

Summary

The City of East Palo Alto, as the Lead Agency, has prepared this Draft Subsequent Environmental Impact Report (SEIR) for the Ravenswood/4 Corners Transit-Oriented Development Specific Plan Update (Specific Plan Update) in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As the CEQA Lead Agency for this Specific Plan Update, the City of East Palo Alto is required to consider the information in this Draft SEIR along with any other available information in deciding whether to approve the Specific Plan Update. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

Summary of the Project

The City adopted the existing Ravenswood Specific Plan in 2013 (2013 Specific Plan). This plan provides a policy and regulatory framework for reviewing development projects and public improvements in the Specific Plan area. The 2013 Specific Plan allows for development of up to 1.3 million square feet of office/R&D uses, 175,820 square feet of industrial uses, 112,400 square feet of retail uses, 36,000 square feet of civic/community uses, and 835 housing units (comprised of 816 multifamily and 19 single-family units). The 2013 Specific Plan assumed there would be a loop road with a multi-use path that would be located along the perimeter of the northern portion of University Village (immediately to the west of the Specific Plan area) and extend from the existing terminus of Demeter Street to connect with University Avenue. As currently envisioned, the loop road configuration would be a 76-foot right of way along the northern perimeter and 56-foot right of way along the western perimeter and would include two travel lanes, along with a 14-foot wide multi-use path and associated shoulders and buffers. The loop road would provide a direct route between the Specific Plan area and University Avenue, avoiding the need to use Bay Road. The loop road could also be used for emergency evacuation, in accordance with state requirements, and provide emergency vehicle access.

An update to the Specific Plan (Specific Plan Update) is proposed and would increase the total amount of development allowed within the Specific Plan area by increasing the maximum square footages for office, R&D/life science, light industrial, civic/community, and tenant amenity, and the total number of residential units allowed under the Specific Plan.

The Specific Plan Update would be implemented as one of two development scenarios, both of which are evaluated in the SEIR:

- Scenario 1 would consist of an additional 1,802,950 square feet of office space, 988,400 square feet of R&D space, 250,000 square feet of industrial space, 129,700 square feet of

civic space, 114,400 square feet of retail space, 43,870 square feet of tenant amenity space, and 1,350 residential units.

- Scenario 2 would consist of an additional 2,135,100 square feet of office space, 1,167,250 square feet of R&D space, 300,000 square feet of industrial space, 129,700 square feet of civic space, 114,400 square feet of retail space, 53,500 square feet of tenant amenity space, and 1,350 residential units.

In addition, the Specific Plan Update proposes a multi-use path along the northern and eastern perimeter of the Specific Plan area with an option to have a loop road and an option without the loop road. The multi-use path and loop road would continue to be located and function as discussed above under the 2013 Specific Plan. Refer to Section 2.0 of this Draft SEIR for a further description of the Specific Plan Update.

Summary of Significant Impacts, Mitigation Measures, and Proposed Specific Plan Update Policies

Table ES-1 contains a summary of the significant environmental impacts identified and discussed in the EIR, and the mitigation measures and Specific Plan Update Policies proposed to avoid or reduce those impacts. The project description and full discussion of the impacts, mitigation measures, and Specific Plan Update Policies can be found in Section 2.0 Project Information and Description, and Section 3.0 Environmental Setting, Impacts, and Mitigation of this EIR, respectively.

Table ES-1: Summary of Significant Impacts and Mitigation Measures/Specific Plan Update Policies	
Impact	Mitigation Measure/Proposed Specific Plan Update Policy
Air Quality	
<p>Impact AIR-1: Future projects under the Specific Plan Update could result in construction criteria pollutant emissions above BAAQMD thresholds resulting in a cumulatively considerable contribution to a significant regional air quality impact. (Less than Significant Impact with Mitigation Measures Incorporated)</p>	<p>MM AIR-1.1: Construction criteria pollutant and TAC quantification shall be required for individual projects developed under the Specific Plan Update once construction equipment and phasing details are available through modeling to identify impacts and, if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds. Reductions in emissions can be accomplished through, not limited to, the following:</p> <ul style="list-style-type: none"> • All construction equipment larger than 25 horsepower used at the future development sites for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for NOx and PM (PM10 and PM2.5), if feasible, otherwise, <ul style="list-style-type: none"> • If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve an 85-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination). • Use of alternatively fueled equipment with lower NOx emissions that meet the NOx and PM reduction requirements above. • Special equipment that cannot meet the above requirements must be approved as exempt by the City after considering reasons for requesting an exemption. • Use electric equipment such as aerial lifts, air compressors, cement mortar mixers, concrete/industrial saws, cranes, and welders. • Diesel engines, whether for off road equipment or on road vehicles, shall not be left idling for more than two minutes, except as provided in exceptions to the applicable state regulations (e.g., traffic conditions, safe operating conditions). The construction sites shall have posted legible and visible signs in designated queuing areas and at the construction site to clearly notify operators of idling limit. • Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment.

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	<ul style="list-style-type: none"> Utilize low volatile organic compound (VOC) (i.e., ROG emitting) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3; Architectural Coatings), for at least 80 percent of all residential and nonresidential interior paints and 80 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 80 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used. Examples of "super-compliant" coatings are contained in the South Coast Air Quality Management District's website.
<p>Impact AIR-2: At buildout for development Scenarios 1 and 2, Specific Plan Update operational criteria emissions would exceed the BAAQMD project-level significance thresholds, for both average daily and total annual emissions, for ROG, NOx, and PM10 emissions, with or without the loop road, resulting in a cumulatively considerable contribution to a significant regional air quality impact. (Significant and Unavoidable Air Quality Impact)</p>	<p><u>Proposed Specific Plan Update 8-4.1: General TDM Requirements</u></p> <ul style="list-style-type: none"> <u>Standard 1: 40 percent Trip Reduction Requirement.</u> Per the City's TDM ordinance, the daily trips generated by new developments in the Plan Area are required to be 40 percent below trip estimates developed based on rates published in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition. <u>Standard 2: Combined Office and R&D Trip Rates.</u> The same average daily trip rate of 10.96 vehicle trips/1,000 square feet will be assumed for all uses in this employment category, since the Plan allows for flexibility in the mix of general office space, research and development space, and life science space, and because these uses have similar vehicle trip characteristics. <p><u>Proposed Specific Plan Update 8-4.3 Required TDM Elements</u></p> <ul style="list-style-type: none"> 1. Shuttle Program: The TMA shall fund and operate a shuttle program that connects employees and residents with nearby commercial, transit, and employment centers and provides long-haul service to housing and employment centers in other communities. <p><u>Proposed Specific Plan Update Policy</u></p> <ul style="list-style-type: none"> Policy LU-4.9: All diesel stand by emergency generators shall meet U.S. EPA Tier 4 engine standards. Permanent stationary emergency generators installed on-site shall

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	<p>have engines that meet or exceed U.S. EPA Tier 4 standards for particulate matter emissions, and shall obtain appropriate permits to operate from BAAQMD, as applicable.</p>
<p>Impact AIR-3: Fugitive dust emissions from future projects' construction diesel exhaust and equipment could result in significant health risk impacts to nearby sensitive receptors. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM AIR-3.1: The applicant shall require all construction contractors to implement the best construction measures recommended by BAQMD to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures:</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • 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 shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). • 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. • 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. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. <p>MM AIR-3.2: Future projects shall implement the following Enhanced Construction Best Management Practices, which include but would not be limited to the measures below. Future project applicants shall submit these measures to the City for approval.</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered at a frequency adequate to maintain

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	<p>minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.</p> <ul style="list-style-type: none"> • 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 shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • 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. • 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. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph and visible dust extends beyond site boundaries. • Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to sensitive receptors. Wind breaks should have at maximum 50 percent air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) Site accesses to a distance of 100 feet from public paved roads shall be treated with a 6 to 12-

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	<p>inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site.</p> <ul style="list-style-type: none"> • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
<p>Impact AIR-4: The construction exhaust emissions from future projects could exceed BAAQMD thresholds and may result community health risks for sensitive receptors such as nearby residents. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM AIR-4.1: Applicants proposing development of projects within 1,000 feet of existing sensitive receptors as defined by the BAAQMD (e.g., residential uses, schools) shall prepare a site-specific construction health risk assessment (HRA). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level thresholds, then additional mitigation would not be required. However, if the HRA demonstrates that health risks would exceed BAAQMD project-level thresholds, additional feasible on- and off-site mitigation shall be identified to further reduce risks to the greatest extent practicable.</p> <p>Measures to avoid significant construction health risks impacts that could be included in projects, depending on the results of the project-specific HRAs could include:</p> <ul style="list-style-type: none"> • Use Tier 4 engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities. • Use diesel trucks with 2010 or later compliant model year engines during construction. • Use renewable diesel during construction. • Use low-VOC coatings during construction. • Implement fugitive dust best management practices and if necessary, enhanced measures recommended by BAAQMD. • Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules.

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	<ul style="list-style-type: none"> • Phase construction appropriate to lower the intensity of emissions at any one location with sensitive receptors. • Provide enhanced air filtration for sensitive receptors adversely affected by project emissions.
Biological Resources	
<p>Impact BIO-1: Disturbance or destruction of individual special-status plant species such as the Congdon’s tarplant, alkali milk vetch, and Point Reyes bird’s beak could occur during construction activities associated with future development projects, resulting in a significant impact to these species. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM BIO-1.1:Pre-Activity Surveys for Special-Status Plants. Prior to initial ground disturbance for Specific Plan-related projects in salt marsh, tidal slough, and grassland/ruderal habitats as depicted on Figure 3.4-1, a qualified plant ecologist shall conduct an appropriately timed survey for Congdon’s tarplant, Alkali milk vetch, and Point Reyes bird’s beak within the project footprint, and a 50-foot buffer around the project footprint. This buffer may be increased by the qualified plant ecologist depending on site-specific conditions and activities planned in the areas but must be at least 50 feet wide. Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust, such as grading; potential for project activities to alter hydrology supporting habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away.</p> <p>Surveys should be conducted in a year with near-average or above-average precipitation; surveys conducted in a year of below-average rainfall would be considered valid if examination of reference populations of the target species indicate that the species would be detectable if present. The purpose of the survey shall be to assess the presence or absence of special-status plants, including Congdon’s tarplant, alkali milk vetch, and Point Reyes bird’s beak.</p> <p>If the target species are not found in the impact area or the identified buffer, then no further mitigation shall be warranted. If the target species, or any other special-status plants are found in the impact area or identified buffers, MM BIO-1.2 and MM BIO-1.3 would be implemented.</p> <p>MM BIO-1.2: Special-Status Plant Avoidance Buffers. To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent shall submit to the City a design for the proposed project, if feasible, to completely avoid impacts on all populations of special-status plants within the project footprints or within the identified buffers of the impact</p>

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	<p>areas. Avoided special-status plant populations shall be protected by establishing and observing the identified buffer between plant populations and the impact area. All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, shall be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around special-status plants to be avoided shall be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site in question). This marking shall be maintained intact and in good condition throughout project-related construction activities.</p> <p>If complete avoidance is not feasible and more than 10 percent of a population (by occupied area or individuals) would be impacted as determined by a qualified plant ecologist, MM BIO-1.3 shall be implemented.</p> <p>MM BIO-1.3: Preserve and Manage Mitigation Populations of Special-Status Plants. If avoidance of special-status plants is not feasible and more than 10 percent of the population would be impacted, compensatory mitigation shall be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To compensate for impacts on special-status plants, habitat occupied by the affected species shall be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant impacted, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10 percent significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to special-status plants beyond the 10 percent significance threshold) or establish an entirely new population in suitable habitat.</p> <p>Areas proposed to be preserved as compensatory mitigation for impacts to special-status plants must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas shall be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource</p>

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	<p>protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat shall be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and shall contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands shall be ensured through an appropriate mechanism, such as a conservation easement or fee title purchase.</p> <p>A habitat mitigation and monitoring plan (HMMP) shall be developed by a qualified biologist or restoration ecologist and implemented for the mitigation lands on a project-by-project basis. Approval of the HMMP by the City shall be required before project impacts occur to the species.</p> <p>The HMMP shall include, at a minimum, the following information:</p> <ul style="list-style-type: none"> • A summary of habitat impacts and the proposed mitigation; • A description of the location and boundaries of the mitigation site and description of existing site conditions; • A description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the species; • A description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist); • Proposed management activities to maintain high-quality habitat conditions for the species; • A description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria will include demonstration that any plant population fluctuations over the monitoring period of a minimum of 5 years for preserved populations and a minimum of 10 years for enhanced or established

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	<p>populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management); and</p> <ul style="list-style-type: none"> Contingency measures for mitigation elements that do not meet performance criteria.
<p>Impact BIO-2: Future projects' construction activities could result in a significant impact to the salt marsh harvest mouse and salt marsh wandering shrew populations and their habitat.</p>	<p>MM BIO-2.1: Salt Marsh Harvest Mouse and Salt Marsh Wandering Shrew Minimization Measure. Any development projects, including the loop road or multi-use path, within 100 feet of an area identified as salt marsh, open water, or tidal slough shall be subject to a habitat assessment prepared by a qualified biologist. All habitats identified by the biologist as suitable habitat for the salt marsh harvest mouse or salt marsh wandering shrew shall be avoided for development and preserved in their existing state, to the extent feasible. If avoidance of salt marsh habitats is infeasible, the following measures shall be implemented:</p> <ul style="list-style-type: none"> Before any construction activities begin, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include descriptions of the salt marsh harvest mouse and salt marsh wandering shrew, their habitats, the laws protecting them, the general measures that are being implemented to conserve the species as they relate to the project, and the boundaries within which the project may be accomplished. To avoid the loss of individual harvest mice or shrews from any excavation, fill, or construction activities in suitable habitat, vegetation removal will be limited to the minimum amount necessary to permit the activity to occur. Wherever feasible, sufficient suitable habitat, as determined by a qualified biologist, will remain adjacent to the activity area to provide refugia for displaced individuals. Within areas where vegetation potentially supporting salt marsh harvest mice or salt marsh wandering shrews will be impacted, vegetation and debris that could provide cover for mice will be removed using only hand tools (which may include motorized equipment such as line trimmers if the vegetation removed is inspected by a qualified biologist and does not contain any salt marsh harvest mice or salt marsh wandering

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	<p>shrews) at least one week prior to the commencement of construction activities. Vegetation removal will occur under the supervision of a qualified biologist. This vegetation will be removed on a progressive basis, such that the advancing front of vegetation removal moves toward vegetation that would not be disturbed. If necessary, temporary shelter consisting of dead vegetation may be positioned to provide escape routes to suitable habitat. A qualified biologist will monitor the vegetation removal and make specific recommendations with respect to the rate of vegetation removal (to ensure that any harvest mice or shrews present are able to escape to cover that will not be impacted), and whether vegetation needs to remain in a certain area temporarily to facilitate dispersal of mice into habitat outside the impact area.</p> <ul style="list-style-type: none"> • All cut vegetation, except cut vegetation left in place as escape cover, will be removed daily from vegetation removal areas to prevent it from being used as refugia by salt marsh harvest mice. • If a salt marsh harvest mouse or salt marsh wandering shrew, or an animal that may be a salt marsh harvest mouse or salt marsh wandering shrew, is detected during vegetation removal or other project activities, all work that could impact the individual will cease until the animal has moved out of the impact area on its own. A qualified biologist will monitor the animal to ensure that it disperses out of the impact area. If the animal will not move on its own, the biologist will confer with the US Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to identify appropriate measures to avoid impacts to the animal. No salt marsh harvest mice or salt marsh wandering shrews will be handled (even for relocation) without prior approval from the USFWS and CDFW. • Following the hand-removal of vegetation, exclusion fencing will be erected as needed between construction areas and harvest mouse/shrew habitat that is to remain unimpacted to define and isolate protected harvest mouse/shrew habitat. This fencing will consist of material that cannot be climbed by harvest mice, buried at least 4 inches below the ground's surface, and with at least 1 ft (but no more than 4 ft) above the ground. All supports for the fencing will be placed on the inside of the work area. A minimum 2-ft buffer will be maintained free of vegetation around the outside of the exclusion fencing.

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	<p>The fencing will be inspected daily during construction, and any necessary repairs will be made within 24 hours of when they are found. If any breaks in the fencing are found, the qualified biologist will inspect the work area for salt marsh harvest mice and salt marsh wandering shrews.</p> <ul style="list-style-type: none"> • During construction, a qualified biologist will check underneath vehicles and equipment for salt marsh harvest mice and salt marsh wandering shrews before such equipment is moved, unless the equipment is surrounded by harvest mouse exclusion fencing. • No animals (e.g., dogs or cats) will be brought to the project site by project personnel to avoid harassment, killing, or injuring of wildlife. • The project site will be maintained trash-free, and food refuse will be contained in secure bins and removed daily during construction, to avoid attracting nuisance animals that may then prey on salt marsh harvest mice. • Nighttime work will be avoided if feasible. If avoidance of night work is infeasible, all project lighting will be shielded and directed away from tidal marshes. • Construction activities within 10 feet of the high tide line shall not occur within two hours before or after extreme high tides (6.5 feet or above, as measured at the Golden Gate Bridge and adjusted to the timing of local high tides), when the marsh plan is inundated, because protective cover for these species is limited and activities could prevent them from reaching available cover. • In either configuration, with or without the loop road, salt marsh and upland grassland habitats, which may be used for foraging and high-tide refugia by both species, would be located immediately adjacent to the new road and pathways. Therefore, dense upland ecotone/transitional salt marsh vegetation shall be planted along the immediate edge of the shoulder of the loop road or multi-use path adjacent to salt marsh and upland grassland habitats to provide high-tide refugia for both species. • In order to provide a barrier between transitional salt marsh and upland grassland habitats and the newly constructed loop road or multi-use path, and to discourage loop road/multi-use path users from entering potential habitats used by salt marsh harvest mice and salt marsh wandering shrews, a low (less than three feet tall) symbolic fence or wall with educational signs prohibiting entry shall be placed along the edge of

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	<p>the developed area, between the developed area and the upland ecotone to be added as described above.</p> <p>MM BIO-2.2: Salt Marsh Harvest Mouse and Salt Marsh Wandering Shrew Compensatory Mitigation. Compensatory mitigation for individual project impacts, including the loop road or multi-use path, on the salt marsh harvest mouse and salt marsh wandering shrew habitat will be provided via the purchase of credits from a conservation bank or mitigation bank that has restored suitable salt marsh habitat for these species; project-specific mitigation via the preservation and management of suitable habitat for this species; or some combination of the two approaches. If no USFWS/CDFW-approved conservation banks specifically for these mammals are available, credits in a tidal wetland mitigation bank that provides suitable habitat for, and is expected to be occupied by, these species would be adequate. Compensatory mitigation shall be provided at a minimum ratio of 2:1 (mitigation to impact) on an acreage basis if project-specific mitigation is performed or 1:1 if credits are purchased from a mitigation or conservation bank. Compensatory mitigation shall be provided for any potentially suitable habitat for these species that is permanently lost to development or that is present within 50 feet of any new or higher-intensity lighting installed by Specific Plan activities.</p> <p>If project-specific mitigation is provided as compensatory mitigation, the applicant will engage a qualified plant or restoration ecologist to prepare an HMMP describing the measures that will be taken to create, restore, or enhance habitat for the salt marsh harvest mouse and salt marsh wandering shrew and monitor the effects of the mitigation on these species. The HMMP will include, at a minimum, the following:</p> <ul style="list-style-type: none"> • A summary of project impacts on the species and the proposed mitigation of these impacts; • A description of the location and boundaries of the mitigation site and description of existing site conditions; • A description of measures to be undertaken to enhance (e.g., through focused management) the mitigation site for the species; • Proposed management activities (e.g., management of invasive plants) to maintain high-quality habitat conditions for the species;

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	<ul style="list-style-type: none"> • A description of community and species monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. At a minimum, success criteria shall include demonstration that habitat conditions are suitable for occupancy by the salt marsh harvest mouse and salt marsh wandering shrew, and that either a) at least one of these species is present, or b) the site is connected to pre-existing, suitable, and presumably occupied habitat so that colonization of the mitigation site is determined to be likely by a qualified biologist. Monitoring will occur until these criteria are achieved but for no less than five years. • A description of the HMMP's adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria; and • A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands. <p>The HMMP shall be prepared by a qualified plant or restoration ecologist. Approval of the HMMP by the City shall be required before project impacts occur to the species.</p> <p>MM BIO-2.3: Prohibit Rodenticides. The use of rodenticides shall not be allowed within 100 feet of any salt marsh habitat.</p> <p>MM BIO-2.4: Restrict Pesticide Use in and near Salt Marsh Habitats. All pesticides used within 100 feet of salt marsh habitats must be utilized in accordance with the manufacturer's directions. No pesticides shall be applied within tidal marsh habitats as part of Specific Plan Update activities. Any pesticides used in areas where they could be washed, or could drift via wind, into tidal marsh habitat must be approved by the City of East Palo Alto for use in aquatic habitats.</p> <p>MM BIO-2.5: Raptor Perch Deterrents. Within 300 feet of any salt marsh habitats within or adjacent to the Specific Plan area, raptor perch deterrents will be placed on any edges of building roofs, terraces, or other structures (e.g., light poles or electrical towers) that are high enough to overlook the marsh and that have an unobstructed view to the marsh. The specific type of</p>

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	<p>perch deterrent(s) used shall be approved by a qualified biologist and the City.</p> <p>MM BIO-2.6: Landscape Design. To avoid perches for avian predators and dense woody vegetation that could hide mammalian predators of salt marsh harvest mouse and salt marsh wandering shrew, new landscaping, as well as the size, location and species of any new or replacement public street trees, within 300 feet of salt marsh habitats shall be reviewed by a qualified biologist familiar with these species’ ecology prior to City approval to ensure that no new landscaping poses a threat to these two mammals. Intervening structures, topography, and other features that may block the view of the tidal marsh from avian predators using proposed trees shall be considered by the biologist.</p> <p>MM BIO-2.7: Restrictions on Outdoor Cat Feeding Stations and Off-Leash Dogs. Future developments shall prohibit outdoor cat feeding stations within 300 feet of salt marsh habitats. Future developments shall also prohibit off-leash dogs within 100 feet of salt marsh habitats unless within fenced areas.</p> <p>MM BIO-2.8: Food Waste Management. The following measures shall be implemented by future developments within 100 feet of salt marsh habitats to reduce impacts on salt marsh harvest mice and salt marsh wandering shrews due to the attraction of nuisance predators:</p> <ul style="list-style-type: none"> • Any bins used for food waste shall include lids that seal tightly to prevent access by animals and incorporate a mechanism to prevent them from being inadvertently left open when not in active use. • Outdoor trash and recycling receptacles shall be emptied frequently enough that cans do not fill up and allow food waste to spill out. • Litter on the site shall be picked up daily, and no food trash is left on-site overnight. • Signs shall be placed on trash and recycling receptacles reminding users to close the lids so that they will not be inadvertently left open. • Residents and visitors shall be prohibited from feeding feral or wild mammals. • Educational signs shall be posted explaining the importance and sensitivity of nearby marsh habitats,

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	prohibiting feeding wildlife and feral animals on the property, prohibiting off-leash dogs, and advising residents and visitors to dispose of food waste in outdoor areas appropriately to avoid attracting and subsidizing nuisance species.
Impact BIO-3: Future project construction could result in the loss of California black rail and/or California Ridgway’s rail populations and their habitats, which would constitute a significant impact. (Less than Significant Impact with Mitigation Incorporated)	<p>MM BIO-3.1: Seasonal Avoidance or Protocol-level Surveys and Buffers around Calling Centers. To avoid causing the abandonment of an active California Ridgway’s rail or California black rail nest, independent project activities within 700 feet of salt marsh habitats within or adjacent to the Specific Plan area will be avoided during the rail breeding season (from February 1 through August 31) unless 1) a qualified biologist determines that a reduced buffer (but no less than 200 feet) is appropriate due to intervening development or obstructions, the level of disturbance by the activity (in terms of noise and equipment), or other factors that would reduce the potential for the activity to disturb nesting rails, or 2) protocol-level surveys are conducted by a qualified biologist to determine rail locations and territories during the year in which construction is initiated. Protocol-level surveys are typically initiated in late January, so proactive planning is necessary to ensure that such surveys are conducted according to the protocol during the year in which construction occurs.</p> <p>If breeding rails are determined to be present, construction activities shall not occur within 700 feet of an identified California Ridgway’s rail calling center or within 300 feet of a California black rail calling center during the breeding season.</p>
Impact BIO-4: Future projects’ construction activities that occur in or near the tidal salt marsh, open water, or tidal slough habitats, could result in significant impacts to special-status species fish. (Less than Significant Impact with Mitigation Incorporated)	<p>MM BIO-4.1: Worker Environmental Awareness Training. Personnel working on projects within or adjacent to salt marsh, open water, or tidal slough habitats shall be trained by a qualified biologist in the importance of the marine environment to special-status fish and other aquatic animals and plants, and the environmental protection measures put in place to prevent impacts to these species, their habitats, and essential fish habitat (EFH). The training session shall include the information described in MM BIO-1.4, as well as the following:</p> <ul style="list-style-type: none"> • A review of the special-status fish, other aquatic animals and plants, and sensitive habitats that could be found in or near the work areas; • Measures to avoid and minimize adverse effects to special-status fish, other aquatic animals and plants, their habitats, and EFH; and

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Impact	Mitigation Measure/Proposed Specific Plan Update Policy
	<ul style="list-style-type: none"> • A review of all conditions and requirements of environmental permits, reports, and plans (e.g., USACE permits). <p>MM BIO-4.2: Water Quality Protection. During construction, the project applicant shall employ standard construction best management practices (BMPs) to protect water quality. These BMPs may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Sediment mitigation measures shall be in place prior to the onset of project construction and shall be monitored and maintained until construction activities have been completed. Temporary stockpiling of excavated or imported material shall occur only in approved construction staging areas. Stockpiles that are to remain on the site throughout the wet season shall be protected to prevent erosion. • No litter, debris, or sediment shall be dumped into storm drains. Daily trash and debris removal shall occur at the site. • All litter and construction debris shall be disposed of off-site in accordance with state and local regulations. All trash and debris within the work area shall be placed in containers with secure lids before the end of work each day in order to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish that may be left on-site. If containers meeting these criteria are not available, all rubbish shall be removed from the project site at the end of each work day. • Equipment staging and parking of vehicles shall occur on established access roads and flat surfaces. • The integrity and effectiveness of construction fencing and erosion control measures shall be inspected on a daily basis. Corrective actions and repairs shall be carried out immediately for fence breaches and ineffective BMPs. • Fueling, washing, and maintenance of vehicles shall occur in developed habitat, away from all tidal salt marsh, open water, and tidal slough habitats. Equipment shall be regularly maintained to avoid fuel leaks. Any leaks shall be captured in containers until equipment is moved to a repair location. Hazardous materials shall be stored only within the developed habitat. Containment and cleanup plans shall be prepared and put in place for immediate cleanup of fluid or hazardous materials spills.

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	<ul style="list-style-type: none"> • Absorbent materials designated for spill containment and clean-up activities shall be available on project sites for use in an accidental spill. • At no time shall sediment-laden water be allowed to enter the salt marsh, open water, or tidal slough habitats.
<p>Impact BIO-5: Future projects' construction activities that occur in proximity to active burrows could result in the injury or loss of burrowing owls, resulting in a significant impact to these species. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM BIO-5.1: Burrowing Owl Minimization Measures. To reduce impacts on burrowing owls, the following shall be implemented:</p> <ul style="list-style-type: none"> • Preconstruction Surveys. Preconstruction surveys for burrowing owls shall be conducted prior to the initiation of construction activities within suitable burrowing owl roosting or nesting habitat (i.e., grassland or ruderal habitats), or within 250 feet of this habitat. During the initial site visit, a qualified biologist shall survey the entire project site and (to the extent that access allows) areas within 250 feet by walking transects with centerlines no more than 50 feet apart and ensure complete visual coverage and looking for suitable burrows that could be used by burrowing owls. If no suitable burrows are present, no additional surveys are required. <p>If suitable burrows are determined to be present within 250 feet of project impact areas, a qualified biologist shall conduct a second survey to determine whether owls are present in areas where they could be affected by proposed activities. The survey shall last a minimum of three hours, beginning one hour before sunrise and continuing until two hours after sunrise, or beginning two hours before sunset and continuing until one hour after sunset. The first survey may occur up to 14 days prior to the start of construction activities in any given area, and the second survey shall be conducted within two days prior to the start of construction activities.</p> <ul style="list-style-type: none"> • Implement Buffer Zones for Burrowing Owls. If burrowing owls are detected during the pre-activity survey, a 165-foot buffer, within which no newly initiated construction-related activities should occur, will be maintained between construction activities and occupied burrows to the extent feasible during the nonbreeding season (September 1 through January 31). This buffer may be reduced if a qualified biologist determines that work will not result in damage to the burrow(s) being used by the owls. Though the species is

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Impact	Mitigation Measure/Proposed Specific Plan Update Policy
	<p>highly unlikely to breed in the Specific Plan area, owls present between February 1 and August 31 will be assumed to be nesting, and a 250-foot protected area will remain in effect until August 31, or until the burrow is no longer occupied, whichever occurs first.</p> <ul style="list-style-type: none"> Passive Relocation. No burrowing owls shall be relocated from burrows during the breeding season (February 1 through August 31). If, during the nonbreeding season (September 1 through January 31), it is infeasible to maintain a buffer around occupied burrow(s) large enough to ensure that the burrow(s) will not be physically disturbed (thus risking injury or mortality of the owl), the owl may be passively relocated from the occupied burrow(s) using one-way doors. Passive relocation shall be performed only by a qualified biologist. One-way doors must be in place for a minimum of 48 hours, during dry conditions, to ensure that owls have left the burrow before the burrow is impacted.
<p>Impact BIO-6: Future project activities in the northwest corner of the Specific Plan area occur within 600 feet of active nests, construction activities could result in the abandonment of nests, and possibly the loss of eggs or young western snowy plover, resulting in a significant impact to these species. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM BIO-6.1: Seasonal Avoidance and Buffers. No Specific Plan Update construction activities shall be performed within 600 feet of an active snowy plover nest during the snowy plover breeding season, March 1 through September 14. Prior to the initiation of any activities within 300 feet of the southwest corner of Pond SF 2, north of the Specific Plan area during the period March 1 through September 14, a qualified biologist shall conduct a survey for suitable habitat for nesting snowy plovers, and for active nests. If no suitable nesting habitat or active nests are present within 600 feet of the proposed activity, construction may proceed. If an active nest is present, no construction activities shall commence within 600 feet of the nest until the nest is no longer active.</p>
<p>Impact BIO-7: Construction disturbance during the bird nesting season (typically February 1 through August 31) could result in the incidental loss of eggs or nestlings of native birds, either directly through the destruction or disturbance of active nests or indirectly by causing enough disturbance to result adult birds abandoning their nests. (Less than</p>	<p>MM BIO-7.1: To minimize impacts on nesting birds, the following shall be implemented:</p> <ul style="list-style-type: none"> Seasonal Avoidance and Buffers. To the extent feasible, vegetation removal, demolition, and initiation of grading and other construction activities should be scheduled to avoid the nesting season. If such activities take place outside the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game code will be avoided. The nesting

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<p>Significant Impact with Mitigation Incorporated)</p>	<p>season for most birds in San Mateo County extends from February 1 through August 31.</p> <ul style="list-style-type: none"> • Preconstruction/Pre-disturbance Surveys. If it is not possible to schedule vegetation removal, demolition, and construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no nests of migratory birds will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of tree removal, demolition, ground disturbance, or construction activities for each construction phase. During this survey, the biologist shall inspect all potential nesting habitats (e.g., trees, shrubs, buildings, electrical towers, and the ground) in and immediately adjacent to the impact areas for migratory bird nests. • Buffers. If an active nest is found within areas that would be disturbed by project activities, the qualified biologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species, though buffers may be reduced by the biologist based on intervening structures or vegetation, the magnitude of disturbance produced by the activity, and the level of human activity to which the birds are already habituated), to ensure that no active nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation. • Inhibition of Nesting. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1) to reduce the potential for establishment of nests in areas to be disturbed.
<p>Impact BIO-8: Increased lighting from future development adjacent to sensitive habitats could result in a significant impact on wildlife such</p>	<p>MM BIO-8.1: Exterior lighting shall be minimized (e.g., by turning lights off) in accordance with recommendations from the International Dark-Sky Association from midnight until dawn, at a minimum, except as needed for safety and City code</p>

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as indirectly increasing predation and bird collisions. (Less than Significant Impact with Mitigation Incorporated)	<p>compliance. Exterior lighting within the Specific Plan area shall be shielded to block illumination from shining upward or outward into the sensitive habitats (i.e., salt marshes) within and adjacent to the Specific Plan area. Uplighting shall be avoided.</p> <p>MM BIO-8.2: Spillage of lighting from building interiors shall be minimized using occupancy sensors, dimmers, blinds, or other mechanisms from midnight until dawn, at a minimum, during migration seasons (February through May and August through November).</p>
Impact BIO-9: Construction and operation of future development would result in soil disturbance adjacent to sensitive salt marsh and tidal slough habitats which could result in the spread of non-native plant species in wetland areas in and adjacent to the Specific Plan area.	<p>MM BIO-9.1: Implement Invasive Weed Best Management Practices (BMPs). The invasion and/or spread of noxious weeds will be avoided by the use of the following invasive weed BMPs:</p> <ul style="list-style-type: none"> • Prohibit the use of moderate or highly invasive and/or noxious weed (as defined by California Department of Food and Agriculture) for landscaping. • During project construction, all seeds and straw materials used in the Specific Plan area shall be weed-free rice (or similar material acceptable to the City) straw, and all gravel and fill material will be certified weed-free to the satisfaction of the City. Any deviation from this will be approved by the City. • During project construction within, or within 100 feet of, tidal salt marsh, open water, or tidal slough habitats, vehicles and all equipment shall be washed (including wheels, undercarriages, and bumpers) before and after entering the proposed project footprint. Vehicles will be cleaned at existing construction yards or car washes. • Following construction of project, a standard erosion control seed mix (acceptable to the City) from a local source, and free of invasive species, will be planted within the temporary impact zones on any disturbed ground that will not be under hardscape, landscaped, or maintained. This will minimize the potential for the germination of the majority of seeds from nonnative, invasive plant species.
Impact BIO-10: Future projects adjacent to the salt marsh habitat could result in a significant impact to jurisdictional waters of the state or U.S. habitat. (Less than Significant Impact with Mitigation Incorporated)	<p>MM BIO-10.1: Jurisdictional Waters Avoidance and Minimization Measures. The following measures will be implemented to avoid and minimize impacts to jurisdictional waters to less than significant levels.</p> <ul style="list-style-type: none"> • During or prior to project design, a wetland delineation of the project area shall be conducted to determine

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	<p>precise boundaries of jurisdictional wetlands and other waters. Impacts to any jurisdictional habitats shall be avoided to the extent practicable. If wetlands or other waters under state or federal jurisdiction occur in the construction areas and involve the placement of fill or dredged materials or other alteration, the necessary and appropriate permits and approvals from responsible resource agencies shall be secured. As appropriate for the type of permit to be considered, options that avoid, minimize, or mitigate potential impacts on jurisdictional wetlands shall be evaluated. Conditions of approval attached to the permits shall be followed.</p> <ul style="list-style-type: none"> • Sensitive habitat areas including wetlands adjacent to, but outside of, the construction area shall be demarcated with orange construction fencing to exclude workers, vehicles, and equipment. • The locations of habitats to be avoided shall be identified in the contract documents (plans and specifications) as “Sensitive Biological Resources – Do Not Disturb.” • Jack-and-bore or other trenchless methods shall be used as feasible to reduce the need for surface construction within identified sensitive habitats and exclusion zones, and construction activities and vehicles shall be restricted to a specified right-of-way. • Temporarily impacted wetlands and other waters shall be restored in place based on a restoration plan prepared by a qualified biologist and approved by the City. • Where possible, trenches shall be worked from only one side to minimize impacts on adjacent habitat. • Watering of exposed earth shall be conducted consistent with construction BMPs to minimize dust production. • Trench lines shall be reseeded with native vegetation appropriate for the affected habitat type, and/or a double-trenching technique shall be used through sensitive habitats to help preserve the existing seedbank. <p>MM BIO-10.2: Jurisdictional Waters Compensatory Mitigation. If impacts to jurisdictional wetlands or other waters cannot be avoided, compensatory mitigation shall be provided as follows (or as otherwise required by conditions of applicable resource</p>

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	<p>agency permits) to reduce impacts to less than significant impacts.</p> <ul style="list-style-type: none"> • Compensatory mitigation shall be provided via the purchase of credits from a wetland mitigation bank; project-specific mitigation via the creation or restoration of the same general type of wetlands/waters impacted; or some combination of the two approaches. Compensatory mitigation shall be provided at a minimum ratio of 2:1 (mitigation: impact) on an acreage basis if project-specific mitigation is performed or 1:1 if credits are purchased from a mitigation bank. Mitigation performed for loss of salt marsh harvest mouse and salt marsh wandering shrew habitat, as described in MM BIO-5, may be adequate compensation for impacts to jurisdictional waters if performed via purchase of credits in a wetland mitigation bank and/or creation of suitable wetlands as described in the following bullet point. • If project-specific mitigation is provided as compensatory mitigation, a qualified biologist will prepare an HMMP describing the measures that will be taken to create, restore, or enhance appropriate habitats and to monitor mitigation success. The HMMP will include, at a minimum, the following: <ul style="list-style-type: none"> • A summary of project impacts on jurisdictional habitats and the proposed mitigation of these impacts; • A description of the location and boundaries of the mitigation site and a description of existing mitigation site conditions; • A description of measures to be undertaken, if necessary, to create, restore, or enhance appropriate habitats; • Proposed management activities, such as management of invasive plants, to maintain high-quality habitat conditions; • A description of community monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. At a minimum, success criteria will include demonstration of at least 75 percent cover by native wetland plants within the mitigation

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	<p>area. Monitoring shall occur until these criteria are achieved but for no less than five years;</p> <ul style="list-style-type: none"> • A description of the HMMP’s adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria; and • A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands. <p>The HMMP will be approved by the City and any agencies involved in issuing permits for the specific project in question (e.g., USACE and RWQCB) prior to the initiation of impacts to jurisdictional wetlands or other waters.</p>
Cultural Resources	
<p>Impact CUL-1: Future projects could indirectly or directly impact known and unknown historic buildings and structures by removing historic buildings and structures, or altering the setting for historic properties. (Less than Significant Impact)</p>	<p>Policy LU-7.1: Ensure that City, State, and Federal historic preservation laws, regulations, and codes are implemented, including State laws related to archaeological resources, to ensure the adequate protection of historic and prehistoric resources.</p> <p>Policy LU-7.2: Require preparation of a project-specific Historic Architectural Resources Assessment (HARA) by a professional Architectural Historian for any buildings or structures that are over 45 years in age that could be affected by a project. The HARA will provide background context, identify any architectural resources including standing buildings and structures, and provide an evaluation using the criteria of the California Register of Historic Resources. Follow the HARA recommendations to avoid and minimize damage to these resources. These may include additional research, measured drawings and photographic recordation with deposition of any research materials with a historical society or repository.</p>
<p>Impact CUL-2: Future projects could discover unknown archaeological resources during construction. If Specific Plan Update Policies to protect these resources during construction are not implemented, future projects would have a significant impact on these resources. (Less than Significant Impact)</p>	<p><u>Proposed Specific Plan Update Cultural Resources Policies</u></p> <p>Policy LU-7.3: Future project applicants shall engage a qualified archaeologist to complete a site-specific review and evaluation of a development site within the Specific Plan area as part of the discretionary permitting process in regard to archaeological resources. The identification, review, and evaluation shall be completed by qualified professional archaeologists. The results shall be presented in a Cultural Resources Assessment Report (CRAR) or similar document format that provides the results of</p>

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	<p>the identification and evaluation effort with site specific mitigation recommendations. The CRAR shall be reviewed and approved by the City as part of the discretionary permitting process.</p> <p>Policy LU-7.4: Future project applicants shall implement site-specific mitigation measures or recommendations presented in the CRAR as determined necessary by the City. Mitigation or recommendations could include:</p> <ul style="list-style-type: none"> • Completion of an archaeological testing program to determine the potential for the presence/absence of subsurface cultural deposits and develop further recommendations for cultural resource avoidance/preservation; • Implementation of cultural resources monitoring during subsurface construction for project sites within or adjacent to a recorded cultural resource; and • Recordation of any significant built environment resources including but not limited to systematic photographic recordation and architectural measured drawings as well as additional detailed archival research. <p>Policy LU-7.5: Future project applicants, in consultation with the City, shall contact the Native American Heritage Commission (NAHC) for environmental reviews during the development permitting process to determine if resources listed on the Sacred Lands File are within or adjacent to a project specific site. Outreach to members of the Native American community identified by the NAHC shall be undertaken to determine if they can provide information on tribal cultural resources within or adjacent to the project site.</p> <p>Policy LU-7.6: Future project applicants shall note on any plans that require ground disturbing excavation that there is a potential for exposing buried cultural resources and tribal cultural resources including prehistoric Native American burials.</p> <p>Policy LU-7.7: Future project applicants shall retain a Professional Archaeologist (PA) on an “on-call” basis during ground disturbing construction to review, identify, and evaluate cultural resources that may be inadvertently exposed during construction. The archaeologist shall review and evaluate any discoveries to determine if they are historical resource(s)</p>

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	<p>and/or unique archaeological resources or tribal cultural resources under CEQA.</p> <p>Policy LU-7.8: Prior to ground disturbing activities, a PA shall complete in-person Worker Awareness Training (WAT) for cultural resources. Training shall be required for all construction personnel participating in ground disturbing construction to alert them to the cultural sensitivity of the project site and provide protocols to follow in the event of a discovery of archaeological materials. The Principal Archaeologist or Project Archaeologist shall develop and distribute an “ALERT SHEET” summarizing potential finds that could be exposed and the protocols to be followed as well as points of contact to alert in the event of a discovery.</p> <p>Policy LU-7.9: If the PA determines that any cultural resources exposed during construction constitute a historical resource and/or unique archaeological resource or tribal cultural resource under CEQA, the PA shall notify the project proponent and Community Development Director, or their designee, of the evaluation. The PA shall recommend mitigation measures to mitigate to a less than significant impact in accordance with California Public Resources Code Section 15064.5. Tribal cultural resources shall be evaluated with the assistance of Native American tribes and/or individual tribal members who have previously been contacted and responded to outreach efforts made by the project proponent. Mitigation measures may include, but would not be limited to, avoidance, preservation in-place, recordation, additional archaeological testing, and data recovery. The completion of a formal Archaeological Monitoring Plan (AMP) and/or Archaeological Treatment Plan (ATP) that may include data recovery may be recommended by the PA if significant archaeological deposits are exposed during ground disturbing construction. Development and implementation of the AMP and ATP and treatment of significant cultural resources and/or tribal cultural resources shall be completed by the project applicant in consultation with any regulatory agencies and Native American tribes and tribal individuals.</p> <p>Policy LU-7.10: The project applicant shall submit a Monitoring Closure Report to the City at the conclusion of ground disturbing construction if archaeological and Native American monitoring was undertaken.</p>

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<p>Impact CUL-3: Future projects could discover unknown human remains during construction. If Specific Plan Update Policies to protect these resources during construction are not implemented, future projects would have a significant impact on these resources. (Less than Significant Impact)</p>	<p><u>Proposed Cultural Resources Specific Plan Update Policy:</u></p> <p>Policy LU-7.11: In the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find will be stopped. The San Mateo County Coroner will be notified and shall make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.</p>
Geology and Soils	
<p>Impact GEO-1: Future projects under the Specific Plan Update could directly or indirectly cause substantial adverse effects related to strong seismic ground shaking and seismic-related ground failure. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM GEO-1: All structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements as a minimum. Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead and live loads. The code-prescribed lateral forces are generally substantially smaller than the expected peak forces that would be associated with a major earthquake. Therefore, structures shall be able to do all of the following:</p> <ul style="list-style-type: none"> • Resist minor earthquakes without damage. • Resist moderate earthquakes without structural damage but with some nonstructural damage. • Resist major earthquakes without collapse but with some structural as well as nonstructural damage.
<p>Impact GEO-2: Future projects under the Specific Plan Update could directly or indirectly cause substantial adverse effects related to liquefaction. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM GEO-2: Foundations shall be designed to compensate for effects of liquefaction, differential settlement, and lateral spreading due to earthquakes. Foundations shall be designed by a qualified structural engineer using soil design parameters developed by qualified geotechnical consultants and verified by the City’s Building Services Division.</p> <p><u>Specific Plan Update Shoreline-Adjacent Development Requirements</u></p> <ul style="list-style-type: none"> • Standard 9.7.6: Shallow Groundwater Vulnerability Assessment and Mitigation. Shoreline-adjacent development projects shall perform a geotechnical

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	assessment of the project’s vulnerability to shallow groundwater rise and submit a list of project measures that will monitor and mitigate seasonal and permanent emergent groundwater impacts, including: buoyancy, seepage, infiltration, liquefaction, corrosion, and contaminant mobilization hazards.
Impact GEO-3: Future development adjacent to the San Francisco Bay could result in a significant impact related to lateral spreading. (Less than Significant Impact with Mitigation Incorporated)	MM GEO-3: Implement Mitigation Measure GEO-1 above. In addition, site development plans and foundations shall be designed to compensate for effects of lateral spreading due to earthquakes. Earthwork activities, including remedial grading, shall be performed using the recommendations provided by qualified geotechnical consultants, and foundations shall be designed by a qualified structural engineers using soil design parameters developed by qualified geotechnical consultants and verified by the City’s Building Services Division.
Impact GEO-4: Future development on existing Bay Mud deposits and fills could result in significant vertical movement and differential settlement. (Less than Significant Impact with Mitigation Incorporated)	MM GEO-4: Improvements on areas of soft Bay Mud and artificial fill must be designed under the guidance of suitably qualified geotechnical consultants to ensure that the underlying substrate is capable of withstanding the load. Existing fills may need to be removed and replaced with engineered fills.
Impact GEO-5: Future development on the existing expansive soils could result in resulting in heaving and cracking of building foundations. (Less than Significant Impact with Mitigation Incorporated)	MM GEO-5: Earthwork and foundations shall be designed to compensate for effects of expansive soils. Fill placement and foundation design criteria shall be developed by qualified geotechnical consultants and verified by the City’s Building Services Division.
Impact GEO-6: Future projects could encounter paleontological resources during construction, resulting in the destruction of these resources. (Less than Significant Impact with Mitigation Incorporated)	MM GEO-6: If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet shall stop and the City shall be notified. A qualified paleontologist shall inspect the findings within 24 hours of discovery. If it is determined that the proposed development could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible, project applicants shall pay in-lieu fees to mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by a project. Possible mitigation under CEQA emphasizes preservation-in-place

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	measures, including planning construction avoid paleontological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement. Under CEQA Guidelines, when preservation in place is not feasible, data recovery through excavation shall be conducted with a data recovery plan in place. Therefore, when considering these possible mitigations, the City shall have a preference for preservation in place.
Greenhouse Gas Emissions	
Impact GHG-1: The greenhouse gas emissions from future development under the Specific Plan Update are predicted to annually add up to 63,690 MT CO ₂ e for Scenario #1 and 72,693 MT CO ₂ e for Scenario #2 through the addition of new residences, office, industrial/R&D, civic/community, and retail land uses. There is no current pathway for the Specific Plan Update, based on the mechanisms currently available to the City, to achieve carbon neutrality by 2045. (Significant and Unavoidable Impact)	Future projects would implement Specific Plan Update 8-4.1 TDM standards to reduce vehicle emissions (listed under Impact AIR-1).
Hazards and Hazardous Materials	
Impact HAZ-1: Future developments projects could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant Impact)	<p><u>Proposed Specific Plan Update Policies</u></p> <ul style="list-style-type: none"> • LU-5.1: Prior to the development or redevelopment of site parcels, a property-specific Phase I ESA shall be completed in accordance with ASTM Standard Designation E 1527-21 (or most recent version) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases. Soil, soil vapor and/or groundwater quality studies shall subsequently be conducted, if warranted based on the findings of the property-specific Phase I ESAs, to evaluate if remedial measures are needed to protect the health and safety of site occupants and construction workers. • LU-5.2: Prior to the start of earthwork activities (e.g., excavation, trenching, grading, etc.) on properties with

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	<p>known contaminants of concern (COC) exceeding the lower of the current California Department of Toxic Substances Control (DTSC), San Francisco Bay Regional Water Quality Control Board (RWQCB) or U.S. Environmental Protection Agency (U.S. EPA) residential screening levels, an appropriate corrective action/risk management plan [e.g., RAP, removal action workplan (RAW) or Site Management Plan (SMP)] shall be prepared that reflects the results of the on-site investigations. The corrective action/risk management plan shall describe measures necessary to protect the health and safety of future site occupants, and establish appropriate management practices for handling and monitoring of impacted soil, soil vapor and groundwater that potentially may be encountered during construction activities. The corrective action/risk management plan shall be prepared by an Environmental Professional and be submitted to an appropriate overseeing regulatory agency (e.g., DEH, DTSC or RWQCB) for review. Regulatory agency approval shall be obtained prior to commencing earthwork activities.</p> <ul style="list-style-type: none"> • LU-5.3: A Health and Safety Plan (HSP) shall also be prepared to establish health and safety protocols for personnel working at the future project site. All remedial measures shall be completed under regulatory agency oversight and meet all applicable federal, state and local laws, regulations and requirements. Following completion, a report documenting compliance with the provisions of the corrective action/risk management plan and describing the work completed shall be submitted to and approved by the overseeing regulatory agency. • LU-5.4: Groundwater monitoring wells associated with the identified open leaking underground storage tank (LUST) and cleanup program site (CPS) cases are located on some Site parcels. These wells must be protected during construction. Upon written approval from the overseeing regulatory agency and the well owner, the wells would be destroyed under permit from the DEH prior to development activities. Relocation of the wells may be required. Monitoring wells that are no longer in use, or any unidentified wells (such as former agricultural wells) encountered

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	<p>during construction activities, shall be properly destroyed in accordance with DEH requirements.</p> <ul style="list-style-type: none"> • LU-5.5: If a future development requires importing soil for property grading, the source and quality of imported soil shall be documented and reported to the appropriate overseeing regulatory agency prior to the start of earthwork activities. • LU-5.6: As part of the facility closure process for project site occupants with permits for storage of hazardous materials and/or generation of hazardous waste, facility closure activities (such as removal of remaining hazardous materials, cleaning of hazardous material handling equipment, decontamination of building surfaces, and waste disposal practices) shall be coordinated with the San Mateo County Department of Environmental Health (DEH) to ensure that required closure activities are completed prior to redevelopment of site parcels or change in use. <p><u>Proposed Specific Plan Update Asbestos and Lead Based Paint Policies</u></p> <ul style="list-style-type: none"> • LU-5.7: Asbestos Survey. Prior to issuance of demolition permits, an asbestos survey shall be completed on all structures proposed for demolition that are known or suspected to have been constructed prior to 1978 in accordance with National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines. NESHAP guidelines require the removal of potentially friable asbestos-containing materials (ACMs) prior to building demolition or renovation that may disturb the ACM. • LU-5.8: Demolition of Buildings Potentially Containing Asbestos: Prior to demolition, future project applicants shall submit a letter of approval that includes a Job Number (J#) shall be issued by BAAQMD, as proof of notification. The applicant shall notify BAAQMD of any demolition or renovation requiring the removal of 100 square feet or more, 100 linear feet or more, or 35 cubic feet or more of asbestos, at least 10 days prior to demolition or renovation. For residential buildings of four or fewer dwelling units, future applicants can

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	<p>notify BAAQMD 72 hours in advance with the payment of an additional fee.</p> <ul style="list-style-type: none"> • LU-5.9: Lead-Based Paint Survey. Prior to issuance of a demolition permit, a lead-based paint (LBP) survey shall be completed on all structures proposed for demolition that are known or suspected to have been constructed prior to 1978. If LBP is identified, then federal and state construction worker health and safety regulations shall be followed during renovation or demolition activities. If loose or peeling LBP is identified at the building, it shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations. Requirements set forth in the CCR Title 8, Section 1532.1 shall be followed during demolition activities, including employee training, employee air monitoring, and dust control. Any debris or soil containing LBP or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed. • LU-5.10: Prior to future projects disposing of any demolition waste (e.g., as fluorescent lamps, PCB ballasts, lead acid batteries, mercury thermostats, and lead flashings), the demolition contractor shall coordinate with DEH to determine if the waste is hazardous and ensure proper disposal of waste materials.
<p>Impact NOI-1: Future projects within 500 feet of residential land uses and 200 feet of commercial land uses could result in significant temporary noise impacts to these receptors. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM NOI-1.1: Prior to the issuance of future developments' grading permits, a typical construction noise logistics plan would include, but not be limited to, the following measures to reduce construction noise levels as low as practical:</p> <ul style="list-style-type: none"> • Limit construction activity to weekdays between 7:00 a.m. and 7:00 p.m. and Saturdays and holidays between 9:00 a.m. and 7:00 p.m., with no construction on Sundays; • Limit combined construction noise levels (levels from all construction equipment used per phase) to an hourly average of 80 dBA L_{eq} for residential receptors and to an hourly average of 90 dBA L_{eq} for commercial receptors; • Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;

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	<ul style="list-style-type: none"> • Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment; • Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses; • Locate staging areas and construction material areas as far away as possible from adjacent land uses; • Prohibit all unnecessary idling of internal combustion engines; • If impact pile driving is proposed, multiple-pile drivers shall be considered to expedite construction. Although noise levels generated by multiple pile drivers would be higher than the noise generated by a single pile driver, the total duration of pile driving activities would be reduced; • If impact pile driving is proposed, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected; • If impact pile driving is proposed, foundation pile holes shall be pre-drilled to minimize the number of impacts required to seat the pile. Pre-drilling foundation pile holes is a standard construction noise control technique. Pre-drilling reduces the number of blows required to seat the pile. Notify all adjacent land uses of the construction schedule in writing; • Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented. • Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.
<p>Impact NOI-2: Traffic noise levels would result in an increase of three dBA CNEL or more at two roadway segments on Bay Road when 2040 cumulative plus project scenarios are compared to existing conditions and would increase</p>	<p>MM NOI-2.1: To address impacts related to traffic noise, the City shall ensure implementation of the following noise reduction strategies:</p> <ul style="list-style-type: none"> • Future development projects under the Specific Plan Update shall pay a fair share contribution toward the City’s installation of quieter pavement types such as Open-Grade Rubberized Asphaltic Concrete which

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<p>noise levels by one dBA CNEL over cumulative no project conditions, resulting in a significant increase in permanent noise levels. (Significant and Unavoidable Impact)</p>	<p>could reduce noise levels by two (2) to three (3) dBA depending on factors such as existing pavement type and traffic speed allowed. Future development projects shall install or pay a fair share contribution toward the City's installation of traffic calming measures along Bay Road (between University Avenue and Pulgas Avenue) that include, but not limited to, speed humps, bumps, or tables, or traffic circles. Future traffic calming measures would be coordinated with the Menlo Park Fire Protection District to ensure there would be no substantial effects on response times.</p>
<p>Impact NOI-3: Future development's operational mechanical equipment could result in noise levels that exceed exterior noise levels at noise-sensitive receptors identified in Section 8.52.030 in the City's Municipal Code. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM NOI-3.1: Future development projects within the Specific Plan area shall retain a qualified acoustical consultant to review mechanical equipment systems during final design of their proposed project consistent with standard City practice. The qualified acoustical consultant shall review selected equipment and determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements set forth in Section 8.52.320 of the City's Municipal Code. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Additionally, enclosures and interior wall treatments shall be considered to reduce noise exposure within the on-site units. Alternate measures may include locating equipment in less noise-sensitive areas, where feasible.</p>
<p>Impact NOI-4: Future construction activities could result in groundborne vibration levels exceeding 0.3 in/sec PPV limit at nonhistorical buildings, which would result in a significant vibration impact. (Less than Significant Impact with Mitigation Incorporated)</p>	<p>MM NOI-4.1: To address potential impacts related to vibration, the project will implement the following vibration controls in addition to the measures included in Policy 7.11 of the City's General Plan:</p> <ul style="list-style-type: none"> • Comply with the construction noise ordinance to limit hours of exposure. The City's Municipal Code allows construction activities between the hours 7:00 a.m. and 6:00 p.m. on weekdays and between 9:00 a.m. and 5:00 p.m. on Saturdays. Construction activity is not permitted on Sundays or national holidays. • Prohibit the use of heavy vibration-generating construction equipment within 25 feet of residences. Use a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 25 feet of residences adjoining the site. • Avoid dropping heavy equipment within 25 feet of residences. Use alternative methods for breaking up

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	<p>existing pavement, such as a pavement grinder, instead of dropping heavy objects within 25 feet of residences adjoining the site.</p> <ul style="list-style-type: none"> • The contractor shall alert heavy equipment operators to the close proximity of the adjacent structures so they can exercise extra care. • For projects requiring impact or vibratory pile driving, a Construction Vibration Monitoring, Treatment, and Reporting Plan shall be implemented to document conditions prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. The construction vibration monitoring plan shall include, but not be limited to, the following measures: <ul style="list-style-type: none"> • Document conditions at all structures located within 90 feet of pile driving activities and at historic structures located within 275 feet of pile driving activities prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. Specifically: <ul style="list-style-type: none"> • Vibration limits shall be applied to vibration-sensitive structures located within 90 feet of any high impact construction activities, such as pile driving, and 275 feet of historic buildings. • Performance of a photo survey, elevation survey, and crack monitoring survey for each structure of normal construction within 90 feet of any high impact construction activities and each historic structure within 275 feet of pile driving activities. Surveys shall be performed prior to any construction activity, in regular intervals during construction, and after project completion, and shall include internal and external crack monitoring in structures, settlement, and distress, and shall document the condition of foundations, walls and other structural elements in the interior and exterior of said structures. • Develop a vibration monitoring and construction contingency plan to identify structures where

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	<p>monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approached the limits.</p> <ul style="list-style-type: none"> • At a minimum, vibration monitoring shall be conducted during all pile driving activities. • If vibration levels approach limits, suspend construction and implement contingency measures to either lower vibration levels or secure the affected structures. • Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site. • Conduct a post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

Summary of Project Objectives

The stated objectives of the Ravenswood Specific Plan Update are to:

1. Blend office, R&D, industrial, retail, and residential uses together with public open space, amenities, and civic uses to create a complete neighborhood defined by increased diversity of activity, mobility choices, numerous high-quality parks, and vibrant community-serving spaces in the Specific Plan area.
2. Create smaller, more walkable blocks through the addition of publicly accessible streets, greenways, alleys, and multi-use pathways.
3. Maintain key view corridors to the Bay through building setbacks, stepbacks, and linear greenway networks.
4. Evolve Bay Road into a series of vibrant, community-serving nodes that are lined with active business and civic spaces through the use of frontage design standards.
5. Improve circulation and mobility in the Plan area by increasing the interconnectedness of the network and increasing opportunities to access the Bay/waterfront. Promote walkability through wide sidewalks covered with tree canopy, buffered bicycle facilities on key public streets, and a welcoming network of open space.
6. Enhance pedestrian and bicycle connections to the surrounding region, light rail, services, housing, and employers, creating a range of new public spaces and transportation options.
7. Achieve a 40 percent or greater reduction in single-occupancy vehicle trips to and from the plan area through improvements to transit service such as a public shuttle system and a multimodal connection to the planned Willow Village rail station.
8. Respect the existing single-family neighborhoods by requiring careful height and massing transitions for new buildings adjacent to single-family houses. Buildings would be smallest adjacent to existing neighborhoods and designed to respect the scale and character of the existing neighborhood.
9. Ensure that the local community benefits from new development, and that new developments specifically prioritize those benefits identified by the City.
10. Expand economic opportunity for residents through workforce development that provide consistent access to both skilled jobs (trainings and internships, subsidized spaces for new businesses) and attainable living wage jobs (funding and space for local merchants, vocational classes, PDR/fabrication/makerspaces & light industrial spaces).
11. Seek to address the current jobs-housing imbalance and maximize production of affordable housing units in the Plan area through a minimum linkage ratio between new housing units and office space that requires office developers to pay an Affordable Housing Commercial Linkage Fee.
12. Minimize displacement of existing residents by expanding the availability of income-restricted rental housing (with a focus on very low and low incomes as is appropriate for East Palo Alto, and to a lesser extent moderate incomes) and through support from developers for home ownership programs and funds.
13. Support the City's sustainability goals by promoting green buildings, aggressive water and energy conservation, and adherence to the City's Reach Code standards.

14. Broaden the City’s tax base by attracting multiple large-scale commercial and/or industrial development projects.
15. Stabilize the City’s finances and fiscal health over the long term through a significant increase over time (as development occurs) in the value of property taxes, Measure HH taxes, and other revenues collected in the Specific Plan area.
16. Facilitate the construction of the maximum amount of (deed-restricted) affordable housing by subsidizing it with linked non-residential development, in order to lessen indirect displacement and meet Regional Housing Needs Allocation (RHNA) housing goals and the General Plan Housing Element.
17. Enable substantial improvements to the utility systems and other infrastructure in the Specific Plan area, by maximizing the amount of development that can fund these upgrades.

Summary of Alternatives to the Proposed Project

CEQA requires that an EIR identify alternatives to a project as it is proposed. CEQA Guidelines Section 15126.6 specifies that an EIR should identify alternatives which “would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” Below is a summary of the project alternatives analyzed in this Draft SEIR. A full analysis of the project alternatives is provided in Section 7.0 Alternatives.

Alternatives Considered but Rejected

The following alternatives were considered but rejected and described in detail in Section 7.3.1.

- Location Alternative
 - A Location Alternative would need to be at least of comparable size and have the potential to accommodate similar uses as the Specific Plan area (approximately 207 acres) within the City of East Palo Alto. There are no alternative locations within the City that meets this criteria.

Analyzed Alternatives

The following alternatives were evaluated as alternatives to the project and described in detail in Section 7.3.2.

- No Project/No New Development Alternative (assumes the Specific Plan is repealed and the Specific Plan area remains as it is today)
- No Project/Adopted Specific Plan Alternative (assumes the 2013 Specific Plan would remain the planning document for the Specific Plan area)
- Reduced Scale Alternative (assumes a 40 percent reduction of future development assumed under the Specific Plan Update, Scenario 2 – the most intensive scenario)

The environmentally superior alternative would be the No Project/No New Development Alternative given there would be no changes to the existing conditions or environmental impacts in the Specific Plan area. CEQA Guidelines 15126.6 (e)(2) state that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Among the alternatives that would involve new development within the Specific Plan area, the environmentally superior alternative is the No Project/Adopted Specific Plan Alternative given it would result in less development and decreased impacts than the Specific Plan Update and Reduced Scale Alternative