences – not just those at the southeast boundary – are protected by deafening construction noise? Why not use the larger and thicker barriers around the entire construction site?

BECKETT-16

3.14 Public Services and Recreation – under “Parks.” **This material is false. There is no usable park space in the neighborhood for children.**

The Stanford/Palo Alto Community Playing Fields is NOT a Park or usable for the “walk-up” resident to use. This facility is by “reservation only” and is only for use for soccer and field hockey type games/practices. No one has ever, ever picnicked there as you state in the ERI – this is absolutely false.

The Sara Wallis Park is also falsely described as a park. This is not a park for children. It has no play facilities and is too small for children to use. It’s also so small as to render it unusable even for the elderly residents who live in the adjacent building.

Bowden Park is not an appropriate park for children because it is adjacent to the train tracks and is impacted by all of the noise, pollution and dirt generated by the train. It is also difficult to access because it requires travelling under the train tracks.

BECKETT-17

3.15.3, Impact of TRA-1, under “Transit” – You state that the project will create only 11 additional transit riders out of a potential 275 residents. **Not only does that put even MORE people on the roads, but it fails to justify your woefully inadequate parking, which is inadequate to meet the needs of building residents. Additionally, under Impact-TRA, all of your assumptions are false.**

Questions: Because you have not provided enough parking spaces for the project and anticipate only 11 transit riders among all residents in the new building, where do you expect residents to park? How can you justify inadequate parking? And how can you assert (in Impact TRA-2) that the project, which will add at least 100 cars to neighborhood streets, will fit into a “low VMT area”?

Commenter GOLD

From: anna gold
To: Chen, Emily F
Subject: [EXTERNAL] Opposition – 231 Grant Housing Project
Date: Sunday, October 31, 2021 5:17:53 PM

GOLD-1 We request **NO** project should be approved due to the following destructive impacts to the environment and the neighborhood.

GOLD-2 1. Damage hydrology and water quality because it is located above the California-Olive-Emerson regional groundwater plume, which is listed on the National Priorities List.

GOLD-3 2. Damage to the soils and other biological resources due to the mufti-years construction.

GOLD-4 3. Significantly increased traffic and environmental degradation. It has a very dense population already. There are buses to and from California Avenue Caltrain Station. And we want to keep the streets biker friendly.

GOLD-5 4. The worsened air quality would severely hurt many elders and have long-term impacts on many young children who live near the development.

GOLD-6 5. Concern regarding the noise and vibration levels. The construction will add devastative burden on top of the traffic noise from Oregon expressway and vibration from the Caltrain.

Sincerely

Anna Gold

Commenter GRAVES

From:	Pria Graves
To:	Chen, Emily F
Subject:	[EXTERNAL] Comments on Environmental Impact Report for the 231 Grant Educator Workforce Housing Project
Date:	Sunday, November 7, 2021 3:50:23 PM
Attachments:	EIR comments.pdf

Dear Ms. Chen,

The following are my comments regarding the Draft EIR for the 231 Grant Project. Please advise me if you have trouble opening the document.

Thank you,

Pria Graves
[redacted]
Palo Alto, CA 94306

[redacted]

Comments on the Environmental Impact Report for the 231 Grant Educator Workforce Housing Project

GRAVES-1

- Page 3 refers to the "Mayfair" neighborhood. It's actually "Mayfield".

GRAVES-2

- Describing housing allocation as including "a sufficient number of units to meet the Facebook grant criteria" which had not been mentioned in earlier public meetings is confusing. That statement fails to make it clear that this is not housing for Facebook staff but for educators in San Mateo county.

GRAVES-3

Furthermore, there is a discrepancy between unit allocations in Exec Summary vs. section 2.3.2. The latter states that "the other 32 units would be set aside for school employees… in San Mateo County" and that "approximately 78 units would serve teachers" in the participating districts [Santa Clara County] while the Executive Summary states that the project would provide "at least 60 rental housing units for teachers and classified staff in targeted school districts within Santa Clara County." This discrepancy needs to be cleared up.

GRAVES-4

- AIR-2: Net Increase in Criteria Pollutants
  MM-AIR-2
  Provision must be made to allow watering to control dust to continue 7 days a week despite Palo Alto's construction days/hours. Clouds of dust were witnessed during construction on the Stanford Campus on several Sundays when the piles of dirt were allowed to dry out.

  It would also be beneficial for surrounding residents if excavation and grading were suspended when high winds occur.

GRAVES-5

- HAZ-3: Hazards from Cortese-List Sites
  The potential for water flow entering surface waters and/or to percolate into clean groundwater is real. Much of this area sits above a compacted subgrade and during times of even moderate rainfall, the soil saturates to the surface and the water migrates gradually downhill until it reaches a point where it

can drain down into the water table. This flow could carry a variety of contaminants and deposit them into the groundwater farther toward the bay.

GRAVES-6

- TRA-3: Traffic Safety Hazards
  I'm pleased to see the proposed mitigations MM-TRA-3A and 3B but I'm still concerned that this is creating a potential for collisions with bicyclists using Park Boulevard. I would request that provision be made for additional measures should such an increase in collisions occur.

GRAVES-7

- UTI-2: Water Supply Availability
  California is in the midst of a long-term drought, a situation that is occurring with increasing frequency. In addition, it is possible that our Individual Supply Guarantee me be reduced in the future.

  While this project meets the letter of the water code, I find the statement that sufficient water supplies are available to be questionable considering that we're currently being told that we must significantly reduce our water use! This project is worthwhile, but to blithely state that the impact on water would be less than significant seems absurd.

GRAVES-8

- NOI-2: Groundborne Vibration
  This impact is concerning, especially since even with mitigations, it is still expected to be significant. Since this project is to be located on an alluvium consisting of "medium dense to very dense gravel and sand", the sound and vibration from compaction equipment is likely to be transmitted through the ground to nearby areas. I do not know if there are any inhabited basement areas nearby, but my personal experience with a much smaller project near my home in College Terrace taught me that such compaction rendered my basement uninhabitable for the duration of the project. This transmission through the ground may prove seriously problematic for nearby residents working from home and/or the occupants of the courthouse.

Commenter HOLZEMER

From: holzemer/hernandez
To: Chen, Emily F
Subject: [EXTERNAL] Info Request -- 231 Grant
Date: Saturday, October 30, 2021 2:01:54 AM

Emily,

I have a request in regards to the 231 Grant project.

HOLZEMER-1

I'm currently reviewing the DEIR report and on several pages (3-43, bottom of page, for example) there is mention of a City of Palo Alto report on the landscape/trees on the 231 Grant site. However, this letter or report is not included anywhere in the DEIR -- in fact, there is little or no documentation in the EIR about the status of any of the trees or other landscaping on site. I would to see this City of Palo Alto report or communication and ask why it is not in the EIR.

Terry Holzemer

Commenter HOLZEMER

From:	donotreply@isd.sccgov.org on behalf of Santa Clara County
To:	Chen, Emily F; Sifuentes, Melissa
Subject:	[EXTERNAL] Webform submission from: Feedback and Comments
Date:	Thursday, November 18, 2021 6:36:30 PM

Submitted on Thu, 11/18/2021 - 18:36

Submitted by: Anonymous

Submitted values are:

First Name
Terry

Last Name
Holzemer

Phone Number:
[redacted]

Street Address
[redacted]

City
Palo Alto

State
CA

Zip Code
94306

E-mail Address
[redacted]

Comments
Ms. Chen,

HOLZEMER-2
Can you please tell me if there is a video online of the October 20th public meeting on the 23 Grant DEIR. I would like to see it.

I would like to know the "next steps" in the process, after tomorrow's comments deadline on the DEIR. When do you anticipate the EIR to be finalized and the comments to be responded to? Will this EIR then go to the County's Planning Commission for a hearing? I assume sometime early next year. Please let me know and keep me posted on any updates.

Commenter HOLZEMER

From:	holzemer/hernandez
To:	Chen, Emily F
Subject:	[EXTERNAL] 231 Grant DEiR Comments
Date:	Friday, November 19, 2021 4:21:13 PM
Attachments:	DEIR Comments.docx

Ms. Chen,

Attached to this email are my 231 Grant DEIR Comments. Please verify that you received them, before the DEIR deadline today.

I also wanted to express to you three additional areas of concerns/questions I have about this project as it moves forward.

HOLZEMER-3

1) The importance of the County (not its "paid agents" -- e.g. the Developer, etc.) establishing a real dialogue and listening segment with the neighborhood on all project activities. It's a shame, for example, that the neighbors -- who live here every day -- weren't invite to participate or comment on the original Project Objectives (EIR Page iii) and provide some constructive feedback on what the proposed building design would be.

Contrary to what some might believed, our neighborhood does support the idea of "teacher housing" and we think the 231 Grant location is an excellent spot for such housing. However, we do have some deep concerns about the project's size, density, toxic plume exposure, construction noise, lack of parking, and other important issues that seemingly have fallen on deaf County ears. No one from the County seems to take our concerns seriously and or is listening to us. Please no more fake "community meetings" -- have real meetings with those who live here each day in this neighborhood.

The question that one of our residents asked at the very first so-called "Community Meeting" remains -- "What, if anything, is the County/Developer willing to compromise on in regards to this project?" So far we have heard only silence.

HOLZEMER-4

2) I would like to add a few comments about the Virtual DEIR Comments Meeting, held October 20th, which I attended, but didn't speak. On purpose, I wanted to listen to all the public speakers who spoke that evening, but was surprised by their seemingly lack of detail or knowledge of the DEIR documents or its contents.

The only public comments I heard (several times, repeatedly) were about the virtues of creating "teacher housing" and how much it was needed. But, where were the public comments on the DEIR document itself? Shouldn't the public speakers be talking about the DEIR and its contents?

Not one of the public speakers talked about the potentially hazardous exposure of contaminated groundwater to neighbors or even the increased traffic in the area, as clearly outlined in the DEIR. Instead, it seemed as if everyone was promoting the idea that anyone against this project was somehow against "teacher housing" or being anti-teacher (I'm certainly not -- I'm a school teacher myself).

It's time to focus on the project itself and the details involved in its construction and future operation.

HOLZEMER-5

3) Your agents/the Developer has been very vague or has never disclosed the real details of how this facility will be run. As a publicly-funded facility, these facts should be known to the general public. Although not a complete list, the following information should be included:

A)1 What will be the specific rents in the building?

B) Will the building have BMR units (how many and what variety)?

C) How will the distribution of units be handled (will it be a strictly lottery system each year?, how many units will go to Palo Alto Unified, to Mountain View/Whisman? etc.)?

4) Since the City of Palo Alto (its taxpayers) put in several million for the project, do they get some say in who lives there?

5) What will be the rental restrictions or conditions attached to each rental unit -- example, what happens if a unit tenant retires or leave her Santa Clara County teaching job, does he/she get to stay indefinitely in 231 Grant or can they even sublease it? What happens if a teacher moves from one district to another (in Santa Clara County) -- does she or he get to stay at 231 Grant? Are these rental restrictions the same for both the Santa Clara County units and the San Mateo (Facebook) ones? Is the San Mateo/Facebook grant restrictive forever (meaning is there any "grandfathering" of the time frame where eventually all the units in the building could become Santa Clara County ones?) The details of the rental restrictions -- who lives there, how long, etc. -- should be clear and understood and disclosed to the public (this is public money, you know).

Thank you.

Sincerely,

Terry Holzemer

[redacted]

Palo Alto, CA 94306

[redacted]

[redacted]

DEIR Comments – 231 Grant (Teacher Housing)

HOLZEMER-6

The comments below and those on the following pages are my own, however, they do reflect the thoughts of many individuals in the Mayfield neighborhood who feel their voices have been ignored and/or dismissed by County officials as unwarranted. It's unfortunate that feeling persists and continues today. It's long overdue that the County (not the Developer, its representatives, or its PR firms) meet with our neighborhood to discuss our concerns listed below. PLEASE no more "Developer-led, so-called Community Meetings", inviting every special interest group from San Jose to San Francisco to speak about the virtues of teacher housing. No one is against teacher housing – I'm a teacher myself. Instead focus on the concerns of the residents, who live in this neighborhood – no more than a five or six-block radius of the project site.

HOLZEMER-7

1) Under Executive Summary, Project Objectives – who specifically created the project objectives and when were they created? Was it a selected committee? This was never identified in the EIR. I know residents and the Mayfield neighborhood were never consulted, requested to comment on, nor a part of selecting these objectives. EIR page iii.

HOLZEMER-8

2) Under Project Objectives, #1 – who or how was the specific number of "60" selected for rental housing units for teachers within Santa Clara County? Why not 30 or 50? How was this specific number selected and what was the process in selecting this – is 60 really the only choice? EIR page iii.

HOLZEMER-9

3) Under Project Objectives, #1 – what is the Facebook grant criteria? – this is not disclosed anywhere in the DEIR. Any project document should be publicly known, especially to all parties, including County residents. Why weren't these criteria, I assume negotiated by the County, made public or disclosed to the public in the EIR, especially to the neighborhood? Who agreed to the Facebook criteria – was there a County Supervisor vote on the criteria or a signed agreement with Facebook? If so, when? EIR page iii.

HOLZEMER-10

4) Under Project Objectives, #1 – what does the words "accelerated rate" mean? No definition provided. Does this mean this is the only way the project can be built? What happens if a significant earthquake happens during construction or groundwater/soil contamination is found on-site, does "accelerated rate" mean construction continues non-stop? The public – especially the neighborhood (a five-block radius) – should be consulted first and throughout the project. EIR page iii.

HOLZEMER-11

5) Under Project Objectives, #3 – the statement, "compatible with the surrounding neighborhood" is an incorrect, untrue statement of fact and needs to be corrected. All the residential multi-family complexes in the Mayfield area are zoned RM-40 (40 units per acre). The proposed 231 Grant project is **DOUBLE** that density (around 80 units per acre). That is not compatible (or even close) with the surrounding residential complexes. EIR page iv

HOLZEMER-12

6) 2.2 -- Project Objectives – again, who specifically decided these "objectives", who had "input" or "say" into the design of these objectives? The Mayfield neighborhood – the area most affected by the Project -- was never invited, asked to comment on, or requested to participate in the design of these "project objectives". EIR page 2-4.

HOLZEMER-13

7) 2.2 -- Project Objectives, #1 -- the number "60" seem arbitrary (no basis in any EIR fact or detail) and the statement, "compatible with neighborhood" is just simply false. What facts do you have to base the number "60" on and why is that so vital? The above statement is incorrect and needs to be changed. EIR Page 2-4.

HOLZEMER-14

8) 2.3.1 – Building Design and Site Layout, roof height, extends beyond 50' to approx. 60' – this exceeds the City of Palo Alto's height limitations by 10'. All residential buildings in the Mayfield neighborhood are limited to 40'. Why can't this standard height for the project building remain? What can be done to reduce the height on the sides of the building (facing Park and Birch) nearest residential complexes? The EIR's Alternative #2 does meet this height standard. EIR Page 2-5.

HOLZEMER-15

9) 2.3.3 – Flex Space and Public Amenities – as outlined, a suggested café in this northeast corner, close to nearby residences, would have major daily operational problems, being along Park and Grant – where would patrons park? how would food deliveries be handled (blocking streets, bike paths, etc.)? Not a good location, -- as street parking is only for residents -- for any type of restaurant (recently a new restaurant went out of business in the new Park Place Apartment building, down on the corner of Park and Page Mill). EIR Page 2-5.

HOLZEMER-16

10) 2.3.4 – Landscaping, Utilities, and Other Site Improvements – the removal of two, beautiful, native mature trees (#64 and #67) are of deep concern to Mayfield neighborhood residents. These trees are landmarks in our neighborhood and beloved by many residents. Why was the neighborhood not informed of this removal decision and excluded from the tree removal decision-making process? Until an arborist report was requested (not included in the EIR) no one in the neighborhood knew of the trees removal (they were in the original Project plans to keep these trees). EIR Page 2-6.

HOLZEMER-17

11) 2.4 – Project Construction – "modular construction" is the Project's preferred method of construction yet nothing in the EIR describes the safety aspects of doing this construction. What happens in strong wind conditions? Nothing is described or detailed. Has this type of construction been done in Palo Alto before? No specifics provided. EIR Page 2-13.

HOLZEMER-18

12) 2.4 – "parking stackers and podium will be built on-site", however no detail on the parking stackers or system is provided. How will it be constructed "on site"? Again, no safety details on the parking stackers provided in the EIR. EIR Page 2-13.

HOLZEMER-19

13) 2.4.1 – Construction Phasing – a "15-18 month" construction period is mentioned through the EIR. Why is this "accelerate rate" necessary (who said so?) and what are the sacrifices in safety and quality construction? Who is responsible for overseeing the overall safety and quality workmanship? If local residents see "safety conditions" being sacrificed, who do we contact and how quickly will they respond? EIR Page 2-13.

HOLZEMER-20

14) 2.4.1 – Construction hours – the City's construction hours must be strictly adhered to for the peaceful and quality of life enjoyment of the neighborhood. "Early starts/late finishes" work is NOT ACCEPTABLE, without neighborhood involvement. What steps will the County take to ensure that the neighborhood (within a five-block radius) is involved in setting any special construction hours, so everyone can be aware – in advance -- of any changes to the City's allowable hours? EIR Page 2-13.

HOLZEMER-21

15) 2.4.1 – "abatement of hazardous materials" – what information methods and/or notification will be made to the neighborhood (five-block radius) about the discover of hazardous materials or contaminated soil found on the project site? Those most affected in the neighborhood need to know if any hazardous material/contaminated soil is found, the type, and the significant potential health issues these that materials or soil may have for residents in the area. EIR Page 2-13.

HOLZEMER-22

16) 2.4.2 – Construction Haul Routes/Staging/Traffic Control – "workers would park in public parking lots within a quarter mile of the site" – Do you have a service agreement with the City of Palo Alto to provide this "worker parking"? When was this established and by who? The only Parking Garage/structure with a quarter mile is meant strictly for the commercial businesses on California Avenue (I participated in the planning of this Garage since it is in my neighborhood). This Garage is not for 'construction workers to park in all day'. What specific City parking lots are you planning to park in? Street parking is for residents only. EIR Page 2-15.

HOLZEMER-23

17) 2.4.2 – street closures around project site – Sheridan, Birch, Grant, Park and Sherman are all narrow, connector or feeder streets to multi-family residences in this neighborhood. All are narrow two-lane roads with some limited street parking. Grant Avenue, specifically, is a major connector street for several residential complexes, including Birch Court, Grant Avenue, and especially Palo Alto Central. Literally, hundreds of residents use these streets -- Grant, Sheridan, Sherman (when it is open – which it isn't) to connect to Park Blvd., Oregon Expressway, and El Camino. Question – why isn't the neighborhood involved in the decision-making process of any of these street closure decisions? Neighbors insist on being part of this decision-making process. Lane and street closures are not acceptable when it affects the ability of residents to get to and from their homes each and every day. Delays, which could be critical, getting out or coming back to their homes is simply not acceptable and both the County and City should be aware of these issues. EIR Page 2-15.

HOLZEMER-24

18) Table 2.4-2 -- Estimated Material Import/Export Volumes – the estimated (not exact) # of truck trips is literally shocking for our quiet Mayfield neighborhood – nearly **3,000 truck visits**, back and forth, throughout the project's building cycle. What will be done to reduce this huge level of truck traffic on our small neighborhood streets (Birch, Grant, Sherman, Park)? This level is not acceptable to the neighborhood. What will be done to reduce the truck noise and diesel exhaust from these trucks on a daily basis? Children, who live very close by and throughout our neighborhood, will be exposed to these trucks on a daily basis – what is being done to protect them from this diesel exhaust and noise on a daily basis? EIR Page 2-15.

HOLZEMER-25

19) 2.4.2 – "a traffic control plan will be implemented in consultation with the City of Palo Alto" – why doesn't the "traffic plan" have any input from or outreach to the neighborhood – the folks most affected by any plan? The neighborhood, MUST have input in any traffic plan that impacts them. No outreach or input from the neighborhood has been requested by the County or the City. EIR Page 2-17.

HOLZEMER-26

20) 2.4.2 – "72 hour advance notice to abutting property owners" – who selected this time frame of 72 hours and why weren't residents a part of this decision on notification time? 72-hour notice is simply not enough notification for road closures and changes. In addition, "abutting property owners" should not be the only ones notified of changes. It is not enough to notify the "abutting residents of the project" about road closures/modifications. EIR Page 2-17.

HOLZEMER-27

21) 3.1.2 – Cumulative Impact Assessment Methodology – Under "List of Cumulative Projects" this table is significantly incomplete and excludes several major projects that being currently planned by the City of Palo Alto in the surrounding neighborhood of the project site. The project list includes 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real. All these projects should have been included in your cumulative analysis because together they will impact the quality of life, traffic, parking, and congestion of the Mayfield neighborhood, where the project resides. Why were these projects ignored in the cumulative impact assessment and if they were for some "technicality", please explain why these projects should not be examined now as part of "cumulative impact" now? EIR Page 3-2.

HOLZEMER-28

22) 3.2 – Aesthetics, Impact AES-1, Scenic Vistas – Analysis that there is "no impact" is incorrect. Being a 55-60-foot tall structure, immediately across the street, will severely impact and block the scenic view/vista of many residents who live in the Palo Alto Central residential complex, who face the Stanford foothills, looking west from Park Blvd. The statement, "construction would not obstruct background views of scenic resources", is simply a false statement. How will this statement be corrected? The impact and loss of these scenic vistas will be significant to the residents facing the project from the east. EIR Page 3-6.

HOLZEMER-29

23) 3.2 – Impact AES-3, Scenic Quality – In the "Impact Analysis" section, the statement, "the project site is surrounded by urban development and the 50 feet (this is an error, the building is 55-60) is similar to existing buildings" excludes the fact that all other residential buildings in the area are 40-feet or below. This project is not like other residential buildings in the area – it exceeds it in height and density. This project will standout and not fit in with existing residences. Why is it necessary to exceed the existing residential neighborhood standards? This is not explained anywhere in the EIR? EIR Page 3-7.

HOLZEMER-30

24) 3.3.3 – Project Impacts and Mitigation – Impact AIR-2: Net Increase in Criteria Pollutants – it clear from this section that there will be "potentially significant" impacts to the residents who live in this neighborhood, especially air quality during and after construction. Nearly 3,000 truck visits to the site will increase air pollution in the area, including the amount of dust particles in the air, affecting all the neighboring residences. What will be done to decrease the amount of truck trips to the site – 3,000 is just excessively high? Why weren't residents consulted or made aware of the level of truck visits required before this project's design was finalized? What can be done to reduce the number of truck visits? EIR Page 3-26.

HOLZEMER-31

25) 3.3.3 – "MM-AIR-2: Fugitive Dust Reduction Measures" – why no clear involvement by the neighborhood in monitoring the level of dust in the area and ways to report it back to the parties responsible of reducing it for the neighborhood? These measures don't go far enough in involving the neighborhood. EIR Page 3-27.

HOLZEMER-32

26) 3.3.3 – "Idling times shall be minimized either by shutting them down or limiting them to 5 mins" – 5 mins is way too long of time for "idling equipment" – dangerous exhaust for children and young people to breathe in. Why can't this time be reduced to 2 minutes? Who will monitor the time for idling trucks and equipment? How will it be done and what will be the consequences for exceeding it? EIR Page 3-27.

HOLZEMER-33

27) 3.3.3 "Impact AIR-3: Exposure of Sensitive Receptors" – EIR exclusion of several senior living facilities in the Mayfield neighborhood, like the Sunrise Assisted Living Facility, which has residents who are particularly sensitive receptors to the project site. Why were they excluded? Any neighborhood facility, which has large senior population, (within a five-block radius) should be examined and reviewed for possible impacts. EIR Page 3-29.

HOLZEMER-34

28) 3.3.3 "Impact AIR-3", 'the greatest potential for toxic air contaminant emissions would be diesel particulate matter" – the need to reduce the level of truck visits and the use of heavy equipment is critical to people's safety. What will the County do to reduce these truck visits and minimize the use of heavy equipment? Again, numerous trucks idling for 5 minutes every day for 15 or 18 months is NOT acceptable to the Mayfield neighborhood and their air quality. EIR Page 3-30.

HOLZEMER-35

29) 3.3.3 “Impact AIR-3”, Operation section – No discussion in the EIR on the parking stacker equipment air emissions standards or the air quality impact inside the garage while cars are “queuing up” to either leave or come into the garage area while waiting to park. How will the vehicle exhaust exposure inside the garage area be measured? EIR Page 3-31.

HOLZEMER-36

30) Cumulative Impact C-AIR-1, Air Quality Plan Conflicts or Net Increase in Criteria Pollutants, -- again the EIR fails to take into account several neighborhood projects that have been approved or going through the approval process. These projects – should all be examined together before any cumulative impacts can be dismissed. EIR Page 3-33.

HOLZEMER-37

31) Cumulative Impact C-AIR-2 – same as above. Needs to examine more than two proposed additional projects that are planned in our neighborhood. The EIR analysis is flawed, incomplete and inaccurate today. EIR Page 3-34.

HOLZEMER-38

32) 3.4, Biological Resources – “nesting habitats for common bird species would be reduced because of the mature tree removals” – Instead of the proposed mitigation measure suggested in the DEIR, why can’t these mature trees remain and a construction “work-around” be done to save these valuable mature trees? Who will monitoring the conditions of MM-BIO-4 measure? No monitoring system is established in the EIR. Who is the “qualified biologist” and how will residents be able to contact him/her? EIR Page 3-42.

HOLZEMER-39

33) 3.4, Impact BIO-5: Local Policy or Ordinance Conflicts – no neighborhood group or residents were ever contacted about the removal of street or property mature trees in their neighborhood – why? Residents disagree with the tree(s) conditions both on the property (Tree #64 and #67) on the street. Removal of the street trees is certainly not justified nor warranted and should be protected – explain the need for the street tree(s) removal? We understand Mr. Passmore is no longer with the City of Palo Alto and his opinion carries no official City capacity at this point or time. EIR Page 3-43.

HOLZEMER-40

34) 3.4, Impact BIO-5: Local Policy or Ordinance Conflicts – the two mature, “heritage” trees on the project site (#64 and #67) were both an original part of the design plans for the project and should remain in place. There is no need to remove these trees, except for the benefits of the project’s construction – which could be modified to save these beautiful and majestic trees. Both the coastal redwood (#64) and the camphor (#67) are landmark trees in our neighborhood and we want them retained. Why weren’t the residents who love these trees consulted before any decision was made about their removal? No one from the project team or the County or City every contacted the neighborhood. EIR Page 3-44.

HOLZEMER-41

35) 3.4, Impact BIO-5, If the coastal redwood tree (#64) and Camphor (#67) are to be removed, neighborhood residents **insist** on the following steps: 1) it is mandatory that each replacement native tree in the area be given at least 1,200 sq.ft. of rootable soil

surrounding each tree, with a 25-foot radius of space to grow new canopy. The maximum level of soil volume should be verified by the City and/or a professional arborist serving the new landscape. An engineered soil area (Silva cells or equivalent technology) for each tree should be used to energize and keep the trees healthy for long term sustainability and 2) the proposed recycled water level and its use must be carefully maintained and adjusted so as to not damage the trees' lifespan. The maximum is 500 ppm salt content – if this is compromised, replacement trees will die over time. Will you accept these terms? EIR Page 3-44.

HOLZEMER-42

36) Cumulative Impact C-BIO-4: Fish or Wildlife Movement, Migration or Nursery Sites – again, the issue is not including these other planned projects that are proposed for the Mayfield neighborhood. All these projects mentioned earlier – 300 Lambert, 123 Sherman, 380 Cambridge, etc. are not included in this EIR analysis and should be as they affect the cumulative effects of our neighborhood. EIR Page 3-45.

HOLZEMER-43

37) 3.5, Historical Resources, under "Built Environmental Survey" – statement made that two other additional resources (the Courthouse building and the Courthouse Plaza office building) were identified as potential historical resources due "to their age". Question – why wouldn't 231 Grant, the project – because of its age as well – be considered as a potential historical resource as well? Not explained nor detailed in the EIR. EIR Page 3-50.

HOLZEMER-44

38) 3.5, Impact CUL-1: Historical Resources – potential vibration damage due to construction equipment is studied only for abutting properties, but neighborhood concerns also arise from numerous residential buildings and underground garages that are close to the project site -- less than 100 yards away. What will be the process if damage occurs to these near-by residences because of vibration from project construction equipment? Who will be responsible for responding to vibration damage issues and how quickly will they respond? What mitigation steps will be taken if damage is found? EIR Page 3-60.

HOLZEMER-45

39) Cumulative Impact C-CUL-1: Historical Resources – again the omission of several proposed and planned projects in the area makes for a flawed EIR. Why can't the cumulative effects of these other projects – which are in the planning process – be studied now? EIR Page 3-65.

HOLZEMER-46

40) 3.6.3 Impact ENE-1: Wasteful, Inefficient or Unnecessary Consumption of Energy Resources – under "construction", it clear that additional truck trips (nearly 3,000) will be need for the modular construction being planned – why can't this number of truck trips be minimized or reduced. Idling time up to 5 minutes is not acceptable to residents – this type of diesel fume exposure on a regular, daily basis needs to be reduced. What specific steps will the County take to reduce this fume/particle exposure to neighborhood residents? Reduction of truck trips is critical for residents. EIR Page 3-72.

HOLZEMER-47

41) Cumulative Impact C-ENE-1 – again, no study of the additional proposed projects in the Mayfield neighborhood. Two proposed projects the EIR included (one on El Camino and the other, the Public Safety Building) do not show the full impact of these proposed projects that are now in the pipeline to be built. These projects include: 300 Lambert, 123 Sherman, 2955 El Camino, 200 Portage and 380 Cambridge. All are within a 10-minute walk from the project site. EIR Page 3-75.

HOLZEMER-48

42) 3.7.3 Impact GEO-1: Seismic Hazards – under "impact analysis", it's clear that the project site is in a very seismically active area/neighborhood. A major quake and resulting damage are nearly a certainty in the lifetime of 231 Grant. Why then no details in the EIR about how seismically safe and strong is the 231 "modular" construction to withstand a 7 or 8 magnitude earthquake? Nothing specific is in there about the construction details. In addition, why are there is no details in the EIR on the seismic abilities of the parking "stacking" system that will be enclosed under the living areas of the building? What specific steps are being taking to ensure the seismic capabilities of the parking stackers? What steps will be taken if the parking stackers collapse in an earthquake? What fire prevention steps will be taken in regard to the parking stackers in an earthquake? No facts or information on the parking stackers provided in the EIR. What are the environmental effects to the entire neighborhood if a major fire erupts when a stacker collapses (after an earthquake) that is enclosed in the garage area of 231 Grant? No professional fire support will be available, after a major quake. EIR Page 3-85.

HOLZEMER-49

43) 3.7.3 Impact GEO-3: Unstable Soils or Geological Units – "under Impact Analysis", it's clear that the soil beneath the site is not very stable, so footings/foundations must be deeper than originally planned. There are concerns over the soil, so that a deepening of the foundation may be necessary, affecting abutting buildings. What specific steps will be taken to ensure the safety of all future building occupants? Concern is also raised about the need to go 'deeper" into the ground – 27 feet bags – 10 feet below ZOI – which is where the contaminated groundwater is located from the hazardous waste toxic plume which is a Super Fund site. What steps will be taken if this groundwater is contacted by construction activities and how will residents be notified of this discovery? It's vital to inform residents of any contact by construction crews with this groundwater and its impact on the neighborhood. EIR Page 3-87.

HOLZEMER-50

44) MM-GEO-3: Preparation of the Geotechnical Report and Implementation of a Monitoring Program" – vital that such a "geotechnical report" be made available to the public and distributed to the neighborhood residents. Explain that this will be done. In addition, any monitoring program should be fully disclosed and details provide to the residents in the neighborhood. Please provide details on the monitoring program. EIR Page 3-88.

HOLZEMER-51

45) Cumulative Impact C-GEO-1: Seismic Hazards – again, the cumulative effects of proposed projects in the neighborhood have not been studied in the EIR. Why? There are several projects being planned in our neighborhood that are not included in the EIR

analysis. List of projects already mentioned. The dangers of parking stackers (being planned beyond 231 Grant – 123 Sherman plans "stackers" too) is not fully understood with regards to "seismic hazards" and this should be provided in the EIR. If a major quake occurs (which is likely) in the next 30 years, what will be parking stackers impact on the environment and the neighborhood? Not explained in the EIR. EIR Page 3-93.

HOLZEMER-52

46) Cumulative Impact C-GEO-3: Unstable Soils – under "cumulative impact analysis", statement that "none of the identified cumulative projects (only two) are in the immediate vicinity" is true, but only because there is a clear EIR omission of several planned, proposed projects in the immediate area – 300 Lambert, 200 Portage, 123 Sherman, etc. These projects should be part of any "cumulative analysis". EIR page 3-94.

HOLZEMER-53

47) 3.8.3 Impact GHG-1: GHG Emissions – Why has the County not established "thresholds" for determining whether a project's GHG emissions are significant? That's inexcusable to residents who are concerned about global warming and its impacts on our environment. EIR Page 3-106.

HOLZEMER-54

48) 3.8.3 under "Impact Analysis", construction – it's clear that significant GHG emissions will occur from construction equipment during the project's construction. Why are these emissions allowed to be "amortized" over the life of the project? Construction emissions should remain separate from "operational" emissions. What can be done to reduce this sizeable net increase in CO2 emissions from construction and future operations as indicated in this section? EIR Page 3-110.

HOLZEMER-55

49) Cumulative Impact C-GHG-1: GHG Emissions – again, there are several proposed projects omitted by this EIR design that should have been studies in this EIR – including 123 Sherman, 380 Cambridge, 200 Portage, etc. These projects are listed previously in these comments. EIR Page 3-113.

HOLZEMER-56

50) 3.9.3 Impact HAZ-3: Hazards from Cortese-List Sites – major concerns by neighborhood residents regarding construction and possible release of contaminated groundwater from the Super Fund toxic groundwater plume under the project site. As stated in EIR, this groundwater is located at 16.5 to 18 feet bags, which is the range of where the project's foundation (between 17-27 feet bags) is to be built. This means that contaminated groundwater is likely to be encountered during construction. What is the process (in detail) that will be done when contaminated soil is found? How will residents in the neighborhood be informed and what steps will be taken to minimize any residential contact with the contaminated soil? The California-Olive-Emerson contaminant plume is a Federal Super Fund site and therefore is a major concern to all neighborhood residents. Residents must be informed whenever this contaminated soil is encountered. EIR Page 3-124.

HOLZEMER-57

51) MM-HAZ-3A: Perform Site Assessment and Implement Associated Recommendations – a statement reads – that "The Developer shall provide the results from a completed Site

Assessment and Conceptual Site Model to a "selected regulatory agency" – BUT, this isn't enough for residents. Why aren't residents involved in getting the results from a completed Site Assessment and Conceptual Site Model? It's vital that the neighborhood be involved and aware of what the Site Assessment says and have an opportunity to comment on it. Who is this "selected regulatory agency" and who do they represent --- the County? No, it needs to be the residents who live in the neighborhood. EIR Page 3-125.

HOLZEMER-58

52) MM-HAZ-3B: "Obtain permit for construction dewatering of contaminated groundwater" (as needed) – the neighborhood needs to be informed and be asked to comment on any construction permit – before it is issued -- regarding the removal of any toxic plume soil and/or its groundwater. Details on what is being dewatered, where on the site it is being done, the amount of dewatering that will be done, and for how long a period of time must be provided residents. The correct federal or state agencies and developer must contact and inform the neighborhood and its residents about any contact the construction crews encounter with contaminated soil or groundwater immediately. EIR Page 3-126.

HOLZEMER-59

53) MM-HAZ-3D: Prepare and Implement a Site-Specific Health/Safety Plan – this plan must be available for review and inspection by all residents in the neighborhood, not just the proper federal and state responsible agencies. It is not enough to have this plan reviewed by the proper agencies – the local neighborhood should also be aware of any safety plan involving hazardous materials. EIR Page 3-127.

HOLZEMER-60

54) MM-HAZ-3D, under "operation", the statement reads "groundwater contamination from the Superfund plume has migrated beneath the project site" – clearly this presents a dangerous situation for not only the project's residents, but all neighborhood residents as well. The statement continues, "volatile organic compounds present in the groundwater could migrate upward through soil pores and potentially impact air quality in the new building" – this is MAJOR warning about the dangers of this toxic groundwater plume. EIR Page 3-127.

HOLZEMER-61

55) MM-HAZ-3E: Install vapor barrier and perform periodic indoor air testing -- Installation of a building vapor barrier is critically important for not only the project residents, but the entire neighborhood. Details on the vapor barrier, how it will be installed, by whom, and when are all details critically for the neighbors to be aware about. Who is doing the monitoring of the air quality is important as well – how often will this be done, by who, will a report be issued? EIR Page 3-128.

HOLZEMER-62

56) Impact HAZ-5: Emergency Response or Evacuation Plan Impairment – under "construction", residents are extremely sensitive and concerned about lane or street closures. Sherman, Grant, Park, and Sheridan are all connector streets to our residences and are major pathways to our jobs and other activities throughout our daily routines. Closing streets and not allowing for quick and easy access to these streets will not be

acceptable to the neighborhood. It vital that emergency vehicles (Fire trucks, ambulances and police) have total access, at all times of the day or night on these streets. With the construction of the Public Safety Building (new headquarters for Police and Fire in Palo Alto), it's of vital necessity that our roads -- Sherman, Sheridan, Grant, and especially Park, be open and available all day, everyday. Park, especially, is a major connector to Oregon Expressway and the 101 freeway and its closure is not acceptable at any time of the day and won't be by residents. Any discussion of a "Traffic Control Plan" or TCP needs to have discussion with neighborhood residents – NOT just the City Staff, who don't live here. Residents and the Mayfield neighborhood need to be involved on any traffic control process or decisions. EIR Page 3-129.

HOLZEMER-63

57) Impact HAZ-5 – under "operation", no impacts are discussed in the EIR about the stacked parking operation or its impact on emergency situations – why? It's obvious that there will be potential car fires in the garage and in an emergency situation (earthquake or just a car fire), what will happen to the other cars that are "stacked" there? How will a major power failure (for hours or days) or a major collapse of the stacking system be handled? What is the potential for a fire to spread to other cars and what preventative steps are being taken since fire personnel will be in an enclosed garage space, with poisonous gases? Again, neighbors should be aware of how these emergency problems will be handled as it could affect them. EIR Page 3-129.

HOLZEMER-64

58) 3.9.4 Cumulative Impacts/Mitigation -- under C-HAZ-3 -- the statement, "any measures necessary to protect construction and operation related to health and environment at other cumulative sites would be "confined" to those sites and would not be an additive in nature" is totally false and misleading. It's been known for over 30 years that this toxic plume does affect our residents and the future health of its people, children, especially. Again, not all the proposed projects in the area are being examined in this EIR in a cumulative way. EIR Page 3-131.

HOLZEMER-65

59) Cumulative Impact C-HAZ-5 – in this section you have a totally false statement -- "the only known past, present, or reasonably foreseeable project is the Public Safety Building". Not true, not even close. As mentioned earlier, there are at least 5 or 6 other neighboring projects being planned for in this neighborhood that are not a part of the cumulative study of this EIR. EIR Page 132.

HOLZEMER-66

60) 3.10.3 Impact HYD-1: Water Quality Standard Violations, under "construction", construction dewatering "may be necessary". It's vital that any dewatering process be fully disclosed to the neighborhood before the process is allowed to start. Full disclosure of the process, who is doing it, how long it will take, how many gallons are being extracted, and the dewatering process details need to be made public. What specific steps will the County take to ensure that any dewatering process is full disclosed to the neighborhood? EIR Page 3-142.

HOLZEMER-67

61) Impact HYD-2 Groundwater Supply and Recharge, under "construction" – that in the eastern portion of the project site, excavation would occur up to a max. depth of 17-27 feet bags, which is below the current known position of the toxic Super Fund plume. Any excavation or penetration of the contaminated soil or the toxic plume needs to disclosed publicly and communicated quickly to local residents and the entire neighborhood. Dewatering is not considered "minor" in Palo Alto and it certainly is not considered. "short term" as the EIR states. Dewatering is a major concern in any construction project and we take its impacts very seriously. We consider any dewatering to be significant and the neighbors need to be made aware of this potential activity and the process. EIR Page 3-143.

HOLZEMER-68

62) Impact HYD-5, under "Impact Analysis", any dewatering of the project needs public awareness and what the process will be. During construction, any contact with contaminated soil or groundwater should be automatically disclosed to the neighborhood and all residents. Having just a "Plan", as outlined in MM-HAZ-3B is not enough – disclosure to residents must happen. EIR Page 3-146.

HOLZEMER-69

63) 3.10.4, Cumulative Impact C-HYD-1, again, there were a range of proposed projects that were never studied or analyzed in this EIR. There are 5 or 6 projects in the immediate area – 300 Lambert, 200 Portage, 123 Sherman, etc. which were never studied nor included in this EIR. EIR Page 3-147.

HOLZEMER-70

64) 3.11.3, Impact LUP-1: Physically Divide A Community, under "construction", residents believe that the impacts would be "unavoidable" and "more than significant" if changes in the road closures are not made. EIR claims that the road closures would be "temporary disruption" is totally false and not acceptable to residents. For example, Grant is one of the main connector roads to Park Blvd., which is a main pathway to Oregon Expressway (freeways, 101 and 280). Hundreds of residents in our neighborhood use this road to connect to jobs in Silicon Valley and beyond. These are not "short-term" inconveniences that is portrayed in the EIR – did anyone from AECOM (the EIR authors) contact the neighbors about their thoughts on road closures – never once! These are not "temporary disruptions" AT ALL! It's a falsehood. A "traffic control plan or TCP" is ridiculous without serious discussion, communication involving the neighborhood. It's a falsehood of lies to say that there is "no impact". County and AECOM officials should be ashamed of themselves. EIR Page 3-150.

HOLZEMER-71

65) Impact LUP-1, under "operation", the EIR has a false and misleading statement – "proposed land uses are compatible with the existing development in the surrounding area". It's false and misleading statement because all other residential complexes in the Mayfield area are zoned RM-40 (40 units per acre). There are no RM-80's (the density of 231 Grant is approx., 80 units per acre) in the Mayfield area. This should be clarified and corrected in the final EIR. EIR Page 3-150.

HOLZEMER-72

66) 3.11.4, Cumulative Impacts/Mitigation – this project will have "significant and unavoidable" impacts to the community, especially during the construction timeframe. Why didn't the EIR include any analysis of the road closure impacts of the Public Safety Building (Sherman is closed now) or is the on-going, possible permanent closure of California Avenue (due to COVID concerns) a part of the cumulative impacts that the EIR should have studied. These road and street closures are going on now and impacting residents daily. EIR Page 3-152.

HOLZEMER-73

67) 3.12, Noise and Vibration, under "Ambient Noise-Level Surveys", statement reads, "ambient noise levels in the vicinity of the project site were measured between February 3rd and February 4th, 2021 (this year)". These ambient noise levels were taken during the worst COVID months of the past year (there was a major lock-downs of many businesses going on at the same time). Obviously, these measures – however accurate they may be – do not reflect the true noise level measure of the surrounding area. At this time, travel was discouraged –except for essential workers. These measures are inaccurate by normal standards and need to be changed or adjusted, using more correct measurements in the area. EIR Page 3-157.

HOLZEMER-74

68) 3.12, under "Existing Vibration", Were there any accurate measurements of the vibrations taken around the project site currently? Not clear if the data presented was from 2018, which would not be accurate to today's measurement of vibration surrounding the project site. Were any measurements taken during our most severe COVID-impacted months? If so, when exactly? No clarification in the EIR about how these measurements were taken -- in COVID months? EIR Page 3-160.

HOLZEMER-75

69) 3.12, Impact NOI-1: Ambient Noise Levels, clearly a major problem (found to be "significant" and "unavoidable" in EIR). NOT ACCEPTABLE. Construction traffic and the volume of truck visits is simply not acceptable by the residents. Contrary to the EIR, it's clear that the addition of at least 65 construction related vehicle trips PER HOUR would generate several major traffic noise congestion issues and an endless bottleneck of honking horns for residents, given the already road closures of Sherman (for the Public Safety Building) and California Avenue (due to COVID-related decisions). The falsehood that somehow because traffic volume is not "doubled", it wouldn't cause any perceptible increase in traffic noise" is a simply totally false and a misunderstanding EIR statement of the neighborhood noise levels today (remember these noise levels were not measured correctly anyways). EIR Page 3-167.

HOLZEMER-76

70) Impact NOI-1, under "construction equipment" – the noise impacts on residents, especially construction hour changes (some starting as early as 5 a.m.) are unacceptable and will not be tolerated. At no time, has County or City officials come to the neighborhood to discuss these possible extreme construction hours or the impacts on their daily quality of life in the neighborhood. Construction work must be conducted during the normal construction hours (8 a.m. to 6 p.m.) each weekday. Why isn't the neighborhood involved or outreach done on any extreme construction hours? This is a

"residential neighborhood" and the project designers, engineers, construction crews, need to understand that fact each and every day they come to work. The City/County must contact the neighborhood and residents about any extreme construction hours, outside the normal ones. EIR Page 3-168.

HOLZEMER-77

71) MM-NOI-1: Construction Noise Reduction Measures – as indicated in the EIR, these impacts would be significant and unavoidable, but not just to abutting residences, but to the entire neighborhood. Question – who wrote the section on "construction hours"? – certainly not the EIR authors, since they don't know that adherence to the City construction hours is paramount for residents. Any advance notice for extreme construction hours should go to residences first beyond 50 feet (which is a ridiculous #). The distance should be at least 150 feet or within a two/three block distance from the project site. Many residents, outside 50 feet, will be affected by the extreme construction hours. How was this number (50 feet) established, and by who? What is this number based on? Explain in detail how the 50 feet was decided upon. EIR Page 3-170.

HOLZEMER-78

72) MM-NOI-1, statement – "staging areas and stationary noise-generating equipment, such as compressors, shall be located – as far away – from noise-sensitive uses as feasible" – what does this mean? What do you mean, specifically, about "as far away"? Not clear. EIR Page 3-171.

HOLZEMER-79

73) MM-NOI-1, statement, "Idling times of equipment, up to 5 minutes" – who is monitoring this? How will this be accurately measured? Who is responsible? Phone #'s, etc.? EIR Page 3-171.

HOLZEMER-80

74) MM-NOI-1, statement, "smart back-up alarms will automatically adjust to ambient noise levels" -- all back-up alarms on construction equipment should be silent and replaced with human spotters, period – no back-up alarms activated on project site. Back-up alarms are too loud and disturb residents. EIR Page 3-171.

HOLZEMER-81

75) MM-NOI-1, D. "Temporary sound barriers" – Sound barriers should be used and maintained around the entire project site. Street frontage barriers MUST be higher than 8 feet (not only up to 8 feet) – recommend the height of these barriers be discussed and adjusted with residential/neighborhood input and outreach. No neighborhood outreach on these barriers have been made. EIR Page 3-171.

HOLZEMER-82

76) MM-NOI-1, "even with implementation of MM-NOI-1A through NOI-1D, the construction noise will be significant and unavoidable" – **this is a major and very concerning statement by the EIR**. Most neighborhood residents are not even aware of this statement – no neighborhood outreach has been done – why? Community meetings are NOT neighborhood meetings – inviting the entire "community" (from Palo Alto and beyond) is not inviting the neighborhood. Why can't County officials (not the PR firm of the Developer's) meet with the neighborhood (defined by a five-block radius from the

project site) and explain these concerns and what their impacts are? No County officials have met with the neighborhood exclusively. EIR Page 3-172.

HOLZEMER-83

77) MM-NOI-1, under "Project-Generated Traffic" – the problem with the EIR's entire Traffic Impact Assessment is that assumes that daily traffic patterns remain consistent and regular each day. The increase suggested – 145 average daily trips – is totally underestimated because many residents who live in the project building will take several car/vehicle trips each and every day – trips to the grocery store, trips to the kids to school and bring them back, trips to soccer practices, etc. etc. These trips are irregular and do not represent a true reflection of the vehicle trips this project will present to the neighborhood. To say that only because the "project doesn't double the existing traffic volume – volumes which was measured during COVID and/or more than 5 years ago (during the Public Safety Building traffic study) – so there will be no imperceptible increase in traffic-related noise" is simply a false and misleading statement by the EIR/County authors. EIR Page 3-173.

HOLZEMER-84

78) MM-NOI-1, under "Delivery and Trash/Recycling Trucks" – several points, why would delivery or trash trucks ever be allowed to "idle" at all? What warnings do you give? At many residences in the neighborhood, trucks are asked to "turn off" their engines when delivering food or other services. Statement – "driveway design positions the delivery vehicles under the upper floors of the building creates a physical noise barrier for residents" – however, what are the sound barriers for the residents surrounding the building? What are the plans to deal with idling delivery trucks that surround the building? The neighborhood should be considered first and the noise impacts from these vehicles. No delivery vehicles should limit residential access to Grant, Birch, or Park at any time. EIR Page 3-173.

HOLZEMER-85

79) MM-NOI-1, under "Outdoor Courtyards" – concern over loud music and/or voices coming into the neighborhood from the courtyards. No parties, with amplified music, should be allowed in these courtyards at anytime, day or night. What rules will residents have to follow in regards to these courtyards? These rules should be disclosed to the neighborhood residents. EIR Page 3-174.

HOLZEMER-86

80) MM-NOI-1, under "Summary of Operational Noise Impacts" – once again, any information on the daily noise levels of the parking stacking system is omitted by the EIR. Why? What are the noise impacts on a daily basis? No mention of this system or its operational capabilities are even mentioned by the EIR authors. EIR Page 3-175.

HOLZEMER-87

81) Impact NOI-2: Groundborne Vibration – again, EIR states, this impact is "significant and unavoidable" to the neighborhood. Has this fact been communicated or any outreach done to the neighborhood – nothing by either the County or its Developer has been done. Most neighborhood residents (those in a 5-block radius) are not even aware of this "significant or unavoidable" impact and why hasn't this outreach been done? Doing nothing to inform the neighborhood is NOT ACCEPTABLE. EIR Page 3-175.

HOLZEMER-88

82) NOI-2, under "Construction" – "structural damage occurs only when certain types of construction activity – earth moving, heavy truck traffic – occur very close to existing structures". There are many residential structures next to or within 100 yards of the project site which could experience structural damage due to vibration activities at the project site – what kind of process will be put in place to not only minimize vibrations, but to ensure that abutting or near-by residential structures are not damaged? Who is responsible for the vibration issue during construction? If damage does occur to either residential buildings or our underground garages, how will that process be handled? By whom and when will the damage be fixed? EIR Page 3-176.

HOLZEMER-89

83) MM-NOI-2: Vibration. Reduction Measures, A. In this section, the only neighborhood residents considered are those in either 200 Sheridan or the Courthouse Plaza office building. Construction vibration and its affects are well known to travel beyond simply 50 feet from any construction project. All of the surrounding residential properties, around the project site – on Birch, Park, and Sheridan – should be included in these vibration reduction measures. B. No vibration equipment usage outside City construction hours – who is monitoring and how will it be enforced – by who? EIR Page 3-179.

HOLZEMER-90

84) MM-NOI-2, "real-time vibration monitoring" – how often and by who (names, phone #'s)? by a "qualified acoustic consultant" (again, who is this and how is he/she to be contacted?). EIR Page 3-180.

HOLZEMER-91

85) Impact NOI-2, under "operation" – once again, total lack of omission on any information on the parking stacker system or its vibrations on the neighborhood. What are these details? Nothing provided in the EIR or to the neighborhood. EIR Page 3-180.

HOLZEMER-92

86) 3.12.4 Cumulative Impacts and Mitigation – once again, the omission of many of the proposed projects in the area – 300 Lambert, 200 Portage, 123 Sherman, 380 Cambridge is surprising in this EIR given the cumulative impacts all these projects will have to our Mayfield neighborhood. Some of these projects will be going on at the same time and will impact traffic noise and vibrations in the area. EIR Page 3-180.

HOLZEMER-93

87) Cumulative Impact C-NOI-1, EIR states this impact is "significant and unavoidable". Has this impact been communicated or outreach done to the neighborhood (six-block radius) area? So far, no one from the County or Developer has contacted this neighborhood or has done any outreach about any "significant or unavoidable" impacts in this area. Why? EIR Page 3-181.

HOLZEMER-94

88) Cumulative Impact C-NOI-1, under "Operation" – given the Public Safety Building position as the main police headquarters and primary vehicle station, plus being the fire department's headquarters as well, the amount of traffic noise and vibration will like increase to double or triple the current traffic noise levels. We believe the current Table

3.12-14 to be inaccurate based on police traffic (study of traffic in and around Palo Alto's City Hall, where the current police headquarters is) and additional demands if California Avenue re-opens fully for commercial use. Cumulative traffic will increase significantly once the Public Safety Building is in place and 231 Grant will only increase it further. A new cumulative traffic and noise study should be conducted using the current police traffic information from the area around City Hall in downtown Palo Alto. EIR Page 3-182.

HOLZEMER-95

89) Cumulative Impact C-NOI-2: Vibration – EIR states, "significant and unavoidable". Has any outreach or communicate been done to the neighborhood about this impact? None has been to our knowledge. Other cumulative projects should be considered and their impacts – 300 Lambert, 200 Portage, etc. EIR Page 3-183.

HOLZEMER-96

90) 3.13 Impact POP-1: Growth Inducement – contrary to the EIR conclusion of at the end of this section, this project is "oversized" for the neighborhood (it exceeds the normal City height limitations, and its density is double what is currently allowed in the area). In addition, the impact on traffic, congestion, and the connector roads will be significant and not minor, as the EIR claims. Obviously, this project is "growth inducing" to this residential neighborhood. EIR Page 3-187.

HOLZEMER-97

91) 3.14 Public Services and Recreation – under "Parks" – misstatement of facts in EIR – the Stanford/Palo Alto Community Playing Fields is NOT a Park or usable for the "walk-up" resident to use. This facility is by "reservation only" and is only for use for soccer and field hockey type games/practices. It is NOT a Park! No one "picnics" there – a total misrepresentation of what is there and how it is used. The Sarah Wallis Park is also misrepresented at a "park". No kids play there – is not a park for kid to play in. Too small and no playground equipment there. Bowden Park has a small playground but requires kids/parents to go underground (thru a tunnel by the Cal Avenue Train Station) to get there –not acceptable to most parents. NO useable park space for kids, within a half mile from the project site – this is not pointed out in the EIR. EIR Page 3-190.

HOLZEMER-98

92) 3.14 Public Service and Recreation – under "Parks" – EIR statement, "With these four recreation areas, the nearest being less than a quarter mile away, the project site is considered relatively well served with park and recreational facilities." Who wrote this misstatement? Where are such words in the City's Parks Master Plan? This is totally inaccurate and a misrepresentation of the current conditions in the Mayfield neighborhood and its lack of park space in the area. Another fact – where is the community indoor recreation center, within a half mile of the project site, that is quoted in the EIR? What are you talking about and where is it located (be specific)? EIR Page 3-190.

HOLZEMER-99

93) Impact PSR-1: Demand for Public Services – under Operation, Fire Protection – no mention of the additional fire resources needed or the fire suppression plan for the project's car stacker system or how fire control would work in the event of a major

earthquake or collapse of the building structure (due to poor construction)? Details need to be known to the neighborhood so to prevent fires from getting out of control in the building and spreading to neighboring residential complexes/buildings. The car stacker system is a total mystery and the details of how fire suppression will work in this type of situation must be known by the entire neighborhood (especially if professional fire fighters are not available to assist, such as in a major earthquake situation). City Fire officials should meet with neighbors about the fire suppression plans for the building. EIR Page 3-193.

HOLZEMER-100

94) Impact PSR-2: Existing Recreational Facilities, under "Operation" – although the EIR does acknowledge an "increase" in the use of existing par and recreational facilities, it does recognize the fact that the City of Palo Alto, including the Mayfield neighborhood, has a huge deficit in existing park space for its residents. Palo Alto should have at least 4 acres of available park space for every 1,000 residents – a standard and practice well known in park space management. The City does not meet this standard today. If you truly exclude the park space that is outside the six-block radius of our neighborhood (which is likely the furthest distance any parents and kids would walk to a park) and the Stanford Playing Fields (which are not a Park), you come up with only 2.3 acres of park space for more than 1,500 residents who live in the Mayfield neighborhood. Anyway you cut it, it means there is a deficit of park space in Mayfield. Why are these data excluded from the EIR? EIR Page 3-195.

HOLZEMER-101

95) Impact PSR-2, under "Operation" – EIR statement says, that "the project would provide approx. 10,000 square feet of private open space to residents". However, using these data and the ratio that all cities should have at least 4 acres of park space for every 1,000 residents, means that the project site should have 1.2 acres of park space for its approx. 300 residents. This means that that the 10,000 square feet of open space is totally inadequate and an underestimate of the amount of park/open space that that building should have. EIR Page 3-195.

HOLZEMER-102

96) Impact PSR-2, under "Operation" – EIR statement that states, "residents will be dispersed among existing parks and recreational facilities, thereby minimizing substantial impacts on a single existing recreational area" is based on what actual facts? This is an obviously an opinion – with no basis in any facts about Palo Alto. On what basis you do you have any evidence of this "dispersion"? In fact, the truth is most residents – including those in the Mayfield neighborhood -- gravitate toward the "nearest park" and do not travel to distance parks. Most residents will use the nearest parks that are close to their homes – period. EIR Page 3-195.

HOLZEMER-103

97) Impact PSR-3: New Recreational Facilities, under "Operation" – again, the same false statement about "dispersion", based on no facts about Palo Alto or how we use our parks here. Undoubtedly, as I have spoken to several in our own City's Parks Department, an increase in demand for parks and park space is already clearly a need for our City. The City already has a major deficit in park space, which the EIR never

pointed out. Contrary to what is stated in the EIR, more residents will require more dedicated park space. This impact is significant and unavoidable, unlike what the EIR states. Why is the park space deficit in Palo Alto omitted and not stated correctly in the EIR? EIR Page 3-196.

HOLZEMER-104

98) Cumulative Impact C-PSR-1: Public Services – again, the cumulative effects of a variety of proposed Mayfield neighborhood projects were omitted from the EIR. No acknowledgement was given to projects that are on the planning table – 300 Lambert, 200 Portage, 380 Cambridge, 123 Sherman. All these projects should have been reviewed and studied for this EIR for their cumulative impacts on the neighborhood. EIR Page 3-197.

HOLZEMER-105

99) Cumulative Impact C-PSR-2: Existing or New Recreational Facilities – same as #97 above, cumulative effects of the proposed projects on existing or the need for new park space or recreational facilities should have been studied. Why were these projects omitted from this EIR review? EIR states the following – "that cumulative impacts to parks and recreational facilities would be less than significant through compliance with the City's Municipal Code, which requires the provision of recreational space or payment of applicable park impact fees" – is the County or its 231 Grant Developer going to create this additional park space or pay the impact fees for this project? What will the in-lieu fee be and when will it be paid by the County? EIR Page 3-197.

HOLZEMER-106

100) 3.15 Transportation, under "Existing Road Network" – errors in this section for the street closures of both California Avenue (due to COVID decisions) and Sherman Avenue (lasting for another year through the Public Safety Building construction project). Why were these closures, which could be permanent, excluded from this EIR analysis? EIR Page 3-199.

HOLZEMER-107

101) 3.15.3, Impact TRA-1: Transportation Plan or Program Conflicts, under "Construction" – it states that "a construction traffic management plan would be established and implemented in accordance with City requirements". However, nowhere does it stress the importance of direct communication and involvement with the neighborhood about such a plan. It's vital that such plan have residential input and decisions made based on this neighborhood input. Closure of roads or lane changes cannot be made without neighborhood approval and to give residents a say in what happens on the project site, when, and where. EIR Page 3-206.

HOLZEMER-108

102) 3.15.3, Impact of TRA-1, under "Transit" – can someone explain why they anticipate only 11 new transit riders from a potential 275 residents in the project building? How will this be measured and by whom? This means that almost all of the building residents will drive and have multiple vehicle trips between home and work. EIR 3-207.

HOLZEMER-109

103) 3.15.3, Impact TRA-2: Vehicle Miles Traveled – the EIR states, "Because the project site is within a low-VMT area, and because the Project would have a "**similar density**", mix of uses, and transit accessibility, the Project meets the City's Screening Criteria 2 and therefore, a significant VMT impact would not be anticipated". The key part of this message is "similar density" which is inaccurate since the planned project has a density that is double the existing densities in the entire residential area (the project density is nearly 80 units per acre, when all the other residential areas are zoned RM-40). The density is not the same, so it doesn't meet the same standard. EIR 3-209.

HOLZEMER-110

104) Impact TRA-3: Traffic Safety Hazards, under "Construction" – EIR states "the contractor would prepare and implement a traffic control plan a part of the Project, in consultation with the City of Palo Alto", however, there is no mention of involvement of the residents in the neighborhood in such a plan. Communication and involvement and have a voice in this plan is critical. Residents need to have a voice in what happens in their neighborhood and any plan needs to be approved by the neighborhood. Why wouldn't the neighborhood have a say in this traffic control plan? EIR Page 3-210.

HOLZEMER-111

105) MM-TRA-3B, Maximize Site Distance – the neighborhood and its residents need to be involved and participate in any discussion eliminating on-street parking in their neighborhood. Parking is a premium in the Mayfield neighborhood and eliminating parking spaces need to have neighborhood involvement and discussion. Safety is important, but so too is the issue around eliminating parking spaces. EIR Page 3-211.

HOLZEMER-112

106) Impact TRA-4: Emergency Access – again, the major concern by residents is quick and easy access to our connector roads (Park, Grant, Birch, Sheridan, Sherman, and even California Avenue) which lead to work, hospitals, medical appointments, and other important daily activities that affect our lives. At no time, can quick assess be denied by construction work. Traffic delays could mean lives in danger and this needs to be recognized by all parties. Road closures, even for short period of time, could impact resident's lives. A traffic control plan must have neighborhood involvement and a say in what happens on our neighborhood streets. EIR Page 3-212.

HOLZEMER-113

107) 3.15.4, Cumulative Impact C-TRA-1: Transportation Plan or Program Conflicts – again, there are a number of proposed projects – 300 Lambert, 200 Portage, etc. that were not studied or examined for their cumulative impacts in this EIR. Needs to be. EIR Page 3-214.

HOLZEMER-114

108) 3.15.4, Cumulative Impact C-TRA-3: Traffic Safety Hazards and Emergency Access – EIR states, "Along with the Project, construction-related traffic and road closures associated the PSB project could cause additional detours, lane closures . . . overall cumulative impact could be **potentially significant**. This NOT ACCEPTABLE to residents! EIR Page 3-214.

HOLZEMER-115

109) MM-C-TRA-3: Coordination of Construction Traffic Plans – this mitigation is critical and essential to all residents who live in the Mayfield neighborhood. However, beyond just emergency access to all neighborhood properties, residents need to be involved In the planning of any traffic control plan that is implemented between the PSB project and 231 Grant. It is not enough to simply "notify" residents what is happening – they need to be involved in the entire planning process. EIR Page 3-215.

HOLZEMER-116

110) 3.17.3, Impact UTI-1: New or Expanded Utility Services – under "Construction and Operation" – EIR states, "Construction of new connections to existing utilities would result in the potentially significant environmental impacts identified in relevant sections of this document". This section concerns residents because digging into the project site soil and ground means possible exposure and release of contaminated toxic groundwater – previously discussed in these comments. All measures need to be taken to ensure groundwater exposure doesn't happen and if it does, it is reported not only to the relevant state and local agencies, but the neighborhood residents as well. Communication and quick outreach to the neighborhood is essential for this project. EIR Page 3-228.

HOLZEMER-117

111) 3.17.4, Cumulative Impact C-UTI-2: Water Supply Availability – as residents and believers in a sustainable future for our children, we believe this issue "water supply availability" is nothing less than "significant" and "unavoidable" for California and for the Bay Area. Water is becoming a major issue in California and having enough for the residents who already live here is a concern. The cumulative effect of more buildings, especially office development, should be studied in this EIR and how the project impacts our water supply for future generations. EIR Page 3-229.

HOLZEMER-118

112) 3.19.1, Impact MFS-2: Individually Limited but Cumulatively Considerable Impacts – as the EIR points to "the Project would have a **significant and unavoidable**" cumulative impact. Even with the suggested mitigations (MM-NOI-1 and MM-NOI-2), these cumulative impacts will affect hundreds of neighborhood residents who call Mayfield their "home". It's a shame how the County has handled this project because it shows a total lack of caring for the people most affected by it. There's an attitude of "we don't care", that seems clear to everyone. Obviously, more communication, listening to the neighborhood residents should be an essential part for the future -- especially by County officials. A real constructive, give- and-take is needed. As one of our long-time residents asked at one of the project's "community meetings" sponsored by the Developer and Architects – "what are you willing to compromise on"? No one responded.

HOLZEMER-119

113) 3.19.1, Impact MFS-3: Direct or Indirect Adverse Effects on Human Beings – again, the EIR says, "the impact of construction noise and vibration will be **significant and unavoidable**. For the neighborhood, this means more than a year of living every day (some extreme construction hours) with construction noises and vibrations that could affect the health and safety of not only us, but all the children who live here. The County

need to take some responsibility here for the safety and well-being of our neighborhood and review what can or should be done to reduce construction noise and vibrations to the minimum levels possible. Will the County have strict adherence to the City's normal construction hours, for example? Once again, what is the County willing to compromise on?

HOLZEMER-120

114) 4. Alternatives – For a whole variety of reasons, the best Alternative for the Mayfield neighborhood would be Alternative #2 – Reduced Scale Alternative. Alternative #2 would not only produce the new and essential teacher housing which everyone (including our neighborhood) agrees needs to be built, but also would be more environmentally friendly and still maintain the density and height standards for residential housing in the neighborhood. Specifically, this Alternative is superior in many ways – 1) it's density would be around 45 units per acre, similar to all the RM-40 residences in the area; 2) it's building height of 35 feet would be similar to all the other residential housing units around it; 3) no danger of potentially excavating into the California-Olive-Emerson toxic plume or contaminated groundwater; 4) fewer construction truck trips to and from the project site (minimizing air pollution), 5) less construction time (14 months versus 15 to 18) and less traffic/road closures during construction. Although it builds fewer new units than the Project, it is a much better Alternative for the neighborhood and fits in well with the goal providing housing to our most valued teachers and support staff that work in our schools. Will Alternative #2 be seriously considered? By whom? The EIR says Alternative #2 doesn't meet the #1 Objective of the Project, but questions remain – who decided these "project objectives" and were any neighborhood residents invited to participate or give their opinions on this "objectives list"? Why wasn't the neighborhood asked about these objectives? We live here each and every day. Was there a County Supervisor vote on these "objectives"? When and where was it? Again, why is "60" the number of units that has to be built in Santa Clara County? Who decided that number? What is the Facebook grant and where are the details of that grant? Could the grant be changed or renegotiated with Facebook? None of the details are provided in the EIR. EIR pages 4-28 to 4-61(?) – pages are misnumbered in EIR!

HOLZEMER-121

115) 4.4, Environmentally Superior Alternative – the EIR clearly states that beyond the "no alternative" option being the best one, the next best is Alternative #2. Alternative #2 is the next best because the "degree and duration of construction noise would be less" and it would avoid the potential significant hydrology impacts of excavation and impacting a Super Fund toxic groundwater/soil site. Alternative #2 would take less truck trips (reducing diesel particles in the air) and less construction time than the other reviewed Alternatives. If building the project at an "accelerated rate" is Objective #1 (which the own Objectives state), then Alternative #2 is the best one. EIR Page 4-61(?) – again, these pages in the Alternatives section are "misnumbered" in the EIR.

HOLZEMER-122

116) Appendix E – Traffic Impact Analysis, 1.2 Site Access and Circulation – EIR claims the maneuverability of vehicles is unlikely to be affected in the garage because they

would be “nicely” arranged by the proposed stacked parking system. What evidence in the EIR support that claim? There’s nothing. There is no information provided in the EIR on the stacked parking system, its capabilities, or what it can “nicely” handle. A very poor choice of words. EIR Page 1-2.

HOLZEMER-123

117) Appendix E, 1.2, Site Access and Circulation -- On street parking in the Mayfield neighborhood is an essential need. We have a residential parking permit program. Removing any current parking along Park, Birch, Grant, Sherman, or Sheridan must be weighed very carefully and have residential input before any final decision is made. Most people in the Mayfield area do not have adequate parking now (most families have two cars, two incomes) and taking away street parking, without residential involvement, is not acceptable. What will the County do to ensure residential opinions are involved in any street parking decisions? EIR Page 1-2.

HOLZEMER-124

118) Appendix E, 1.3, Parking -- Again, no information on the stacked parking system included in this EIR – nothing about its safety, nothing about its capabilities, queuing information, etc. Facts in this EIR section are based on what evidence? The EIR claim – “no adverse queuing is expected” is based on what evidence? Again, nothing is provided to show these statements are true. EIR Page 1-3.

HOLZEMER-125

119) Appendix E, 1.3, Parking – Although the EIR states that the City’s minimum parking requirements have been met, there is nothing in the EIR about visitor or service parking needs. Where will visitors (who undoubtedly come) to the building park? Where will service providers park? Has there been any provision(s) made for this type of parking need? Neighborhood residents are concerned about what will happen when these folks want to park? We have a residential street parking permit program in Mayfield and we want this strictly enforced and maintained. EIR Page 1-3.

HOLZEMER-126

120) Appendix E, 1.4, VMT – Although the data says we are in a low-VMT area, the traffic counts that are basis for these traffic conclusions were made either during COVID (last year) or made in the pre-COVID years of 2016 or 2017 (5+ years ago). These are not accurate traffic counts to our neighborhood today and the conclusions reached are not the same as we actually face today or will into the future. EIR Page 1-3.

HOLZEMER-127

121) Appendix E, 1.5, TDM – Again, no TDM presented in the EIR. EIR states that such a TDM will be shared with the County and City “in due course” (whatever that means?) – However, why isn’t this TDM being shared with neighborhood residents – the folks most affected by any TDM? This must be shared and have discussion with the neighborhood. EIR Page 1-3.

HOLZEMER-128

122) Appendix E, 1.6, Construction Traffic – Once again, the Traffic Construction Plan (TCP) is mentioned, but nothing is presented. Working closely with the City is not enough – communication and input from residents in the neighborhood is critically

important as well. Nothing is spelled out about the neighborhood in the EIR – why? EIR Page 1-3.

HOLZEMER-129

123) Appendix E, 3.2, Existing Traffic Conditions – No current data on traffic volume or traffic counts was presented in the EIR. Relying on old traffic data (most of it over 5 years old), even during pre-COVID days, leads to false assumptions and theorical conclusions. Question – why did the County only present "PM" peak hour data for the ECR/Page Mill Road and Middlefield Road/Oregon Expressway intersections? Where is the "AM" data? Most of the "traffic count" intersections in our neighborhood (Park/Page Mill, etc.) were based on data from 2016 or 2017 – 5 years ago. In my view, old data represents a very bad analysis.

HOLZEMER-130

124) Appendix E, 3.6, Cumulative Conditions – Any Traffic Analysis should include real, proposed projects – not just the ones approved by City. There are a number of proposed projects in the area – 123 Sherman, 200 Portage, 300 Lambert, 380 Cambridge, 2955 El Camino, etc. and none of these were presented in the traffic analysis. These traffic impacts should be included and reviewed in a cumulative way so neighborhood residents understand them. EIR Page 3-5.

HOLZEMER-131

125) Appendix E, 4.1, Trip Generation – The conservative estimate that the project will generate 145 AM additional vehicle trips and 81 PM vehicle trips is likely much too low. Given the number of residents residing in the building (273+) and knowing the vast majority will drive to and from their schools, it's clear the connector roads – Park, Grant, Birch, Sheridan, and Sherman -- will all become more congested with cars throughout each day. Will the County put in traffic calming measures to deal with the increased traffic flow? Will the County come back in 3 years, after the building is complete, and do another traffic analysis? Only then, will we know if these estimates are correct. I will guarantee that Park Blvd. will have a major backup of cars on a regular basis, driving south from California Avenue to Oregon Expressway. EIR Page 4-2.

HOLZEMER-132

126) Appendix E, 4.5.3, Stacked Parking – No real information on the stacked parking provided in the EIR. Don't understand the logical of the number of the in-bound vehicles in the morning (claiming to be 64 – number based on?) would be "equally" distributed between the two garage driveways. Unfortunately, that assumption is totally incorrect. For example, if someone needs to go south on Park to reach either 101 or Oregon Expressway, they are not going go out the Birch Court garage entryway. Most cars will NOT go in or out of the garage entryways "equally". With no details or facts to back up what is said in this section, the EIR authors should not include their own opinions like -- "it is unlikely that the stacking process would result in a significant queuing along the streets".

HOLZEMER-133

127) Appendix E, 4.6.1, Automobile Parking – Although, the EIR claims the project is meeting the minimum parking requirements (providing 112 spaces, versus the City's minimum of 108), the real City minimum of having 154 parking spaces for 110 units and

a commercial space is being ignored for so-called “20% parking reductions due to having a TDM or shared parking facilities”. The fact that there is no TDM (or any evidence of one), should be alarming to everyone. Because of these facts, it’s clear this residential building will be “underparked” (the reality is many residents have 2 cars per unit, two incomes to support the rent, etc.) and it will force both residents, visitors, and service providers to double park, enter the garage illegally, or worst yet -- park out on the same city streets where our neighborhood is already experiencing a shortage of parking spaces. EIR Page 4-14.

HOLZEMER-134

128) Appendix E, 4.7.2, Evaluation Results – the following EIR statement is false and misleading --, that “because the project site is within a low-VMT area, and because the project would have a – **similar density** – **mix of uses**, and transit accessibility . . ., the project meets the City’s Screening Criteria 2.” This is false sentence because the project building does not have a “similar density” to its residential surrounding neighbors, which is RM-40. As you know, the building has **double** the density of all surrounding neighboring residential structure. In addition, it is misleading in the EIR to state the building has a “mix of uses”. Although it does have a very small, 1,000 square foot commercial or flex space, nearly 100% of the square footage is residential – this fact should be stated in the EIR. I don’t believe the project meets the City’s Screening Criteria 2, given these facts. EIR Page 4-17.

HOLZEMER-135

129) Appendix E, 4.8, TDM – No TDM or details provided in the EIR. Nothing. The EIR statement, “that a monitoring program of the proposed TDM measures should be in place” is essential for the neighborhood. Who will do this monitoring, how often, and how can residents participate in ensuring that the TDM is followed? It is not enough for City staff to be the sole responsible part here. EIR Page 4-18.

HOLZEMER-136

130) Appendix E, 4.9, Construction Traffic – As pointed out earlier in previous comments, it is not enough for the project developer to be “committed to work with the City of Palo Alto” alone. Neighborhood residents should not only be informed as to what is happening on a regular basis but have input into decisions that affect them directly – especially any lane adjustments and/or road closures. The idea that a TCP will be developed or not involve residents or neighbors that surround the project is simply not acceptable. Just putting up some signs and/or passing out some flyers is totally inadequate.

HOLZEMER-137

131) Appendix E, 5: Conclusions – for numerous reasons, as outlined previously, I do not feel this traffic analysis and its conclusions were done well. Using data from 5+ years ago does not feel like accurate traffic information to base your traffic analysis on. I don’t feel this project meets the City’s Screening Criteria 2 (for the reasons listed earlier) and I hope this analysis could be redone using new, accurate data and an understanding of the true traffic impacts we have in our area. EIR Page 5-1.

Commenter JAMASON

Ellen E. Jamason
[redacted]
Atherton, CA 94027

County of Santa Clara Facilities and Fleets Department
Attention: Emily Chen
2310 North First Street, Suite 200
San Jose CA 95131

November 19, 2021

Re: 231 Grant Educator Workforce Housing Development

Dear Santa Clara County Supervisors:

JAMASON-1

I am writing to express my support for the development of workforce and affordable housing at 231 Grant Avenue, in Palo Alto.

As a resident of the San Mateo and Santa Clara County for over than 20 years (including 14 years in Mountain View and Palo Alto), I applaud the County and Supervisor Joseph Simitian for embarking on this innovative project that will help address the housing crisis in our region. Teachers and educators in the area are often median income earners – earning too much to qualify for low-income housing, but not enough to afford market rents. This new project specifically addresses this special housing need.

We all know and recognize that having teachers live in the neighborhoods in which they work is a huge benefit to our communities. This vibrant location—with nearby public transportation, parks and other amenities--is the ideal location for this type of housing. It will offer numerous opportunities for residents to be active members of the neighborhood and the extended school communities that they serve.

Keeping educators living local will reduce long commute hours to locations where teachers and staff are being forced to relocate to afford housing. Retaining the quality of educators in Santa Clara and San Mateo County is vital to achieve excellence in education. Our ability to do so is significantly impacted by our area's high costs of living, particularly with respect to housing. Building this project will serve to keep educators connected to the students they teach.

Again, I fully support the project and urge the Board of Supervisors to approve the 231 Grant Ave Educator Workforce Housing.

Thank you for your consideration.

Sincerely,

Ellen E. Jamason

Commenter MA

From:	Kevin Ma
To:	Chen, Emily F
Subject:	[EXTERNAL] Draft EIR Comment on 231 Grant Educator Workforce Housing
Date:	Sunday, October 31, 2021 2:36:58 PM

Dear County Facilities and Fleets Department,

MA-1

As a former resident of the neighborhood containing 231 Grant and a continuing resident of the county, I think that the provided Draft EIR is adequately extensive and sufficiently mitigates the potential significant impacts of the project.

Sincerely,
Kevin Ma

Commenter SHULER

From: Peter Jon Shuler
To: Chen, Emily F
Subject: [EXTERNAL] Public Comments on Draft EIR for 231 Grant
Date: Thursday, November 18, 2021 9:53:46 PM

To whom it may concern:

SHULER-1

There is a lot to hate about your proposed project for someone living directly across the street who will bear the full brunt of its impacts.

But I want to focus on one topic -- traffic safety and the BIG LIE about the dangerous curb cuts outlined in the report. 3.15.1, 3.15.3, TRA-3, MM-TRA-3A, MM-TRA-3B

How can you brag that you are reducing total curb cuts, when in fact you are adding curb cuts on two heavily used streets (Birch Street with 686 vehicles per hour) and Park Boulevard with 793 vehicles per hour), while reducing curb cuts mainly on Grant which has the least traffic? One of the new curb cuts crosses a major Class II bike lane (Park). The current curb cut on Park is barely used at all compared to the heavy use it will get after full build-out of this project. Three curb cuts you are eliminating are on a far less busy one-way street (Grant Avenue with 161 vehicles per hour) which is apparently not a public street unless it suits your purpose to pretend it is. So yes, you have a net decrease of two curb cuts, but the EIR glosses over the true impact of your smoke-and-mirrors claims on local traffic. How can you justify these false and misleading statements that will allow you to add traffic and potential collisions on already busy streets? What will you do to provide MEANINGFUL mitigation for potential collisions with bicycles, pedestrians and motor vehicles on Park and Birch? Your dishonest boilerplate findings that the impacts are "less than significant" with the woefully inadequate proposed mitigations make you potential accomplices to manslaughter. Your project is a deadly collision waiting to happen. What's to prevent a resident of your project, late for work, from barreling out into cyclist cross-traffic on Park? Or another vehicle? What happens when motorists cannot hear the proposed warning alarm? What happens when the alarm doesn't work? And maximizing site distance sounds more like easily ignored, easily discarded wishful thinking. In addition, any discussion about reducing the number of parking spaces along Birch should involve neighborhood residents. Street parking is already at a premium in the area and will only be made worse by this project.

Solution: Keep all your curb cuts on Grant where they will have the least impact on local traffic - especially bicycle and pedestrian traffic. Incidentally, your proposal to put curb cuts on Park and Birch cuts across a total 1,479 vehicle trips per hour. The current configuration (with far less traffic flow) interferes with 1,169 vehicle trips per hour. Putting two curb cuts on Grant would conflict with only 322 vehicle trips per hour, and virtually no bike trips.

Sincerely,

Peter Jon Shuler
Park Blvd.. Palo Alto

Commenter VYAS

From: Vipul Vyas
To: Chen, Emily F
Subject: [EXTERNAL] 231 Grant Avenue Development - EIR
Date: Friday, November 19, 2021 3:39:29 PM

Dear Ms. Chen-

VYAS-1 I am writing to you ahead of the deadline for public comment on the county's 231 Grant Avenue, Palo Alto development environmental impact report (EIR).

I am incredibly enthusiastic about 231 Grant Avenue. It's a wonderful idea and concept.

However, I have several notable concerns:

VYAS-2 1. I fear there is insufficient bike storage allocated for the development. Bicycle theft is an issue in the Bay Area. With that in mind, people living at 231 Grant will have easy access to the business district at California Avenue and any of the many public schools in Palo Alto (should they world at a Palo Alto Unified School District school). Encouraging and making bicycle use convenient is critical. Indoor, designated, and even allocated bicycle storage with up to 3 bicycles per family seems critical to me. I would hope that at a minimum 330 convenient bicycle storage spaces would be available inside the contemplated parking garage structure or other indoor and secure location. Otherwise, bicycle usage will be a missed opportunity. Given there is an allocation of 1 car spot per residence, even greater allocation should be given to alternatives such as bikes.

VYAS-3 2. Further, areas immediately around the development should have protected bicycle lanes. Again, given the proximity to the business district and likely traffic, it's critical that residents feel safe using non-automobile transportation modalities in and around the development.

VYAS-4 2. I fear there is insufficient retail space allocated given the volume of residents contemplated for the development. A coffee shop is a wonderful idea. However, it's insufficient. More space should be allocated to improve convenience for residents, enhance the local economy, and keep local dollars in the community. The current retail space allocation is anemic at best, unfortunately. I believe the development planners can do better and allocate a substantially greater portion of the space to more retail.

VYAS-5 3. I fear there is insufficient garden space allocated. Garden box space is at a premium in Palo Alto with long wait lists. Having access to community garden opportunities would be a substantial miss. I love the concept of common. areas and courtyards. However, many of the residents will have children, and they should have an opportunity to grow their own food and learn about gardening. A substantial amount of space whether around the development or on the rooftop should be allocated to gardening space. Again, gardening is a popular activity that is part of the culture of Palo Alto. Ideally, much of the landscaped area could be converted to community gardening opportunities. The residents should have a connection with the building and landscaping will simply be an operational cost burden versus community garden boxes which will really create a true sense of community and connection.

VYAS-6 4. I fear there is not enough play space for children in the current plan. I believe play space should be in the central courtyard space of the development. If it is not, then parents may be anxious about their children being too far out of sight. Could we make accommodations for

secure common playspace.

Thanks for your consideration,
Vipul Vyas
Palo Alto Resident

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Vipul Vyas
Doing business as a Member Manager of Dharma Enterprises, LLC
phone: 415-377-0352 (mobile, iMessenger enabled)
email: vipul.vyas@gmail.com
linkedin: https://www.linkedin.com/in/vipulnvyas/

"Here, We are not afraid to follow truth wherever it may lead, nor to tolerate any error so long as reason is left free to combat it." - Thomas Jefferson

Appendix B Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program

Where a CEQA document has identified significant environmental effects, Public Resources Code Section 21081.6 requires public agencies to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.”

A public agency is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). A Mitigation Monitoring and Reporting Program (MMRP) must be designed to ensure project compliance with mitigation measures during project implementation.

The County of Santa Clara is the lead agency that must adopt an MMRP for development of the proposed project – the 231 Grant Educator Workforce Housing project. This MMRP has been prepared to provide for the monitoring of mitigation measures required of the proposed project, as set forth in the Final EIR. This MMRP addresses those measures in terms of how and when they will be implemented.

This MMRP identifies the individual mitigation measures included in the Final EIR and is presented in Table 1. Key features of the table are briefly described below:

- Monitoring and Reporting Action identifies the outcome from implementation of mitigation measures.
- Implementation Timeframe provides the general schedule for conducting each mitigation task.
- Implementation Responsibility identifies the person/group responsible for implementation of the mitigation measure.
- Implementation Oversight assigns the responsibility for verifying compliance with each mitigation measure and reporting task.
- Verification of Compliance documents the person who verified implementation of the mitigation measure and the date on which this verification occurred.

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
MM-AIR-2: Fugitive Dust Reduction Measures 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): • 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. • All haul trucks transporting soil, sand, or other loose material off site shall be covered. • 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. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • 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. • 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. • 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. • 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. 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.	Review and approve construction specifications with inclusion of fugitive dust reduction measures. Implementation of measures.	Prior to and during demolition and construction activities.	The Developer or their designee. The construction contractor.	Santa Clara County Facilities and Fleet Department.	Verified by: _____ Date: _____
MM-BIO-4: Nesting Bird Avoidance Measures 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: • 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. • 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.	Verify that the specified nesting bird season is avoided or that nesting bird surveys have been conducted if construction activities occur during the specified nesting season. Verify that active nest buffers have been established, if necessary.	Prior to demolition, construction or tree-trimming activities.	The Developer .Construction contractor. Qualified biologist.	Santa Clara County Facilities and Fleet Department.	Verified by: _____ Date: _____
MM-CUL-2: Inadvertent Discovery of Prehistoric, Historic, or Tribal Cultural Resources A. Prior to the start of earthmoving activities, the Developer shall implement a worker archaeological awareness training and Tribal Cultural Resources Sensitivity Training by the Tamien Nation for all construction personnel involved with excavation activities. The training shall include informing 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. B. During all ground disturbing activities (excavation, grading, utility trenching, and landscaping that occurs in previously undisturbed soil), the Developer shall retain a tribal cultural resources monitor and an on-call qualified archaeologist to undertake construction monitoring at the project site. The tribal cultural resources monitor shall be a representative of the Tamien Nation who will be given at least 5 days' notice prior the start of ground disturbing activities. If, in the event that the Tamien Nation is given such notice and cannot provide the required monitors at an hourly rate not to exceed $150 (with an annual increase of no more than 3 percent per year), the Developer may contract with an alternative tribal cultural resources monitor. No reimbursement for travel, fuel, or lodging shall be provided.	Verify the implementation of the worker environmental awareness program for personnel involved with excavation activities. Verify prehistoric or historic resources have been evaluated by a qualified archaeologist and implement recommendations for	Prior to and during all ground disturbing activities, including excavation, grading, and utility trenching.	The Developer's Project Manager or designee. Santa Clara County's Project Manager or designee. Tribal resources monitor. Qualified archaeologist.	Santa Clara County Facilities and Fleet Department. Santa Clara County Director of Planning and Development.	Verified by: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
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. If the tribal cultural resources monitor determines that there is limited potential for encountering cultural resources (e.g., if remaining ground disturbing activities would only occur in areas and depths that were previously disturbed by Project construction), monitoring may be reduced or curtailed. 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, in collaboration with a Tamien Nation Tribal representative, 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: 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. 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, in collaboration with a Tamien Nation Tribal representative, 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, in collaboration with a Tamien Nation Tribal representative, prior to resuming construction activities within the 50-foot radius. 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, and reasonably agreed upon by the Tamien Nation, prior to resuming construction activities within the 50-foot radius. 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. 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 Northwest Information Center (NWIC). A redacted report of findings shall be submitted to the County Director of Planning and Development. D. Fill soils used for construction purposes shall not contain archaeological materials.	dispositions of finds, and verify County Ordinance Code B6-18 through B6-20 is followed for any human remains or grave goods. Verify Native American consultation has occurred and implement additional mitigation measures if necessary.				
MM-GEO-3: Prepare a Subsequent Geotechnical Report and Implement a Monitoring Program During Construction 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. Any work on the adjacent property would require the consent of the landowner. 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.	Verify the preparation of a geotechnical report. Verify the implementation of a monitoring program to ensure that stabilization of walls during construction activities.	Prior to the issuance of building permits and during construction.	The Developer and its construction contractor. Licensed geotechnical engineer. City of Palo Alto Building Department. Santa Clara County Geologist.	Santa Clara County Facilities and Fleet Department.	Verified by: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
MM-HAZ-3A: Perform Site Assessment and Implement Associated Recommendations Prior to the issuance of a building permit, the Developer shall obtain regulatory oversight from either the County of Santa Clara Department of Environmental Health, the San Francisco Bay Regional Water Quality Control Board, or the California Department of Toxic Substances Control (the "Selected Regulatory Agency"). The Developer shall consult with the Selected Regulatory Agency to identify the requirements needed for a Site Assessment and Conceptual Site Model to ensure adequate characterization of the soil, groundwater, and soil gas at the project site. The Site Assessment and Conceptual Site Model shall examine and discuss all potential exposure pathways, including the following: • dermal—physical contact with contaminated soil and groundwater during construction; • inhalation—indoor air quality and dust generated by construction activities and potential vapor intrusion; and • surface and groundwater—potential for overland flow from construction dewatering to enter surface waters, and to percolate into clean groundwater that is not part of the current contaminated groundwater plume. The Site Assessment and Conceptual Site Model shall evaluate potential hazards to both construction workers and future site residents and employees during the operational phase, and shall make recommendations governing soil re-use or disposal, and construction dewatering requirements, during construction. The Developer shall provide the results from the completed Site Assessment and Conceptual Site Model to the Selected Regulatory Agency for review and approval. Once the Selected Regulatory Agency approves the completed Site Assessment and Conceptual Site Model, the Developer shall prepare a Site Management Plan that describes the Developer's plan to manage all of the identified risks and shall submit the Site Management Plan to the Selected Regulatory Agency for review and approval. The Developer shall incorporate all elements of the approved Site Management Plan into the construction contractor specifications in accordance with Mitigation Measures MM-HAZ-3B and MM-HAZ-3C, and shall inform preparation of a site-specific health and safety plan in accordance with Mitigation Measure MM-HAZ-3D.	Consult with the Selected Regulatory Agency to identify requirements needed for a Site Assessment and Conceptual Site Model. Verify that the results from aforementioned documents have been reviewed and approved by the Selected Regulatory Agency. Verify the approval of a prepared Site Management Plan and incorporation into construction contractor specifications.	Prior to the issuance of building permits	The Developer	Santa Clara County Facilities and Fleet Department. Selected Regulatory Agency [either County of Santa Clara Department of Environmental Health (SCCDEH), San Francisco Bay Regional Water Quality Control Board (RWQCB), or the California Department of Toxic Substances Control (DTSC)]	Verified by: _____ Date: _____
MM-HAZ-3B: Obtain Permit for Construction Dewatering of Contaminated Groundwater (as Necessary) and Implement Appropriate Treatment Measures Prior to Discharge If construction dewatering at the project site is necessary, the Developer shall obtain a permit for construction dewatering of potentially contaminated groundwater from the San Francisco Bay RWQCB. The Developer shall comply with all requirements of the RWQCB permit and shall include all of the RWQCB permit requirements in the construction contractor specifications. An appropriate method for storing the groundwater prior to discharge shall be employed (as determined by a registered environmental engineer retained specifically for the Project in coordination with the Selected Regulatory Agency).	If necessary, verify the obtainment of a permit for construction dewatering of potentially contaminated groundwater Verify compliance with all requirements of the RWQCB permit	Prior to and during any construction dewatering activities	The Developer. Registered environmental engineer.	Santa Clara County Facilities and Fleet Department. San Francisco Bay RWQCB Selected Regulatory Agency (either SCCDEH, San Francisco Bay RWCQB, or the California DTSC)	Verified by: _____ Date: _____
MM-HAZ-3C: Incorporate Standards for HazMat Training and the Proper Handling and Disposal of Contaminated Soils into the Project's Construction Specifications 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: • 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. • 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. 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.	Verify that specifications, procedures, and provisions are included in contractor specifications. If necessary, verify that licensed engineering contractor is used for contaminated soil removal or handling.	Prior to and during any ground disturbance activities	The Developer Construction contractor Licensed engineering contractor	Santa Clara County Facilities and Fleet Department. Selected Regulatory Agency (either SCCDEH, San Francisco Bay RWCQB, or the California DTSC)	Verified by: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
MM-HAZ-3D: Prepare and Implement a Site-Specific Health and Safety Plan 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.	Verify the preparation, implementation, and approval of a site-specific HASP meeting specified requirements. Verify that the HASP is available to all construction workers prior to construction activities.	Prior to and during construction activities.	The Developer. Certified industrial hygienist. Construction contractor.	Santa Clara County Facilities and Fleet Department.	Verified by: _____ Date: _____
MM-HAZ-3E: Install Vapor Barrier and Perform Periodic Indoor Air Quality Testing, if required 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.	Verify the installation and all compliance requirements of a VIMS or other engineering controls, if required.	Prior to building occupation.	The Developer	Santa Clara County Facilities and Fleet Department. Selected Regulatory Agency (either SCCDEH, San Francisco Bay RWCQB, or the California DTSC)	Verified by: _____ Date: _____
MM-NOI-1: Construction Noise Reduction Measures 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: 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). 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 all residential properties within the area bounded by Oregon Expressway, El Camino Real, California Avenue, and the Caltrain corridor, and provide the contact details of the dedicated disturbance coordinator (see MM-NOI-1A). 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. D. The following noise minimization measures shall be implemented: • 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. • 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). • "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. • Electrical power, rather than diesel equipment, shall be used to power tools and any temporary structures, such as construction trailers. • Staging areas and stationary noise-generating equipment, such as compressors, shall be located as far away from noise-sensitive uses as feasible. • 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. • 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.	Verify the inclusion of measures A through E in the contractor specifications. Verify the implementation of all required measures. Obtain exception permit and/or variance if required for work outside of specified hours. Verify installation and maintenance of temporary sound barriers, as specified.	Prior to and during all construction phases.	The Developer. Construction contractor. Disturbance coordinator.	Santa Clara County Facilities and Fleet Department. City of Palo Alto.	Verified by: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
• All noise from workers' radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity. 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.					
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 150 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. 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. 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: • The equipment is operated in "static mode" with all vibratory functions turned off; or • 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 • 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.	Verify the inclusion of specified measures A through C within construction contractor specifications. Verify implementation of specified measures.	Prior to and during construction.	The Developer. Construction contractor. Qualified acoustic consultant (if necessary)	Santa Clara County Facilities and Fleet Department.	
MM-TRA-3A: Pedestrian/Bicycle Warning System The Developer shall require that an audio-visual warning system with adjustable audio and lighting levels be installed at all parking garage exits to warn cyclists and pedestrians when a vehicle is approaching the garage exit. The audio-visual warning system shall meet the requirements of the City of Palo Alto. 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.	Verify the installation of audio warning technology to warn cyclists and pedestrians of approaching vehicles Verify the placement/installation of signage warning motorists to yield to pedestrians and cyclists	Prior to construction activities	The Developer	Santa Clara County Facilities and Fleet Department	
MM-TRA-3B: Maximize Site Distance 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.	Verify efforts to limit on-street parking near the Birch Street access point Identify and document proposed street trees on	Prior to construction and prior to building occupancy.	The Developer	Santa Clara County Facilities and Fleet Department. City of Palo Alto.	
MM-C-TRA-3: Coordination of Construction Traffic Plans 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 and construction contractors for other active construction projects in the immediate vicinity of the project site to coordinate the Construction Traffic Management Plans for all projects such that: • Temporary lane and/or road closures and detour routes do not conflict; • Temporary road closures on Grant and Sherman Avenues at the same time shall be avoided to the extent feasible, to maintain connectivity between Birch Street and Park Boulevard and allow access to the Courthouse; • Notification to local residents, bicycle and pedestrian advocacy groups, the Judicial Council of California, and the Valley Transit Authority are coordinated and clearly identify locations and periods of road closures, alternative routes, and other pertinent information; and • Emergency access is maintained to all properties in the vicinity of the projects throughout the combined construction period.	Verify consultation with specified parties and coordination of traffic management plans.	Prior to and during construction activities	The Developer and its construction contractor. City of Palo Alto and its construction contractor for Public Safety Building project. Construction contractors for other active construction projects in vicinity.	Santa Clara County Facilities and Fleet Department. City of Palo Alto.	

Appendix C – Arborist Report

ASCA Registered Consulting Arborist #401 / ISA Tree Risk Assessment Qualified / ISA Certified Arborist #WE-3172A Cell: (415) 203-0990 / Email: walterslevisonjr@yahoo.com

Assessment of and recommendations for Private trees and street trees at and adjacent to

231 Grant
Palo Alto, California
(Santa Clara County Land)

Prepared for:

Ms. Maegan Pearson, Associate Vice President, Development
Abode Communities
1149 S Hill Street, Suite 700
Los Angeles, CA 90015

Field Visits:

Walter Levison, Consulting Arborist (WLCA)
2019-2021

Report by:

WLCA
Iteration Date 3/25/2021

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1.0 Assignment & Background

Walter Levison, Consulting Arborist (WLCA) was retained in 2020 by Mercy Housing to tag with numeric aluminum tags, photograph, and assess all 231 Grant site trees and adjoining neighbor property trees, and collect standard arboriculture data for inclusion in a written arborist report to be submitted to County of Santa Clara planning division. It is WLCA's understanding that, at the request of County planning division, City of Palo Alto Urban Forestry division will also weigh in on the project, in terms of assessing construction-related impacts to trees, and proposed tree protection measures for specimens that the project team proposes to protect in place (PIP), even though this project site is technically outside the jurisdiction of the City of Palo Alto.

WLCA tagged eighty-two (82) trees (#1 through #82) using racetrack shaped aluminum professional grade tags. For cypress trees #1 through #23, and cypress trees #44 through #58, and #65, the tags are affixed to the mainstem base. For all other trees, the tags are affixed to tree mainstems at approximately 5.5 to 6.5 feet above grade elevation.

The tree tag numbers are noted on various plan sheets assembled by the project team, and also on an updated tree map markup from 2021 by WLCA which is embedded in this report, using the most current iteration of Plural's landscape plan sheet as basis. Note that this older tree location map shows only the initial 2020 conceptual view of the project buildout plan, and may not represent the most current finalized build plan.

Tree data for the 82 study trees are assembled in an Excel table attached to the end of this report. This table includes standard arboriculture data, plus notes on proposed work impacts on the trees, and recommendations for tree protection and tree maintenance in the righthand cell of each row.

Diameters were determined using a forestry D-tape which converts actual circumference to an "average diameter" in inches and tenths of inches, which is the standard method of diameter determination. In some cases, the author visually estimated trunk diameter.

Canopy spreads were estimated visually.

Tree heights were vector-determined with a Nikon forestry pro 550 digital hypsometer/rangefinder.

Recommendations for tree protection and maintenance are detailed in section 4.0. Some recommendations include suggested adjustments to the current proposed plan set. Some of these suggested adjustments may or may not be able to be achieved, given certain restrictions and offsets required per County and State Code details that WLCA does not have access to.

Tree images archived by WLCA are located in section 8.0, and are provided as additional reference of existing pre-project site conditions.

2.0 Summary

1. Total trees tagged, assessed, and mapped by WLCA: 82

2. Trees requiring protection measures on-site and off-site ("protected size" trees per City of Palo Alto and County of Santa Clara tree ordinance are noted in **bold black**):

   On-site trees **#33, 76, 77.**

   Off-site trees #1 through **#24.**

   Off-site trees #44 through #58, and #65.

   Street trees **#25, 31, 38, 39, 40, 41** (City of Palo Alto jurisdiction trees).

   PROTECTED-SIZE TREES TO BE PROTECTED IN PLACE (PIP): 15 OF 45 TREES BEING RETAINED.

3. Trees being removed ("protected size" trees per City of Palo Alto and County of Santa Clara tree ordinance are noted in **bold black**):

   Street trees **#26, 27, 28, 29, 30, 32, 34, 35, 36, 37, 42, 43** (City of Palo Alto jurisdiction trees).

   On-site trees #59, 60, 61, 62, 63, **64**, 66, **67**, 68, 69, 70, 71, 72, 73, 74, 75, **78, 79, 80, 81, 82**.

   See report pages #7 and #8 "suitability for preservation" below for analysis of trees #64 and #67, which are very large specimens proposed for removal on County of Santa Clara land.

   PROTECTED-SIZE TREE REMOVALS: 19 OF 37 TOTAL TREES BEING REMOVED.

4. Replacement Trees:

   Per the team's discussion with City of Palo Alto urban forester Mr. Walter Passmore via zoom on 4/1/2021, street trees are all under City jurisdiction, and therefore the removal permitting and replacement ratios would need to be per the City, and not the County of Santa Clara.

   Per Mr. Passmore, if the trees are provided with elongated planting strips and/or soil vaults to achieve 400, 800, or 1200 cubic feet of soil volume for each tree considered to be small, medium, or large size, then the replacement ratio will be 1:1. However, if the trees are planted in smaller than this rough spec soil planter volume, then the replacement ratio will be increased to 2:1 (where planting "deficits" can be paid as in-lieu fees to the City of Palo Alto, if the 2:1 ratio cannot be met with on-site plantings).

   The most current May, 2021 iteration of Plural's landscape plan for this site does not include use of structural soil or structural cells for new tree plantings.

5. DETAILS OF EXPECTED IMPACTS TO TREES, AND SUGGESTED IMPACT MITIGATION MEASURES:

Tree Tag Numbers (Selected Only)	Species	Estimated offset distance between encroaching item and tree trunk edge	Encroaching Construction Item	Impact Severity (Estimate)	Suggested Plan Set Adjustments to Optimize Root Preservation (and Other Recommendations)
25, 31	*Quercus lobata* (valley oak)	(Not yet finalized)	New sidewalk base section excavation, New building foundation footing, etc.	Moderate to severe.	Maintain an offset radius between trunk edge and new construction of at least 8 to 10 feet radius around entire circumference of tree.
26, 27, 28, 29, 30	*Pistacia chinensis* (Chinese pistache)		New sidewalk base section excavation, utility trenching, irrigation pipe trenching.	Moderate to severe.	These trees are currently proposed to be removed. If they are to be retained, then maintain an offset radius between trunk edge and new construction of at least 4 to 6 feet radius around entire circumference of tree.
33	*Phoenix canariensis* (Canary Island palm)	(Not yet finalized)	New sidewalk base section excavation, New building foundation footing, new patio base excavation, etc.	Moderate	Palms can typically handle loss of up to 80 or 85% of their root system during transplant. I would still suggest a minimum construction offset radius of at least 6 to 10 feet between trunk edge and new construction, around the entire circumference of the trunk. A good minimum size for the new open soil planter area for this tree would incorporate a construction offset of roughly that radius (e.g. a planter size of approx. 12'X12', 14'X14', 16'X16', etc.).

Tree Tag Numbers (Selected Only)	Species	Estimated offset distance between encroaching item and tree trunk edge	Encroaching Construction Item	Impact Severity (Estimate)	Suggested Plan Set Adjustments to Optimize Root Preservation (and Other Recommendations)
38, 39, 40, 41	*PLatanus x acerifolia* Cult. (London plane tree cultivar)	(Not yet finalized)	New sidewalk base section excavation, curbwork, etc.	Moderate	London plane trees can typically withstand moderate root loss, as long as there is temporary heavy irrigation water provided to the trees during construction to partially mitigate loss of root function.
76, 77	*Sequoia sempervirens* (coast redwood)	(Not yet finalized)	Deep foundation footings for new building(s), plus landscaped area development (pipe trenching, edging restraints, etc.).	Moderate	(To be determined)

Tree Tag Numbers (Selected Only)	Species	Estimated offset distance between encroaching item and tree trunk edge	Encroaching Construction Item	Impact Severity (Estimate)	Suggested Plan Set Adjustments to Optimize Root Preservation (and Other Recommendations)
1-23, 44-58, 65	*Cupressus sempervirens* (Italian cypress)	(Not yet finalized)	Shading along entire north sides of canopies, due to the high elevation massing of new building construction. Root loss due to new construction in very close proximity to the trunk edges. Soil moisture deficit may also occur, if irrigation systems are required to be shut down or are damaged or severed during site work at 231 Grant (the volume of supplemental water being applied to the trees as of the date of writing, if any, has not been verified).	Moderate to severe	Supply heavy irrigation via soaker hose or emitter lines or garden hose, to all of the Italian cypress tree specimens during construction, on a 1x/week or 2x/week basis, throughout the entire construction period. Volume: To be determined. Locations: To be determined.

3.0 County of Santa Clara, California – What Trees are Protected?

Per the official County of Santa Clara County website, trees on the subject property are protected at the threshold level of 12 inches diameter at 4.5 feet above grade.

Street trees are also protected per County tree ordinance, with all tree species of all mainstem diameters in the street/sidewalk right of way considered to be of protected size.

Per the County tree ordinance, there are 29 total protected-size trees in the study group of 82 trees, and 18 of these protected-size trees are being removed, as noted in bold black on page 4 of the Summary section 2.0. Note that most of the protected-size trees being removed are of protected-status not because of their mainstem diameters being greater than 12.0 inches diameter at 4.5 feet grade, but instead are protected-status due to their planting positions along the public sidewalk (i.e. they are considered “street trees”).

4.0 Discussion: Existing Tree Issues, Preservation vs. Removal, & Replacement Strategy

Issues with Existing Trees

The Palo Alto street southern magnolias along Grant are in decline due to years of droughty California weather, and lack of regular piped irrigation water to the trees (assume piped systems nonexistent or non-functional). The trees are proposed for removal.

The Palo Alto street London plane trees along Park are in decent condition, but are experiencing fungal issues from sycamore anthracnose, etc. due to susceptibility to this pathogen. These are not “Columbia” cultivar, which is really the only widely available cultivar that resists powdery mildew and anthracnose fungus infections. The original 2020 plan was to remove all of these trees along Park. However, the most current (May, 2021) iteration of the Plural landscape plan will allow for London plane trees #38, 39, 40, and #41 to be retained and protected in place (PIP) along Park.

The Chinese pistache trees along Birch for the most part cannot be retained, due to a variety of issues such as proposed new transformer construction, utilities, parking garage ingress/egress routes, building entrance paths, etc. This tree species generally performs well in Palo Alto when provided with adequate irrigation and rootable soil volume.

Suitability for Preservation / Redwood #64

Redwood tree #64 was in fair overall condition when assessed in early 2020.

The tree's critical root zone (CRZ) was calculated as 6 X diameter = 22 feet as a radial offset for new construction. Based on the project footprint of new buildout (multiple story elevation massing) to the south, east, and west of the canopy, it was determined that the new deep excavation would occur within the tree's CRZ, and that live wood and foliage would need to be sheared back (a non-standard form of pruning) to clear both the new building footprints and a 5 foot wide or greater width construction corridor required for a lift machine to operate and perform final exterior siding installation, window installation, painting, etc. All of these impacts to both the above ground canopy and the below ground root system of radially extended woody roots represent a severe impact to the tree, and would necessarily reduce the likelihood that this high water-use species could survive over the long term. Therefore, the project team decided to request removal of this tree through County of Santa Clara planning division, at WLCA's suggestion.

Issues that reduce tree #64 safe and useful life expectancy include:

a. PROPOSED DEVELOPMENT WORK WITHIN CRITICAL ROOT ZONE: Expected construction-related deep building foundation excavation, walkway base section excavation, grading, landscaping, utility trenching, etc. within the 22 foot radial offset "Critical Root Zone" distance calculated for this tree, based on mainstem diameter at 4.5 feet above grade. Note that the Best Management Practices/Root Management booklet 2017 by International Society of Arboriculture recommends offsetting proposed new work such that a distance of 6 x diameter of mainstem is maintained as a lateral offset on one side of the tree. Note however that at 231 Grant, the proposed work will occur on multiple sides (quadrants) of a tree's root system, which necessarily translates to root loss/damage type impacts of far greater severity than that expected from work on only a single side of a tree's root system. The overall development impact to this tree's root system is expected to be "severe" or "very severe".

b. SOIL MOISTURE DEFICIT1: 9 or more years of droughty conditions between 2011 and 2021, which has reduced canopy live twig extension and live needle density to poor/moderate per the attached WLCA Excel tree data table.

c. SOIL MOISTURE DEFICIT2: Lack of formalized, regular, supplemental irrigation to the tree's root system (which is currently covered by asphalt parking lot materials).

d. PRUNING: Tipping pruning of the canopy, which has damaged the canopy irreparably by removing the outermost ends of the scaffold limbs: a practice which is contrary to the ANSI A300 U.S. national standards for tree care.

e. CODOMINANT MAINSTEM FORK: Presence of a mainstem fork at 70 feet means that the mainstem has an elevated risk of splitout and failure at that mainstem union location, if the two stems are not strengthened by installing a support system per U.S. ANSI-A300 standards (e.g. installation of through-bolt brace rods). This is a structural stability issue of note.

Given all of the above issues noted on this page, WLCA calculated the official Tree Conservation Suitability Rating (TCS) for **coast redwood #64**, based on factors noted in the most current text[1]. The tree rates out with a numeric **TCS rating of 57**, on a scale from 8 to 100, which is a "Poor" tree conservation suitability rating. See page #11 of this report for the full breakdown of TCS rating worksheet factors and definitions, per reference #1.

[1] Fite and Smiley, 2016. *Best Management Practices: Managing Trees During Construction, 2nd Edition*. International Society of Arboriculture publications. USA.

Suitability for Preservation / Camphor #67

Camphor #67 is another high water-use specimen, in poor overall condition. Similar to redwood #64, this tree is an older, larger specimen with large canopy dimensions that has suffered from the ongoing California drought and lack of regular heavy irrigation water applications.

This tree was also noted to have been subjected to “lion tail” pruning: a non-standard form of pruning that removes inner canopy and lower canopy elevation live wood and foliage, resulting in a pom-pom effect that encourages the tree to become lanky and over-extended, effectively increasing risk of limb and branch failure over time as the limb systems exhibit increased loads acting on their points of attachment to the lower mainstem. The tree has apparently been subjected to lion tail pruning multiple times, including during the last 12 months since WLCA’s initial tree assessment in early 2020.

As with redwood #64, the long term safe and useful life expectancy of the tree is limited, given that it is already in poor condition, and will be subjected to additional significant or severe root loss within the tree’s Critical Root Zone (calculated at 15 feet radius offset from trunk edge) and expected canopy loss due to proposed new building footprint work and also a construction corridor of an additional 5 feet width for travel by a lift machine in front of all of the building massings that requires additional clearance pruning to allow for exterior finish work to be performed. WLCA suggested to the project team that this high water-use tree in poor condition also be removed, based on the above factors.

The overall development impact to this tree’s root system is expected to be “severe” or “very severe”, per the following bulleted breakdown:

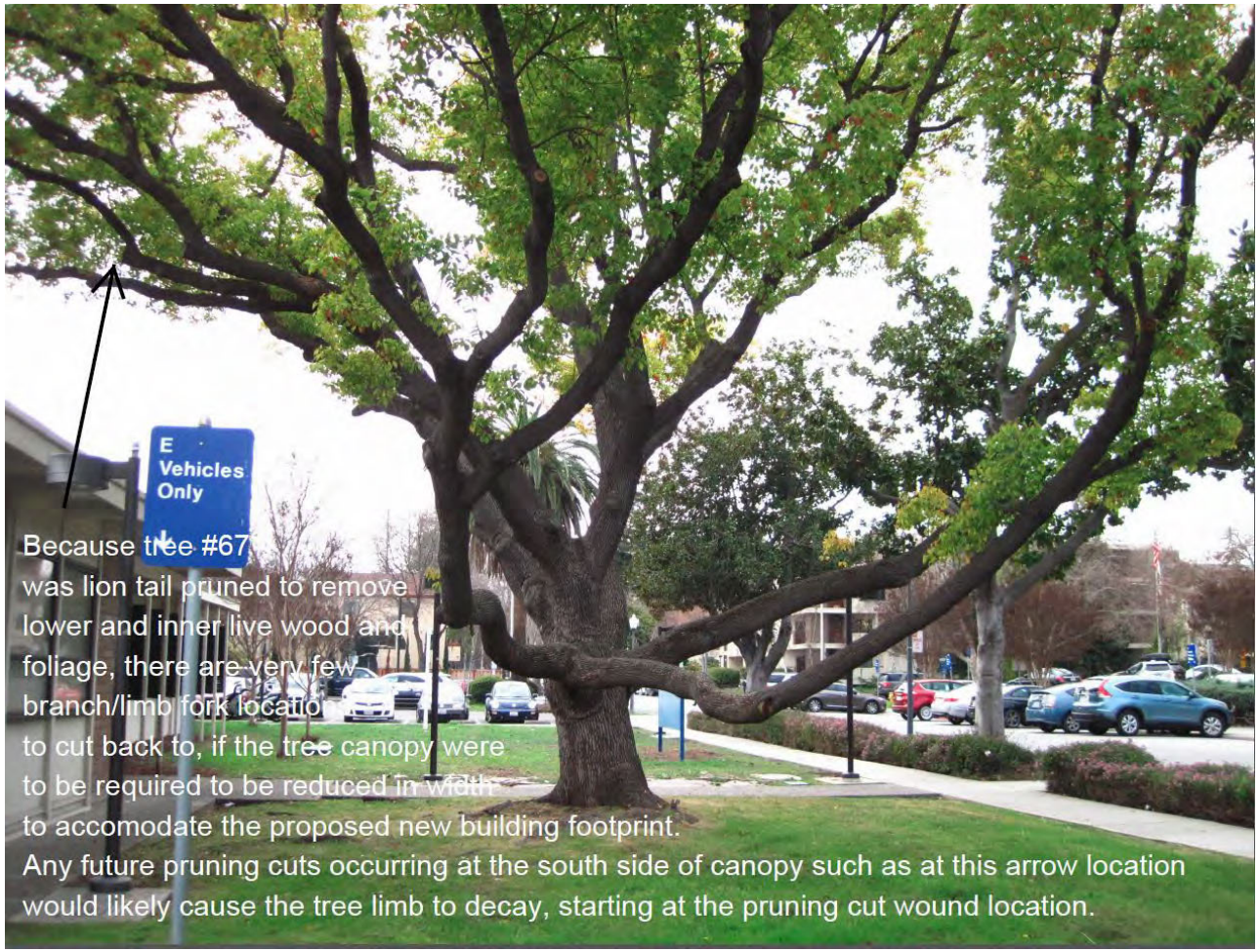
a. PROPOSED DEVELOPMENT WORK WITHIN CRITICAL ROOT ZONE: Expected construction-related deep building foundation excavation, walkway base section excavation, grading, landscaping, utility trenching, etc. within the 15 foot radial offset “Critical Root Zone” distance calculated for this tree, based on mainstem diameter at 4.5 feet above grade. Note that the Best Management Practices/Root Management booklet 2017 by International Society of Arboriculture recommends offsetting proposed new work such that a distance of 6 x diameter of mainstem is maintained as a lateral offset on one side of the tree. Note however that at 231 Grant, the proposed work will occur on multiple sides (quadrants) of a tree’s root system, which necessarily translates to root loss/damage type impacts of far greater severity than that expected from work on only a single side of a tree’s root system. The overall development impact to this tree’s root system is expected to be “severe” or “very severe”.

b. SOIL MOISTURE DEFICIT1: 9 or more years of droughty conditions between 2011 and 2021, which has reduced canopy live twig extension and live needle density to poor/moderate per the attached WLCA Excel tree data table.

c. SOIL MOISTURE DEFICIT2: Lack of formalized, regular, supplemental irrigation to the tree’s root system (which is currently covered by asphalt parking lot materials).

d. PRUNING: Lion tail pruning of the canopy, both in the distant past, and in the immediately past (2020?), has damaged the canopy irreparably by removing the innermost and lowermost elevation live wood and foliage: a practice which is contrary to the ANSI A300 U.S. national standards for tree care. The resulting tree is “over-extended” because the limbs now can only grow from their outermost points, forcing all new stem growth to those ends. The tree then becomes ever-extended with no possibility of shortening the over-extended branch and limb systems, because there are few or no side branches to cut back to in the lower and inner canopy. Trees that are lion tailed no longer have side branching in the canopy that can be used as pruning cut points for “reduction pruning”. Pruning of the correct “endweight reduction pruning” method per ANSI-A300 standards to shorten the canopy extensions by removing the outermost ends of the canopy is therefore very difficult or impossible to perform, since cutting back to a random internodal location with no side branch “fork” would cause a limb to die back from the pruning cut.

Given all of the above issues concerning **camphor tree #67**, as discussed above on page 9 of this report, WLCA calculated the official Tree Conservation Suitability Rating (TCS) for tree #67, based on factors noted in the most current text noted in reference #1. The tree rates out with a numeric **TCS rating of 46**, on a scale from 8 to 100, which is a "Poor" tree conservation suitability rating. See page #11 of this report for the full breakdown of TCS rating worksheet factors and definitions, per reference #1.



TREE #67 SIDE VIEW SHOWING HOW LION TAIL PRUNING HAS NEGATIVELY AFFECTED THE CANOPY IN TERMS OF STRUCTURE. IT IS NOW ALMOST IMPOSSIBLE TO PRUNE TO REDUCE SOUTH CANOPY EXTENSION RADIUS WITHOUT USING NON-CONFORMING PRUNING CUTS THAT WOULD RESULT IN EXTENSIVE STEM DECAY INITIATING FROM THE PRUNING CUT WOUNDS.

Tree Conservation Suitability (TCS) Ratings

A tree's suitability for conservation is determined based on its health, structure, age, species and disturbance tolerances, proximity to proposed cutting and filling, proximity to proposed construction or demolition, and potential longevity, using a scale of good, fair, or poor (Fite, K, and Smiley, E. T., 2016). The following list defines the rating scale. Note that if proposed site work can be offset to farther linear distances from a tree's trunk edge, a tree's TCS rating may be elevated by one rating tier, given that there would be a corresponding reduction in expected future root zone impacts.

TPS Ratings	Range of values	
Good	**80-100**	Trees with good health, good structural stability and good expected longevity after construction.
Moderate	**60-79**	Trees with fair health and/or structural defects that may be mitigated through treatment. These trees require more intense management and monitoring, before, during, and after construction, and may have shorter life expectancy after development.
Poor	**<59**	Trees are expected to decline during or after construction regardless of management. The species or individual may possess characteristics that are incompatible or undesirable in landscape settings or unsuited for the intended use of the site.

TCS Ratings Worksheet Factors (Total Possible: 100 Points)

Health (1-15)
Root Cut/Fill Distance from Trunk (1-15)
Structure Defects (1-15)
Construction Tolerance of the tree species (1-15)
Age relative to typical species lifespan (1-10)
Location of construction activity (1-10)
Soil quality/characteristics (1-10)
Species desirability (1-10)

5.0 Recommendations

1. Project Arborist / Construction Phase (if required by Santa Clara County Planning Division Conditions of Approval):

   It is suggested that a project arborist or "PA" be retained to perform a minimum of 1x/monthly inspections on site to verify that tree protection and tree maintenance recommendations are being adhered to per the pre-construction phase arborist report submitted to County of Santa Clara planning division. The inspection typically involves an arborist visiting the site, documenting existing conditions with a digital camera, checking soil moisture with a Lincoln soil moisture meter or a soil recovery probe (both of which are used by WLCA), and noting tree condition, damages, fencing protection, etc.

   A written inspection letter is then generated by the PA, to include a site tree location map, digital images of trees and tree protection, notes on existing conditions, and a punchlist of to-do items.

   The PA can be WLCA or another consulting arborist.

   Suggested minimum required classification for the PA:

   - ISA Certified Arborist and
   - ASCA Registered Consulting Arborist or ISA Board Certified Master Arborist

   The PA shall meet with the general contractor on site prior to start of demolition, to go over tree protection and maintenance requirements outlined in this recommendations section of the arborist report.

   The PA shall revisit the site prior to demolition start, to verify that tree protection measures are all in place on site as per the recommendations section of this arborist report.

   The PA shall continue site visits on a minimum of a 1x/monthly basis.

2. Suggested Plan Adjustments to Optimize Tree Survival (As-Feasible):

The following suggestions are included in this report as optional adjustments to the current-proposed plan sheets for new development and for renovation of existing site infrastructure, in order to optimize survival of tree root systems that extend horizontally from trees proposed to be preserved and protected. These lateral woody roots extend in highest density between approximately grade elevation and 2 feet below grade elevation, out to as much as 50 or 100 feet radius from trunk edge in some cases.[2]

a. Oak #25:

Minimize or eliminate subbase scarification and recompaction for new sidewalk renovation work. Toward this end, it may be necessary to use a biaxial or triaxial geogrid such as Tensar TX5 or TX7 as an underlayment placed directly onto the existing soil surface, which will support loads and eliminate the need for any subbase preparation work, even in clay-based high-plasticity type soils[3].

(See the image at right, showing a Stanford University parking lot build near oak specimen trees being retained. All subbase scarification and recompaction was eliminated. The geogrid was laid directly over the soil surface, and class II baserock built up over the grid. Asphalt was then laid down directly over the baserock layer).

b. Oak #31: Same as above.

c. Palm #33:

Optimize canopy preservation by stepping the higher elevation levels of the proposed new building back southward from the 1st (ground level) story.

Maintain a minimum of 400 to 600 square feet of open soil root zone around this tree as unadulterated “no dig” root zone, if possible.

Incorporate subdrains, drain tiles, and/or other drainage enhancement measures to ensure that irrigation water applied to this tree planter area quickly drains away from the tree without pooling (flooding).

[2] ***Arboriculture, 4th Edition*** notes that lateral roots often extend as much as 3x to 5x the canopy dripline radius, as long as there are no impediments to this normal lateral root extension growth, such as curb footings or structural foundation footings.
[3] Stanford University uses this product under the direction of WLCA, to eliminate the need for subbase scarification and recompaction.

d. Cypress specimens #1-23, 44-58, 65:

Maximize construction offset distances from trunk edges of these trees, and maintain heavy 2x/week irrigation of the trees using soaker hoses, emitter lines, garden hoses, etc. during construction.

e. Redwoods #76, 77:

Offsets:

Maintain at least 10 to 20 feet of horizontal offset distance between construction and trunk edge at all times.

Root Zone Preservation:

Maintain a minimum of 800 to 1,000 square feet of open soil root zone around this group of two (2) trees as unadulterated “no dig” root zone, if possible.

Trenching:

Push out all new utility trenching, and irrigation pipe trenching, to at least 20-25 feet offset from the trunk edges.

Permanent over-grade irrigation system:

Use a system of concentric circles of ½” diameter emitter line such as Netafim or equivalent with high flow emitters built into the line on a 12 inch spacing setup, laid down over the soil surface as full perimeter circles, with a circle each at 4 feet offset, 6 feet offset, and 8 feet offset, 10 feet offset, and 12 feet offset from trunk edge, so that even distribution of supplemental water is achieved over a very large portion of the tree’s remaining root system.

Subdrains:

Incorporate subdrains, drain tiles, and/or other drainage enhancement measures to ensure that irrigation water applied to this tree planter area quickly drains away from the tree without pooling (flooding).

f. London plane trees #38, 39, 40, 41:

Maximize construction offset distances from trunk edges of these trees, and maintain heavy 2x/week irrigation of the trees using soaker hoses, emitter lines, garden hoses, etc. during construction.

3. Trunk Buffer Wrap Type III Protection:

Prior to project commencement, install a trunk buffer around either the lowermost six (6) feet of the trunks, or the area between grade and the lowest scaffold branches, of **trees #25, 26, 27, 28, 29, 30, 31, 33, 38, 39, 40, 41, 76, and #77 being retained** (see spec image at right).

Wrap an entire roll of orange plastic snow fencing around the lowermost 6 to 8 feet of each single tree.
Stand 2x4 wood boards upright, side by side, around the entire circumference of the trunk. Affix using duct tape (do not use wires or ropes). See spec image above right showing the wooden boards correctly mounted against the plastic, such that the wood does not actually touch the trunk at all.

4. Chain Link Root Protection Zone Fencing:

Fencing protection shall be established prior to arrival of any site plan construction or demolition equipment on site.

The protective fencing shall be termed “Root Protection Zone” fencing or “RPZ”, and marked with appropriate signage indicating that the fencing shall not be moved or removed without written authorization from the PA (project arborist).

Fencing material shall be chain link steel, minimum 5 feet in height, hung on two-inch diameter iron tube posts pounded 24-inches into the ground at a spacing of no greater than 8 feet on-center. See image at right.

Alternative Method / Chain Link Panels:

Wire chain link panels together using steel bailing wire, or use moveable concrete fence panel footings, to set the panels in place as full perimeters. Affix the panels in place such that they cannot be moved, by pounding rebar or layout stakes into the soil at the corners of each fence panel (see image below right).

Images at right and below show both the pounded iron tube post method, and also the alternative “chain link panel method” with panels set on moveable concrete block footings.

Locations to set the RPZ Fence Perimeters:

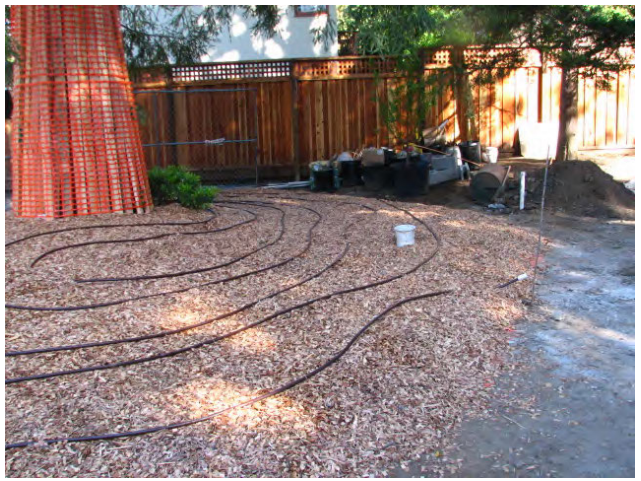
As far as possible around **trees #25, 26, 27, 28, 29, 30, 31, 33, 38, 39, 40, 41, 76, and #77 being retained**.

5. Temporary Irrigation During Construction:

Supply all trees being retained with **2x/week or 3x/week supplemental irrigation** starting on the date that the existing system is shut down or otherwise inactive. As of the date of writing, the trees being retained that will require temporary irrigation include:

Trees #25, 26, 27, 28, 29, 30, 31, 33, 38, 39, 40, 41, 76, and #77 being retained.

Cypress in rows (#1-#24, #44-#58, 65) being retained on neighbor property.



Water volume: To be determined.

The general recommendation is 10 gallons per inch of trunk diameter per month for small diameter trees (e.g. 5 inch tree would receive 50 gallons spread out over the month), or roughly 100 to 200 gallons of water per month for larger trees measuring 10 to 20 inches diameter each.

Coast redwoods typically like 20 gallons per each inch of trunk diameter per month, which equates to 400 gallons/month for a 20 inch diameter tree, applied as 100 gallons 1x/week.

Water application can be made using one or more of the following methods (see sample images below).

- Soaker hoses.
- Emitter lines.
- Garden hoses.
- Fire truck hoses.
- Water trucks.
- Tow-behind spray tank apparatus.
- On-site water tank with gravity feed.
- Over-grade PVC piping with spray heads wired to rebar or other steel stakes.

Images above right: Various additional methods of providing trees with supplemental irrigation during construction. Water needs to be applied throughout the tree's entire root system, which can extend 50 or 100 feet out from the trunk in many cases. In other words, do not water only the area directly around the trunk. Instead, thoroughly saturate the soil between the trunk and at least 10 or 20 feet out from trunk, assuming that there is an open soil planting area extending that distance.

6. Recycled Water vs. Standard Drinking Water as Irrigation for Site Trees:

   It is suggested that 100% of the irrigation water at this site be municipal drinking quality water to avoid problems regarding certain trees such as coast redwoods being sensitive to ionic content in irrigation water (e.g. sodium and chloride ions).

   If the County of Santa Clara is requiring that recycled water be utilized as a source of irrigation water for the trees at this site, then it is suggested that a "blend" of potable drinking water and recycled water be formulated in order to achieve a Total Dissolved Solids (TDS) concentration of less than 500ppm, in order to avoid causing decline or death to the tree and plant materials being maintained at this landscape site. Currently as of 2021 there is no known source of recycled water that meets this high standard except for the "blend" of treated recycled water that is being sold by the **Silicon Valley Advanced Water Purification Center run by Santa Clara Valley Water District**. This water is only available to commercial customers in San Jose, Milpitas, San Jose Water Company, and Santa Clara jurisdictions. Therefore, it appears that our site at 231 Grant is not eligible to receive commercial sale of the special water blend produced by SCVWD that tests TDS levels averaging <500ppm.

   There may or may not be a local City of Palo Alto blended recycled water source available that can meet this strict TDS standard of maintaining less than 500ppm average daily TDS load (further research required).

   Author's Side Note: Trees may express visible symptoms of twig, leaf, and needle dieback due to various causes such as overwatering, sunburn, windburn, soil moisture deficit, San Francisco Bay water intrusion into the root zone, dumping of janitorial chemicals, dumping of paints, etc. Therefore, it is extremely difficult to determine with absolute certainty that a given landscape tree is being negatively affected by ionic content in recycled water being applied as irrigation on the landscape. Given this limitation in discerning the cause(s) of a tree's dieback, it is always best to irrigate the landscape with irrigation water, be it 100% recycled water, or a blend of both recycled water and drinking water content, that is being periodically tested and found to contain an average daily TDS level of less than +/- 500ppm.

7. Pruning & Related Maintenance:

   Redwood #76:

   Either remove 1 of 2 codominant mainstems at the fork at 35 feet elevation above grade, or install arborist cable(s) per all ANSI A300 standards above that elevation.

   Various Trees:

   Perform airspace clearance pruning as-needed to clear horizontal and/or vertical airspace.

   All pruning will need to be directly overseen on site by an ISA-Certified Arborist.

   All pruning shall conform to the most current iterations of ANSI A300 standards for tree care (e.g. ANSI A300 "tree, shrub, and other woody plant /pruning").

8. Landscape / Plant Palette / Use of Special Oak Species in Large Sidewalk Cutouts:

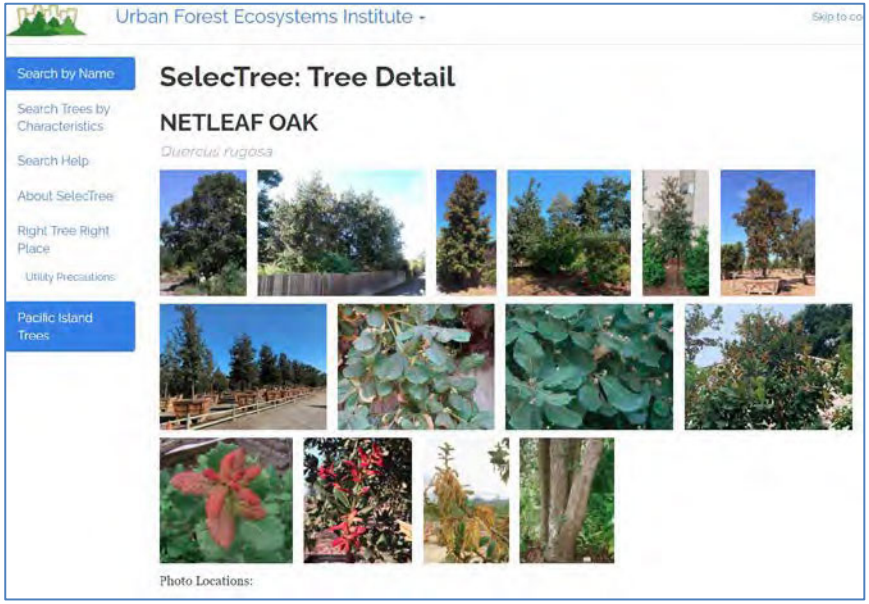
Per WLCA's communication with Mr. Dave Muffly, former Apple Inc. staff arborist and creator of one of the largest-ever tree plantings in the Western Hemisphere (Apple Park, Cupertino, CA), two (2) of the most useful "new" moderate size oak species appropriate for street tree plantings at Palo Alto that would work well for the 231 Grant site are *Quercus rugosa* (netleaf oak): an evergreen with unusual foliage that emerges as red succulent and transitions into a leathery green, and *Quercus engelmannii* (Engelmann oak): a deciduous tough oak from Southern and Central California.

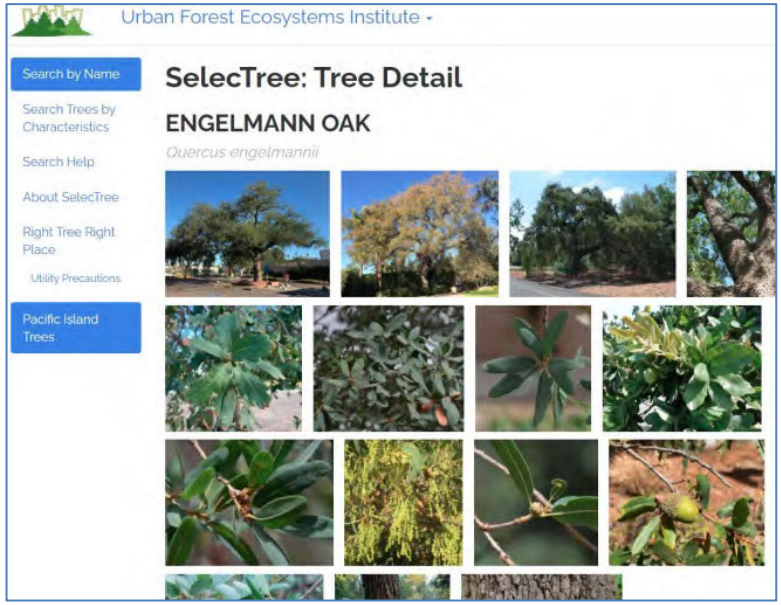
Muffly used both of these species in plantings throughout the Apple campus in Cupertino, and are fairing well at that location.

Both of these trees are available as acorn-grown starts from Dave Muffly, which are then grown to wholesale sizes (15 gallon, 24" box) at the Devil Mountain Nursery facilities throughout California, using special Pioneer ™ pots that are considered "air pruning pots" that allow root systems to shed as they reach the edge of the pot, virtually eliminating girdling and circling roots in many cases. Trees grown in these pots achieve very high density, and are therefore more robust and tough, with better drought resistance, resulting in faster growing trees that achieve larger ultimate sizes.

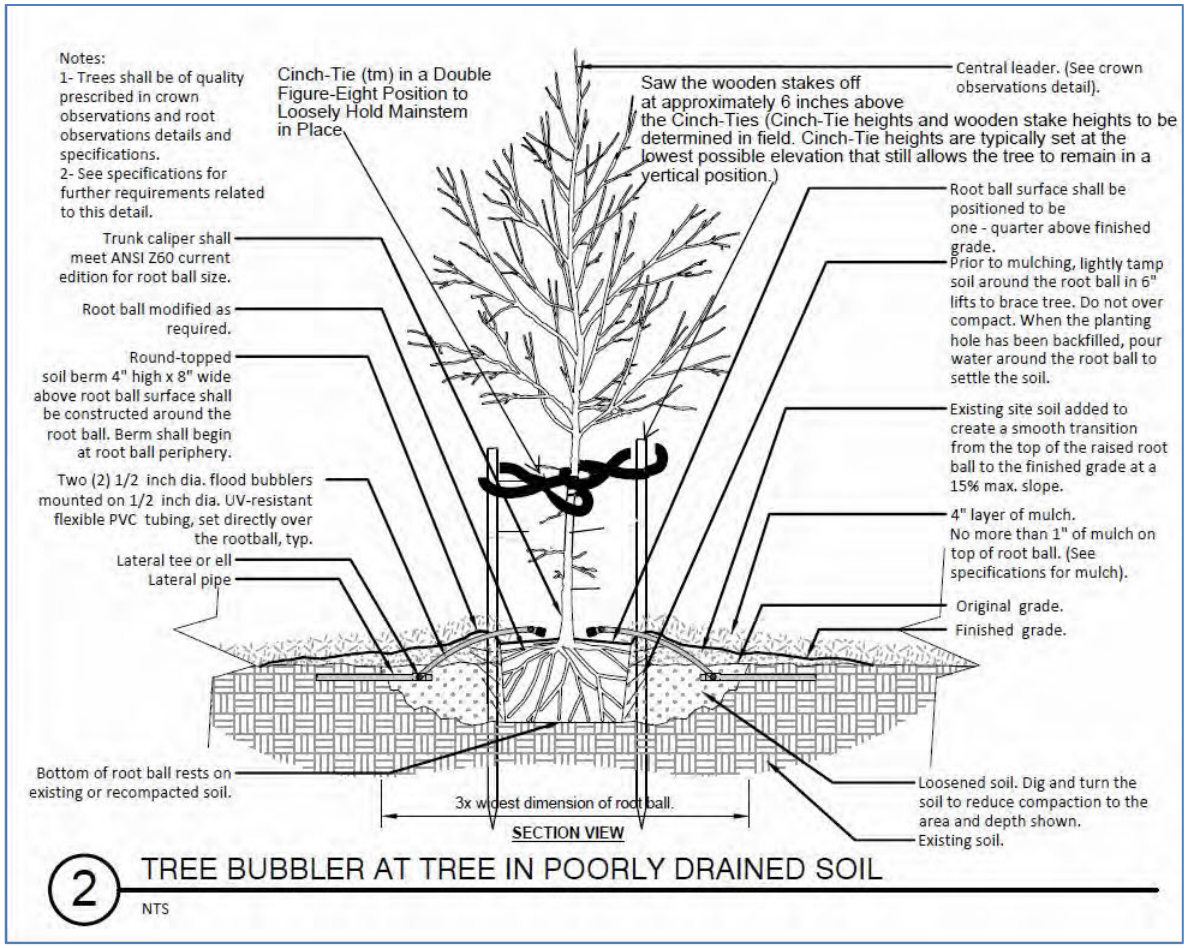
Both netleaf and Engelmann oaks would need to be contract grown at Devil Mountain Nursery in the east bay area, through negotiation with that company. The negotiation for this type of contract grown would need to commence at least 1 to 2 years or more prior to the date the trees are required to be installed at the 231 Grant site. Contact Devil Mountain Nursery for full information: Devil Mountain Wholesale Nursery - Whatever the Need. We Deliver. : Devil Mountain Wholesale Nursery (devilmountainnursery.com)

Refer to Selectree database for full details of the two tree species:
UFEI - SelecTree: A Tree Selection Guide (calpoly.edu)





9. Landscape / Planting Specifications:



Above is a specification developed by WLCA which illustrates most or all tree planting specifications as a single side cut style graphic representation. Note how the two (2) ½" diameter high flow type flood bubblers are set directly over the rootball, inside a high wall type earthen watering berm, for excellent gravitational flow irrigation where irrigation water develops a head over the rootball, and flows vertically downward into the ball to achieve proper periodic wetting of the rootball.

This is correct shallow/wide pit construction, rootball set above surrounding grade, staking, tying with double figure eight, watering berm at the edge of rootball, and high flow type irrigation directly over the rootball of a landscape tree, though almost no landscape tree planting ever achieves this level of perfection in my experience. The watering berm is of utmost importance, and needs to be frequently built back up to as much as 4 or 6 inches height to prevent irrigation water from simply draining out to landscape areas outside of the rootball.

5.0 Author's Qualifications

- Continued education through The American Society of Consulting Arborists, The International Society of Arboriculture (Western Chapter), and various governmental and non-governmental entities.

- Contract Town Arborist, Town of Los Gatos, California
  Community Development Department / Planning Division
  2015-present

- Tree Risk Assessment Qualified (ISA TRAQ Course Graduate, Palo Alto, California)

- Millbrae Community Preservation Commission (Tree Board)
  2001-2006

- ASCA Registered Consulting Arborist #401

- ASCA Arboriculture Consulting Academy graduate, class of 2000

- Associate Consulting Arborist
  Barrie D. Coate and Associates
  4/99-8/99

- Contract City Arborist, City of Belmont, California
  Planning and Community Development Department
  5/99-5/20 (21 Continuous years)

- ISA Certified Arborist #WE-3172A

- Peace Corps Soil and Water Conservation Extension Agent
  Chiangmai Province, Thailand 1991-1993

- B.A. Environmental Studies/Soil and Water Resources
  UC Santa Cruz, Santa Cruz, California 1990

  UCSC Chancellor's Award, 1990

  (My full curriculum vitae is available upon request)

6.0 Assumptions and Limiting Conditions

Any legal description provided to the consultant/appraiser is assumed to be correct. Any titles and ownership to any property are assumed to be good and marketable. No responsibility is assumed for matters legal in character. Any and all property is appraised and evaluated as through free and clean, under responsible ownership and competent management.

It is assumed that any property is not in violation of any applicable codes, ordinance, statutes, or other government regulations.

Care has been taken to obtain all information from reliable sources. All data has been verified insofar as possible; however, the consultant/appraiser can neither guarantee nor be responsible for the accuracy of information provided by others.

The consultant/appraiser shall not be required to give testimony or to attend court by reason of this report unless subsequent contractual arrangements are made, including payment of an additional fee for such services as described in the fee schedule and contract of engagement.

Unless required by law otherwise, the possession of this report or a copy thereof does not imply right of publication or use for any other purpose by any other than the person to whom it is addressed, without the prior expressed written or verbal consent of the consultant/appraiser.

Unless required by law otherwise, neither all nor any part of the contents of this report, nor copy thereof, shall be conveyed by anyone, including the client, to the public through advertising, public relations, news, sales, or other media, without the prior expressed conclusions, identity of the consultant/appraiser, or any reference to any professional society or institute or to any initiated designation conferred upon the consultant/appraiser as stated in his qualifications.

This report and any values expressed herein represent the opinion of the consultant/appraiser, and the consultant's/appraiser's fee is in no way contingent upon the reporting of a specified value, a stipulated result, the occurrence of a subsequent event, nor upon any finding to be reported.

Sketches, drawings, and photographs in this report, being intended for visual aids, are not necessarily to scale and should not be construed as engineering or architectural reports or surveys unless expressed otherwise. The reproduction of any information generated by engineers, architects, or other consultants on any sketches, drawings, or photographs is for the express purpose of coordination and ease of reference only. Inclusion of said information on any drawings or other documents does not constitute a representation by Walter Levison to the sufficiency or accuracy of said information.

Unless expressed otherwise:
a. information contained in this report covers only those items that were examined and reflects the conditions of those items at the time of inspection; and
b. the inspection is limited to visual examination of accessible items without dissection, excavation, probing, or coring. There is no warranty or guarantee, expressed or implied, that problems or deficiencies of the plants or property in question may not arise in the future.

Loss or alteration of any part of this report invalidates the entire report.

Arborist Disclosure Statement:

Arborists are tree specialists who use their education, knowledge, training, and experience to examine trees, recommend measures to enhance the beauty and health of trees, and attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of the arborist, or to seek additional advice.

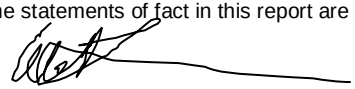
Arborists cannot detect every condition that could possibly lead to the structural failure of a tree. Tree are living organisms that fail in ways we do not fully understand. Conditions are often hidden within trees and below ground. Arborist cannot guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time. Likewise, remedial treatments, like any medicine, cannot be guaranteed.

Treatment, pruning, and removal of trees may involve considerations beyond the scope of the arborist's services such as property boundaries, property ownership, site lines, disputes between neighbors, and other issues. Arborists cannot take such considerations into account unless complete and accurate information is disclosed to the arborist. An arborist should then be expected to reasonably rely upon the completeness and accuracy of the information provided.

Trees can be managed, but they cannot be controlled. To live near trees is to accept some degree of risk. The only way to eliminate all risk associated with trees is to eliminate the trees.

7.0 Certification

I hereby certify that all the statements of fact in this report are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signature of Consultant 

Digital Badges

ISA CERTIFIED ARBORIST CREDENTIAL:
https://certificates.isa-arbor.com/d180515f-ab75-440b-9c66-106005e3cf10?record_view=true#gs.hpaw8u

ISA TREE RISK ASSESSMENT QUALIFIED (TRAQ):
https://certificates.isa-arbor.com/d180515f-ab75-440b-9c66-106005e3cf10?record_view=true#gs.hpb30w

8.0 Digital Images

WLCA archived digital tree images in February, 2020 as a reference of pre-project conditions.

Tree tag numbers are noted below each image for reference.

Note that not all of the existing site trees are shown or referenced in the digital image assemblage below.

Italian cypress row (off-site) tagged as #1 through #23, to be retained.

Cypress #1 through #23, with coast redwoods #76 and #77 in the background at left hand side of the image, which are also to be retained.

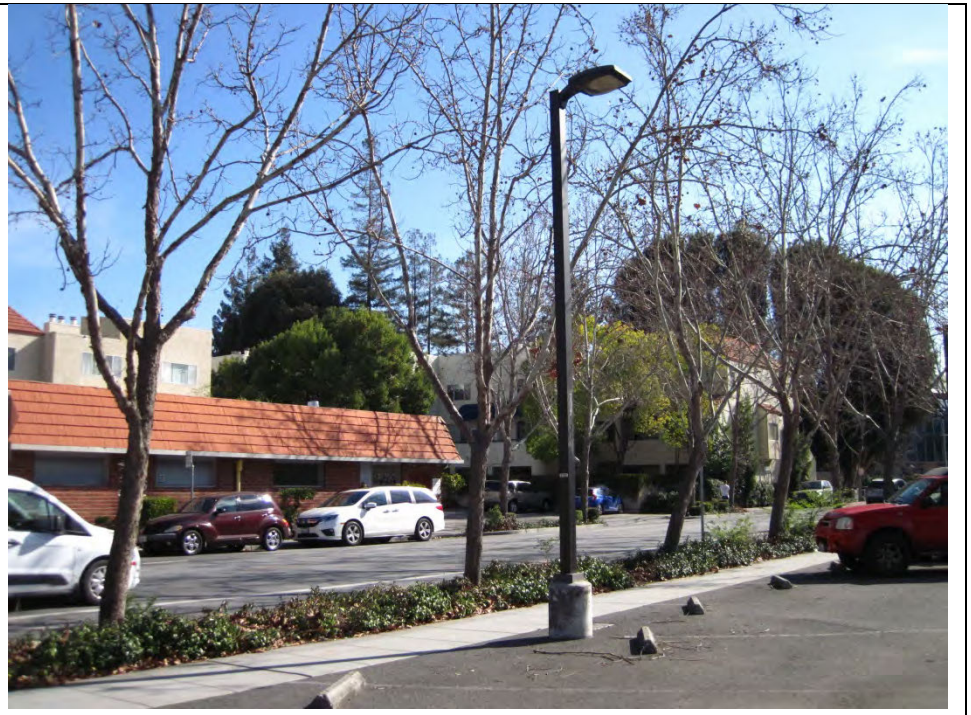
Valley oak #25 to be retained.

Chinese pistache street trees #25 through #30, along Birch Street, looking northward.

Valley oak #31 to be retained at the west corner of the site at corner of Birch and Grant.

Canary Island palm at the weset corner of the site, at corner of Birch and Grant.

Southern magnolias along Grant Avenue exhibit declines in vigor related to chronic soil moisture deficit.



London plane tree specimens #38 through #43 along Park Boulevard, looking southeastward.

Italian cypress specimens #44 through #58, and #65, to be retained, near the east corner of the property (just off-site).

Coast redwood #64 lower elevation portion of mainstem.

Coast redwood #64 lower and mid elevation areas.

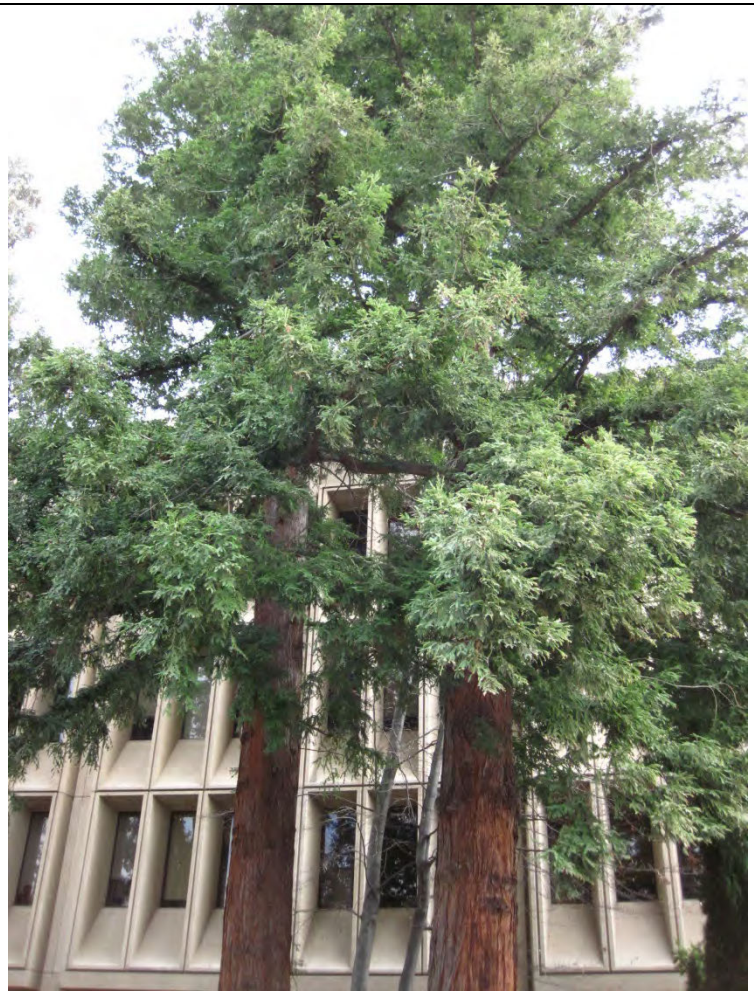
Camphor #67 at the front entrance area of the property. This tree has unfortunately lost vigor due to years of droughty conditions and lack of regular heavy irrigation water volume application.

WLCA also noted that a pruning company has performed at least one or more “lion tail” pruning sequences in this tree, removing inner and lower elevation live wood and foliage, which has resulted in permanent damage to the tree’s branch architecture.

Eucalyptus #78, 79, 80, 81 to be removed along the south boundary.

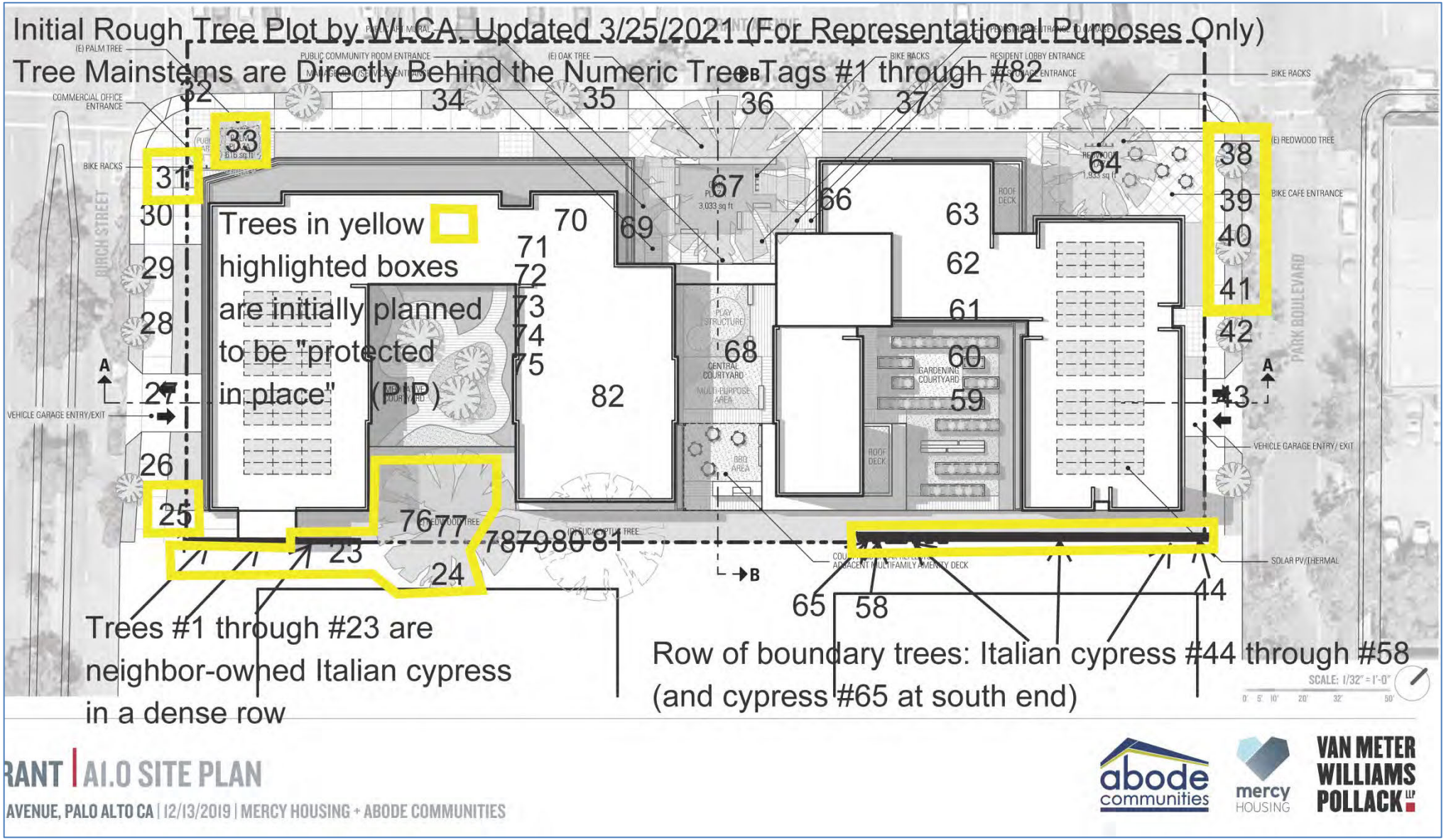
Coast redwoods #76, 77 to be protected in place (PIP) along the south boundary area, with a neighbor owned alder specimen (#24) shown at the left side of the image in the background, which wil also be retained.

Elm #82 to be removed in the center of the project area.



Lower and mid elevation canopy areas of coast redwoods #76 and #77 at the south end of the site to be protected in place (PIP). These two trees will require both a large square footage of rootable soil volume to be preserved, and a formalized over-grade system of surface irrigation to be built to supply regular high volume irrigation to the trees year-round to maintain vigor.

9.0 Tree Location Map Mark-Up from 2021 (Mark-up by WLCA)



10.0 Attached: Excel Tree Data Table (WLCA)
11.0 Attached: Plural Landscape Plan (Iteration: May, 2021)

Tree Data
231 Grant Avenue
Palo Alto, California (Santa Clara County Land)
3/25/2021

Tree Tag #	To be Removed Per Current Site Plan, or "Protect in Place" (PIP)?	Trunk 1 (in.)	Trunk 2 (in.)	Trunk 3 (in.)	Trunk 4 (in.)	Trunk 5 (in.)	Trunk 6 (in.)	Adjusted Trunk Diameter Inches @ 54" A.G. (1+2+3+4+5)	Protected Status in Santa Clara County (12" diameter or greater, at 4.5 feet above grade)	Common Name	Scientific Name (*Genus, species*)	Height and Canopy Spread (ft.)	Health & Structural Ratings (0-100% each)	Overall Condition Rating (0-100%)	Live Twig Density (Very Poor, Poor, Mod, Good, Exc.)	Lopsided Canopy (Direction Noted)	Trunk Lean (Direction Noted)	Historical Stem Splitout Evidence (Note Elevation)	Severely Pruned or Root Pruned in Past (topping, lionstailing, shearing, etc.)	Buried Root Crown (BRC) or Girdling Roots (GR)	Twig, Branch, Limb, Mainstem Decay (Note Elevation)	Codominant Mainstems with Severe Bark Inclusion(s) (Note Height)	Pest and/or Disease Symptoms Visible (Note Below)	Soil Moisture Deficit (aka "drought stress")	Notes	Tree Protection and Maintenance Codes
1	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	16/3	30/30	30% Poor	Poor		West						Sap flux on bark indicating likely cypress canker fungus infection.	X	Italian cypress typically expresses sap flux symptoms from cypress canker infection when planted on hot, dry sites that are not heavily irrigated on a regular basis.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
2	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	16/3	50/50	50% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
3	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	15/3	50/50	50% Fair	Mod								Sap flux on bark indicating likely cypress canker fungus infection.	X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
4	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	27/3	50/30	40% Poor	Mod							Bark inclusion noted.	Sap flux on bark indicating likely cypress canker fungus infection.	X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
5	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	24/3	60/60	60% Fair	Mod		South-west							X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
6	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	27/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
7	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	32/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
8	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/60	60% Fair	Mod		South-west							X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
9	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	38/3	50/60	55% Fair	Mod								Gold colored sap flux visible on lower trunk bark	X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
10	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	38/3	50/50	50% Fair	Mod						Brown needles noted on west side of canopy.		Gold colored sap flux visible on lower trunk bark	X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
11	PIP	Est. 7	-	-	-	-	-	Est. 7		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.

Tree Tag #	To be Removed Per Current Site Plan, or "Protect in Place" (PIP)?	Trunk 1 (in.)	Trunk 2 (in.)	Trunk 3 (in.)	Trunk 4 (in.)	Trunk 5 (in.)	Trunk 6 (in.)	Adjusted Trunk Diameter inches @ 54" A.G. (1+2+3+4+5)	Protected Status in Santa Clara County (12" diameter or greater, at 4.5 feet above grade)	Common Name	Scientific Name (*Genus, species*)	Height and Canopy Spread (ft.)	Health & Structural Ratings (0-100% each)	Overall Condition Rating (0-100%)	Live Twig Density (Very Poor, Poor, Mod, Good, Exc.)	Lopsided Canopy (Direction Noted)	Trunk Lean (Direction Noted)	Historical Stem Splitout Evidence (Note Elevation)	Severely Pruned or Root Pruned in Past (topping, liontailing, shearing, etc.)	Buried Root Crown (BRC) or Girdling Roots (GR)	Twig, Branch, Limb, Mainstem Decay (Note Elevation)	Codominant Mainstems with Severe Bark Inclusion(s) (Note Height)	Pest and/or Disease Symptoms Visible (Note Below)	Soil Moisture Deficit (aka "drought stress")	Notes	Tree Protection and Maintenance Codes
12	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
13	PIP	Est. 7	-	-	-	-	-	Est. 7		Italian cypress	*Cupressus sempervirens* 'Glauca'	30/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
14	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	37/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
15	PIP	Est. 7	-	-	-	-	-	Est. 7		Italian cypress	*Cupressus sempervirens* 'Glauca'	33/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
16	PIP	Est. 7	-	-	-	-	-	Est. 7		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
17	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/60	60% Fair	Mod									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
18	PIP	Est. 7	-	-	-	-	-	Est. 7		Italian cypress	*Cupressus sempervirens* 'Glauca'	38/3	50/60	55% Fair	Mod								Gold colored sap flux visible on lower trunk bark	X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
19	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	40/3	50/40	40% Poor	Mod									X	Metal wire embedded in trunk at 5 feet elevation from landscaper trying to hold tree in place. This can cause a tree to fail structurally as the wire girdles the growing trunk.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
20	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	27/3	40/40	40% Poor	Poor									X	Metal wire embedded in trunk at 5 feet elevation from landscaper trying to hold tree in place. This can cause a tree to fail structurally as the wire girdles the growing trunk.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
21	PIP	Est. 5.5	-	-	-	-	-	Est. 5.5		Italian cypress	*Cupressus sempervirens* 'Glauca'	38/3	50/50	50% Fair	Poor									X	Italian cypress typically expresses sap flux symptoms from cypress canker infection when planted on hot, dry sites that are not heavily irrigated on a regular basis.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
22	PIP	Est. 4.5	-	-	-	-	-	Est. 4.5		Italian cypress	*Cupressus sempervirens* 'Glauca'	33/3	50/50	50% Fair	Poor									X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.

Tree Tag #	To be Removed Per Current Site Plan, or "Protect in Place" (PIP)?	Trunk 1 (in.)	Trunk 2 (in.)	Trunk 3 (in.)	Trunk 4 (in.)	Trunk 5 (in.)	Trunk 6 (in.)	Adjusted Trunk Diameter Inches @ 54" A.G. (1+2+3+4+5)	Protected Status in Santa Clara County (12" diameter or greater, at 4.5 feet above grade)	Common Name	Scientific Name (*Genus, species*)	Height and Canopy Spread (ft.)	Health & Structural Ratings (0-100% each)	Overall Condition Rating (0-100%)	Live Twig Density (Very Poor, Poor, Mod, Good, Exc.)	Lopsided Canopy (Direction Noted)	Trunk Lean (Direction Noted)	Historical Stem Splitout Evidence (Note Elevation)	Severely Pruned or Root Pruned in Past (topping, lionTailing, shearing, etc.)	Buried Root Crown (BRC) or Girdling Roots (GR)	Twig, Branch, Limb, Mainstem Decay (Note Elevation)	Codominant Mainstems wth Severe Bark Inclusion(s) (Note Height)	Pest and/or Disease Symptoms Visible (Note Below)	Soil Moisture Deficit (aka "drought stress")	Notes	Tree Protection and Maintenance Codes
23	PIP	Est. 6.0	-	-	-	-	-	Est. 6.0		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/60	60% Fair	Mod										X	(Same as above)	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
24	PIP	10.1	9.1	-	-	-	-	19.2	Protected status	white alder (tree out of leaf for winter period)	*Alnus rhombifolia*	75/30	65/50	58% Fair	Est. Mod	West										Neighbor-owned tree with west-lopsided canopy growing to sunlight source away from the existing neighbor building. Root zone likely extends at least 30 to 40 feet radius into the 231 Grant Ave property, which means the tree will be negatively impacted by proposed work at 231 Grant. Interestingly, the growth of this tree is physically blocked by the canopies of redwoods #76 and #77 on the 231 Grant property.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
25	PIP	14.5	-	-	-	-	-	14.5	Protected status	valley oak	*Quercus lobata*	35/35	80/75	78% Good	Good	North and West										This is a high value that the City may require the project team to transplant using a tree mover contractor (to be determined). The trunk edge is +/- 6 feet north of the existing sidewalk edge, and it thus appears to be a private property tree with Significant Tree designation per the trunk diameter (to be verified). Current proposed construction does not appear to allow adequate horizontal clearance from canopy (not verified).	TB, RPZ, W
26	X	6.0	-	-	-	-	-	6.0	Street tree	Chinese pistache	*Pistacia chinensis*	20/16	80/70	77% Good	Good											Good species for street tree planting.	
27	X	7.0	-	-	-	-	-	7.0	Street tree	Chinese pistache	*Pistacia chinensis*	20/16	80/70	77% Good	Good											Trunk is approximately 1 foot north of sidewalk.	
28	X	7.2	-	-	-	-	-	7.2	Street tree	Chinese pistache	*Pistacia chinensis*	22/18	80/70	77% Good	Good											Trunk is approximately 1 foot north of sidewalk.	
29	X	7.4	-	-	-	-	-	7.4	Street tree	Chinese pistache	*Pistacia chinensis*	20/30	80/70	77% Good	Good											Trunk is approximately 1 foot north of sidewalk.	
30	X	7.9	-	-	-	-	-	7.9	Street tree	Chinese pistache	*Pistacia chinensis*	30/25	80/70	77% Good	Good											Trunk is approximately 1 foot north of sidewalk.	
31	PIP	12.4	-	-	-	-	-	12.4	Protected status	valley oak	*Quercus lobata*	35/45	80/75	78% Good	Good											Trunk is approximately 7 feet north of sidewalk. As with tree #25, the current proposed work at this site appears to encroach into the canopy massing, which may require that the tree be transplanted (to be determined).	TB, RPZ, W
32	X	9.1	-	-	-	-	-	9.1	Street tree	Southern magnolia	*Magnolia grandiflora*	20/25	70/60	66% Good	Mod										X	Tree located on street side of the existing sidewalk.	

Tree Tag #	To be Removed Per Current Site Plan, or "Protect in Place" (PIP)?	Trunk 1 (in.)	Trunk 2 (in.)	Trunk 3 (in.)	Trunk 4 (in.)	Trunk 5 (in.)	Trunk 6 (in.)	Adjusted Trunk Diameter Inches @ 54" A.G. (1+2+3+4+5)	Protected Status in Santa Clara County (12" diameter or greater, at 4.5 feet above grade)	Common Name	Scientific Name (*Genus, species*)	Height and Canopy Spread (ft.)	Health & Structural Ratings (0-100% each)	Overall Condition Rating (0-100%)	Live Twig Density (Very Poor, Poor, Mod, Good, Exc.)	Lopsided Canopy (Direction Noted)	Trunk Lean (Direction Noted)	Historical Stem Spitout Evidence (Note Elevation)	Severely Pruned or Root Pruned in Past (topping, liontailing, shearing, etc.)	Buried Root Crown (BRC) or Girdling Roots (GR)	Twig, Branch, Limb, Mainstem Decay (Note Elevation)	Codominant Mainstems with Severe Bark Inclusion(s) (Note Height)	Pest and/or Disease Symptoms Visible (Note Below)	Soil Moisture Deficit (aka "drought stress")	Notes	Tree Protection and Maintenance Codes
33	PIP	30.2	-	-	-	-	-	30.2	Protected status	Canary Island palm	*Phoenix canariensis*	45/30	75/75	75% Good	Good											Note that there are at least thirty (30) owl pellets around the base of this tree, plus whitewash from owl fecal droppings, indicating that one or more owls (species not verified) currently reside in this tree, which means that a registered California wildlife biologist will need to assess the situation and determine how to proceed with proposed construction, given that the tree is a verified active wildlife tree.	TB, RPZ, W
34	X	23.1	-	-	-	-	-	23.1	Street tree	Southern magnolia	*Magnolia grandiflora*	40/35	55/55	55% Fair	Mod										X	This tree species native to the U.S. South is highly sensitive to droughty soil conditions, and seems to prefer cooler climates and/or heavy irrigation.	
35	X	19.7	-	-	-	-	-	19.7	Street tree	Southern magnolia	*Magnolia grandiflora*	30/35	40/40	40% Poor	Poor										X	This tree species native to the U.S. South is highly sensitive to droughty soil conditions, and seems to prefer cooler climates and/or heavy irrigation.	
36	X	15.6	-	-	-	-	-	15.6	Street tree	Southern magnolia	*Magnolia grandiflora*	30/35	30/30	30% Poor	Poor							X			X	This tree species native to the U.S. South is highly sensitive to droughty soil conditions, and seems to prefer cooler climates and/or heavy irrigation.	
37	X	17.7	-	-	-	-	-	17.7	Street tree	Southern magnolia	*Magnolia grandiflora*	30/30	10/10	10% Very Poor	Very Poor							X			X	This tree species native to the U.S. South is highly sensitive to droughty soil conditions, and seems to prefer cooler climates and/or heavy irrigation. This specimen exhibits sunburn on the upper side of one limb extending laterally over the existing sidewalk. Severe decay was noted throughout the tree's mainstem. This tree should be removed for safety purposes.	
38	PIP	9.0	-	-	-	-	-	9.0	Street tree	London plane tree cultivar	*Platanus x acerifolia* 'Bloodgood' or 'Yarwood'	40/30	50/40	43% Fair	Poor to Mod									See notes at right.		Bloodgood and Yarwood London plane trees exhibit foliar disease issues such as spring anthracnose and summer powdery mildew in the Bay Area. The only plane tree that seems to perform consistently well here is 'Columbia': a cultivar that is resistant to both anthracnose and powdery mildew, and which exhibits a single veritical mainstem upright form that is superior to both Yarwood and Bloodgood cultivars.	TB, RPZ, and heavy irrigation Water during construction.
39	PIP	8.7	-	-	-	-	-	8.7	Street tree	London plane tree cultivar	*Platanus x acerifolia* 'Bloodgood' or 'Yarwood'	40/25	50/40	43% Fair	Poor to Mod									See notes at right.		(See notes for tree #38 above).	TB, RPZ, and heavy irrigation Water during construction.
40	PIP	10.3	-	-	-	-	-	10.3	Street tree	London plane tree cultivar	*Platanus x acerifolia* 'Bloodgood' or 'Yarwood'	40/30	50/25	25% Poor	Poor to Mod									See notes at right.		(See notes for tree #38 above).	TB, RPZ, and heavy irrigation Water during construction.
41	PIP	10.4	-	-	-	-	-	10.4	Street tree	London plane tree cultivar	*Platanus x acerifolia* 'Bloodgood' or 'Yarwood'	40/35	50/40	45% Fair	Poor to Mod									See notes at right.		(See notes for tree #38 above).	TB, RPZ, and heavy irrigation Water during construction.
42	X	10.0	-	-	-	-	-	10.0	Street tree	London plane tree cultivar	*Platanus x acerifolia* 'Bloodgood' or 'Yarwood'	40/35	50/50	50% Fair	Mod									See notes at right.		(See notes for tree #38 above).	
43	X	12.1	-	-	-	-	-	12.1	Street tree	London plane tree cultivar	*Platanus x acerifolia* 'Bloodgood' or 'Yarwood'	40/35	50/45	48% Fair	Mod									See notes at right.		(See notes for tree #38 above).	

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44	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	45/4	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
45	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	48/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
46	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	45/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
47	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	45/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
48	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	45/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
49	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	45/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
50	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	48/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
51	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	48/3	60/60	60% Good	Mod								?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.

Tree Tag #	To be Removed Per Current Site Plan, or "Protect in Place" (PIP)?	Trunk 1 (in.)	Trunk 2 (in.)	Trunk 3 (in.)	Trunk 4 (in.)	Trunk 5 (in.)	Trunk 6 (in.)	Adjusted Trunk Diameter Inches @ 54" A.G. (1+2+3+4+5)	Protected Status in Santa Clara County (12" diameter or greater, at 4.5 feet above grade)	Common Name	Scientific Name (*Genus, species*)	Height and Canopy Spread (ft.)	Health & Structural Ratings (0-100% each)	Overall Condition Rating (0-100%)	Live Twig Density (Very Poor, Poor, Mod, Good, Exc.)	Lopsided Canopy (Direction Noted)	Trunk Lean (Direction Noted)	Historical Stem Splitout Evidence (Note Elevation)	Severely Pruned or Root Pruned in Past (topping, lionstailing, shearing, etc.)	Buried Root Crown (BRC) or Girdling Roots (GR)	Twig, Branch, Limb, Mainstem Decay (Note Elevation)	Codominant Mainstems with Severe Bark Inclusion(s) (Note Height)	Pest and/or Disease Symptoms Visible (Note Below)	Soil Moisture Deficit (aka "drought stress")	Notes	Tree Protection and Maintenance Codes
52	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	40/4	60/60	60% Good	Mod									?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
53	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	46/4	60/60	60% Good	Mod									?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
54	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	45/4	60/60	60% Good	Mod									?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
55	PIP	Est. 6	-	-	-	-	-	Est. 6		Italian cypress	*Cupressus sempervirens* 'Glauca'	43/4	60/60	60% Good	Mod									?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
56	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	50/40	45% Fair	Mod									Tree becoming engulfed by rose shrub growth.	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
57	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	50/40	45% Fair	Mod									Tree becoming engulfed by rose shrub growth.	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
58	PIP	Est. 4	-	-	-	-	-	Est. 4		Italian cypress	*Cupressus sempervirens* 'Glauca'	35/3	60/50	50% Fair	Mod									?	X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark. It is very possible that some sap flux is occuring on the lower trunk at this time, but is simply not visible due to the density of the canopy needles.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
59	X	9.5	-	-	-	-	-	9.5		Chinese pistache	*Pistacia chinensis*	28/25	80/70	75% Good	Good											Tree located in elongated "strip planter" inside the existing parking lot area to be demolished. This tree is expected to be removed.	
60	X	8.6	-	-	-	-	-	8.6		Chinese pistache	*Pistacia chinensis*	25/22	75/65	70% Good	Good											Tree located in elongated "strip planter" inside the existing parking lot area to be demolished. This tree is expected to be removed.	

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61	X	8.6	-	-	-	-	-	8.6		Chinese pistache	*Pistacia chinensis*	25/25	80/70	75% Good	Good											Tree located in elongated "strip planter" inside the existing parking lot area to be demolished. This tree is expected to be removed.	
62	X	8.7	-	-	-	-	-	8.7		Chinese pistache	*Pistacia chinensis*	23/22	78/70	72% Good	Good											Tree located in elongated "strip planter" inside the existing parking lot area to be demolished. This tree is expected to be removed.	
63	X	8.7	-	-	-	-	-	8.7		Chinese pistache	*Pistacia chinensis*	26/25	80/70	75% Good	Good											Tree located in elongated "strip planter" inside the existing parking lot area to be demolished. This tree is expected to be removed.	
64	X	42.8	-	-	-	-	-	42.8	Protected status	Coast redwood	*Sequoia sempervirens*	80/45	50/50	50% Fair	Poor to Mod											Planter measures roughly 15 feet X 15 feet, with the lignotuber (bud burl) bulging upward with at least 12 inches or more of vertical heave around the mainstem base. Live crown ratio is +/- 70%. Critical Root Zone (CRZ) = 22 feet radius offset from the edge of the buttress roots, which means that the proposed work is all within the CRZ and may cause destabilization of tree or tree decline. Other: Tree has been tip-pruned to remove outermost sections of limbs in a manner not consistent with industry standards. Two codominant mainstems fork at 70 feet elevation, and may require a cable system to be installed as support.	(DISREGARD THE BELOW RECOMMENDATIONS IF THIS TREE IS TO BE REMOVED) Use the WLCA "Root Invigoration Protocol" dated February, 2021, and included in this WLCA arborist report, to provide a comprehensive root treatment for this tree, prior to commencing the proposed construction project on the ground. TB, TPZ, W, Cabling.
65	PIP	Est. 5	-	-	-	-	-	Est. 5		Italian cypress	*Cupressus sempervirens* 'Glauca'	40/3	60/50	50% Fair											X	This species is often stressed in the landscape due to lack of adequate soil moisture, resulting in infection from cypress canker fungus that is expressed as gold colored sap flux on the lower trunk bark.	Neighbor tree to be retained (protect in place "PIP"). Protective fencing and temporary irrigation will likely be required.
66	X	6.5	-	-	-	-	-	6.5		crape myrtle	*Lagerstroemia* hybrid (Cult.)	20/15	70/70	70% Good	Good												
67	X	31.5	-	-	-	-	-	31.5	Protected status	camphor tree	*Cinnamomum camphora*	35/75	40/40	40% Poor	Mod				X						X	Tree located in irrigated turf. Tree canopy is very extended, and encroaches into the proposed build areas, which is a problem. The tree was recently extensively pruned in a manner inconsistent with industry standards (aka "lion tailing"), which removed the inner and lower live wood and foliage, such that the tree's structure is now effectively ruined. It is not clear if this tree can be retained and preserved, given its current low 40% overall condition rating, liontail pruning that has been performed on it, and the extent of proposed construction in relation to the canopy. Note roots damaged on grade from mowing over the years.	
68	X	9.5	-	-	-	-	-	9.5		swamp myrtle	*Tristaniopsis laurina*	28/18	80/80	80% Good	Good											Tree can be transplanted if desired.	
69	X	7.1	-	-	-	-	-	7.1		holly tree cultivar with colored foliar margins	*Ilex aquifolia* (Cult.)	12/12	40/20	25% Poor	Poor				X							Tree has been severely pruned back in past.	
70	X	4.8	-	-	-	-	-	4.8		crape myrtle	*Lagerstroemia hybrid* (Cult.)	15/14	70/70	70% Good	Good											Tree is transplantable if desired.	

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71	X	4.5	-	-	-	-	-	4.5		holly tree cultivar with colored foliar margins	*Ilex aquifolia* (Cult.)	12/12	40/20	25% Very Poor	Very Poor										Tree has been severely pruned back in past.	
72	X	6.0	-	-	-	-	-	6.0		Hollywood juniper	*Juniperus chinensis* 'Kaizuka'	18/10	50/30	35% Poor	Mod	South			X					X	Tree was severely pruned to clear building. Lopsided south away from building.	
73	X	4.0	3.0	3.0	-	-	-	10.0		Hollywood juniper	*Juniperus chinensis* 'Kaizuka'	13/12	50/30	35% Poor	Mod	South			X					X	Tree was severely pruned to clear building. Lopsided south away from building.	
74	X	4.1	-	-	-	-	-	4.1		Hollywood juniper	*Juniperus chinensis* 'Kaizuka'	12/5	40/30	30% Poor	Poor	South			X					X	Tree was severely pruned to clear building. Lopsided south away from building.	
75	X	5.5	5.2	-	-	-	-	10.7		Hollywood juniper	*Juniperus chinensis* 'Kaizuka'	12/15	50/40	45% Poor	Mod	South			X					X	Tree was severely pruned to clear building. Lopsided south away from building.	
76	PIP	37.3	-	-	-	-	-	37.3	Protected status	Coast redwood	*Sequoia sempervirens*	95/30	75/45	50% Fair	Mod							Bark inclusion (BI) at 35 feet. Will need to either prune out one of the two codominant mainstems at that elevation, or install			Critical Root Zone (CRZ) = 18 feet radius offset from trunk edge. Live crown ratio is currently 70%. Canopy currently extends roughly 15 feet radius out from trunk edge.	Trunk buffer (TB) wrap. Fence off root system at least 15 feet radius offset from trunk in all directions if possible. Provide heavy irrigation, 1x weekly basis. Either remove one of two mainstems at fork, or install cable system.
77	PIP	37.7	-	-	-	-	-	37.7	Protected status	Coast redwood	*Sequoia sempervirens*	105/30	75/60	65% Good	Mod										Critical Root Zone (CRZ) = 18 feet radius offset from trunk edge. Live crown ratio is currently 75%. Canopy currently extends roughly 15 feet radius out from trunk edge.	Trunk buffer (TB) wrap. Fence off root system at least 15 feet radius offset from trunk in all directions if possible. Provide heavy irrigation, 1x weekly basis.
78	X	15.5	-	-	-	-	-	15.5	Protected status	Appears to be an older seedling planting of non-cultivar dollar gum	*Eucalyptus polyanthemos*	60/18	75/40	50% Fair	Good										These older "seedling dollar gum" specimens are non-cultivar specimens of *E. polyanthemos* that seem to have much better structural growth than the newer named cultivars of the same species. They were highly pest and disease resistant, and the only real mainteannce required was to periodically reduce limb endweight by pruning out the outermost ends of end-heavy limbs back to limb forks.	
79	X	14.4	-	-	-	-	-	14.4	Protected status	Appears to be an older seedling planting of non-cultivar dollar gum	*Eucalyptus polyanthemos*	45/25	70/30	35% Poor	Good				X						Seedling dollar gum specimen. This particular specimen was severely pruned back by a pruner who removed all lower elevation limbs and branches up to approximately 30 feet above grade, effectively destroying the tree's structure. Most of the original strongly-attached limbs and branches are now unfortunately gone from the tree.	

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80	X	26.0	-	-	-	-	-	26.0	Protected status	Appears to be an older seedling planting of non-cultivar dollar gum	*Eucalyptus polyanthemos*	85/50	75/50	65% Good	Good	Mod to Good										Canopy retains good structure at high elevations. Very poor live crown ratio due to lack of branches between grade and 45 feet above grade. Northeast part of canopy is extended to the point where it may require endweight reduction pruning to reduce lengths by removal of the outermost ends to reduce load forces on the limb attachment points. Note Critical Root Zone is 13 feet offset radius from trunk edge.	
81	X	24.2	-	-	-	-	-	24.2	Protected status	Appears to be an older seedling planting of non-cultivar dollar gum	*Eucalyptus polyanthemos*	60/30	75/50	64% Good	Good	North east	North east									Northeast part of canopy is extended to the point where it may require endweight reduction pruning to reduce lengths by removal of the outermost ends to reduce load forces on the limb attachment points. Note Critical Root Zone is 12 feet offset radius from trunk edge.	
82	X	21.5	-	-	-	-	-	21.5	Protected status	Chinese elm cultivar	*Ulmus parvifolia* (Cult.)	50/60	60/40	48% Fair	Poor to Mod				X							Tree has been severely pruned back in the last few years, using an incorrect non-standard pruning technique called liontailing, which is essentially removing all of the innermost and lowermost-elevation live wood and foliage, resulting in a tree that is end-heavy with poor structure: the exact opposite of correct structural pruning which would have instead removed only the outermost portions of limbs at the ends of the canopy. The tree is now impossible to salvage, and its structure has been permanently destroyed.	

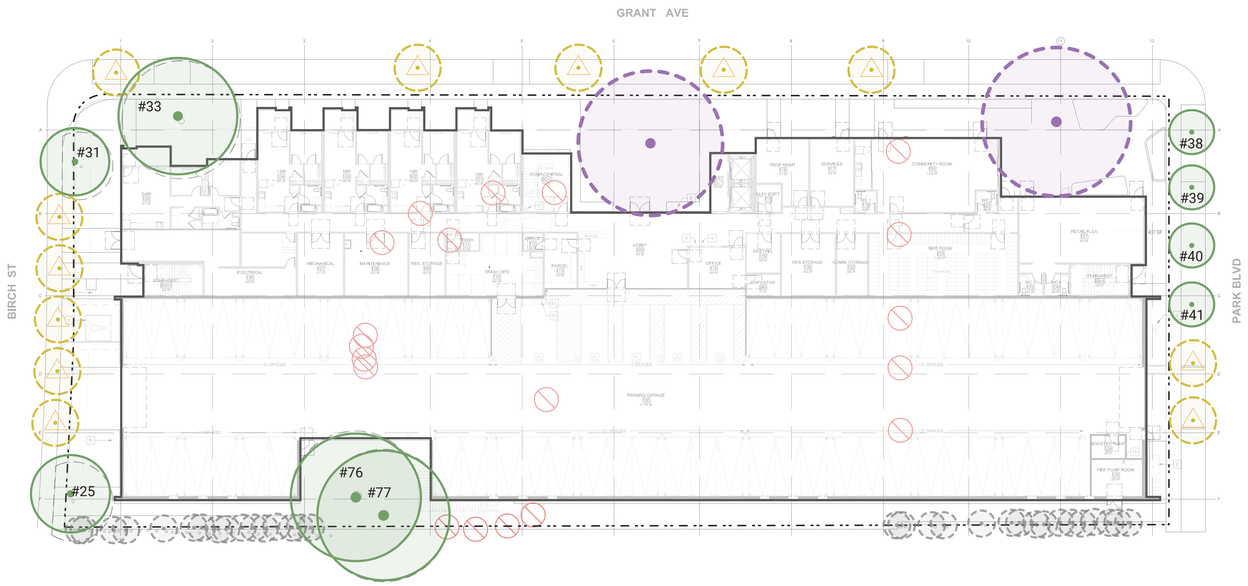
NOTES:

1. Only on-site trees and neighbor trees overhanging the project site airspace with at least one (1) mainstem measuring 4 inches diameter or greater when measured at 4.5 feet above grade were included in this study.

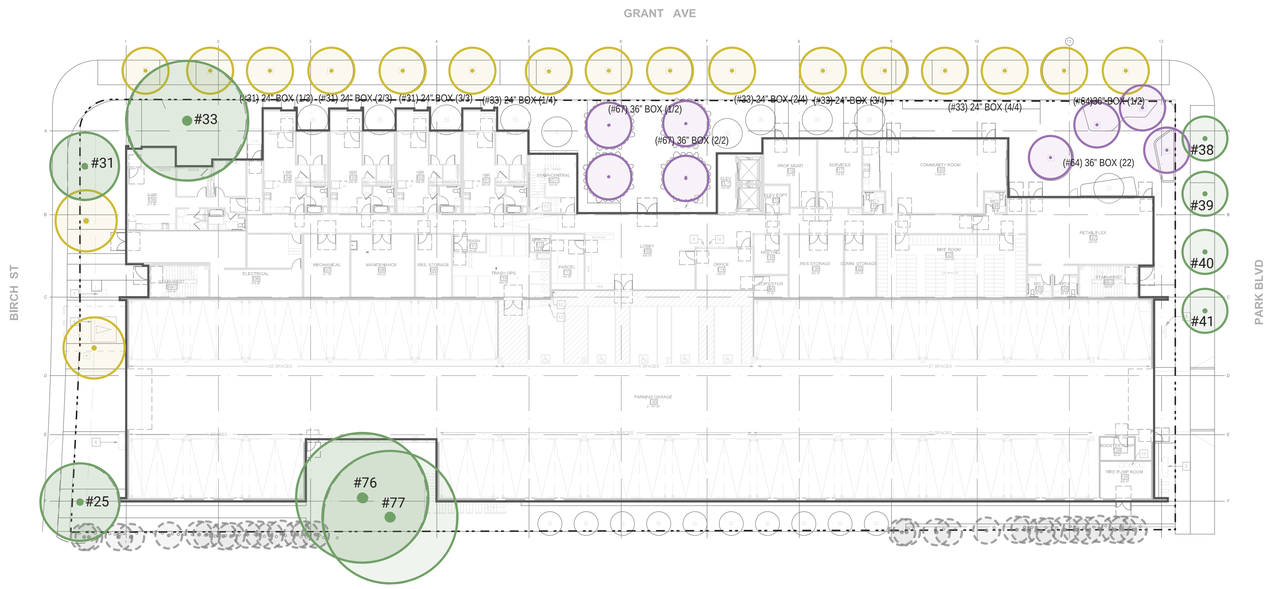
2. WLCA estimated diameter visually for trees with mainstems that were inaccessible at 4.5 feet above grade.

3. Update 3/25/2021: It is now WLCA's understanding that the project is to be submitted to Santa Clara County planning division, and that the tree ordinance of the County (not City of Palo Alto tree ordinance) will be the ordinance that dictates which trees are considered protected size and non-protected size. However, the project team has been directed by County planning as of March, 2021, to work with City of Palo Alto Urban forester Walter Passmore. The reasoning for this collaboration is not clear, given that the City of Palo Alto apparently has no authority to dictate how our site trees are managed in terms of protection, irrigation, etc.

EXISTING TREE REMOVALS



PROPOSED TREE REPLACEMENTS



TREE REPLACEMENTS LEGEND

DRAFT

Protect Tree in Place: Valley Oak #31 & #25, Coast Redwood #76 and #77, Canary Island Palm #33, London Plane #38-41

Protect Tree in Place: Adjacent Property Italian Cypress

Remove Tree with No Replacement

Total Street Trees to be removed: **12**

Proposed New Medium Street Trees : **16** (680 cu ft of soil volume)

Proposed New Large Street Trees : **2** (1000 cu ft of soil volume)

Heritage Trees removed: 2 (Camphor #67 & Coast Redwood #64) 40'-56'

Heritage Tree Placement Required: (12) 24" Box or (2) 48" Box & (2) 36" Box

Heritage Tree Replacement (N) Trees:
8 total ((4) 48" Box & (4) 36" Box))

NOTES:

1. Refer to L3.10 for tree species

2. Refer to "Assessment of and recommendations for Private trees and street trees at and adjacent to 231 Grant Palo Alto, California (Santa Clara County Land) by Walter Levison"

VAN METER WILLIAMS POLLACK LLP
ARCHITECTURE | URBAN DESIGN ■ SAN FRANCISCO | DENVER | MINNEAPOLIS
333 Bryant Street, Suite 300, San Francisco, CA 94107 T 415.974.5252

CIVIL ENGINEER
BKF - SAN JOSE
1730 N. FIRST ST. STE 600
SAN JOSE, CA 95112

LANDSCAPE ARCHITECT
PLURAL STUDIO
2742 17TH STREET
SAN FRANCISCO, CA 94110

STRUCTURAL ENGINEER
HOHBACH-LEWIN
250 SHERIDAN AVE STE 100
PALO ALTO, CA 94306

MEP ENGINEER
EMERALD CITY ENGINEERS
21705 HIGHWAY 99
LYNWOOD, WA 98036

SUSTAINABILITY/ENERGY
REDWOOD ENERGY
1887 Q STREET
ARCATA, CA 95521

plural

ID	DATE	NAME
	4.09.21	50% SCHEMATIC DESIGN
	4.30.21	100% SCHEMATIC DESIGN

Project:

EDUCATOR HOUSING
231 GRANT AVENUE

231 GRANT AVENUE
PALO ALTO, CA 94306

Client:

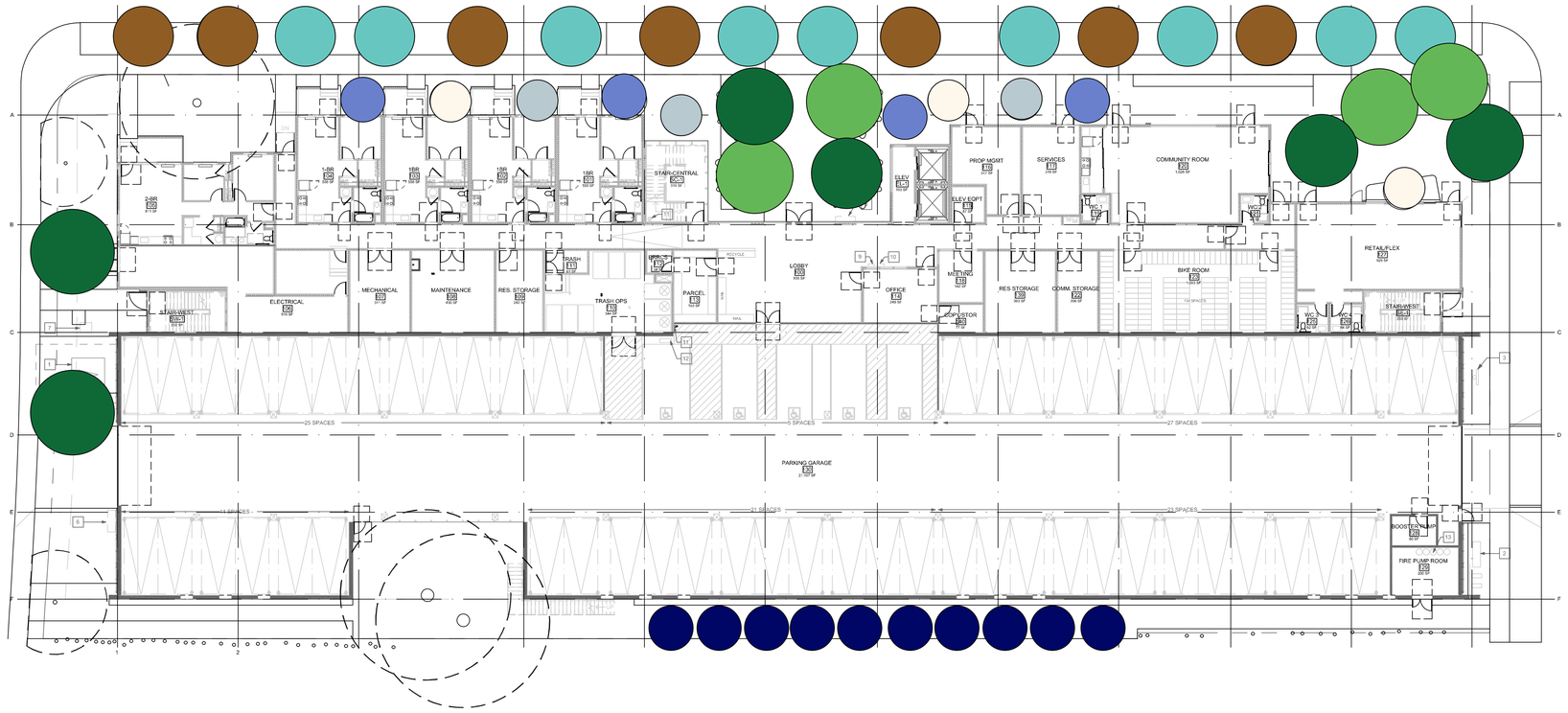
MERCY HOUSING/
ABODE COMMUNITIES

TREE REMOVAL
& REPLACEMENT
PLAN

JOB #: 1925

SCALE:

L3.00



STREET TREE SPECIES PLAN – LEVEL 1

LEGEND

Quercus lobata
Valley Oak
Size: Large (50-60ft)
CA

Quercus agrifolia
Coast Live Oak
Size: Large (20-60ft)
CA

Lyonothamnus floribundus asplenifolius
Fernleaf Catalina Ironwood
Size: Medium (35-40ft)
CA

Agonis flexuosa
Peppermint Willow
Size: Medium (25-35ft)

Ceanothus 'Ray Hartman'
Mountain Lilac
Size: Small (12-20ft)
CA

Aesculus californica
California Buckeye
Size: Small (10-25ft)
CA

Garrya elliptica
Silktassel Tree
Size: Small (10-25ft)
CA

Cupressus sempervirens
Mediterranean Cypress
Size: Medium (35-40ft)

NOTE: THE PLURAL LANDSCAPE TREE PLANTING PALETTE ON THIS ITERATION OF THE PLAN
IS SUBJECT TO CHANGE, AND ONCE FINALIZED MAY INCLUDE SPECIES OTHER THAN THOSE STATED ABOVE.

VAN METER WILLIAMS POLLACK LLP
ARCHITECTURE | URBAN DESIGN ■ SAN FRANCISCO | DENVER | MINNEAPOLIS
333 Bryant Street, Suite 300, San Francisco, CA 94107 T 415.914.5350

CIVIL ENGINEER

BKF - SAN JOSE
1730 N. FIRST ST. STE 600
SAN JOSE, CA 95112

LANDSCAPE ARCHITECT

PLURAL STUDIO
2742 17TH STREET
SAN FRANCISCO, CA 94110

STRUCTURAL ENGINEER

HOHBACH-LEWIN
250 SHERIDAN AVE STE 100
PALO ALTO, CA 94306

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LEVEL 1
TREE PLAN

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