



# Woodland Park Euclid Improvements Project EIR

FINAL EIR | JUNE 2022  
SCH # 2020040270



**Kimley»Horn**  
Expect More. Experience Better.

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### Attachments:

1. Water Tank Location Map

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# 1 Introduction

This Final Environmental Impact Report (Final EIR) is an informational document prepared by the City of East Palo Alto to evaluate the potential environmental impacts of the proposed Woodland Park Euclid Improvements Project. The primary objectives under the California Environmental Quality Act (CEQA) are to inform decision makers and the public about a project's potential significant environment effects, identify possible ways to minimize significant effects, and consider reasonable alternative to the project. This Final EIR has been prepared by the City's EIR consultants and has been reviewed by City staff for completeness and adequacy in accordance with Public Resources Code Sections 21000-21177 and the State CEQA Guidelines.

The Woodland Park Euclid Improvements Project Draft Environmental Impact Report (Draft EIR) was circulated for a 76-day public review period from July 1, 2021 to September 15, 2021. The State of California Governor's Office of Planning and Research State Clearinghouse and CEQA regulations requires a minimum of 45 days for review. The review period was extended at the request of the Planning Commission during the EIR public comment meeting held on June 28, 2021. Electronic copies of the document were accessible from the City's public facing website, and distributed to State, regional, and local agencies, as well as organizations and individuals, for review and comment. Hard copies of the Draft EIR and its appendices were also made available to check out from the Community and Economic Development Department and were available for review at the East Palo Alto Public Library.

This Final EIR has been prepared in accordance with CEQA and State and local CEQA Guidelines and represents the independent judgment of the City, as CEQA Lead Agency. This Final EIR, together with the Draft EIR, technical appendices, and other written documentation prepared during the EIR process, as those documents may be modified by the City Council at the time of certification, will constitute the Final EIR, as defined in the State CEQA Guidelines, Section 15132, and the City of East Palo Alto's environmental document reporting procedures.

The Final EIR must be certified as complete and adequate prior to any action on the proposed project. Once the EIR is certified and all information is considered, the City can take action to go forward with the proposal, make changes, or select an alternative to the proposed project. While the environmental information in the EIR is important, it is only one of several factors the City may consider in its decision-making process. The City is also required to make findings on each significant environmental effect when making that decision.

## 1.1 Document Organization and Framework

This Response to Comments package is organized as follows: **Section 1** provides a brief introduction to this report. **Section 2** provides a list of agencies and interested persons commenting on the Draft EIR. This section also contains individual comments followed thereafter by responses. This Final EIR uses "Master Responses" to address similar comments made by multiple parties or related themes. To facilitate review of the responses, an index



number (e.g., 1-1, 1-2, 2-1) has been assigned to each comment and to its corresponding responses.

**Section 3** contains minor changes, or errata, to the Draft EIR as a result of minor changes to the project, comments by agencies and interested persons, or minor corrections. **Section 4** contains the Mitigation Monitoring and Reporting Program (MMRP). Lastly, this document contains a series of Attachments with information relevant to the comments received.

City Staff has reviewed the comment letters, draft responses and information generated in the course of preparing the responses and determined that none of this material constitutes significant new information that requires a recirculation period for further public comment under CEQA Guideline Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation as described in Section 15088.5.

## 1.2 CEQA Requirements Regarding Comments and Responses

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be, “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, considering factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

## 2 Public Comments and Response to Comments on the Draft EIR

### 2.1 Agency, Organization, and Individual Comments on the Draft EIR

This section includes all written comments received on the DEIR, verbal comments received during the July 26, 2021 Planning Commission meeting, and the City's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the Draft EIR text, if any, are shown in underline for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the Draft EIR during the public review period:

**Table 2-1: List of Written Comments Received on the Draft EIR**

Comment Letter No.	Commenting Agency / Organization / Individual	Date
<i>Agencies</i>		
1	State Water Boards, Lori Schmitz, Environmental Scientist	August 16, 2021
2	East Palo Alto Sanitation District, Akin Okupe, General Manager (via email)	July 7, 2021 August 6, 2021
3	Palo Alto Park Mutual Water Company, Niambi K.V. Lincoln, General Manager	July 26, 2021
<i>Individuals</i>		
4	Eve Sutton	July 7, 2021
5	Andy, EPA Resident (via email)	July 11, 2021
6	Jeff Leroux	July 11, 2021
7	Debbie Kelsey	June 23, 2021
8	Chris and Bereniki Emerson	August 26, 2021
9	Gabriel and Claudia Auxier	September 15, 2021
10A	Omar Rodriguez Munoz (on behalf of "El Comité de Vecinos del Lado Oeste de East Palo Alto") (EPA Neighborhood Committee)	September 15, 2021
10B	El Comité de Vecinos del Lado Oeste de East Palo Alto	September 15, 2021
11	Evelyn Parnell	September 15, 2021
12	Mike Shah	September 15, 2021
13	Marisela Ramos	September 15, 2021
14	Mar Robbart	July 28, 2021
15	Debbie Kelsey and Brady Barksdale	July 7, 2021

Comment Letter No.	Commenting Agency / Organization / Individual	Date
<i>Public Meetings</i>		
16	Response to Comments Received at the Planning Commission Meeting of July 26, 2021	July 26, 2021





# Letter #1

August 16, 2021

East Palo Alto  
Attn: Art Henriques  
1960 Tate Street  
East Palo Alto, CA 94303

EAST PALO ALTO (CITY), ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE WOODLAND PARK EUCLID IMPROVEMENTS PROJECT (PROJECT); SCH # 2020040270

Dear Mr. Art Henriques:

Thank you for the opportunity to review the Environmental Impact Report for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board) is responsible for issuing water supply permits administered under the Safe Drinking Water Act and may require a new or amended water supply permit for the above referenced Project. A project requires a permit if it includes water system consolidation or changes to a water supply source, storage, or treatment or a waiver or alternative from Waterworks Standards (California Code of Regulations [CCR] title 22, chapter 16 et. seq).

The proposed Project includes demolishing 161 existing apartment units and replacing all structures with 605 new residential units and 5,000 square-feet of neighborhood commercial and open space. The Project also includes constructing a 625-space central parking garage. This portion of the Project would be constructed on a group of 14 individual parcels bounded by West Bayshore Road, Manhattan Avenue, and O'Connor Street in East Palo Alto's west side, totaling 3.92 acres.

1-1

The Project proposes a 1.5 million-gallon storage tank and 4,500 to 5,000 gallon per minute pump station at 375 Donohoe Street to provide a minimum of four hours of continuous fire flow. The tank and related pump infrastructure would tie into the existing water system.

Construction would also include installation of a 14-inch water main from the tank site, continuing within Donohoe Street and West Bayshore Road, ultimately connecting to upsized 12-inch mains that surround the project site. The project would install 1,090 linear feet of new or upsized 14-inch pipe and 1,700 feet of upsized 12-inch pipe.

The State Water Board as a potential responsible agency under CEQA, has the following comments on the City's draft EIR.

- What water system would the storage reservoir belong to? Please specify if the water storage tank meets the definition of a distribution reservoir (CCR §64551.10). "Distribution reservoir" means any tank or other structure located within or connected to the distribution system and used to store treated/finished drinking water.

1-2

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- If it does meet the definition of a distribution reservoir, the water system is required to apply for a water supply permit amendment from the State Water Board, Santa Clara District.
  - An application for an amended domestic water supply permit shall be submitted to the State Board prior to the addition of a new distribution reservoir (100,000 gallon capacity or greater) to the distribution system (Title 22, Division 4, Chapter 16, Article 2, 64556 (a)(1).
  - If the Project will require a permit amendment, please send designs to the State Water Board prior to construction.
    - The water supplier shall submit to the State Board for review the design drawings and specifications for each proposed distribution reservoir prior to its construction (Title 22, Chapter 16, Article 6, Section 64585(b)).
- The document states, “The water tank is not required for the project’s water service but is being planned as a community benefit to enhance city-wide storage and fire flow”, (page 18-12, pdf 376).
  - Please further explain this by supporting the current need for the city-wide storage. Is it due to current system demands, water supply security, or fire-flow only?

1-3

1-4

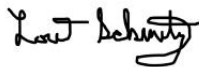
Once the document is adopted, please forward the following items in support of the water system’s permit application to the State Water Board, Santa Clara District Office:

- Copy of the draft and final EIR and Mitigation Monitoring and Reporting Plan (MMRP)
- Copy of the Resolution or Board Minutes certifying and adopting the EIR and MMRP and approving the Project;
- Copy of the EIR with any comment letters received and the lead agency responses as appropriate; and
- Copy of the stamped Notice of Determination filed at the San Mateo County Clerk’s Office and Governor’s Office of Planning and Research, State Clearinghouse.

1-5

Please contact Eric Lacy at the Santa Clara District Office, at (510) 620-3453 or [Eric.Lacy@waterboards.ca.gov](mailto:Eric.Lacy@waterboards.ca.gov) if you have any questions regarding permitting requirements.

Sincerely,



Lori Schmitz  
Environmental Scientist  
Special Project Review Unit  
1001 I Street, 16<sup>th</sup> floor  
Sacramento, CA 95814

Cc:

Office of Planning and Research, State Clearinghouse

Eric Lacy  
District Engineer  
Santa Clara District

# Letter #2

**From:** Akin Okupe <aokupe@epasd.com>

**Sent:** Wednesday, July 7, 2021 4:20 PM

**To:** Art Henriques <ahenriques@cityofepa.org>

**Subject:** Re: Notice of Availability of a Draft EIR and Notice for related Planning Commission Hearing

We don't have the capacity to serve this project.

Akin Okupe, M.B.A.,P.E.  
General Manager  
East Palo Alto Sanitary District  
Tel :(650) 325-9021

2-1

---

**From:** Art Henriques <ahenriques@cityofepa.org>

**Sent:** Wednesday, July 7, 2021 4:16 PM

**To:** Art Henriques <ahenriques@cityofepa.org>

**Subject:** Notice of Availability of a Draft EIR and Notice for related Planning Commission Hearing

Hello. Please be advised that the City of East Palo Alto has a Draft EIR for the Woodland Apartments Euclid Improvements project circulating for a 45-day public review period. You have requested to be notified of City CEQA documents via email. Please see the attached Notice for further information. You are welcome to send comments to me at the email address noted below, also noted in the attachment. Thank you.

---

Arthur Henriques

Contract Project Manager

City of East Palo Alto

# Letter #3

## PALO ALTO PARK MUTUAL WATER COMPANY

2190 ADDISON AVENUE  
EAST PALO ALTO, CA 94303-1433

Telephone: (650) 322-6903

Fax: (650) 322-6981  
City Of East Palo Alto  
Community Development Department

JUL 30 2021

RECEIVED

26 July 2021

Mr. Art Henriques  
Contract Project Planner  
City of East Palo Alto  
Community and Economic Development Department  
1960 Tate St.  
East Palo Alto, CA 94303

Re: Woodland Park Euclid Improvement Project EIR

Dear Mr. Henriques:

This letter contains our response to the Draft EIR that has been released for this project. As correctly noted in the Draft EIR, the Palo Alto Park Mutual Water Company (PAPMWC) is one of the three water purveyors in the City of East Palo Alto; and as a matter of fact, the proposed 1.5-million-gallon (MG) water storage tank located at 375 Donohoe is located within the PAPMWC's service area. We will limit our comments to the 1.5 MG tank and water supply issues.

3-1

The project is described as 14 individual parcels planned for housing redevelopment and an additional group of parcels located at 375 Donohoe that is "under consideration as a location for a new water tank and is included in this description for planning and analysis purposes." Therefore the proposed 1.5 MG water tank must be analyzed to the same level of detail as the housing element. It is not.

There are a number of exhibits, such as Figure 3-2: Project Vicinity Map, that only show the housing element. This figure and all similar figures should also show the tank site at 375 Donohoe. We also request that the attached exhibit showing the PAPMWC's boundaries with the location of the proposed 1.5 MG tank be included in the EIR.

3-2

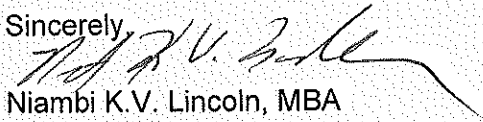
All sections of the report should be expanded to adequately address the environmental impacts associated with the 1.5 MG tank with special emphasis on the sections that address aesthetics, geology and soils, land use, and utilities. There is only one exhibit, Figure 3-13: Water Tank Location, for this tank. This is not adequate for environmental review purposes. This exhibit does not define the tank height. What is the height of the tank sidewalls, and the height from the top of the dome to the ground? As this could be up to 50 feet, what is proposed for screening. Colored elevation views of the completed tank should be included.

3-3

Another major concern we have with the Draft EIR is the utility analysis contained in Section 18. The documents reviewed for the Draft EIR do not include the City's May 2021 Draft Urban Water Management Plan (UWMP). This is a very important planning document as it addresses East Palo Alto's water supply shortfalls during extended (3-5 year) droughts such as the one we are now experiencing. We disagree with Impact UTIL-2 that water supply is "Less than significant". We believe it is "Significant". The Draft UWMP needs to be reviewed and incorporated in the EIR.

3-4

Sincerely,

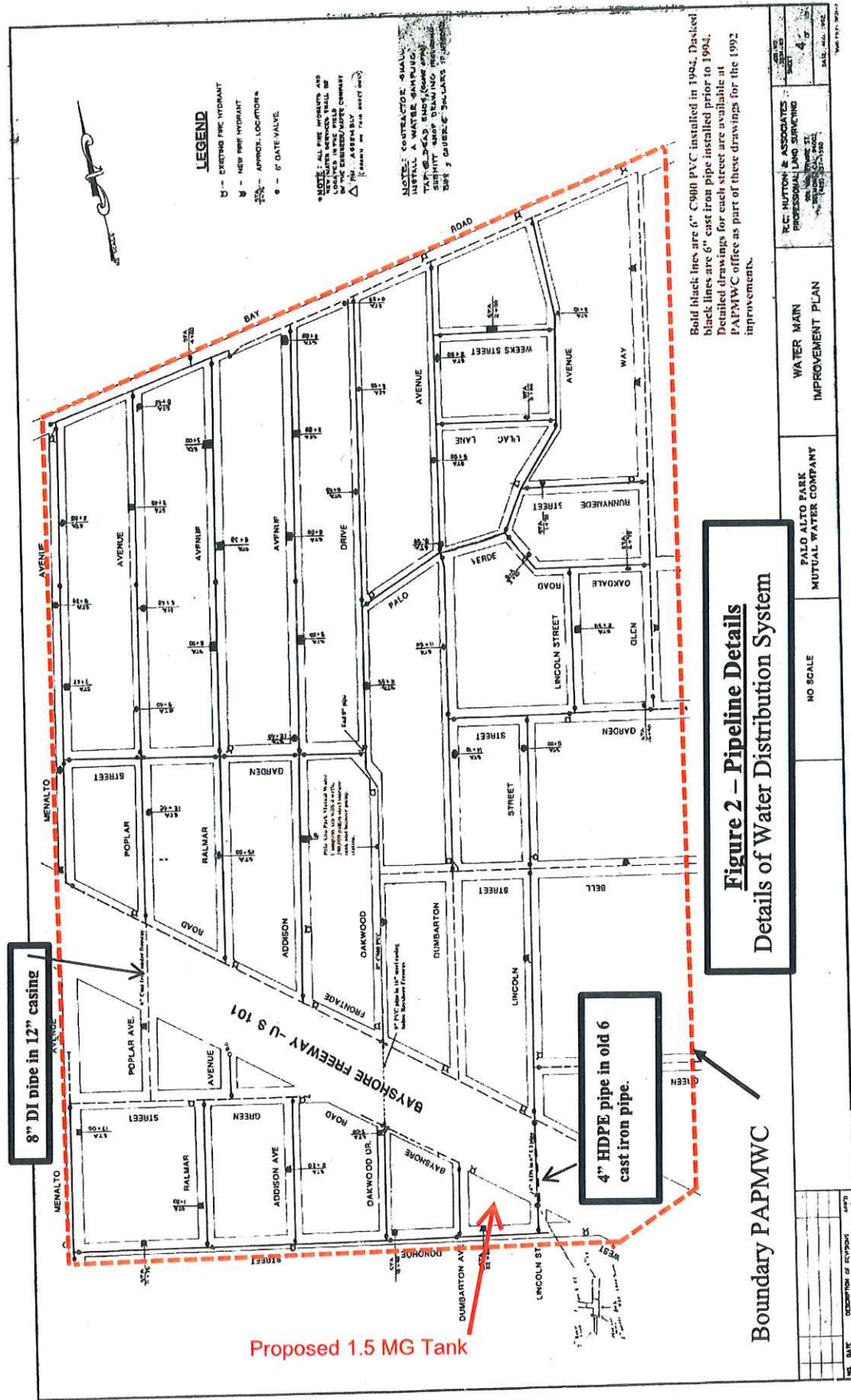


Niambi K.V. Lincoln, MBA  
General Manager

Cc: Daniel Berumen, EPA Senior Planner  
Tom Yeager, Consulting Engineer  
Andy Turner, Legal Counsel  
Katherine Loudd, PPMWC



**Plan of Operations**  
**Palo Alto Park Mutual Water Company**  
**East Palo Alto California**



Please see the as builts for all the distribution system constructed in 1992 and existing. These are pdf files in the office.



- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

### 18.5.2 Summary of No and/or Beneficial Impacts

Not applicable. The project could potentially have adverse effects based on the thresholds of significance because the project would require construction to connect to new, existing or upgraded utility lines (e.g. natural gas, storm drain, water, sanitary sewer, and electrical lines).

### 18.5.3 Impacts of the Proposed Project

**Impact UTIL-1:           The project will require construction to connect and/or upgrade service systems to service the project. This is a less than significant impact with construction mitigation incorporated.**

#### **Water Supply and Fire Flow Infrastructure**

As identified in the Chapter 3, Project Description, the project proponents have studied a range of alternatives for providing improved water supply and fire flow systems to service the project area. For analysis purposes, this EIR assumes that the project would construct a 1.5 million-gallon (MG) storage tank and 4,500 to 5,000 gallon per minute (gpm) fire pump station at 375 Donohoe Street (on the Westside) to provide a minimum of four hours of continuous fire flow. **The water tank is not required for the project's water service but is being planned as a community benefit to enhance city-wide storage and fire flow.**

Physical improvements at this 0.47-acre tank site would include site clearing, material storage, fencing, and paving the entire site around the tank for parking and maintenance. Construction would also include installation of a 14-inch water main from the tank site, continuing within Donohoe Street and West Bayshore Road, ultimately connecting to upsized 12-inch mains that surround the project site. In this scenario, the project would install 1,090 linear feet of new or upsized 14-inch pipe, and 1,700 feet of upsized 12-inch pipe.

The primary parcel at 375 Donohoe Street is a vacant field, with approximately 10 trees including redwood, oak, fir, orange and ornamentals. Uses on adjoining parcels include a small temporary park ("Boom" Pop Up Park) and a residential duplex use on Dumbarton Avenue owned by the applicant.

Construction of these improvements would occur at the same time as other construction for the project. Beyond on-site construction activity to install the tank and pump house, physical construction would also involve trenching within the public rights of way, pipe installation, backfilling, compaction and

# Letter #4

**From:** Eve Sutton <[eve@well.com](mailto:eve@well.com)>

**Sent:** Wednesday, July 7, 2021 7:02 PM

**To:** Art Henriques <[ahenriques@cityofepa.org](mailto:ahenriques@cityofepa.org)>

**Cc:** Court Skinner <[court.skinner@gmail.com](mailto:court.skinner@gmail.com)>; Elizabeth Jackson <[ezjlee@gmail.com](mailto:ezjlee@gmail.com)>; William Byron Webster <[williambwebster@gmail.com](mailto:williambwebster@gmail.com)>; Dennis J. Parker <[wisteria423@yahoo.com](mailto:wisteria423@yahoo.com)>

**Subject:** Eve's comments on Notice of Availability of a Draft EIR, Planning Commission Hearing

Dear Mr Henriques,

Cc: Court Skinner, Elizabeth Jackson, William Byron Webster, Dennis Parker

Thank you for inviting comments on the proposed/draft EIR.

Construction on this site should include a review of infrastructure in the surrounding area including utilities that could be improved for the whole neighborhood. Before or during construction, please enlist ATT for a review of their plans to install fiber optics that will support landline telephone service. In an emergency, many residents rely on landline phones. But the aging wires are unreliable, and ATT has not followed through with their plans to replace those lines with more reliable fiber cables.

Ideally, we would have new phone lines to support landline phones in all neighborhoods—including the Gardens, where I live. But if we have the opportunity to start with newer housing development, then do so!

—Eve Sutton [eve@well.com](mailto:eve@well.com)

650 325-3234 landline, best 10am-9pm

Leave voice msg after 6 rings

216 Daphne Way

East Palo Alto, CA 94303

On 7/7/21, 4:16 PM, "Art Henriques" <[ahenriques@cityofepa.org](mailto:ahenriques@cityofepa.org)> wrote:

Hello. Please be advised that the City of East Palo Alto has a Draft EIR for the Woodland Apartments Euclid Improvements project circulating for a 45-day public review period. You have requested to be notified of City CEQA documents via email. Please see the attached Notice for further information. You are welcome to send comments to me at the email address noted below, also noted in the attachment. Thank you.

Arthur Henriques

Contract Project Manager

City of East Palo Alto

1960 Tate Street, East Palo Alto, CA 94303

Ph: (650) 853-3121; Fax: (650) 853-3179

[ahenriques@cityofepa.org](mailto:ahenriques@cityofepa.org)

# Letter #5

**From:** Andy <[andydog621@gmail.com](mailto:andydog621@gmail.com)>

**Sent:** Sunday, July 11, 2021 11:29 AM

**To:** Art Henriques <[ahenriques@cityofepa.org](mailto:ahenriques@cityofepa.org)>

**Subject:** Comment on Woodland Park Euclid Improvement Project (SCH No. 20200422)

Hello Art/City of EPA Community and Economic Development Dept,

I would like to provide a negative comment on the attached proposal.

All the below are concerning for me as an EPA resident.

**Significant Environmental Effects:** The DEIR identified significant or potentially significant effects associated with aesthetics, air quality, biological resources, cultural/tribal/paleontological resources, geology and soils, greenhouse gas emissions, hazardous materials, noise, utilities, and service systems (sewer capacity) and traffic safety. The project is not located on any lists of hazardous material sites enumerated under Section 65962.5 of the Government Code. Potential mitigation measures are noted.

5-1

Also, having 13 levels in height of the new proposal seems drastic for this location. The highest residential building in this area is only 5 levels max.

5-2

Also, if new buildings are built, there should be 1 parking spot for each bedroom/studio. The current parking situation at this location is already too congested on the streets. If no additional parking is given, this would further congest the location.

5-3

Best,  
EPA Resident

# Letter #6

**From:** Jeff Leroux <[m.jeff.leroux@gmail.com](mailto:m.jeff.leroux@gmail.com)>  
**Sent:** Sunday, July 11, 2021 4:56 AM  
**To:** Art Henriques <[ahenriques@cityofepa.org](mailto:ahenriques@cityofepa.org)>  
**Cc:** J. Brady Barksdale <[jbarksdale@gmail.com](mailto:jbarksdale@gmail.com)>  
**Subject:** Woodland Park Improvement Project

Mr. Henriques,

I am unable to attend the meeting rescheduled for July 12 but wanted to ensure I shared this with you.

I mentor a young man from EPA that is 22 years old. He lives on O'Keefe in a 2 bedroom apartment with 3 other people. All four of them need cars to get to their work. Only one parking stall is provided for their unit. Three of the four need to find street parking. This young fellow is afraid to speak up because he does not want to get blacklisted by property managers. Each month he and his fellow tenants struggle to make their rent.

They also struggle to pay the parking fines they repeatedly incur as a result of parking in nearby streets in Menlo Park. He cannot bike to work, he cannot take the bus - he needs his car. By pretending to address the needs of your constituents with one parking space per apartment this project is knowingly allowing their low income tenants to be victimized by the lack of parking.

I wish I could convince some of the tenants to speak up but many of them are afraid of being blacklisted or somehow punished.

Please seek out these tenants and ask them for their input.

Jeff Leroux

--

**Jeff Leroux**  
**417 O'Connor Street**  
**Menlo Park, CA 94025**

**C**

**:**

**415.819.8877**

# Letter #7

**From:** Debbie Kelsey <debbiejkelsey@gmail.com>

**Sent:** Wednesday, June 23, 2021 11:45 AM

**To:** Art Henriques <ahenriques@cityofepa.org>

**Subject:** Re: Status / Question - Woodland Park Euclid Improvements Project

Dear Mr. Henriques,

I wanted to follow-up with additional questions & feedback on the Woodland Park Euclid Improvements Project, after reviewing the [DEIR Appendices](#) as well as other information:

---

- **Questions:**

- **Start Date?** What is the expected start date of the construction? | **7-1**
- **Duration?** What is the best case, and worst case scenario for the time it will take to complete the project? What is the expecting time period of work that will impact the immediate community more? (eg, demolition and other activity that is loud and creates debris/dust) | **7-1**
- **Is there a way to accelerate construction, to minimize impact?** Eg, larger job crews, well orchestrated execution | **7-1**
- **What else will be done to minimize impact on residents?** | **7-2**
- **How will you ensure that traffic & parking is addressed?** Please share your assumptions, analysis, and recommendations in a summary for the public to understand & respond to. | **7-2**
- **How will you incorporate feedback and collaborate with the community?** Perhaps provide a 1 pager on topics brought up, approach to address, and resulting change/decision/action. | **7-3**

- **Feedback: (on next page)**

- **Murals @ 2043 Euclid Avenue.** The Preliminary Historic Assessment Memorandum (Appendix C) uses the criteria for historic resources, in noting that the buildings are not worthy of historic preservation, without any mention of the murals and with photographs (p 9) that do not display the murals fully. Please see the attached for an example of the murals on the buildings, a very empowering cultural depiction with a message of diversity and peace. To tear this down, and replace it with a sterile mixed residential/commercial complex is a classic example of gentrification. 7-4
- **Cultural Dilution & Gentrification.** After decades in the area, I hoped that wealth pouring into East Palo Alto would result in an eclectic showcase of cultural heritage and empowerment. Instead, I am seeing section after section replaced with sterile developments. Why not distinguish this development, by creating an intersection for culture and diversity? (eg, through art, architecture, types of businesses)(eg, if mural buildings must be torn down, preserve the murals and showcase in the park, with sculpture and empowering quotes and history)
- **High Rise Buildings.** 13 stories is ludicrous, and does not match the neighborhood, and will tower above even the Four Seasons complex.
- **Informative sketches & summaries.** Please be specific on the height of the buildings & summarize key info. A top view of the proposed complex is deceiving, and should very clearly be paired with horizontal views and information on # floors, # units, parking spaces, etc, as well as a 1 page summary of all key information (eg, parking ratio, environmental impact, report findings/recommendations). 7-5
- **Parking.** The parking provided is not sufficient. There should be sufficient parking for residents, visitors, and businesses. Most residents will require 1 or 2 parking spots, and the streets are already crowded with difficulty to find parking. 7-6
- **Traffic.** The excess residents will create significant traffic congestion in the area. 7-7
- **Construction Impact - Inconvenience, Noise, Dust, Disruption.** During Covid, people are working from home. Noise will create a huge distraction and disruption for the neighborhood. Dust will require folks to keep windows closed, which are normally open for ventilation and cooling. We are in the building next door, creating an even bigger concern. 7-8

Thank you very much for your help. I look forward to hearing from you.

Warm regards,

Debbie Kelsey  
 650-315-6029  
 Owner of 480 E. OKeefe #204



479 E Okeefe St  
East Palo Alto, California

Google

Street View



# Letter #8

**Bereniki Emerson**

---

**From:** Bereniki Emerson  
**Sent:** Thursday, August 26, 2021 1:33 PM  
**To:** Bereniki Emerson  
**Subject:** FW: Woodland Park / Euclid Project

----- Forwarded message -----

**From:** Christopher Emerson <[christopheremerson01@gmail.com](mailto:christopheremerson01@gmail.com)>  
**Date:** Thu, Aug 26, 2021 at 1:12 PM  
**Subject:** Woodland Park / Euclid Project  
**To:** <[woodland@cityofepa.org](mailto:woodland@cityofepa.org)>

Mr. Henriques -

We're writing to you to voice our strong opposition to this project as it is currently proposed. It's MUCH too dense for this area and we've several major concerns that many of our neighbors share.

8-1

Firstly, the aesthetics of these densely packed 5 - 12 story buildings, so closely located to one another in such a small area is unacceptable.

The Woodland Park land owners are clearly looking to FULLY maximize their return on investment on these parcels as quickly as they can with this OVERLY-dense building project that will have MAJOR NEGATIVE IMPACTS ON LOCAL TRAFFIC, PARKING, CONGESTION, POLLUTION AND QUALITY OF LIFE FOR THOSE OF US WHO LIVE AND WORK IN THIS AREA.

8-2

I understand the pressure coming from the Woodland Park Ownership Group. There is simply no other word for it, except possibly greed, since they don't actually live here. They're clearly taking advantage of a lower income neighborhood dominated by renters and small city to build a MASSIVELY DENSE project that this area and infrastructure was never intended or built to properly accept.

8-3

This is already a densely populated neighborhood, full of apartment and condo buildings. To think that ride services, public transit and cycling will handle the dearth of a lack of proposed parking and ultra high density is ridiculous on its face! No one really believes this - but no doubt they came up with this justification in one of their many strategy sessions to try and "sell" this project.

8-4

The so-called "park" is actually only a TINY open space that is simply a financial concession to try and sell this project.

8-5

Imagine (at least) 400 ADDITIONAL cars in the space of essentially a city block and the immediate surrounding area during commuting hours - morning and evening. Have you ever tried to drive across the 101 to get to the other side of town via Willow Road, (oops, that's illegal), or via University Avenue at rush hour? Virtually grid-lock. These are the ONLY TWO OPTIONS ACROSS TOWN AND ONE OF THEM IS ILLEGAL.

8-6

As it stands, they are not proposing enough parking spots per bedroom. Financial greed - pure and simple. The requirement should be inline with The City requirements at 1.5 spaces per bedroom AT A MINIMUM. Does anyone locally accept that many of these units won't be OVER OCCUPIED?

8-7

Additionally, the loss of sky, space and sunlight having an apartment building crammed full of people five stories high, just feet from my own apartment will create a huge loss of privacy, increased noise, sunlight/views and loss of quality of life - and unfairly so.

8-8

My wife and I aren't against a project in this area of a reasonable size and scope but this is totally OVER SCALED.

8-9

Does anyone REALLY think that the Ownership Group won't come back for a PHASE II to replace other, older buildings that they own in this area? That WILL happen. Will the city allow the replacement of all of their older buildings with new ultra-high density units? How does this end?

8-10

Doesn't it make more sense to start with a more reasonably scaled project? Then, The City can take note of the increased traffic, noise, infrastructure concerns once built?

At that point, if the more modest project doesn't overwhelm the area, THEN it might make sense for a PHASE II to replace more older buildings. Otherwise, let Woodland Park do what most building owners do who own or live in older buildings....maintain them! The idea that buildings expire after 50 years is preposterous. They will require maintenance. Like MOST of the homes and buildings in the eastern half of this country.

8-11

Let's slow this down! The City need not be in a hurry here to approve an ultra-dense project that once built, can't be undone.

Chris & Bereniki Emerson  
480 E OKEEFE ST, APT 305  
EAST PALO ALTO

# Letter #9

**From:** Gabriel Auxier (gauxier) <[gauxier@cisco.com](mailto:gauxier@cisco.com)>

**Sent:** Wednesday, September 15, 2021 9:28 AM

**To:** Woodland Euclid <[WoodlandEuclid@cityofepa.org](mailto:WoodlandEuclid@cityofepa.org)>; Art Henriques <[ahenriques@cityofepa.org](mailto:ahenriques@cityofepa.org)>; Daniel Berumen <[dberumen@cityofepa.org](mailto:dberumen@cityofepa.org)>

**Cc:** [hedley.linda@gmail.com](mailto:hedley.linda@gmail.com); Gabriel Auxier (gauxier) <[gauxier@cisco.com](mailto:gauxier@cisco.com)>; 'Clau Auxier ([clau.auxier@gmail.com](mailto:clau.auxier@gmail.com))' <[clau.auxier@gmail.com](mailto:clau.auxier@gmail.com)>

**Subject:** Comments on Woodland Park Euclid Improvement Project (SCH No 2020040270)

Owner/Resident:

Gabriel & Claudia Auxier

2027 Dumbarton Ave.

East Palo Alto, CA 04303

408-309-8568

Re: Woodland Park Euclid Improvement Project (SCH No 2020040270)

We have 5 major concerns about the proposed project:

1. Insufficient parking for new residents
2. Increased traffic at highway on-ramps and intersections
3. High speed traffic down Bay Rd. and Donohoe St.
4. Unsightly water tank at 375 Donohoe
5. Lack of planned parks and open space for EPA West of 101, north of University Ave.

9-1

## Insufficient parking for new residents

The proposed onsite parking ratio of 1.1 spaces per unit. That is grossly inadequate. The streets from Manhattan Ave to Menalto Ave, Menlo Park are already completely saturated every night with overflow parking from Woodland Park residents, causing local residents to walk up to five blocks from their home to find parking locations. All of the fire hydrants in the neighborhood are regularly blocked at night, with almost no ticketing. Blind turns are created by parking of large vehicles at street intersections. There is literally no available street parking anywhere in East Palo Alto after 9

9-2

p.m. Realistically, every studio apartment will require at least one car. At least half of the 1 bedroom apartments will require 2 cars. And nearly all 2-bedroom apartments will require 2 – 3 cars.

Back of the napkin calculations would be:

230 studio units = 230 cars

200 1 bd units = 250 cars

175 2 bd units = 438 cars (assuming half of the units will have 2 cards, half will have 3 cars)

**Total number of cars: 919 cars**

Short parking for 223 cars!

Why would the Planning Division be willing to underestimate the number of cars that will need to be accommodated by the estimated 1,332 new residents of the neighborhood!?

**The City should require a greater, more realistic parking ratio, such at 1.5 spaces per unit.**

**9-2**

### **Increased traffic at highway on-ramps and intersections**

I do not see any proposal for how the highway on-ramps and nearby intersections are going to accommodate the large increase in traffic. Before approving the project, ensure you have a solid plan that realistically anticipates the number of new cars (see above) and accounts for how to manage the traffic.

**9-3**

### **High speed traffic down Bay Rd. and Donohoe St.**

Donohoe St. from Bay Rd to Menalto Ave., and Bay Rd. from Donohoe St. to Menalto Ave, regularly experience vehicles driving dangerously at high speeds. Cars park along intersections of the cross streets of both Bay Rd. and Donohoe St. (Dumbarton Ave, Oakwood Dr. Addison Ave, Ralmar Ave, Poplar Ave), blocking the view of high speed traffic when entering Bay Rd or Donohoe St from those cross streets. Donohoe St. is a street with large numbers of pedestrians walking to/from their cars or walking in the neighborhood, and is used by bicyclists, including children riding to/from school. Neither street has sidewalks for safe pedestrian traffic. Neither street has marked bike lanes. Neither street has speed bumps. Stop signs are often ignored. The increased congestion created in intersections near University Ave will increase traffic towards Willow Rd, further aggravating the dangerous walking, biking, and driving experience along Bay Rd. and Donohoe St.

**The City should create specific plans to increase vehicle, pedestrian, and cycling safety in the neighborhood.**

**9-4**

### **Unightly water tank at 375 Donohoe St.**

The water tank proposed for the lot at 375 Donohoe St. appears to be a 3-story behemoth of a structure, that will be visible from the street level of all surrounding streets. The plan calls for the removal of ~5 of the 10 trees located around the perimeter of the parcels. This will leave a massive, unsightly water tank fully exposed, with almost no natural screening.

**The City should ensure that the landscaping plans submitted to the City for Review and approval with the final improvement plans require a good number of additional trees to be planted along the perimeter, and in front of ## and ### Dumbarton Ave to create natural visual barriers and screening for the water tank.**

**9-5**

## **Lack of planned parks and open space for EPA West of 101, north of University Ave.**

The City of East Palo Alto has no parks for its residents west of 101, between University Ave and Menalto. This massive project from SandHill Properties investment company designed to raise massive amounts of revenue and to increase the investment company's asset value in the City of East Palo Alto provides the ideal opportunity to require the creation of substantive, permanent new parks and open space. There is currently a token "pop up park" in the neighborhood that will be removed to make space for the water tank, access road, and pump house. While the city in recent years updated its general plan, and created a goal of 3 acres of parkland per 1,000 residents, the neighborhood has no permanent parks. The project proposes a small, publicly accessible "corner park" and some "mini parks", which is wholly and shamefully inadequate. Instead of stating that "the City recognizes there are limited sites available within the urban framework of the City to meet this goal", it needs to stand up for its adopted goals to ensure that "improvements" do not continue to exacerbate the lack of public parks for its existing and growing number of residents. The city recognizes that public open space and parks are important to the quality of life for its residents, but is not standing up for those values for the residents north of University Ave. St. Mark's Missionary Baptist church at 330 Donohoe St., which is defunct and unused, could be converted into a public park or provide residence use of its abandoned, unused parking lot. The space currently reserved for construction storage adjacent to the water tank, could provide some permanent, though very small, park space. The Woodland Park duplex at 220 and 224 Donohoe St. could be razed to create a small residential park.

**The City should ensure that additional, substantive usable parks and open space are created in the neighborhood north of University Ave to increase the quality of life for the existing and new residents.**

**9-6**

Thanks for your consideration of these comments. This is a once in a generation opportunity to plan for such significant and long-term "improvements" to the neighborhood. Getting it right while the city has the leverage, before approving the project, will be a great achievement.

**9-7**

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# Letter #10A

## Woodland Euclid EIR

- page 1-17: impact LU-3 that says: the project will cause the temporary relocation of a substantial number of people and housing units) has been marked as LESS SIGNIFICANT. Given the number of tenants affected and the duration of the project, this impact should be marked \* SIGNIFICANT \* **10-1**
  
- page 3-24: indicates that the plan may result in moving (assumed permanently) some or all of the rent controlled apartments to a third location. This paragraph should be made clearer either by giving more references or by explaining what the details are, as this option is not part of the 5 options presented in chapter 19 **10-2**
  
- Chapter 14: This chapter on page 14 targeting the effect on the population demonstrates that the analysis of how the effects on current tenants would be mitigated NEEDS MORE DETAILS AND MORE CONSIDERATION. For example, only the transit chapter contains 61 pages !! **10-3**
  - Table 14-2 still contains several statements that appear to be incorrect regarding guiding principle # 2 the project will increase affordable rental housing on the west side by providing 444 additional housing subject to the city's affordable housing requirement. **10-4**
  - It is with respect to ENVIRONMENTAL AND HOUSING POLICY 1.3: the project would expand the total quantity of income restricted affordable housing in the city. A mix of permanent income restricted housing and new rent-controlled housing is proposed to be consistent with policies that support both types. **10-5**
  - It is with respect to policy 1.11 the affordability plan as proposed would provide both inclusionary housing per city ordinance and rent stabilized unit's. **10-6**
  - THE COMPLETE TABLE 14-2 MUST BE REVIEWED!
  
- The premise of the project is to declare the project site as \* NCO \* (neighborhood center residential overlay). NCO includes that the site must include commercial and community service facilities. This designation is the one that seems to allow the tall buildings that are planned to be built (6.9 and 13 stories). **10-7**
  - This appears to be the first time the City of East Palo Alto would approve an NCO zone project. But the total retail space, which is barely 5000 sq. Ft. And the communal space of 3000 sq. Ft. It would NOT merit that denomination that would set a bad example for future projects.
  - For example, page 4-6 lists a similar housing and business project in the city of San Mateo of 158 multi-family units and 14,400 sq. ft. of commercial space vs 605 units and 5,000 sq. ft. in the current Woodland / Euclid project. **10-8**
  - This translates to 91.1 sq. Ft. Commercial / housing in San Mateo vs. 8.2 sq. Ft. Commercial / housing in this project. Or 11.1x !!
  - The EIR document refers to other documents that have supposedly been presented to the city board of directors, but does not include references for their study. **10-9**

- For instance, Item 3-11 in Table 14-2 says: the project has prepared a relocation (plan / report?) for the city approval consistent with this policy.
  - Article 3.6.2 on page 3-24 states: Consistent with the ..., the applicant has prepared and submitted a Community Impact Report for the city review and consideration.
- NONE OF THESE REPORTS OR PLANS HAVE DIRECT REFERENCE SO THAT THEY ARE EASILY LOCATED BY THE COMMUNITY. **10-9**
- As is stated in page 10-10 The Geotechnical Engineering study found that the project site is mapped in zone of very high liquefaction susceptibility. And ... the surface profile of the site generally consists of soil that are of medium high plasticity and have a moderately high potential for expansion. **10-10**
  - Given the recent history of the collapsed condominiums in Surfside, FL and the continuing sinking of the Millennium Tower in San Francisco, CA, the findings highlighted above would require that multiple experienced engineering firms all agree that buildings of these heights be constructed in the location.
- Other important study points are:
  - Parking: the ratio of the number of parking spaces to apartments of 1:1 is very low since it limits the number of spaces available for visitors. The report indicates the average number of inhabitants per apartment, what is the number of vehicles per apartment? **10-11**
  - Odor / Environmental / Utilities: It is unclear if the garbage and recycling collection site (?) Illustrated in Figure 3-5 on page 3-11 will serve the 3 buildings and 605 apartments. It appears to be very small and very difficult for tenants to individually carry garbage to that location, a garbage odor analysis would have to be included in chapters 6, 11, or 18. **10-12**
  - Bicycle storage: likewise, the number of bicycle storage spaces shown in figure 3-5 seems to be very small for a total of 605 apartments **10-13**

We, as a committee of neighbors & affected by the project, would like the city to provide all the information in Spanish because most of those who may be affected, the first language is Spanish. **10-14**

We hope you may take our comments and concerns to be of importance.

Sincerely,  
EPA Neighborhood Committee

# Letter #10B

**From:** [el comite de vecinos](mailto:el comite de vecinos)  
**To:** [Woodland Euclid](mailto:Woodland Euclid)  
**Subject:** Fwd: Comentarios de impactó ambiental EIR  
**Date:** Wednesday, September 15, 2021 5:37:58 PM

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----- Forwarded message -----

From: **el comite de vecinos** <[epacomite@gmail.com](mailto:epacomite@gmail.com)>  
Date: Wed, Sep 15, 2021 at 4:43 PM  
Subject: Fwd: Comentarios de impactó ambiental EIR  
To: [omrodriguez mora@gmail.com](mailto:omrodriguez mora@gmail.com) <[omrodriguez mora@gmail.com](mailto:omrodriguez mora@gmail.com)>

----- Forwarded message -----

From: **el comite de vecinos** <[epacomite@gmail.com](mailto:epacomite@gmail.com)>  
Date: Wed, Sep 15, 2021 at 4:38 PM  
Subject: Comentarios de impactó ambiental EIR  
To: [woodlanddeuclid@cityofepa.org](mailto:woodlanddeuclid@cityofepa.org) <[woodlanddeuclid@cityofepa.org](mailto:woodlanddeuclid@cityofepa.org)>

Sep-15-2021

Woodlad Euclid EIR

- página 1-17: impacto LU-3 que dice: el proyecto causara la temporal reubicación de un número sustantivo de personas y housing unit) se ha marcado como LESS SIGNIFICANT. Dado el número de inquilinos afectados y la duración del proyecto, este impacto debería ser marcado como \*SIGNIFICANT \*

- página 3-24: indica que es posible que el plan resulte en mover(se supone permanentemente) alguno o todos los apartamentos de renta controlada a un tercer lugar. Este párrafo debería ser más claro ya sea dando más referencias o explicando cuáles son los detalles, pues esta opción no es parte de las 5 opiniones presentadas en el capítulo 19.

- capítulo 14: este capítulo de la página 14 que se dirige efecto a la población demuestra que el analysis de cómo se mitigaría los efectos a los inquilinos actuales NECESITA MÁS DETALLES Y MÁS CONSIDERACIÓN. Por ejemplo solamente el capítulo de tránsito contiene 61 páginas!!

- la tabla 14-2 aún contiene varias declaraciones que parecen ser incorrectas cómo está con respecto al guiding principle #2 the project will increase affordable rental housing on the west side by providing 444 additional housing subject to the city's affordable housing requirement.

- O Está con respecto a la ENVIRONMENTAL AND HOUSING POLICY 1.3: the project would expand the total quantity of income restricted affordable housing in the city. A mix of permanent income restricted housing and new rent-controlled housing is proposed to be consistent with policies that support both types.

- O Está con respecto a la póliza 1.11 the affordability plan as proposed would provide both inclusionary housing per city ordinance and rent stabilized unit's.

- LA COMPLETA TABLA 14-2 DEBE REVISARSE POR CERTIDUMBRE!

- La premisa del proyecto es de declarar el sitio del proyecto como \*NCO\*(neighborhood center residential overlay). NCO incluye que el lugar tiene que incluir facilidades para servicio a la comunidad y comerciales. Esta designación es la que parece permitir los edificios altos que se planea construir (6,9y 13 pisos).

- Está pareciera ser la primera vez que la ciudad de East Palo Alto aprobaría un proyecto de zona NCO. Pero el total de espacio comercial, que es apenas 5000 sq.ft. Y el espacio comunal de 3000 sq.ft. NO Ameritaria esa denominación que daría un mal ejemplo para futuros proyectos.

- por ejemplo la página 4-6 lista un proyecto similar de viviendas y comercios en la ciudad de San Mateo de 158 unidades multi familiares y 14,400 sq.ft. de espacio comercial vs 605 unidades y 5,000 sq.ft. en el actual proyecto Woodlad/Euclid.

Esto se traduce a 91.1 sq.ft comerciales/vivienda en San Mateo vs. 8.2 sq.ft.

Comerciales/vivienda en este proyecto. O 11.1x!!

El documento EIR se refiere a otros documentos que supuestamente se han presentando a la junta directiva de la ciudad, pero no incluye referencias para su estudio.

Por ejemplo

- El artículo 3-11 de la tabla 14-2 dice: the project has prepared a relocation (plan/report?) for the city approval consistent with this policy.

- El artículo 3.6.2 en la página 3-24 declara: Consistent with the ..., the applicant has prepared and submitted a Community Impact Report for the city review and consideration.

-NINGUNO DE ESTOS REPORTES O PLANES TIENEN DIRECTA REFERENCIA PARA QUE SEAN FÁCILMENTE UBICADOS POR LA COMUNIDAD.

- As the state in page 10-10 The Geotechnical Engineering study found that the project site is mapped in zone of very high liquefaction susceptibility. And ... the surface profile of the site generally consists of soil that are of medium high plasticity and have a moderately high potential for expansion.

- Give the recent history of the collapse condominium in surfside, FL and the continuing sinking of the Millenium tower in San Francisco,CA, the finding highlighted above would require that multiple experienced engineering firms all agree that buildings of these heights be constructed in the location.

- otros puntos importantes de estudio son

- Parking : la proporción de número de plazas de parqueo a apartamentos de 1:1 pararse muy baja ya que limita el número de plazas disponibles para visitantes. El reporte indica el número de habitantes promedio por apartamento, cuál es el actúa número de vehículos por apartamento?

- Odor/ Environmental / Utilities: No está claro si el lugar de recolección de basura y reciclaje (?) ilustrado en la figura 3-5 de la página 3-11 servirá a los 3 edificios y a 605 apartamentos. Parece ser muy pequeño y muy difícil para los inquilinos a llevar la basura individualmente a ese lugar, un análisis de odor de basura tendría que ser incluido en los capítulos 6,11,o 18.

- Almacenaje de bicicletas: igualmente, el número de espacios para almacenar bicicletas demostrando en la figura 3-5 parece ser muy pequeño para un total de 605 apartamentos

Nosotros como comité de vecinos & afectados del proyecto nos gustaría que la ciudad pudiera proporcionar toda la información en español por que la mayoría de los que posiblemente seremos afectados nuestra primera lengua es español esperamos tomen encuesta nuestro comentarios

Atentamente: Comité de vecinos de EPA.

**El Comite de Vecinos del Lado Oeste de East Palo Alto**

# Letter #11

**From:** [Eve P](#)  
**To:** [Woodland Euclid](#)  
**Subject:** Public Comment  
**Date:** Wednesday, September 15, 2021 9:58:28 PM

---

Hello,

I would like to comment on Woodland Park Communities proposal to build midrises on Euclid Avenue. I am a current resident of Woodland Park on Manhattan avenue and have lived here for about 3 years. The plan to build a neighbourhood community center and water tank within the new development is very exciting. Currently the children in the area do not have much to do and I think the community center would be a positive addition to the neighbourhood. I also like the idea of the water tank because my apartment and some of my neighbours have issues with foul smelling and discolored water. I am hoping that a new tank nearby would fix this problem for most of us.

11-1

A few things about the proposal worry me though. The density of the new building would be much higher and we already have a lot of traffic during rush hour. During the covid-19 shutdowns traffic was greatly reduced but now the number of cars and backups on Woodland Ave are returning to pre-pandemic levels. Some days it is nearly impossible to turn out of the driveway and onto Woodland to get to University Ave. With the addition of about 450 units in this immediate area I can only imagine traffic will be even worse. I hope there is a plan in place to address any possible increases in traffic and to maybe fix the light to the University Circle complex which contributes to the Woodland Avenue traffic backups.

11-2

I am also concerned about the trash in the area. Many apartments here are shared with a number of adults and children living in them. This living arrangement makes the apartments more affordable because they can split the rent but it also makes for overcrowded conditions that generate a lot of garbage. As it stands our dumpsters are overflowing by trash pick up day with garbage scattered on the ground in the parking lots. If more units are added, is there a realistic plan in place to increase trash pickup enough to account for the likely scenario of a large number of occupants sharing a single apartment .

11-3

My last concern as a current resident is that Woodland Park is building more apartments to increase revenue but has not presented a plan to re-invest into their existing properties. Please tour Woodland Park properties on either side of University avenue. I encourage anyone interested to walk these neighborhoods. Many of the buildings are in shambles. If Woodland Park Communities is going to increase their revenue from the additional leases they should be required to use the money to repair their other properties so that all of the residents can benefit. Many of the repairs I have had done to my apartment are only cosmetic and don't address the true issue because Woodland Park deems that too expensive. If Woodland Park will be making more money moving forward they should address the renters living conditions. The reviews for this community on Yelp and Google from residents are true and this project should put Woodland Park in a better position financially to truly repair problems and not just cover them up with quick fixes.

11-4

Thank you,

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# Letter #12

From: Mike Shah <mikecali453@gmail.com>

Sent: Wednesday, September 15, 2021 2:40 PM

To: Planning <planning@cityofepa.org>

Subject: WoodLandPark/Euclid Project please STOP this development project Inbox

Hi,

As a concerned resident, I'd like to **voice serious problems and flaws** with the WoodLandPark/Euclid Project regarding **space, parking, traffic, water, electricity and the community**.

12-1

**This project is not in favor of the community and should be STOPPED immediately.** The following are the reasons.

1. Developer wants to cram so many units for profit. This is clearly a bad approach for future residents, community and will **exacerbate** the population density, traffic, parking space, water, electricity etc.
2. The serious lack of parking spaces means this is NOT helping the community.
3. **Parking** is a VERY serious issue and all **streets are already OVER PACKED** with cars. Instead of **alleviating** the issue, the WoodLandPark/Euclid Project will make it very very **WORSE**. See streets of E O'Keefe, Euclid and Woodland st
4. Traffic is a serious issue and **streets are packed with cars**. Because parking and traffic are so linked, people randomly park on street where it is NOT allowed and **traffic becomes worse due to accidents** and possibly loss of **property and life. Our kids's lives are at stake here**.
5. 50 ft Water tower??? **NO No No, that is not a solution**. Not only will it reduce all **property values**, it will set an ugly precedent that **E Palo Alto city** only cares for profit and has compromised all moral values and uses old **outdated** methods instead of **modernizing** the city. We have facebook next to us. **A 50 ft water tower is NOT the answer**. Rules should not be **bended** or **broken**.
6. **Proper sewage is key** and building them is the developer's responsibility. E Palo Alto should not compromise and negotiate away all these key things. Rules are rules for a reason.
7. **Rules are rules for a reason. Negotiating** all these crucial rules and **bending** them to the will of developer is **NOT how democracy** works in E Palo Alto.
8. Say **NO to compromise** and bending Genuine rules for **Random for-profit** developers.
9. They should be building outdoor parks and recreation features instead of cramming this already over populated area with more cars and people.

12-2

12-3

12-4

12-5

12-6

12-7

12-8



# Letter #13

## Woodland Euclid EIR

- page 1-17: impact LU-3 that says: the project will cause the temporary relocation of a substantial number of people and housing units) has been marked as LESS SIGNIFICANT. Given the number of tenants affected and the duration of the project, this impact should be marked \* SIGNIFICANT \* **13-1**
- page 3-24: indicates that the plan may result in moving (assumed permanently) some or all of the rent controlled apartments to a third location. This paragraph should be made clearer either by giving more references or by explaining what the details are, as this option is not part of the 5 options presented in chapter 19 **13-2**
- Chapter 14: This chapter on page 14 targeting the effect on the population demonstrates that the analysis of how the effects on current tenants would be mitigated NEEDS MORE DETAILS AND MORE CONSIDERATION. For example, only the transit chapter contains 61 pages !! **13-3**
  - Table 14-2 still contains several statements that appear to be incorrect regarding guiding principle # 2 the project will increase affordable rental housing on the west side by providing 444 additional housing subject to the city's affordable housing requirement. **13-4**
  - It is with respect to ENVIRONMENTAL AND HOUSING POLICY 1.3: the project would expand the total quantity of income restricted affordable housing in the city. A mix of permanent income restricted housing and new rent-controlled housing is proposed to be consistent with policies that support both types. **13-5**
  - It is with respect to policy 1.11 the affordability plan as proposed would provide both inclusionary housing per city ordinance and rent stabilized unit's. **13-6**
  - THE COMPLETE TABLE 14-2 MUST BE REVIEWED!
- The premise of the project is to declare the project site as \* NCO \* (neighborhood center residential overlay). NCO includes that the site must include commercial and community service facilities. This designation is the one that seems to allow the tall buildings that are planned to be built (6.9 and 13 stories). **13-7**
  - This appears to be the first time the City of East Palo Alto would approve an NCO zone project. But the total retail space, which is barely 5000 sq. Ft. And the communal space of 3000 sq. Ft. It would NOT merit that denomination that would set a bad example for future projects.
  - For example, page 4-6 lists a similar housing and business project in the city of San Mateo of 158 multi-family units and 14,400 sq. ft. of commercial space vs 605 units and 5,000 sq. ft. in the current Woodland / Euclid project. **13-8**
  - This translates to 91.1 sq. Ft. Commercial / housing in San Mateo vs. 8.2 sq. Ft. Commercial / housing in this project. Or 11.1x !!
  - The EIR document refers to other documents that have supposedly been presented to the city board of directors, but does not include references for their study. **13-9**

- For instance, Item 3-11 in Table 14-2 says: the project has prepared a relocation (plan / report?) for the city approval consistent with this policy.
  - Article 3.6.2 on page 3-24 states: Consistent with the ..., the applicant has prepared and submitted a Community Impact Report for the city review and consideration.
- NONE OF THESE REPORTS OR PLANS HAVE DIRECT REFERENCE SO THAT THEY ARE EASILY LOCATED BY THE COMMUNITY. **13-9**
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  - Given the recent history of the collapsed condominiums in Surfside, FL and the continuing sinking of the Millennium Tower in San Francisco, CA, the findings highlighted above would require that multiple experienced engineering firms all agree that buildings of these heights be constructed in the location.
- Other important study points are:
  - Parking: the ratio of the number of parking spaces to apartments of 1:1 is very low since it limits the number of spaces available for visitors. The report indicates the average number of inhabitants per apartment, what is the number of vehicles per apartment? **13-11**
  - Odor / Environmental / Utilities: It is unclear if the garbage and recycling collection site (?) Illustrated in Figure 3-5 on page 3-11 will serve the 3 buildings and 605 apartments. It appears to be very small and very difficult for tenants to individually carry garbage to that location, a garbage odor analysis would have to be included in chapters 6, 11, or 18. **13-12**
  - Bicycle storage: likewise, the number of bicycle storage spaces shown in figure 3-5 seems to be very small for a total of 605 apartments **13-13**

We, as a committee of neighbors & affected by the project, would like the city to provide all the information in Spanish because most of those who may be affected, the first language is Spanish. **13-14**

We hope you may take our comments and concerns to be of importance.

Sincerely,  
EPA Neighborhood Committee

## Woodland Park Euclid Project

Mar Robbart <marrobbart@yahoo.com>

Wed 7/28/2021 8:22 AM

To: Art Henriques <ahenriques@cityofepa.org>

Dear Mr. Henriques,

Please tell me when entitlements are anticipated to be complete on this project.

I saw that the applicant is San Hill Property, please give me the name of the person there that you interact with on his project.

Thank you for your time, I look forward to your reply

Mar Robbart

**CAUTION:** This e-mail originated from outside of the organization. Do not click links or open attachments unless you validate the sender and know the content is safe.

14-1

# Letter #15

*Copy of Public Email Comments Regarding the Woodland Apartments Euclid Improvements Project*

Debbie Kelsey <debbiejkelsey@gmail.com>

Wed 7/7/2021 1:26 PM

To: Art Henriques

Mural 1.pdf

249 KB

Dear Mr. Henriques,

Please note my concerns below, as well as additional data on current vs proposed units, height, and parking, and my request to provide summarized information that allows for the public to more easily digest the information. I am resubmitting the information, to ensure it is included during the Public Review period. Thank you very much.

15-1

Warm regards,

Debbie Kelsey

----- Forwarded message -----

Dear Council Members,

As an owner at 480 E. O'Keefe Street, I agree with Brady's concerns, and would like to add additional items to consider:

- **Murals @ 2043 Euclid Avenue.** The Preliminary Historic Assessment Memorandum (Appendix C of the EIR) uses the criteria for historic resources, in noting that the buildings are not worthy of historic preservation, without any mention of the murals and with photographs (p 9) that do not display the murals fully. Please see the attached for an example of the murals on the buildings, a very empowering cultural depiction with a message of diversity and peace. To tear this down, and replace it with a sterile mixed residential/commercial complex is a classic example of gentrification.
- **Cultural Dilution & Gentrification.** After decades in the area, I hoped that wealth pouring into East Palo Alto would result in an eclectic showcase of cultural heritage and empowerment. Instead, I am seeing section after section replaced with sterile developments. Why not distinguish this development, by creating an intersection for culture and diversity? (eg, through art, architecture, types of businesses)(eg, if mural buildings must be torn down, preserve the murals and showcase in the park, with sculpture and empowering quotes and history)
- **High Rise Buildings, Parking & Traffic.** Brady's info below provides strong quantitative comparisons of current vs proposed. 13 stories is ludicrous, and does not match the

15-2

↓ 15-3

neighborhood, and will tower above even the Four Seasons complex. The parking provided is not sufficient. There should be sufficient parking for residents, visitors, and businesses. Most residents will require 1 or 2 parking spots, and the streets are already crowded with difficulty to find parking. The excess residents will create significant traffic congestion in the area.

15-3

- **Construction Impact - Inconvenience, Noise, Dust, Disruption.** During Covid, people are working from home. Noise will create a huge distraction and disruption for the neighborhood. Dust will require folks to keep windows closed, which are normally open for ventilation and cooling. We are in the building next door, creating an even bigger concern.

15-4

- **Sketches & summaries.** The information provided to the public should be specific and concise to communicate the proposed development as well as the key information in response to community concerns (eg, parking ratio, environmental impact, report findings/recommendations).

15-5

Please note that I had hoped to speak at the meeting next week. However, I have a meeting which I am unable to shift, and will not be available. Thank you for considering these comments, and hearing the voice of the community.

15-6

Warm regards,

Debbie Kelsey

650-315-6029

On Thu, Jun 24, 2021 at 10:19 AM J. Brady Barksdale <[jbbarksdale@gmail.com](mailto:jbbarksdale@gmail.com)> wrote:

Some things that immediately caught my eye are they are proposing a **275% increase in units with expectation of 1 parking space per unit.** I have to question even if they have shuttles and bus service and bike programs and everything else, cars are clearly going to outnumber the units by a factor of 2 to 1. In fact if anyone is familiar with the already overflowing parking situation of that area and EPA (where overnight parking is allowed) this would not nearly be enough parking to accommodate the increase in units. Also, if anyone can recall pre-Covid times, some mornings it took me several light cycles to get out of Willows to 101 going via Woodland. I actually timed myself at times and found it was easier to go through the Willows to the Willow Road onramp to get to 101 was faster than taking the University Avenue onramp.

15-7

- Current Total Residential Units 161 - PROPOSED: 605
- Current Height 1 to 4 stories - PROPOSED 13 stories (120 feet to roof level of tallest structure)
- Current Off-street Parking Stalls 155 - PROPOSED 625 (multi-level garage)

Jeff Leroux <[m.jeff.leroux@gmail.com](mailto:m.jeff.leroux@gmail.com)>

Sun 7/11/2021 4:56 AM

## 2.2 Master Responses

### 2.2.1 Master Response 1: Parking

Several general comments were made regarding the adequacy of the project's parking supply.

For purposes of public disclosure and information, parking supply and demand has not been included in the CEQA guidelines as an "environmental impact" with significance thresholds since 2010. The project's parking supply was not specifically analyzed in the EIR because parking is not recognized by CEQA as an environmental issue. The local inventory of on-street and off-street parking is an important issue to both the City and the neighborhood. Parking requirements and the adequacy of any proposed parking plan are addressed through the East Palo Alto Municipal Code and individual project review by City staff. In this case, construction of the internal parking structure is part of the project, and the construction of parking, as analyzed in this EIR, is treated in the overall assessment of construction-related effects.

The project's off street (internal) parking garage provides for 625 spaces, or slightly more than one space per residential apartment. The proposed mix of apartments is 71 percent studios and one bedroom units, 29 percent two bedroom units, and less than 1 percent proposed for three for four bedroom units. The City is aware that the parking spaces proposed are unique to the requested zoning amendment and do not reflect the existing parking requirements of the municipal code.

Comments describing existing on-street parking conditions are noted for the record. Existing parking conditions are not caused by the project. The project developer/owner is ultimately responsible for managing on-site parking operations and implementing measures or conditions of approval required by the City (including a Transportation Demand Management [TDM] program) to reduce the project's private vehicle parking demand in this urban environment.

### 2.2.2 Master Response 2: Project Size, Scale and Aesthetics

Several comment letters addressed the project's general size, scale and density. These comments are collectively responded to below.

#### Analysis Methods and CEQA Standards

As noted on page 5-15 of the Draft EIR, the thresholds of (impact) significance for Aesthetics utilize the CEQA Guidelines. Using this criteria, a project's impacts would be considered significant if they would:

- Cause a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.
- Substantially degrade the existing visual character, coastal scenic resources, or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage points.)



- In an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
- Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

While CEQA provides no specific technical standard or guidance to Lead Agencies in answering these questions, the impact assessment methodology is described on page 5-16 of the Draft EIR. This discussion acknowledges that the degree of impact or what may be considered an “adverse” change may be subjective. For this reason, the Draft EIR uses pre- and post-project imagery in the form of simulations and elevation drawings prepared by a licensed architect to illustrate the potential visual changes in the environment for public review and comment. The methods and images utilized in order to draw conclusions of significance represent standard industry practice for CEQA documents.

Caltrans and federal agencies such as the Federal Highway Administration use several standardized Visual Impact Assessment (VIA) tools<sup>1</sup> to conduct impact assessments on State transportation projects. The Woodland Park Euclid Improvements Project is not located directly on a State facility, does not impact a State Scenic Highway, and is not subject to the analysis requirements of the National Environmental Policy Act (NEPA) and therefore is not subject to those standards. The Draft EIR does, however, use much of the same basic Caltrans methodology in terms of establishing viewer sensitivity, documenting visual changes, viewer concern and other factors.

The public is included in this review process through public review of the Draft EIR, ability to comment, and invitation to provide localized opinion with respect to the project’s relationship to its surroundings and community character. The EIR serves as a public disclosure document used to explain and disclose a project’s potential effects on the environment.

In terms of disclosure, it should be noted Impact AES-2 (Draft EIR page 5-17) identifies that the project would change the underlying zoning (regarding density), allowing intensification of residential land uses. The Draft EIR identifies this change and resulting aesthetic impact related to the unavoidable change in community character as a significant and unavoidable environmental effect of the project.

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<sup>1</sup> <https://dot.ca.gov/programs/design/lap-visual-impact-assessment>

## 2.3 Individual Responses to Comments

### 2.3.1 Response to Letter 1: State Water Boards, Lori Schmitz, Environmental Scientist

- 1-1 Factual Information Regarding Proposed Project: The comment describes the water tank infrastructure proposed by the project and identifies the permitting authority of the State Water Boards for certain types of new or amended water supply projects. Comments are noted for the record. Please see related information below.
- 1-2 Ownership of Proposed Storage Reservoir: The proposed storage reservoir infrastructure would be owned and controlled by the City of East Palo Alto (East Palo Alto Water). As of June 1, 2020, the City contracts with Veolia North American to operate and maintain the City's water distribution system and the storage reservoir would belong to this water system. The proposed water tank meets the definition of a distribution reservoir per CCR 64551.10 because it would be a tank located within and connected to the distribution system and used to store treated/finished drinking water. The tank meets this definition even though the primary purpose of the stored water is for water sustainability, safety and fire flow.
- 1-3 Water System Permitting Requirements: Should the water tank require a water supply permit amendment from the State Water Board, the City understands that applications and all related materials would need to be submitted to the State Water Board for review and approval. These requirements do not affect the environmental analysis or conclusions within the Draft EIR.
- 1-4 Water Storage Tank Need and Function: The comment requests additional information regarding the need for the proposed water storage tank. The City of East Palo Alto Ten-Year Capital Improvement Program Update (adopted by the City Council on September 15, 2020) identifies a series of needed water storage and distribution projects over the next decade, as well as future year projects. This list of projects (see link to the CIP document below) includes new water storage tanks on the east and west sides of US Highway 101. Project WS-03B is the tank west of the highway. As described in the CIP:

*"This project will involve the construction of a new storage tank with the capacity to meet emergency supply needs for the current and anticipated future population of the City. The City currently does not have any water storage facilities. The Water System Master Plan indicates that 3.8 million gallons of water is adequate to meet the needs of the City....The facility would include all necessary piping, the reservoir, and the pump station to return the water to the property system pressure."*

The proposed 1.5-million-gallon tank represents approximately one half of the necessary water supply storage identified in the Water System Master Plan. As indicated by the description and the Master Plan, the reservoir is for water supply security, sustainability and fire safety. This description is consistent with page 18-12 of the Draft EIR.

[https://www.cityofepa.org/sites/default/files/fileattachments/public\\_works/page/3451/proposed\\_ten-year\\_capital\\_improvement\\_program\\_and\\_fy2020-2021\\_capital\\_budget.pdf](https://www.cityofepa.org/sites/default/files/fileattachments/public_works/page/3451/proposed_ten-year_capital_improvement_program_and_fy2020-2021_capital_budget.pdf)

1-5 Request for Information: Documents requested by the State Water Board, Santa Clara District Office, will be provided following EIR certification and project approval.

### **2.3.2 Response to Letter 2: East Palo Alto Sanitary District, Akin Okupe, General Manager**

2-1 Sewer System Capacity: Comments from the District simply state that the District does not have the capacity to serve the project. Comments are noted. The analysis of sewer system capacity is detailed in Chapter 18 of the Draft EIR, which finds a significant and unavoidable impact.

### **2.3.3 Response to Letter 3: Palo Alto Park Mutual Water Company, Niambi K.V. Lincoln, General Manager**

3-1 Water Tank Location and PAPMWC Boundaries: The proposed water tank location relative to the PAPMWC boundaries is noted. With respect to the analysis of the water tank, each chapter of the Draft EIR considers the potential environmental effects of constructing the water tank at the 375 Donohoe location. For example, Chapter 5 (Aesthetics) provides a detailed analysis and ultimately requires mitigation to visually screen the tank (pages 5-17 and 5-18). Chapter 7, Biological Resources, considers the impacts of tree removal at the tank site (page 7-8). The tank site and the potential effects of construction and operation of the reservoir is considered throughout the document.

3-2 Water Tank Location and Graphics: With respect to the water tank site location, the site is identified in Chapter 3, Project Description, on page 3-20. Figure 3-13 shows the tank location and general site layout. However, for clarity and context, please see the attached figure (Attachment 1) that shows the water tank site relative to the primary project area. PAPMWC boundaries, as mapped and provided in the comments, are included in this Final EIR and are therefore included in the record for the final environmental document.

3-3 Environmental Effects of Proposed Water Tank: Please see response 3-1 above regarding the potential environmental effects of the water tank and the analysis

included in the Draft EIR. Draft EIR page 5-17 identifies that the proposed tank has a diameter of 80 feet and a height of approximately 50 feet. Page 18-12 of the Draft EIR discloses the potential environmental effects of tank construction. The Draft EIR acknowledges that the introduction of the tank into the neighborhood represents a potentially significant environmental effect. Fencing and vegetation is required as mitigation to soften visual effects, and measures to address short term construction impacts are identified. The request for additional views are noted; however, the Draft EIR adequately discloses potential aesthetic effects.

- 3-4 Water Supply Analysis: Comments regarding water supply and the utility analysis are noted. The Draft EIR was prepared following the Notice of Preparation in April 2020, and is based on the circumstances, documents and materials available at that time, consistent with CEQA. The May 2021 Draft Urban Water Management Plan (UWMP) was being prepared at the same time the Draft EIR was being prepared, and its findings were not available until the EIR was being readied for public release. As documented on page 18-14, and as noted in the references on page 18-19, the Draft EIR cites the City's Water Safety Strategy Blueprint and Bay Area Water Supply and Conservation Agency data to reach conclusions regarding long term water supply. The analysis also cites the 2015 UWMP, as well as information from the July 2017 City Manager's Update regarding the state of the City's water system presented by the Director of Public Works. It should be noted that while a UWMP provides useful information there is no requirement under CEQA that an EIR consider a UWMP to draw conclusions.

In response to this comment, staff reviewed the Final 2020 Urban Water Management Plan (UWMP, June 2021). The UWMP documents that East Palo Alto has purchased and used less than 50% of its individual supply guarantee (ISG) of 3.46 million gallons per day (MGD) from 2018 through 2020. This fact is attributable to the City's recently expanded guarantees from the cities of Palo Alto and Mountain View, as well as the City's successful water conservation effort.

Chapter 7 of the UWMP addresses water service reliability and drought risk assessment, considering future growth in the City. This assessment describes several scenarios that could result in shortfalls in multiple dry years through year 2045. Many of these scenarios are considered worst case predictions involving several factors that are beyond the control of the City, such as the implementation of the Bay-Delta Plan Amendment. All future water scenarios for Bay Area communities are predictions, with a high level of uncertainty.

As part of the supply reliability analysis, East Palo Alto has conducted a Drought Risk Assessment (DRA), which evaluates the effects on available water supply sources of an assumed five-year drought commencing the year after the assessment is completed (i.e., from 2021 through 2025). East Palo Alto's supply is expected to be sufficient to meet demands in the first two years of the assumed drought (i.e., 2021 and 2022). However, based on the current allocation methodology and San Francisco Public Utilities

Commission (SFPUC) dry year cutbacks, East Palo Alto could experience shortfalls in subsequent years of the assumed drought through 2025. The largest shortfall is estimated to be 351 MG in 2025. It should be noted that both the 2015 and 2020 UWMP identify the potential for drought risk.

To address these uncertainties and to plan for the potential for water supply shortfalls locally, the City has prepared a Water Shortage Contingency Plan (WSCP, UWMP Appendix J) to address water shortage conditions resulting from any cause (e.g., droughts, impacted distribution system infrastructure, regulatory-imposed shortage restrictions, etc.). The WSCP identifies a variety of actions that East Palo Alto will implement to reduce demands and further ensure supply reliability at various levels of water shortage. These contingency plans and response actions include operational changes, the use of emergency groundwater from City wells (Gloria Way and Pad D), conservation measures, voluntary and mandatory restrictions, and water waste patrols. Under various shortage scenarios (shortage levels 1 through 6), the City has estimated that the shortage gap could be reduced from five percent to 55 percent with implementation of these measures. This level of water savings would effectively address multi-year shortage scenarios. As such, the conclusions of the EIR remain unchanged, and there is no significant new information in the 2020 UWMP that would cause recirculation of the Draft EIR under CEQA Guidelines Section 15088.5(a). Recirculation is not required where, as here, information added to the EIR merely clarifies, amplifies or makes insignificant modifications to an adequate EIR.

#### 2.3.4 Response to Letter 4: Eve Sutton

4-1 Telecommunications Service: Chapter 18 of the Draft EIR (page 18-4) notes that ATT is the local telecommunications provider. As noted on page 18-10, City policy requires new development to install and ensure compatibility with the most up to date and established broadband and telecommunications technology, including fiber optic infrastructure. Based on CEQA standards and thresholds of significance, a project could have a significant environmental impact if it requires construction to connect or upgrade existing systems.

In this case the project can only construct facilities to be compatible and to receive upgraded connections if and when they are available. However, it is up to the utility, ATT, to actually provide the service and technology. The City agrees that upgrades to any service should be coordinated with project construction to take advantage of street closures and other utility installations to the greatest degree possible. The project will not, however, result in significant impacts from the construction of telecommunications facilities. The potential impacts of all aspects of the project, including planning to receive upgraded systems, have been analyzed within the context of “construction impacts” throughout the Draft EIR.

### 2.3.5 Response to Letter 5: Andy (no last name provided), EPA Resident (via email)

- 5-1 General Environmental Concerns: The comments provide a clip showing the potentially significant effects of the project from the published Notice of Availability (NOA). General concerns are noted for the record.
- 5-2 Project Height and Scale: Comments regarding the height of the project are also noted for the record. Chapter 5 of the Draft EIR (Aesthetics) provides an analysis of the aesthetic and visual changes that could result from project implementation. The Draft EIR concludes that such aesthetic effects from intensification would be considered an unavoidable consequence of the project as proposed. See also Master Response 2 regarding building heights and aesthetics.
- 5-3 Parking Supply: With respect to parking, please see Master Response 1.

### 2.3.6 Response to Letter 6: Jeff Leroux

- 6-1 Parking Supply: The comments provided address local parking supply. Please see Master Response 1.

### 2.3.7 Response to Letter 7: Debbie Kelsey

- 7-1 Construction Timing and Effects: This comment asked several questions regarding construction. As noted on page 3-25 of the Draft EIR, construction is expected to take 18-24 months, with demolition, grading and excavation expected to last four to six months. This initial period would result in the most noticeable temporary construction effects locally. If the project is approved in early 2022, construction could be expected to begin in early 2023 once all final plans and agreements are completed and permits issued.

The estimated construction schedule outlined in the Draft EIR is based on input from the developer. Methods to accelerate the schedule are outside of the scope of the EIR. Several requirements (conditions of approval, mitigation measures, and policies) would be placed upon the project to address temporary construction effects. These include hours of construction, dust abatement, traffic management and visual screening. These measures are identified throughout the Draft EIR.

- 7-2 Traffic and Parking: With respect to traffic, please see Chapter 17 (Transportation and Circulation) of the Draft EIR which contains a thorough analysis of vehicle miles travelled (VMT) as required by CEQA, as well as an operations (congestion) analysis. This latter analysis is not required by CEQA but included in the report for informational purposes. Regarding parking, please see Master Response 1.



- 7-3 Community Input: Comments relative to community collaboration and feedback are important to the project review process but no specific environmental comments on the Draft EIR are provided. Public comments provided to the City during public review must be responded to in writing in this Final EIR.
- 7-4 Murals/Cultural Issues: The building located at 2043 Euclid Avenue was reviewed for historic importance within the Preliminary Historic Assessment Memorandum prepared for the Draft EIR, included as Draft EIR Appendix C. That assessment evaluated the structure against CEQA thresholds and Secretary of the Interior's standards for historic importance. Based on these criteria, the structure did not meet these significance standards. The murals, while unique and vibrant, are modern and do not factor into the historic significance of the structure, which is the applicable CEQA inquiry. Regardless of one's viewpoint and definition of gentrification and cultural representation, this issue is not subject to review under CEQA. Recommendations for more art showcasing the area's cultural diversity are noted for the record.
- 7-5 Building Heights: Please see Master Response 2.
- 7-6 Parking: Please see Master Response 1.
- 7-7 Traffic: Please see response to comment 7-2.
- 7-8 Construction Impacts: The potential environmental effects of construction activity are disclosed and analyzed throughout each chapter of the Draft EIR. Chapter 6 (Air Quality), Chapter 11 (Greenhouse Gas Emissions), Chapter 15 (Noise and Vibration) quantify these temporary, potentially significant effects and mitigation measures and standard conditions of approval have been identified to fully mitigate the effects of dust, noise and greenhouse gasses. Please also see response to comment 7-1 regarding this issue.

### **2.3.8 Response to Letter 8: Chris and Bereniki Emerson**

- 8-1 Project Scale and Aesthetics: Comments regarding the scale of the project are noted for the record. Chapter 5 of the Draft EIR (Aesthetics) contains a thorough analysis of the aesthetic and visual changes that could result from project implementation. The Draft EIR concludes that such aesthetic effects from intensification would be considered an unavoidable consequence of the project as proposed. See Master Response 2 regarding building heights, density and aesthetics.
- 8-2 General Environmental Concerns: This comment points out a list of general environmental concerns. Regarding traffic and congestion, Chapter 17 of the Draft EIR (Traffic and Circulation) discloses traffic and circulation impacts that could be caused by project implementation. Regarding parking, please see Master Response 1. Regarding congestion, please see response to Comment 7-2. See also response to Comment 7-8 regarding construction effects, as well as Chapter 6 of the Draft EIR (Air Quality) for a

thorough analysis of the air quality impacts that could result from project implementation.

- 8-3 General Comment: General comments about environmental impacts and opposition to the project are noted for the record. Please see Master Response 2 regarding project scale. Please see Chapter 18 of the Draft EIR (Utilities and Service Systems) for a thorough analysis on the existing service systems in the affected area. The analysis identifies and analyzes potential environmental impacts associated with the expansion or construction of those systems, and recommends measures to properly reduce or avoid adverse impacts anticipated from project construction and operation.
- 8-4 General Comment: General comments about environmental impacts and opposition to the project are noted for the record. Please see Master Response 1 and Master Response 2 regarding parking and project scale, respectively.
- 8-5 Park/Open Space: The comment points out the proposed corner park at the corner of O' Connor Street and Euclid Avenue as open space. This area would be Publicly Accessible/Usable Open Space that would be accessible to future residents and the community at large. As disclosed in Chapter 16 of the Draft EIR (Public Services and Recreation), this proposed use would contribute towards the larger park and public benefit goals (Goal W-8) outlined in the Westside Area Plan.
- 8-6 Traffic and Circulation: General comments about existing traffic and circulation in the project area are noted for the record. Please see Chapter 17 of the Draft EIR (Transportation and Circulation) for a thorough analysis of study intersections on Willow Road and on University Avenue. Specifically, Table 17-3 (page 17-31) of the Draft EIR summarizes the potential operational effects of the project at the Willow Road and University Avenue interchanges with US 101. See also response to Comment 7-2 regarding traffic and parking.
- 8-7 Parking Concerns: Please see Master Response 1 regarding parking requirements.
- 8-8 General Comments: General comments about environmental impacts regarding visual quality and privacy are noted. Chapter 5 of the Draft EIR (Aesthetics) provides an analysis of the aesthetic and visual changes that could result from project implementation. The Draft EIR concludes that such aesthetic effects from intensification would be considered an unavoidable consequence of the project as proposed. With respect to shade and sunlight (shadow), the Draft EIR beginning on page 5-19 provides a shadow study with images of future project conditions. The Draft EIR analysis concludes that shadow on adjacent residential areas would be most pronounced in the early morning. The Draft EIR notes that while shadow and shade are not significance thresholds under CEQA, it is a factor related to overall visual character or quality and as such this analysis has been included. See also Master Response 2 regarding building heights and aesthetics. Chapter

15 of the Draft EIR (Noise and Vibration) provides an analysis of the potential noise effects that could result from project implementation.

- 8-9 Project Size and Scope: General comments about the project's general size and scale and opposition to the project are noted for the record. Please see Master Response 2.
- 8-10 Replacement of Older Buildings: Comments regarding the replacement of older buildings is noted. Chapter 8 of the Draft EIR (Cultural Resources) fully discloses the local, State, and federal regulations that are required to be considered for the rehabilitation, preservation, and restoration of structures deemed by any level of government as having importance to the history, architecture, or culture of an area. The City understands replacement of structures that are over 50 years after construction are required to go through proper historic evaluation. A qualified historian was hired to prepare a historic evaluation of the four oldest structures on site to determine any distinguishable elements that would categorize them as historic. The four properties were found not to have distinguishable elements that would categorize them as historic.
- 8-11 General Comment: General comments about environmental impacts and opposition to the project are noted for the record.

### 2.3.9 Response to Letter 9: Gabriel and Claudia Auxier

- 9-1 Summary of Concerns. List of primary concerns are noted. Each is responded to below.
- 9-2 Parking Concerns. Please see Master Response 1 regarding this issue.
- 9-3 Traffic at Highway On-Ramps and Intersections. Comments regarding additional traffic volumes on the larger roadway network are noted. Chapter 17 of the Draft EIR includes a comprehensive analysis of existing, existing plus project and cumulative traffic scenarios, including operational analysis at freeway ramps. This analysis was provided for informational purposes, as the current standard for evaluating traffic under the California Environmental Quality Act (CEQA) is Vehicle Miles Travelled (VMT), not congestion. The Draft EIR also evaluates the project's VMT against City thresholds.
- 9-4 Existing High-Speed Traffic on Local Roadways. The comment recommends that the City plan for enhanced vehicle, pedestrian and bicycle safety in the neighborhood. The comments provide anecdotal information regarding existing vehicle speeds and hazards. Comments are noted, and established speed limits for Bay Road and Donohoe Street are identified on page 17-4 of the Draft EIR. Page 3-16 of the Draft EIR identifies that the project will be providing pedestrian access and perimeter sidewalks around the project, high visibility crosswalks, and bulbouts. Chapter 17, page 17-27 (Mitigation Measure TRA 2.1) also requires traffic calming measures at Bayshore Road/Manhattan Avenue adjacent to the project, to reduce traffic speeds near the project's main entrance. The comments describe existing observations of traffic along Bay Road and Donohoe Street,

on the east side of US 101. While the project will contribute traffic trips to these facilities, additional trips do not translate to a speed or safety hazard associated with the project. Outside of the CEQA review process, the project will be required to pay fair share fees toward citywide traffic improvements.

- 9-5 Visual Effect of Proposed Water Tank. The potentially significant aesthetic effect of the water tank is analyzed on pages 5-17 and 5-18 of the Draft EIR. Mitigation Measure MM AES 2.2 requires appropriate screening during construction, as well as long term screening consisting of a combination of fencing and vegetation. All plans are required to be submitted to the City for review and approval.
- 9-6 Public Park Space. Parks and recreational facilities are addressed in Chapter 16 of the Draft EIR, pages 16-9 and 16-10. The Draft EIR acknowledges the challenges of meeting ratios for park space due to limited available land area and higher densities in East Palo Alto. It should be noted that the thresholds for environmental impacts related to park and recreational facilities focus on the potential deterioration of existing facilities, and/or the impacts from construction of new facilities, that may be caused by a project. While the project would provide the 9,533 square foot corner park and other publicly accessible open space totaling 27,666 square feet, the Draft EIR also identifies city plans for additional park space south of University Avenue, consistent with the Westside Area Plan. The “pop-up” park mentioned in the comments included temporary improvements and has not been dedicated as permanent park space. The grouping of parcels in that location could support both the proposed water tank and informal park, should the City and property owner decide to do so.
- 9-7 Closing comments. Closing comments regarding the planning for long term improvements for the neighborhood are noted for the record.

### **2.3.10A Response to Letter 10A: EPA Neighborhood Committee**

- 10-1 Temporary Relocation Plan. Page 14-8 of the Draft EIR provides the supporting analysis for Impact LU-3. The analysis explains that the project’s relocation plan would allow existing residents to relocate to a comparable apartment within Woodland Park, with a right to return to a new, rent stabilized unit once constructed. With implementation of this plan and construction of replacement housing as part of the project, the temporary relocation would not result in a significant impact based on CEQA thresholds.
- 10-2 Temporary Relocation. Page 3-24 and 14-8 of the Draft EIR describe the tenant relocation plan proposed as part of the project. Page 3-24 discloses that current tenants of the existing rent-stabilized apartments would have a right to relocate to a replacement apartment of the same size within the Woodland Park Westside neighborhood during project construction. Following construction, those tenants would have a right to return to a newly constructed apartment within the new project. There is

- no “third location” proposed for rent-stabilized units. With respect to the reference to Chapter 19 (Project Alternatives), that chapter is an analysis required by CEQA to evaluate feasible alternatives that could reduce or eliminate environmental impacts. As the temporary relocation plan does not result in environmental impacts, there is not an alternative needed to address that issue. Please also see response to Comment 10-1.
- 10-3 Draft EIR Chapter 14 (Land Use, Population and Housing). Chapter 14 of the Draft EIR addresses potential environmental effects based on CEQA thresholds of significance. These thresholds, or significance criteria, are listed on page 14-5 of the Draft EIR. The analysis in this section focuses on this criterion. Comment regarding the need for additional detail is noted for the record. Regarding Table 14-2, please note that the numbering of policies has been updated in the Errata to reflect the numbering in the final, adopted General Plan. However, the comments in this letter appear to track the numbering sequence as presented in the Draft EIR and are responded to accordingly.
- 10-4 Table 14-2/Guiding Principle 2. Guiding Principle 2 of the West Side Area Plan calls for affordable housing on the West Side. The table simply notes that the project will provide more affordable housing compared to existing conditions. Comments also suggest disagreement with the consistency analysis in Table 14-2. While general disagreement with Table 14-2 does not raise specific environmental issues addressed in the Draft EIR, additional responses are provided below.
- 10-5 Policy 1.3. Policy 1.3 of the West Side Area Plan calls for more income-restricted housing on the West Side. The table simply notes that the project will provide more affordable housing within the City compared to existing conditions.
- 10-6 Policy 1.11. Policy 1.11 of the West Side Area Plan calls for a mix of housing affordability levels, and the development of new housing that will provide more diversity in the type, size, and level of affordability. The table simply notes that the project would provide a mix of rent stabilized, off-site inclusionary, and market rate housing consistent with this policy.
- 10-7 Neighborhood Center Residential Overlay (NCO). Comments regarding the proposed NCO designation and proposed mix of land uses are noted for the record. The Draft EIR provides an environmental evaluation of the project as proposed. The comment does not raise specific environmental concerns.
- 10-8 Mix of Land Uses. Comments regarding the mix of proposed land uses are noted for the record. The projects listed on page 4-6 of the Draft EIR establish the cumulative projects evaluated in the Draft EIR.
- 10-9 Reference to Other Documents. The documents noted in the comment were submitted with the project’s original application in September 2019. The application contained a Tenant Protection and Community Housing Preservation Plan, Community Impact

Report and Fiscal Impact Analysis, and Community Involvement Strategy, among other documents. It should be noted that the applicant continues to work with the City on the affordable housing plan. The Draft EIR (pages 3-24 and 3-25) identifies these documents as part of the project, but also acknowledge that these parallel efforts have limited influence on the environmental review. Project information can be found on the city's website, located here:

<https://www.cityofepa.org/planning/project/woodland-park-euclid-improvements-general-plan-amendment-zoning-amendment-and>

- 10-10 **Geology and Soils.** Comments regarding the findings of the project's preliminary geotechnical investigation and information about other projects is noted for the record. Draft EIR page 10-11 includes Mitigation Measure MM GEO-5.1 that requires a construction-level geotechnical evaluation to address any geologic or soil related constraints. All projects, including Woodland Park Euclid Improvements, must conform to all established regulations and building codes.
- 10-11 **Parking.** Please see Master Response 1.
- 10-12 **Odor and Proposed Trash Areas.** Project operations and maintenance would be maintained by Woodland Park Communities as disclosed on pages 3-25 and 3-26 of Chapter 3 (Project Description) in the Draft EIR. The project site plan also identifies trash collection areas in each of the three buildings. All trash collection areas must be serviceable from the street and designed to meet requirements of the Municipal Code. Code compliance addresses trash area placement serve to control odor and other nuisances related to trash areas.
- 10-13 **Bicycle Storage.** Bicycle storage areas and lockers are designed into the project to promote convenient bicycle riding as an alternative mode of transportation. Bicycle parking and storage areas are also provided pursuant to the Municipal Code (Section 18.30.120).
- 10-14 **Comments in Spanish.** The City appreciates the EPA Neighborhood Committee providing these comments in Spanish. See response to Letter 10B below. CEQA does not require an EIR and related documents to be provided in multiple languages.

### **2.3.10B Response to Letter 10B: El Comité' de Vecinos del Lado Oeste de East Palo Alto**

This letter provides the comments of Letter 10A in Spanish. Please see responses to Letter 10A.



### 2.3.11 Response to Letter 11: Evelyn Parnell

- 11-1 Community Center and Water Tank: Introductory comments regarding support for the proposed community center and water tank are noted for the record.
- 11-2 Traffic: With respect to traffic, please see Chapter 17 (Transportation and Circulation) of the Draft EIR which contains a thorough analysis of existing traffic conditions as well as an operations (congestion) analysis. The commentor raises the suggestion to fix the light to the University Circle complex which contributes to the Woodland Avenue traffic backup. Woodland Avenue/University Circle (Intersection #18) is an intersection of study in Chapter 17 of the Draft EIR. This intersection was found to operate at an unacceptable LOS without the project. With the addition of the project, the intersection was found to increase delay by 4 seconds. However, with implementation of the recommended roadway improvements identified on page 17-48 of Chapter 17 of the Draft EIR, LOS at this intersection would improve to an acceptable LOS or to better than pre-project conditions.
- 11-3 Trash: Please see response to comment 10-12. Project operations and maintenance would be maintained by Woodland Park Communities and is disclosed on pages 3-25 and 3-26 of Chapter 3 (Project Description) in the Draft EIR. However, general maintenance of the residential and commercial spaces during project operations is not an environmental issue subject to review under CEQA. Therefore, no further response is necessary.
- 11-4 Revenue: The Draft EIR analyzes the project as proposed. Issues regarding potential revenue are noted but not related to the content and environmental analysis of the Draft EIR.

### 2.3.12 Response to Letter 12: Mike Shah

- 12-1 Summary of concerns: General comments about environmental impacts and opposition to the project are noted for the record. List of primary concerns are noted and are addressed below.
- 12-2 General Comment: General comments about environmental impacts regarding population density, traffic, parking space, water, and electricity are noted for the record. Please see Chapter 14 (Land Use, Population and Housing), Chapter 17 (Transportation and Circulation), Chapter 18 (Utilities and Service Systems) for thorough discussions on these concerns. See Master Response 1 regarding parking.
- 12-3 Parking: Please see Master Response 1 regarding parking.

- 12-4 Parking and Traffic: Please see Master Response 1 regarding parking. Regarding traffic, Chapter 17 (Transportation and Circulation) of the Draft EIR provides a comprehensive evaluation of traffic operations.
- 12-5 Water Tank: The comment describes the water tank infrastructure proposed by the project and suggests that the tank reduce property values. Property values are not subject of review with the Draft EIR. The potential environmental effects of the proposed water tank are evaluated throughout the Draft EIR.
- 12-6 Sewage: General comments regarding adequate wastewater services are noted. Please see Chapter 18 (Utilities and Service Systems) for a detailed discussion on wastewater capacity, conveyance, and treatment.
- 12-7 General Comment: General comments regarding compliance with rules/regulations are noted for the record.
- 12-8 Outdoor Parks and Recreation: The comment suggests that outdoor parks and recreation features should be built instead of populating the area with more cars and people. The project proposes a corner park at the corner of O' Connor Street and Euclid Avenue as open space. This area would be Publicly Accessible/Usable Open Space that would be accessible to future residents and the community at large. As disclosed in Chapter 16 of the Draft EIR (Public Services and Recreation), this proposed use would contribute towards the larger park and public benefit goals (Goal W-8) outlined in the Westside Area Plan.

### **2.3.13 Response to Letter 13: Marisela Ramos**

- 13-1 This letter is a duplicate of Letter 10A. Please see responses to Letter 10A.

### **2.3.14 Response to Letter 14: Mar Robbart**

- 14-1 This comment requests information regarding the timing of project entitlements and requests contact information for the applicant. Action on the project that could result in entitlements is expected in 2022. The applicant's contact information is not the subject of the EIR or environmental review. The commenter can contact the Planning Division or review the application materials on line.

### **2.3.15 Response to Letter 15: Debbie Kelsey/Brady Barksdale**

- 15-1 Additional comments submitted by the commenter are noted. Please see specific responses below.

- 15-2 Comments regarding murals and cultural issues are repeated from previous comments. Please see response to Comment 7-4.
- 15-3 With respect to building heights, please see Master Response 2. Regarding parking ratios, please see Master Response 1.
- 15-4 Comment regarding construction effects is repeated from previous comments. Please see response to Comment 7-8.
- 15-5 The comment requests that information made available to the public be specific and concise. The Draft EIR (Chapter 3, Project Description) provides a clear and concise description of the proposed project, including narrative text and images. This Final EIR also responds to comments and concerns raised through the public review process.
- 15-6 General closing comments are noted for the record.
- 15-7 Comments (via email attachment from Brady Barksdale) address parking and congestion. Please see Master Response 1 regarding parking. The Draft EIR Project Description (page 3-16) also discusses the project's proposed Transportation Demand Management (TDM) program that is intended to identify alternative transportation options for residents to reduce vehicle trips. Please note that traffic congestion (level of service) is no longer the standard of review under CEQA. Congestion is addressed for informational purposes within Chapter 17 of the Draft EIR. Other project details noted in the comment are consistent with the Project Description.

### **2.3.16 Response to Comments Received at the Planning Commission Meeting of July 26, 2021**

#### **Summary of Comments**

The Planning Commission met on the evening of July 26, 2021 to hold a public hearing and receive public comments on the Draft EIR. Several comments were made (and questions asked) by both members of the public and individual Commissions. Most of these comments and questions, however, addressed issues unrelated to the environmental analysis contained within the Draft EIR. The following summary of comments addresses only those issues relevant to the environmental review.

The Draft EIR was originally scheduled to conclude public review on August 15, 2021. The Commission ultimately moved to extend the review period to September 26, 2021.

Commissioner Garcia – What is the trigger for population and housing impacts? The Draft EIR uses the CEQA Guidelines Appendix G (checklist) as guidance for establishing thresholds of significance. These thresholds ask if a project would induce substantial unplanned growth, either directly or indirectly, or displace substantial numbers of existing people or housing that

would necessitate the construction of housing elsewhere. These issues and potential effects of the project are addressed in detail within Chapter 14 of the Draft EIR.

Commissioner Mashack – Would any of the alternatives to the project reduce significant unavoidable impacts? Page 19-13 of the Draft EIR explains that Alternative D, with a sewer connection to WBSD, would be environmentally superior as it would avoid an otherwise unavoidable effect caused by existing EPASD sewer system constraints. The other alternatives have some environmental benefits and could reduce the severity of impacts; however, they would not reduce those impacts to a less than significant level.

Commissioner Fisk – Water tank height and purpose? Responses to Letter 1 and Letter 3 contain detailed responses regarding the characteristics of the proposed reservoir (tank), design (height) and its operations. Please refer to responses to those letters.

Commissioner Garcia and Chair Hernandez – Would there be environmental impacts if the project were connected to West Bay Sanitary District? The potential effects of this alternative connection are explained in the analysis of Alternative D, beginning on page 19-10 of the Draft EIR. As explained by staff at the hearing, both the project as proposed and Alternative D would require the construction of physical infrastructure and both could expect construction-related effects. Construction of sewer infrastructure within public roadways often requires a temporary traffic management plan. Sewer connections under U.S. 101 are feasible and currently exist. Any future proposal to extend infrastructure near the highway would require an encroachment permit from Caltrans.

Commissioner Garcia – General question about traffic mitigation. Chapter 17 of the Draft EIR contains an evaluation of vehicle miles travelled (VMT) which is the current standard of review under CEQA. Chapter 17 also contains extensive analysis of the project's potential operational effects for informational and planning purposes and identifies planned improvements throughout the City's roadway system.

Commissioners Garcia and Brown-Austin – Questions regarding the ownership of the water tank parcel and relationship to the pop-up park. As noted verbally by staff during the hearing, the proposed water tank location is owned by the project applicant. Similarly, the temporary "pop up" park parcel is also owned by the applicant. The Draft EIR (Mitigation Measure MM AES-2.2) requires visual screening of the tank if constructed in that location.

Chair Hernandez – Noted that this was one of the few areas in the City supporting larger canopy trees (near the creek) and stated a preference for keeping larger trees. As disclosed on page 7-10 of the Draft EIR the project proposes removal of 26 trees but would preserve 45 trees on the site. The project is required to comply with the Municipal Code and conditions of the requested Tree Removal Permit, which generally requires replanting of trees to mitigate the impact. San Francisquito Creek is located approximately 0.15 mile south of the site and would not be affected by the project.

### 3 Changes to the Draft EIR (EIR Errata)

Changes to the Draft EIR are shown on the following pages in the order that they appear in the EIR. New text is shown in underline, and removed text is shown in ~~striketrough~~. These text changes do not constitute substantial new information (per CEQA Guidelines Section 15088.5) and do not result in significant new impacts or the increase in severity of impacts already disclosed.

Page 3-6, Project Objectives, Objective 3

- 3. **Preserve Housing Affordability and Stability.** Provide a combination of rent-controlled (rent-stabilized) and inclusionary housing opportunities to meet key City objectives. Preserve the Rent Stabilization Program, ensure housing stability for future tenants, comply with the City’s Inclusionary Housing Ordinance and retain the below market rents of existing tenants.

Page 14-10

The City provides the following minor clarifications, technical corrections or amplifications to Table 14-2 (Land Use). Numbering changes reflect the City’s final adopted version of the General Plan.

**Table 14-2: West Side Area Plan Environmental and Housing Policy Consistency Analysis**

Principle or Policy	Consistency Analysis
<i>Relevant Guiding Principles</i>	
<b>Guiding Principle 2 4:</b> Provide affordable rental housing.	The project will increase affordable rental housing on the West Side by providing 444 additional housing <u>units</u> subject to the City’s affordable housing requirements.
<b>Guiding Principle 3 12:</b> Provide diverse parks, community facilities and shopping for all residents.	The project will provide publicly accessible park space and commercial uses where there currently are none.
<b>Guiding Principle 5 1:</b> Avoid displacement.	Displacement can be fully avoided due to the developer’s ability to temporarily relocate residents within comparable nearby units and by offering a continued rent stabilization strategy and right of return.
<b>Guiding Principle 6 8:</b> Maintain a diversity of housing types and unit sizes.	The project will provide a more diverse mix of unit sizes and rental housing types compared to the existing housing stock on the site, which are primarily studios and one-bedroom units.

Principle or Policy	Consistency Analysis
	Thirty percent of the new units would be 2-bedroom units. Only 2 percent of existing units are 2-bedroom.
<b>Guiding Principle 8 14:</b> Beautify the Westside.	The project provides opportunities to beautify these specific city blocks with architecture, street trees and green spaces.
<b>Guiding Principle 10:</b> Address infrastructure deficiencies.	The project will provide upgraded water infrastructure and pay fair share contributions for upgrades to other common facilities.
<b>Guiding Principle 11 7:</b> Improve housing quality.	The project will significantly improve the quality and quantity of housing through new construction.
<b>Relevant Environmental and Housing Policies</b>	
1.1 Preservation of housing.	The project will replace older housing with additional, new housing that accommodates households that are diverse in size, type and level of affordability.
1.2 No net loss in housing.	The project will increase housing and therefore will have no net loss.
<del>1.3</del> <u>3.1</u> Expansion of income-restricted affordable housing.	Through compliance with the City’s inclusionary housing ordinance, <del>the</del> project would expand the total quantity of income restricted affordable housing in the City. <del>A mix of permanent income restricted housing and new rent-controlled housing is proposed to be consistent with policies that support both types.</del>
<del>1.4</del> <u>3.5</u> Incentives for affordable housing.	The project would increase density, and <del>also provides a combination of income restricted and deed restricted</del> provides affordable housing consistent with the <del>above baseline levels identified by the</del> Inclusionary Housing Element Ordinance and through alternative compliance measures.
<del>1.5</del> <u>3.6</u> Affordability for current residents.	The project provides for a mix of affordable housing (rent stabilized and income-restricted). <del>The project provides rent stabilized rent for current residents at rent control rates.</del>
<del>1.6</del> <u>3.2</u> Affordable Housing Location.	The <del>affordable rent-controlled</del> units within the project would be spread throughout the development.
<del>1.7</del> <u>3.3</u> Land swap to achieve no net loss.	This concept is not necessary due to the developer’s ability to provide affordable housing within the project.



Principle or Policy	Consistency Analysis
1-8 1.3 Home ownership.	The project is 100% rental housing, replacing existing rental housing. Project does not provide ownership opportunities.
1-9 1.4 Diversity of housing types.	The architectural styles of the individual buildings within the project provide a range and diversity of housing types.
1-10 1.5 Diversity of unit sizes and types.	The project proposes a more balanced mix of unit sizes (comparable ratios of studio through 2-bedroom units) compared to existing units, that are almost entirely studios and 1 bedroom).
1-11 3.4 Mix of affordability levels.	The project provides <del>more affordable housing than the minimum threshold, including both the opportunity for existing tenants of rent-controlled units to relocate to the new units with no rent increases, and while also providing market rate units.</del> The affordable housing plan as proposed would provide both inclusionary housing per City ordinance and rent stabilized units.
1-12 1.6 High quality housing.	The new structures would provide new, high quality housing.
1-13 1.7 Funding for affordable housing.	<del>This is a City goal, but the project could be considered a funding source for publicly supported affordable housing by providing affordable housing above minimum standards.</del> <u>The affordable housing plan includes funding for affordable housing.</u>
1-14 1.8 Maintain a viable Rent Control program.	The proposed relocation plan <u>and replacement of rent stabilized units</u> would maintain rent stabilized units within the project, thus helping to maintain the City’s program.
3-1 5.1 Transformation over time.	The project provides a process and framework to allow increases in intensity consistent with this policy.
3-2 5.2 Development intensity.	The project provides an intensification of development but also provides neighborhood benefits in the form of affordable housing, infrastructure improvements, public open space and commercial amenities.
3-3 5.3 Prerequisites for increases in intensity.	The project has been analyzed by City staff and found to be consistent with the listed prerequisites of this policy because the project: <u>provides for income restricted housing</u> ; prevents displacement; preserves “right of return” for exiting residents; maintains the City’s rent stabilization program; includes new parks and open space; improves streets and infrastructure;

Principle or Policy	Consistency Analysis
	improves fiscal health; and beautifies the area with urban design and landscaping.
3.4 <del>5.4</del> Development process for increased intensities.	The project is located on the north side of University Avenue. For this area, proposed increased <del>s</del> in intensity over currently allowed intensities must prepare a master plan, development agreement or specific plan or similar document. The project includes a development agreement.
3.5 <del>5.5</del> Application information for increased intensities.	Detailed information required per this policy has been submitted and reviewed for adequacy by City staff.
3.6 <del>5.6</del> Replacement of affordable housing stock.	The project provides replacement affordable housing consistent with this policy, including replacement of RSO units and <u>compliance with the inclusionary housing ordinance</u> , subject to review and approval by the City.
3.7 <del>5.7</del> Affordable housing as community benefit.	The project <del>provides additional and replacement affordable housing units</del> <u>will provide rent-controlled units, some of which will serve as right of return units for current tenants at current rents</u> , as a community benefit consistent with this policy. <u>The project will also provide off-site income-restricted units or achieve alternative compliance with the City’s inclusionary housing ordinance.</u>
3.8 <del>5.8</del> Replacement affordable housing for density bonus projects.	N/A. Project not requesting density bonus.
3.9 <del>Income-restricted affordable housing.</del>	The project <del>will exceed the 20 percent affordable housing minimum.</del>
3.10 <del>5.9</del> First right of return.	The project’s relocation plan includes provisions for first right of return of existing residents.
3.11 <del>5.10</del> Relocation plan.	The project has prepared a relocation <u>plan</u> for City approval consistent with this policy.
3.12 <del>5.11</del> Relocation benefits.	The project’s relocation plan includes option for existing residents consistent with this policy.
3.13 <del>5.12</del> Land use vision for the Westside.	The project has a housing focus consistent with this policy. The Main Street and market concepts are envisioned south of University Avenue and are therefore not applicable. The project provides non-residential (retail) support services as part of the development plan.

Principle or Policy	Consistency Analysis
3-14 <u>5.14</u> Graduation of height.	The project design concentrates height and intensity toward US 101 (away from San Francisquito Creek) and transitions to lower building heights closer to adjacent residential neighborhoods. Heights graduate from 13 levels to 6 levels.
3-15 <u>5.15</u> Neighborhood transitions and character.	The project is new/replacement multi-family development, but is not immediately adjacent to existing single family residential neighborhoods. Single family development is located nearby, however, in Menlo Park, one block to the northwest. The project provides transitions in height consistent with this policy.
4-2 <u>6.2</u> Building quality and character.	The project would introduce high quality architecture, materials and pedestrian-oriented facades consistent with this policy.
4-3 <u>6.3</u> Frequent pedestrian entries and windows.	The project is designed to provide street access to units and the commercial space.
4-4 <u>6.4</u> Building articulation.	The structures as proposed provide architectural relief, articulation, balconies, awnings and other features to soften structural bulk and mass.
4-5 <u>6.5</u> Engaging residential facades.	Preliminary designs of the project illustrate windows, stoops, porches/balconies and other features of ground floor residential consistent with this policy.
4-6 <u>6.6</u> Elevated ground-floor residential.	Ground level units include stairs rising to elevated entrances.
4-7 <u>6.7</u> Parking frontage.	Project parking is provided off-street within a central parking garage. There are no surface lots along local streets.
4-8 <u>6.8</u> Building length.	Building lengths are visually broken into segments using voids and green spaces around the project perimeter.
4-9 <u>6.9</u> Garage and driveway entries.	The central parking garage utilizes a single ingress/egress point consistent with this policy.
4-10 <u>6.10</u> Placement of utilities.	The project will provide an opportunity to underground utilities locally and screen project details such as trash containers to a central location.
4-11 <u>6.11</u> Loading docks and service access.	Loading areas, service bays and trash collection are accessed by a service alley at the corner of West Bayshore Road and Manhattan Avenue and appropriately screened.

Principle or Policy	Consistency Analysis
5.1 <u>7.1</u> Greening and streetscape.	The landscape plan provides new landscaping and streetscaping details consistent with this policy.
5.2 <u>7.2</u> Connections to parks and nature.	While the project does not have a direct connection to San Francisquito Creek, the project will provide nearly an acre of public open space area as part of the development plan.
5.3 <u>7.3</u> Street furnishings.	Improvements and furnishings including a seating plaza, small dog park, and benches are planned along Euclid Avenue, within the public open space area, and within the entry plaza are consistent with this policy.
5.4 <u>7.4</u> Street lighting.	The project provides an opportunity to provide new street lighting that is consistent with City standards and the project design.
5.5 <u>7.5</u> Green streets.	The project landscape and drainage plans illustrate biofiltration areas, streetscaping, public park area and community greenspaces around the project perimeter consistent with this policy.
5.6 <u>7.6</u> University Circle integration.	The applicant and the City have closely coordinated with University Circle and their expansion plans to integrate common facility needs and infrastructure related to water systems, circulation and roadway improvements.
6.3 <u>8.3</u> Other new parks and open space.	This policy calls for new pocket parks, plazas and public spaces, including on O'Connor Street between Euclid Avenue and Manhattan Avenue. The project's proposed park and open space area is consistent with this policy.
6.4 <u>8.4</u> Community Meeting Space.	The project provides community space in conjunction with neighborhood serving retail.
7.2 <u>9.2</u> Safe pedestrian network.	The project proposes speed tables, visual roadway treatments and crosswalks along Euclid Avenue.
7.3 <u>9.3</u> Safe bicycle network.	Currently direct access to bicycle facilities is provided adjacent to the project site including Class III bicycle routes along O'Connor Street and W Bayshore Road/Manhattan Avenue. Improvements proposed by the project would not affect existing Class III bicycle routes adjacent to the site. The site will also provide bicycle parking for residents, employees, and customers.

Principle or Policy	Consistency Analysis
7.4 <u>9.4</u> Transit service.	The project proposes a new bus stop at the corner of Euclid Avenue and O’Connor Street near the proposed park. Project is working with regional transit providers consistent with this policy.
7.5 <u>9.5</u> Complete Streets.	Complete streets improvements, such as bicycle signals and forward stop bars, should be incorporated into larger offsite roadway and intersection improvements to better accommodate pedestrians and bicyclists, but are not necessary on the local network immediately surrounding the project.
7.6 <u>9.6</u> Sidewalks.	The project provides walkable, treelined sidewalks consistent with this policy.
7.7 <u>9.7</u> Pedestrian crosswalks.	There are existing sidewalks on both sides of O’Connor Street, on both sides of Euclid Avenue between E O’Keefe Street and O’Connor Street, and both sides of W Bayshore Road/Manhattan Avenue between O’Connor Street and the Four Seasons Hotel Driveway. With the project, existing sidewalks will remain on both sides of the street and additional improvements will be constructed to improve pedestrian facilities adjacent to the project. These improvements include constructing high visibility crosswalks along Euclid Avenue at O’Connor Street and O’Keefe Street and bulb outs for the north leg of the intersection of Euclid Avenue and O’Connor Street.
7.11 <u>9.11</u> University Avenue crossings.	Not directly related to the project.
7.12 <u>9.12</u> University Avenue overpass.	Not directly related to the project.
8.1 <u>10.1</u> Parking for new development.	The project includes an internal parking garage providing 1.1 parking spaces per apartment unit.
8.3 <u>10.3</u> Off-street parking allocation.	The project would manage and allocate all parking spaces available to tenants.
8.4 <u>10.4</u> Increase opportunities for residents parking.	Parking for project residents will be located within a centralized, secure parking structure.
8.5 <u>11.5</u> Transportation Demand Management.	The project includes a Transportation Demand Management (TDM) plan to help reduce vehicle miles travelled associated with the project and to encourage/incentivize use of alternative transportation modes.

Principle or Policy	Consistency Analysis
<del>8.6</del> <u>11.6</u> Mechanized Parking.	No mechanized parking is proposed.
<del>9.1</del> <u>11.1</u> Infrastructure upgrades.	The project is responsible for its fair share contribution to water and sewer system upgrades and/or studies to ensure that the project’s responsibility is addressed as part of infrastructure planning and improvements on the Westside.
<del>9.4</del> <u>11.4</u> Public Safety Services.	Police and fire protection service providers have been engaged in the project planning process to ensure that service levels and response times are within acceptable standards.
<del>9.5</del> <u>11.5</u> Infrastructure for new development.	The project will contribute fees toward common infrastructure as well as provide a 1.5 MG water tank that will serve as a community benefit.
<del>9.6</del> <u>11.6</u> Waste and recycling.	The project includes centralized waste collection areas.

## 4 Mitigation Monitoring and Reporting Program

### 4.1 Public Resources Code

When approving projects with Environmental Impact Reports (EIRs) that identify significant impacts, the California Environmental Quality Act (CEQA) requires public agencies to adopt monitoring and reporting programs or conditions of project approval to mitigate or avoid the identified significant effects (Public Resources Code Section 21081.6(a)(1)). A public agency adopting measures to mitigate or avoid the significant impacts of a proposed project is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). The program must be designed to ensure project compliance with mitigation measures during project implementation.

The Mitigation Monitoring and Reporting Program (MMRP) is organized in a table format (see [Table 4-1: Mitigation Monitoring and Reporting Program for the Woodland Park Euclid Improvements Project](#), keyed to each significant impact and each EIR mitigation measure. Only mitigation measures adopted to address significant impacts are included in this program. Each mitigation measure is set out in full, followed by a tabular summary of monitoring requirements. The column headings in the tables are defined as follows:

- **Mitigation Measures:** This column presents the mitigation measure identified in the EIR.
- **Monitoring/Reporting Responsibility:** This column contains an assignment of responsibility for the monitoring and reporting tasks.
- **Timing of Implementation:** This column refers to when the measure is required to be implemented.
- **City Staff/Notes:** This column will be used by the lead agency to document the person who verified the implementation of the mitigation measure and the date on which this verification occurred.

### 4.2 Enforcement

If the project is approved, the MMRP for the development would be incorporated as a condition of such approval. Therefore, all mitigation measures for significant impacts must be carried out to fulfill the requirements of approval. A number of the mitigation measures would be implemented during the course of the development review process. These measures would be checked on plans, in reports, and in the field prior to construction. Most of the remaining mitigation measures would be implemented during the construction, or project implementation phase.



Table 4-1: Mitigation Monitoring and Reporting Program for the Woodland Park Euclid Improvements Project

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
<b>Aesthetics</b>				
<p><b>AES-2</b></p>	<p><b>MM AES-2.1 Construction Screening</b></p> <p>To minimize and soften the visual effect as seen from visitors and nearby residents, the project proponent shall incorporate construction fencing or screening around the perimeter of the site. The screening material shall be of sufficient height to mask ground-level activities within and be designed with graphics, murals, historic references, or other design features to blend as much as possible with the neighborhood surroundings while communicating the future uses at the site. Screening shall remain in place during demolition of existing structures, site preparation and new building construction. Screening shall not be necessary during the final stages of construction when architectural coatings, detailing and landscaping are applied. The plan for screening concept and design shall be submitted for approval to the City of East</p>	<p>Community and Economic Development Department</p>	<p>Plan for screening to be submitted prior to the issuance of any building or grading permits.</p> <p>Measure to remain in place until final stages of construction.</p>	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	Palo Alto prior to issuance of any building and grading permits.			
<b>AES-2</b>	<p><b>MM AES-2.2 Water Tank Screening</b></p> <p>During construction, the applicant shall provide construction screening of the water tank site to soften visual effects of construction. In the final phase of tank construction, the applicant shall landscape the perimeter of the water tank site at 375 Donohoe with a combination of fencing and vegetation to soften and screen the appearance of the water tank and related improvements. Plant selection shall include native, taller species or trees to provide a visually appealing screen as viewed from the roadway and surrounding land uses. Landscaping and screening shall not conflict with water tank access or operations. Landscaping plans shall be submitted to the City for review and approval with final improvement plans.</p>	Community and Economic Development Department	<p>Applicant to maintain screening around the perimeter of the water tank site throughout construction period (e.g. demolition, site preparation, and new building construction).</p> <p>Landscaping plans shall be submitted to the City for review and approval with final improvement plans. Applicant to landscape the perimeter of the water tank site with fencing vegetation in the final phase.</p>	
<b>AES-3</b>	<b>MM AES-3.1 Glare Reduction</b>	Community and Economic	Applicant to incorporate AR glass products and surfaces to minimize	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	As part of final improvement plans, the project shall incorporate anti-reflective (AR) glass products and surfaces selected specifically to minimize reflective glare. Such materials can vary but typically consist of matte or patterned finishes that serve to both reduce reflective glare and reduce bird strike.	Development Department	glare as part of final improvement plans.	
<b>Air Quality</b>				
<b>AQ-2</b>	<b>SC AQ-2.1 BAAQMD Basic Construction Measures</b>  BAAQMD Basic Construction Measures. Prior to any grading activities, the applicant shall prepare and implement a Construction Management Plan that includes the BAAQMD Basic Construction Mitigation Measures to minimize construction-related emissions. This shall plan shall first be reviewed and approved by the Director of Public Works/City Engineer. The BAAQMD Basic Construction Mitigation Measures are:	Director of Public Works/City Engineer; Construction contractor	Prior to and during construction.	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<ul style="list-style-type: none"> <li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li> <li>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>• All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</li> <li>• All vehicle speeds on unpaved roads shall be limited to 15 mph.</li> <li>• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>• Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5</li> </ul>			

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</p> <ul style="list-style-type: none"> <li>• All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</li> <li>• 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.</li> </ul>			
<b>AQ-3</b>	<b>MM AQ-3.1 Off-Road Diesel-Powered Construction Equipment</b>	Community and Economic Development	Construction operations plan to be submitted and equipment specifications to be confirmed prior	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>All mobile diesel-powered off-road equipment operating on-site for more than two days and larger than 50 horsepower shall, at a minimum, meet U.S. Environmental Protection Agency (EPA) particulate matter emissions standards for Tier 4 engines or equivalent. Prior to the issuance of any demolition permits, the project applicant shall submit a construction operations plan to the Planner/Project Manager of the Planning Division of the Department Community and Economic Development, which includes specifications of the equipment to be used during construction and confirmation this requirement is met. Such equipment could include concrete/industrial saws, graders, scrapers, rollers, cranes, forklifts, generator sets, and air compressors.</p> <p>The construction contractor may use other measures to minimize construction period Diesel Particulate Matter (DPM) emissions to reduce the estimated cancer risk below the thresholds. The use of equipment that includes CARB-certified Level 4 Diesel Particulate Filters or alternatively-fueled</p>	<p>Department; Construction Contractor</p>	<p>to the issuance of any demolition permits.</p>	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	equipment (i.e., non-diesel), added exhaust devices, or a combination of these measures could meet this requirement. If any of these alternative measures are proposed, the construction operations plans must include specifications of the equipment to be used during construction prior to the issuance of any demolition permits. If any of these alternative measures are proposed, the plan shall be accompanied by a letter signed by a qualified air quality specialist, verifying the equipment included in the plan meets the standards set forth in this mitigation measure.			
<b>Biological Resources</b>				
<b>BIO-1</b>	<b>MM BIO-1.1 Preconstruction Bird Surveys</b>  The applicant shall schedule all on-site tree removal, demolition and grading to occur outside of the nesting and breeding season (February 1 through September 1) of any given year to avoid nest disturbance. If this schedule is not practical or feasible, the applicant shall hire a qualified biologist to	Project Applicant; Qualified Biologist	Applicant to schedule on-site tree removal, demolition, and grading to occur outside of the nesting and breeding season (February 1 through September 1) to avoid nest disturbance.	



Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	conduct preconstruction nesting bird surveys of the site plus a 100-foot perimeter around the site, no more than seven days prior to removal of trees and grading. If nesting birds are observed, the biologist will establish a buffer zone where no tree removal or grading will occur until the biologist confirms that all chicks have fledged and are no longer reliant on the nest. The buffer zone may vary from 50 to 250 feet, depending upon the species of bird and exposure of the nest site.		If surveys are required, results shall be submitted to Community and Economic Development Department prior to commencement of site work/tree removal.	
<b>Cultural Resources</b>				
<b>CR-2</b>	<b>MM CR-2.1 Inadvertent Discovery of Archaeological Resources</b>  In the event the buried, or previously unrecognized archaeological deposits or resources are encountered during ground disturbing activities, work shall be temporarily halted within a 50-foot radius of the discovered materials and workers should avoid altering the materials and their context until a qualified professional Archaeologist has evaluated the situation	Construction Contractor; Qualified Archaeologist	During ground disturbing activities.	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>and provided appropriate recommendations. Project personnel shall not collect cultural resources. Construction and potential impacts to the area(s) within a radius determined by the archaeologist shall not recommence until the assessment is complete.</p> <p>If any tribal cultural resources are found, the project applicant and/or its contractor shall cease all work within 50 feet of the discovery and immediately notify the City of East Palo Alto Planning Division. Potentially significant Native American resources consist of but are not limited to chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. The tribal monitor(s) will contact the tribal representative(s) and in consultation with the City and an archeologist evaluate the finds. Appropriate mitigation measures for the inadvertently discovered tribal cultural resource shall be at the direction of tribal leadership.</p>			

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>The City and tribal representative(s) shall consider the mitigation recommendations and agree on implementation of the measure(s) that are feasible and appropriate. Such measures may include reburial of any ancestral remains, avoidance, preservation in place, excavation, documentation, or other appropriate measures.</p>			
<p><b>CR-2</b></p>	<p><b>MM CR-2.2 Inadvertent Discovery of Human Remains</b></p> <p>In the event that human remains (or remains that may be human) are discovered at the project site, Public Resource Code Section 5097.98 must be followed. All grading or earthmoving activities shall immediately stop within a 50-foot radius of the find. The project proponent shall then inform the San Mateo County Coroner and the City of East Palo Alto immediately, and the Coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).</p>	<p>Community and Economic Development Department; San Mateo County Coroner</p>	<p>During ground disturbing activities.</p>	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the Coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (Public Resource Code [PRC] § 5097). The Coroner shall contact the NAHC to determine the most likely descendant(s) (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD will determine the most appropriate means of treating the human remains associated grave artifacts, and shall oversee the disposition of the remains.</p> <p>In the event the NAHC is unable to identify an MLD or the MLD fails to make a recommendation within 48 hours after being granted access to the site, the landowner or his/her authorized</p>			

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	representative shall rebury the Native American human remains and associated grave goods with appropriate dignity within the project area in a location not subject to further subsurface disturbance.			
<b>Geology &amp; Soils</b>				
<b>GEO-5</b>	<p><b>MM GEO-5.1 Final Geotechnical Evaluation</b></p> <p>A construction level geotechnical evaluation shall be required for the project. The project shall be required to adhere to and incorporate all standards and recommended engineering measures to mitigate for liquefaction, expansive soils and other local soil constraints. The final geotechnical evaluation will be provided to the City for review and approval prior to the issuance of building permits.</p>	Community and Economic Development Department	Prior to the issuance of building permits.	
<b>GEO-6</b>	<p><b>MM GEO-6.1 Inadvertent Discovery of Paleontological Resources</b></p> <p>In the event that fossils or fossil-bearing deposits are discovered during</p>	Qualified Paleontologist	During ground disturbing activities.	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>construction activities, work shall be temporarily halted with a 50-foot radius of the discovered materials and workers should avoid altering the materials and their context until a qualified paleontologist has evaluated the situation and provided appropriate recommendations. Construction and potential impacts to the area(s) within a radius determined by the paleontologist shall not recommence until the assessment is complete.</p> <p>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, the applicant shall mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources</p>			

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>that would be damaged or destroyed by a project. Possible mitigation under CEQA emphasizes preservation-in-place 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.</p>			
<b>Greenhouse Gas Emissions</b>				
<b>GHG-1</b>	<p><b>MM GHG-1.1 Transportation Demand Management Plan</b></p> <p>Prior to approval of project entitlements for future residential uses, the project applicant shall prepare qualifying Commute Trip Reduction (CTR)/Transportation Demand Management (TDM) plan to reduce mobile GHG emissions for all uses. The TDM plan shall be approved by the City of East Palo Alto and any physical features</p>	<p>Community and Economic Development Department</p>	<p>Prior to the approval of project entitlements.</p>	



Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>resulting from the plan shall be shown in final improvement plans. The TDM plan shall discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. The following measures or equally effective measures shall be incorporated into the TDM plan.</p> <ul style="list-style-type: none"> <li>• The project applicant shall consult with the local transit service provider on the need to provide infrastructure to connect the project with transit services. Evidence of compliance with this requirement may include correspondence from the local transit provider(s) regarding the potential need for installing bus turnouts, shelters or bus stops at the site.</li> <li>• The CTR/TDM plan for the project shall include, but not be limited to the following potential measures: ride-matching assistance, preferential carpool parking, flexible work schedules for carpools, half-time transportation coordinators, providing</li> </ul>			

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	a web site or message board for coordinating rides, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and including bicycle end of trip facilities. This list may be updated as new methods become available. Verification of this measure shall occur prior to building permit issuance for the commercial uses.			
<b>Hazards &amp; Hazardous Materials</b>				
HAZ-1	<b>MM HAZ-1.1 Asbestos Operation and Management Plan</b>  Prior to demolition and removal of material from the site, the project applicant shall implement the recommendations of the 2014 Asbestos O&M Plan for work involving asbestos-containing material. These measures include asbestos training and specific work procedures for employees managing asbestos contaminated materials, notification procedures for building owners and occupants, asbestos clean-up and	Project Applicant; City Building Official	Prior to demolition activities.	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	emergency response procedures, and recordkeeping of identified asbestos contaminated materials. The plan shall be reviewed and approved by the City of East Palo Alto prior to implementation.			
<b>HAZ-1</b>	<p><b>MM HAZ-1.2 Lead Based Paint and PCB Operation and Management Plan</b></p> <p>Prior to any renovations or demolition, the project applicant shall implement the recommendations of the LBP O&amp;M Plan for work involving lead based painted surface areas to be carried out. These measures include training and special work procedures for employees managing lead-based paint materials, notification procedures for building owners and occupants, emergency response procedures, and recordkeeping of identified lead-based paint materials. The plan shall be reviewed and approved by the City of East Palo Alto prior to implementation. The project shall also follow current San Francisco Bay Regional Water Quality Control Board requirements</p>	Project Applicant; City Building Official	Prior to any renovations or demolition activities.	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	for identifying and controlling PCB's during building demolition, if present.			
<b>Noise &amp; Vibration</b>				
<b>N-1</b>	<p><b>MM N-1.1 Construction Noise Reduction</b></p> <p>Prior to Grading Permit issuance, the applicant shall demonstrate, to the satisfaction of the City of East Palo Alto Director of Public Works or City Engineer that all applicable construction plans and specification include the following measures:</p> <ul style="list-style-type: none"> <li>• Construction activities shall be restricted to daytime hours of between 7:00 a.m. and 8:00 p.m. on weekdays.</li> <li>• Prior to the start of construction activities, the construction contractor shall:                             <ul style="list-style-type: none"> <li>○ Maintain and tune all proposed equipment in accordance with the manufacturer's recommendations to minimize noise emission.</li> </ul> </li> </ul>	Project Applicant; Director of Public Works or City Engineer	Prior to issuance of grading permit issuance.	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<ul style="list-style-type: none"> <li>○ Inspect all proposed equipment and should fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds that are no less effective than as originally equipped by the manufacturer.</li> <li>○ Post a sign, clearly visible at the site, with a contact name and telephone number of the City of East Palo Alto’s authorized representative to respond in the event of a noise complaint.</li> <li>○ Place stationary construction equipment and material delivery in loading and unloading areas as far as practicable from the residences.</li> <li>○ Limit unnecessary engine idling to the extent feasible.</li> <li>○ Use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters.</li> </ul>			

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<ul style="list-style-type: none"> <li>○ Use low-noise emission equipment.</li> <li>○ Limit use of public address systems.</li> <li>○ Minimize grade surface irregularities on construction sites.</li> </ul>			
<b>Transportation &amp; Circulation</b>				
<b>TRA-2</b>	<p><b>MM TRA-2.1 Traffic Calming Measures</b></p> <p>Prior to operational use of the parking garage, the project applicant shall install traffic calming measures at the Bayshore Road/Manhattan Avenue location to reduce traffic speeds and improve the safety of driveway movements. Such measures could include advisory speeds signs, advanced warning signage along Manhattan Avenue and Bayshore Road, roadway bulbouts, raised dots, parking restrictions or other physical improvements. Final traffic calming measures will be determined in consultation with City of East Palo Alto</p>	City Public Works Department	<p>Final measures determined prior to final improvement plans.</p> <p>Implementation/installation prior to operation of the parking garage.</p>	

Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	Public Works staff during review of improvement plans.			
<b>Utilities &amp; Service Systems</b>				
<b>UTIL-1</b>	Refer to MM AES-2.1, SC AQ-2.1, SC AQ-3.1, MM AQ-3.1, MM GHG-1.1, MM HAZ-1.1, MM HAZ-1.2, MM N-1.1	Refer to Impact AES-2, AQ-2, AQ-3, GHG-1, HAZ-1, and N-1.	Refer to Impact AES-2, AQ-2, AQ-3, GHG-1, HAZ-1, and N-1.	
<b>UTIL-3</b>	<p><b>MM UTIL-3.1 Fair Share Funding of Project Improvements</b></p> <p>The project applicant shall either fund the fair share of construction of physical sewer line improvements (pipe upgrades) immediately downstream of the project, provide fair share funding toward system wide sanitary sewer system improvements, or a reasonable combination of both. The project’s financial and implementation responsibility for sewer capacity improvements shall be determined in consultation with the City of East Palo Alto Public Works Department. Fair share funding of common improvements to the city-wide system would also address the</p>	City Public Works Department	Prior to issuance of building permits	



Impact Number	Mitigation Measure	Monitoring/ Reporting Responsibility	Timing of Implementation	City Staff Notes; Initials/Date when Done
	<p>project’s contribution to significant cumulative effects. Funding or construction of common improvements shall occur prior to the issuance of building permits or as determined by the City. The project’s fair share of responsibility shall be proportionate to the impact. The project shall not be responsible for mitigating all existing deficiencies.</p>			
<b>UTIL-5</b>	<p>Refer to MM AES-2.1, SC AQ-2.1, SC AQ-3.1, MM AQ-3.1, MM GHG-1.1, MM HAZ-1.1, MM HAZ-1.2, MM N-1.1</p>	<p>Refer to Impact AES-2, AQ-2, AQ-3, GHG-1, HAZ-1, and N-1.</p>	<p>Refer to Impact AES-2, AQ-2, AQ-3, GHG-1, HAZ-1, and N-1.</p>	

**Attachment 1**

Water Tank Location Map



Water Tank Location



West Bayshore Road

East O'keefe Street

Highway 101

Project Site

O' Connor Street

Euclid Avenue

Manhattan Avenue

University Avenue

