NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

TO:	State Clearinghouse, Responsible and Trustee Agencies, Interested Parties, and County Clerk of San Mateo County
DATE:	February 17, 2023
SUBJECT:	**Notice of Intent to Adopt a Mitigated Negative Declaration (MND) and Public Hearing**
LEAD AGENCY:	City of East Palo Alto
PROJECT TITLE:	Library Property Acquisition Project
PROJECT AREA:	City of East Palo Alto

Notice is Hereby Given that the City of East Palo Alto, as the Lead Agency, has prepared an Initial Study for the project identified below and intends to adopt a Mitigated Negative Declaration & Mitigation and Monitoring and Reporting Program for the project. The minimum review period for this document is thirty (30) days. The document is available for review at the City of East Palo Alto Planning Division office, 1960 Tate Street, East Palo Alto and online at: https://www.cityofepa.org/planning/page/ceqa-notices

Project Location: The approximately one-acre project site is located in the southerly, vacant portion of Assessor's Parcel Number 063-240-490, on the east side of Pulgas Avenue, bounded by Montage Circle. The project site is included on a list of hazardous materials sites compiled pursuant to the California Government Code Section 65962.5.

Project Description: The proposed project is the acquisition of a one-acre site located east of Pulgas Avenue, between Bay Road and Montage Circle, for the future development of a library. The purchase agreement between the City and the current property owner requires that either a library or community center use be developed on-site. If an alternative use is proposed on-site, ownership of the property would be returned to the current property owner. Furthermore, if the property is acquired by the City, a General Plan Amendment and Rezoning from Ravenswood Employment Center (REC) to Public Institutional (PI) would be necessary prior to approval and implementation of a library. For purposes of analysis, a two-story, approximately 23,275-sf library is assumed. The future library design would undergo project-level environmental review prior to approval.

Public Review and Comment: The review period for the Initial Study and MND extends from February 17, 2023 to March 20, 2023. Comments must be submitted in writing to the Community and Economic Development Department at the address below prior to the close of the public comment period. The Initial Study and draft MND are available for review during the circulation period at https://www.cityofepa.org/planning/page/ceqa-notices or in print at the City of East Palo Alto Planning Division office, 1960 Tate Street. Please call (650) 853-3189 to make an appointment.

Interested residents, agencies, and other concerned citizens may transmit their concerns or comments within the public review period. Please direct your comments regarding potential environmental impacts to: elee@cityofepa.org or Elena Lee, Planning Manager, City of East Palo Alto, 1960 Tate Street, East Palo Alto, CA 94303.

Public Hearing: Notice is hereby given that on Tuesday, March 21, 2023, at the hour of 6:30 p.m., or as soon thereafter as the matter may be heard, the City of East Palo Alto City Council will conduct a hearing on the following item:

- **Public Hearing:** Library Property Acquisition Project and Mitigated Negative Declaration.
- **Location/APN:** One acre vacant southerly portion of Assessor's Parcel Number 063-240-490 (1950 Bay Road), located on Pulgas Avenue, bounded by Montage Circle
- **Proposal:** Property acquisition for future development of a two-story, approximately 23,275-sf library.
- **Recommendation:** Adopt a resolution adopting a Mitigated Negative Declaration & Mitigation Monitoring and Reporting Program for the project pursuant to CEQA Guidelines; approving a Purchase and Sale Agreement; and appropriating funding to acquire the project site for future development of a new two-story, approximately 23,275-sf library building, surface parking lot, landscaping, and other amenities.

A challenge to the above item in court may raise only those issues which were raised at the public hearing described in this notice or in written correspondence to the City of East Palo Alto at, or prior to, the public hearing, or submitted to the City of East Palo Alto as a comment on the Initial Study before March 20, 2023, at 5:00 PM, as described below. For further information regarding this meeting, contact the City of East Palo Alto City Clerk, (650) 853-3118. The Americans with Disabilities Act (ADA) requires reasonable accommodation and access for the physically challenged. Those requesting such accommodation should contact the City Clerk at (650) 853-3118 four days before the hearing date.

Pursuant to Government Code Section 54953(b)(4), this meeting will be held in a hybrid format, whereby virtual teleconference/video conference is available only as permitted by applicable law, including allowing both in-person and virtual public participation. Members of the public can find information and may provide comments by signing up on the City's meeting page at http://eastpaloalto.iqm2.com/Citizens/Default.aspx or by attending the meeting live via Zoom and using the "RAISE HAND" feature when the Chair or City Clerk calls for public comment. Project questions and comments can also be sent to the project planner per the contact information listed above.

City of East Palo Alto

Community and Economic Development Department, Planning Division
California Environmental Quality Act (CEQA)

MITIGATED NEGATIVE DECLARATION

PROJECT TITLE: Library Property Acquisition Project

PROJECT LOCATION: One acre vacant southerly portion of Assessor's Parcel Number 063-240-490 (1950 Bay Road), located on Pulgas Avenue, bounded by Montage Circle

ASSESSORS PARCEL NO.: 063-240-490

PROJECT DESCRIPTION: The proposed project is the acquisition of a one-acre site located east of Pulgas Avenue, between Bay Road and Montage Circle, for the future development of a library. The purchase agreement between the City and the current property owner requires that either a library or community center use be developed on-site. If an alternative use is proposed on-site, ownership of the property would be returned to the current property owner. Furthermore, if the property is acquired by the City, a General Plan Amendment and Rezoning from Ravenswood Employment Center (REC) to Public Institutional (PI) would be necessary prior to approval and implementation of a library. For purposes of analysis, a two-story, approximately 23,275-sf library is assumed. The future library design would undergo project-level environmental review prior to approval.

I. FINDING AND BASIS FOR A MITIGATED NEGATIVE DECLARATION:

In accordance with the California Environmental Quality Act (CEQA), the City of East Palo Alto, Community and Economic Development Department has conducted an Initial Study to determine whether the proposed project may have a significant adverse effect on the environment. It is hereby determined that, based on the information contained in the attached Initial Study, the proposed project will not result in a significant effect on the environment because the mitigation and avoidance measures described in the Initial Study are included in the project. The City of East Palo Alto, as the project proponent before public release of this draft Mitigated Negative Declaration, has made or agrees to make project revisions that clearly mitigate the effects to a less than significant level. The mitigation and avoidance measures described in the Initial Study and included in the proposed project are listed below.

II. MITIGATION MEASURES:

Air Quality

Impact AIR-1: Emissions of toxic air contaminants during construction of a library on-site could exceed BAAQMD thresholds and result in a significant impact. **(Significant Impact)**

Mitigation Measure:

MM AIR-1.1: A health risk assessment shall be completed for the proposed project once construction equipment and phasing details are available to identify impacts, and if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds. The health risk assessment shall also evaluate cumulative health risk levels, considering other TAC sources within 1,000 feet, consistent with BAAQMD methodology, and identify measures to ensure the project would not contribute to a cumulative health risk based on cumulative thresholds.

Biological Resources

Impact BIO-1: Future library development would result in impacts to nesting birds, if present on or adjacent to the site at the time of construction. **(Significant Impact)**

Mitigation Measures: The following mitigation measures would reduce and/or avoid impacts to nesting birds (if present on or adjacent to the site) to a less than significant level.

MM BIO-1.1: Prior to the start of any tree removal, or any grading or demolition activities (whichever occurs first), the project applicant shall schedule demolition and construction activities to avoid the nesting season. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1st through August 31st (inclusive). Construction activities include any site disturbance such as, but not limited to, tree trimming or removal, demolition, grading, and trenching.

MM BIO-1.2: If demolition and construction cannot be scheduled between September 1st and January 31st (inclusive), pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests shall be disturbed during construction activities. This survey shall be completed no more than 14 days prior to the initiation of construction activities during the early part of the breeding season (February 1st through April 30th inclusive) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May 1st through August 31st inclusive). During this survey, the ornithologist shall inspect all trees and other possible nesting habitats on-site and within 250 feet of the site for nests.

MM BIO-1.3: If an active nest is found within 250 feet of the project area to be disturbed by construction, the ornithologist, in consultation with the California Department of Fish and Wildlife, shall determine the extent of a construction free buffer zone to be established around the nest, (typically 250 feet for raptors and 100 feet for

other birds), to ensure that raptor or migratory bird nests shall not be disturbed during project construction.

MM BIO-1.4: Prior to any tree removal, or any grading or demolition activities (whichever occurs first), the ornithologist shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the City's Director of Planning or Director's designee of the Department of Planning, Building and Code Enforcement.

Cultural Resources

Impact CUL-2: Ground disturbing activities associated with construction of the proposed project could disturb previously unrecorded archaeological resources. **(Significant Impact)**

Mitigation Measures: The following mitigation measures shall be implemented to reduce impacts to archaeological resources that may be present on-site.

MM CUL-2.1: The following mitigation measures are based on the recommendations in the archaeological literature search and based on tribal consultation with the Tamien Nation. Implementation of these mitigation measures would reduce impacts to archaeological resources to a less than significant level:

- As part of the project-level CEQA review for the future library development, a qualified archaeologist shall conduct presence/absence exploration for archaeological deposits and cultural materials and the City shall consult with the Tamien Nation on the manner of the site investigation. If presence/absence exploration for archaeological deposits and cultural materials is infeasible, an archaeological monitor shall be present during remediation efforts and construction activities. If archaeological monitoring is the only option, the monitor in consultation with the project archaeologist, shall determine when a sufficient sample of ground disturbing activities for remediation and select construction activities has occurred. When a sufficient sample has been examined and no cultural resources have been identified, no more monitoring will be required. If any archaeological evidence is identified, additional recommendations will be tailored to the type of resource identified and the proposed improvements. A report documenting the results of presence/ absence exploration and monitoring and any data recovery shall be submitted to the City of East Palo Alto Community Development Director prior to issuance of building permits.• In the event that buried, or previously unrecognized archaeological deposits or materials of any kind are inadvertently exposed during remediation and construction activities, work within 50 feet of the find shall cease until the City of East Palo Alto is notified and a qualified archaeologist can assess the find and provide recommendations for further treatment, if warranted. Construction and potential impacts to the area(s) within a radius determined by the archaeologist shall not recommence until the assessment is complete. If the find is discovered during remediation efforts, consultation between the project archaeologist and the lead

remediation person shall formulate the best approach to address the level and kind of toxin(s) in concert with the type of cultural resource identified. A report documenting the results of presence/absence exploration and monitoring and any data recovery shall be submitted to the City of East Palo Alto Community Development Director prior to issuance of building permits.

Impact CUL-3: Ground disturbing activities associated with future library development could disturb human remains interred outside of dedicated cemeteries. **(Significant Impact)**

Mitigation Measures: Future library development would implement the following mitigation measures to reduce impacts to human remains to a less than significant level.

MM CUL-3.1: If human remains are encountered as a result of construction activities, all work in the vicinity shall be halted and the County Coroner contacted. In the event that the County Coroner determines that the human remains are Native American, notification of the Native American Heritage Commission (NAHC) is required, who shall appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The qualified archaeologist, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5(d). The agreement shall incorporate 'best practices' as identified by the state NAHC. A final report shall be prepared by the project archaeologist in consultation with the MLD and approved by the City of East Palo Alto. Work on the project may proceed upon City approval.

Geology and Soils

Impact GEO-1: Ground disturbing activities associated with project construction could disturb currently unrecorded paleontological resources or a unique geologic feature. **(Significant Impact)**

Mitigation Measure: Consistent with the General Plan EIR, the proposed project would implement the following mitigation measures to reduce impacts to unrecorded paleontological resources during project construction activities to a less than significant level.

MM GEO-1: If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet of the find shall stop and the City of East Palo Alto Director of Community and Economic Development shall be notified. A qualified paleontologist shall inspect the find within 48 hours of discovery. If it is determined that the proposed development could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or

left undisturbed. If preservation in place is not feasible. (e.g., planning construction activities to avoid paleontological sites, incorporating sites into parks and other open spaces, covering sites with stable soils, and deeding the site into a permanent conservation easement) data recovery through excavation shall be conducted by a qualified paleontologist with a data recovery plan in place.

Hazards and Hazardous Materials

Impact HAZ-1: Development of the proposed project could result in impacts to construction workers and nearby residents by exposing them to on-site soils with elevated levels of contamination.

Mitigation Measure:

MM HAZ-1.1: The project applicant shall retain a qualified environmental professional to prepare a Corrective Action/Risk Management Plan. The Corrective Action/Risk Management Plan shall describe mitigation measures necessary to protect the health and safety of construction workers, nearby residences, and future site occupants, and establish appropriate management practices for handling and monitoring of impacted soil, soil vapor, and groundwater. The Corrective Action/Risk Management Plan shall be submitted to the Waterboard for review and approval prior to issuance of grading or building permits, whichever occurs first. The Corrective Action/Risk Management Plan shall include the following:

- Air monitoring plan that assesses potential for exposure of construction workers and neighboring occupants to contaminants of concern during construction.
- Vapor intrusion mitigation plan
- Operations, maintenance, and monitoring plan
- Health and safety plan

Noise

Impact NOI-1: Construction of the proposed project would occur for more than 12 months and be located within 500 feet of residential uses, resulting in a significant noise impact.

Mitigation Measure: Consistent with General Plan Policy 7.11, the following standard noise control measures shall be implemented during project construction.

MM NOI-1.1: The following measures shall be implemented during construction.

- Limit construction activity to weekdays between 7:00 a.m. and 7:00 p.m. and Saturdays and holidays between 9:00 a.m. and 7:00 p.m., with no construction on Sundays;[1]

[1] The project proposes construction within the City's permitted construction hours. Should extended construction hours be requested, an exception may be granted by Planning Commission per Municipal Code Section

- Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;
- Locate staging areas and construction material areas as far away as possible from adjacent land uses;
- Prohibit all unnecessary idling of internal combustion engines;
- Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented.
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.

Impact NOI-1.2: Mechanical equipment operations associated with the future library development would result in noise levels in excess of exterior noise thresholds at the property line of nearby sensitive receptors. **(Significant Impact)**

Mitigation Measure: Incorporation of the following mitigation measures would reduce mechanical equipment noise impacts on nearby sensitive receptors to a less than significant level.

NOI-1.2: Prior to issuance of building permits, project mechanical equipment shall be selected and designed to reduce impacts on surrounding uses and meet the City’s exterior and interior noise level requirements. A qualified acoustical consultant shall be retained to review mechanical noise as the equipment systems are selected and determine specific noise reduction measures necessary to reduce noise to comply with the City’s 55 dBA L50 daytime exterior limit and 50 dBA L50 nighttime exterior limit at the nearest residential property lines. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls to block the line-of-sight between the noise receptors. Alternate measures may include locating equipment in less noise-sensitive areas.

Impact NOI-2.1: Construction-related vibration levels at the existing EPA Center Arts building to the north of the project site would exceed the City’s 0.03 in/sec PPV threshold. **(Significant Impact)**

Mitigation Measure: The following measures shall be implemented during construction of the proposed project.

15.040125B(3).

NOI-2.1: The proposed project shall incorporate the following measures to reduce vibration levels to 0.03 or less at nearby structures.

- Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
- Use of smaller equipment to minimize vibration levels below the limits near existing or on-site buildings shall be required.
- Modify/design or identify alternative construction methods to reduce vibration levels below the limits.
- Avoid dropping heavy objects or materials.

Utilities and Service Systems

Impact UTL-2: The City does not have sufficient water supplies available to serve the project and reasonably foreseeable future development during single-dry and multiple-dry years in 2025 and beyond. **(Significant Impact)**

Mitigation Measure: The following mitigation measures shall be implemented by the proposed project to ensure adequate water supplies are available to serve the project and reduce impacts to a less than significant level.

ULT-2.1: To address the discrepancy between the proposed project's 3.76 acre feet per year of water demand and the available water supply, the City shall secure the additional water supplies needed for the proposed project. To do so, the City shall implement one of the following programs to supply a minimum of 3.76 acre feet per year.

- **Groundwater Opportunities.** The City is addressing the supply shortfall by developing new groundwater well and treatment facility at Pad D. This project is expected to produce 32.85-acre feet per year. Implementation of this measure alone would provide sufficient water supplies to serve the proposed project.
- **Transfer and Exchange Opportunities.** The City's agreement with SFPUC allows for the transfer or exchange of unused portions of water allocations among contracting agencies within the SFPUC system. Additionally, the agreement allows for purchase and transfer of water from outside the SFPUC service area through third party transmission systems. The City of East Palo Alto is seeking other opportunities for water supply transfers. However, no specific agreements are currently being negotiated by the City.

Initial Study

Library Property Acquisition Project

Prepared by

CITY OF EAST PALO ALTO
INCORPORATED 1983

In Consultation with

DAVID J. POWERS
& ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

February 2023

TABLE OF CONTENTS

Figures

Photos

Tables

Appendices

SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

The City of East Palo Alto, as the Lead Agency, has prepared this Initial Study for the Library Property Acquisition project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of East Palo Alto, California.

The project proposes to acquire a site to construct a two-story library, surface parking lot and landscaping on-site. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.2 PUBLIC REVIEW PERIOD

Publication of this Initial Study marks the beginning of a 30-day public review and comment period. During this period, the Initial Study will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 30-day public review period should be sent to:

Elena Lee, Planning Manager
1690 Tate Street
East Palo Alto, CA 94303
elee@cityofepa.org

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

Following the conclusion of the public review period, the City will consider the adoption of the Initial Study/Mitigated Negative Declaration (MND) for the project at a regularly scheduled meeting. The City shall consider the Initial Study/MND together with any comments received during the public review process. Upon adoption of the MND, the City may proceed with project approval actions.

1.4 NOTICE OF DETERMINATION

If the project is approved, the City will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

SECTION 2.0 PROJECT INFORMATION

2.1 PROJECT TITLE

Library Property Acquisition Project

2.2 LEAD AGENCY CONTACT

Elena Lee, Planning Manager
1690 Tate Street
East Palo Alto, CA 94303
elee@cityofepa.org

2.3 PROJECT APPLICANT

City of East Palo Alto

2.4 PROJECT LOCATION

One acre vacant southerly portion of Assessor's Parcel Number 063-240-490 (1950 Bay Road), located on Pulgas Avenue, bounded by Montage Circle.

2.5 ASSESSOR'S PARCEL NUMBER

Assessor's Parcel Number: 063-240-490

2.6 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

The project site has a General Plan land use designation of General Industrial and is zoned Ravenswood Employment Center (R-EC) in the Municipal Code. The project site is located within the Ravenwood/4 Corners Transit Oriented Specific Plan area.

General Plan and Zoning Amendments of the site from its current designation and zoning to Public/Institutional and Public Institutional (PI) would be required in order to allow for future library development.

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT LOCATION

The approximately one-acre site (approximately 43,000 square feet) is located in the southerly, vacant portion of Assessor's Parcel Number 063-240-490, on the east side of Pulgas Avenue, within the Ravenswood Specific Plan area of the City of East Palo Alto. The project site is currently partially developed, with the northern approximately one third of the site developed with a gravel surface parking lot and the remaining approximately two thirds undeveloped grass area. Chain-link and metal fencing surrounds the perimeter of the site.

Figure 3.3-1, Figure 3.3-2, and Figure 3.3-3 feature a regional location map, vicinity map, and aerial map of the project site, respectively.

3.2 BACKGROUND

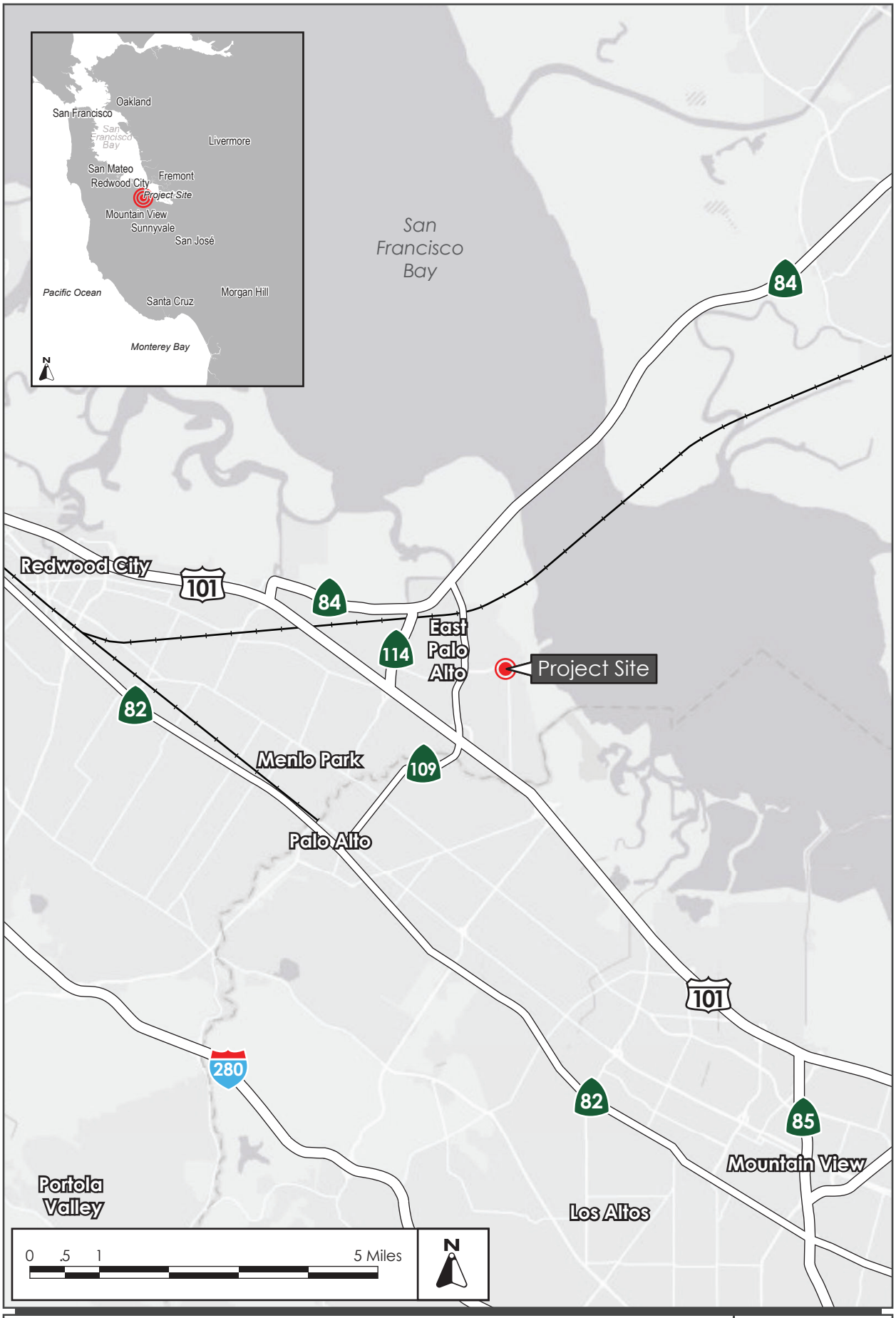
The City of East Palo Alto adopted the Ravenswood/4 Corners Transit Oriented Development Specific Plan (RBD Specific Plan) and certified the Ravenswood/4 Corners TOD Specific Plan (RBD Specific Plan EIR) (SCH#2011052006) in February 2013. The RBD Specific Plan provides a framework for how the Ravenswood and 4 Corners areas can be transformed into thriving districts that provide places to live; employment opportunities; parks and open spaces; and amenities and provides detailed regulations for all new development that occurs within the Specific Plan area. The RBD Specific Plan EIR evaluated the environmental impacts of the Specific Plan.

Specifically, the adopted Specific Plan allows for development of up to 1.2 million square feet of office uses, 112,400 square feet of retail uses, 351,820 square feet of industrial uses 61,000 square feet of civic/community uses, and 835 residential units. The Specific Plan also includes new and enhanced parks, trail corridors, and public streets.

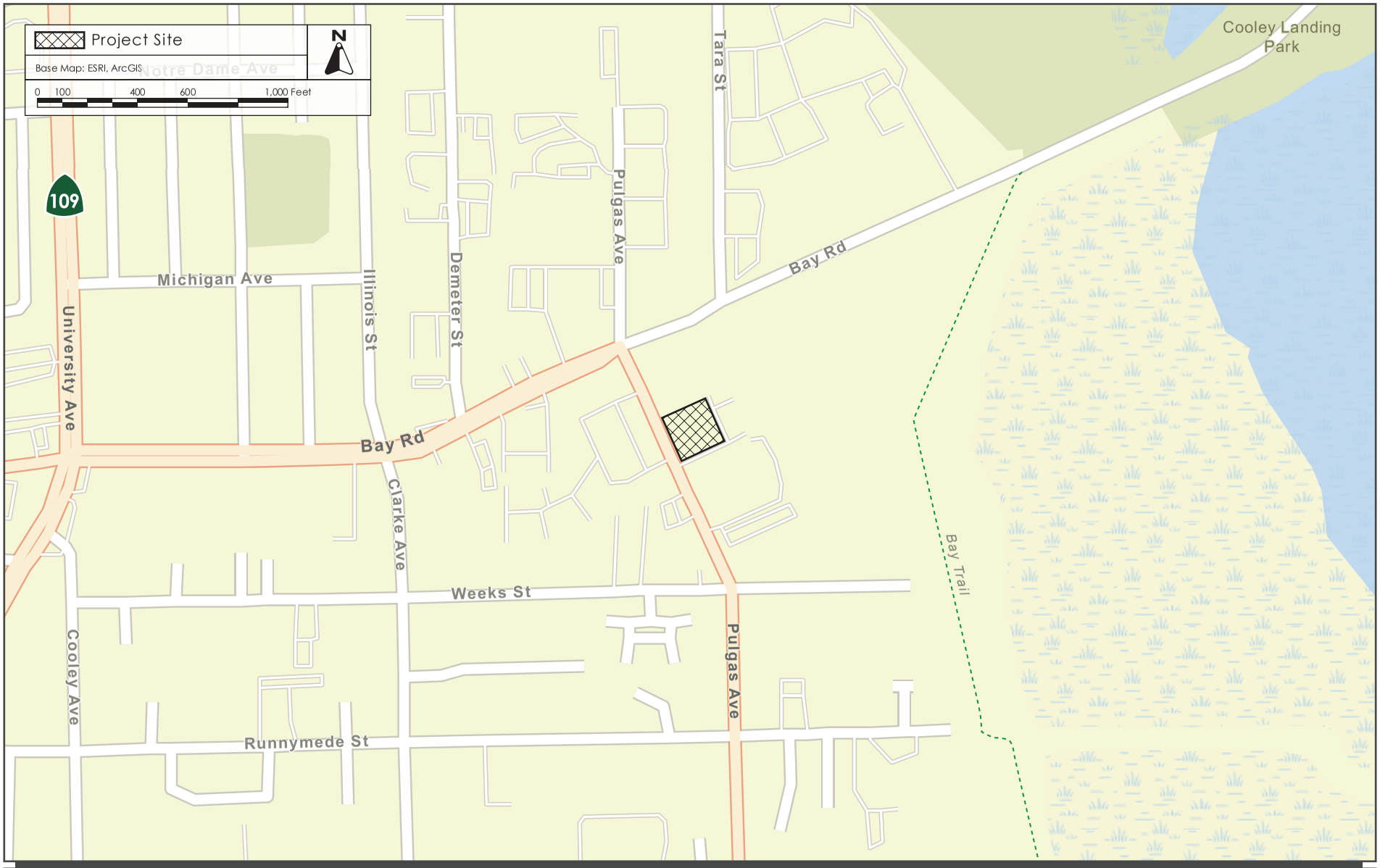
The City is currently in the process of updating the RBD Specific Plan and preparing a supplemental EIR; however, the updated plan has not been adopted at the time of preparation of this Initial Study. It is anticipated that the project site would be designated as Public Institutional (PI) in the updated RBD Specific Plan.

3.3 PROPOSED PROJECT

The proposed project is the acquisition of a one-acre site located east of Pulgas Avenue, between Bay Road and Montage Circle, for the future development of a library. The purchase agreement between the City and the current property owner requires that either a library or community center use be developed on-site. If an alternative use is proposed, ownership of the property would be returned to the current property owner. As noted above, an existing community center (EPACENTER) is already developed adjacent to the north of the project site. The environmental effects of a community center would be substantially the same as a library, in that both uses would require similar sized buildings, provide supportive services to the surrounding community, and have similar occupancy levels; therefore, a library is the most likely use to be developed on the project site. For this reason, this analysis focuses on the effects of a future library development.



REGIONAL LOCATION MAP | FIGURE 3.3-1



VICINITY MAP

FIGURE 3.3-2

AERIAL PHOTOGRAPH OF THE PROJECT SITE AND SURROUNDING AREA | FIGURE 3.3-3

Furthermore, if the property is acquired by the City, a General Plan Amendment and Rezoning from Ravenswood Employment Center (REC) to Public Institutional (PI) would be necessary prior to a development review approval and implementation of a library. The library development plans are currently conceptual and will be further developed after the City purchases the property and proceeds toward development. Therefore, precise details about the construction and operation of the library are not yet known and will be further developed at a later date, and subject to project-level environmental review. As the project scope primarily consists of site acquisition, the Initial Study discusses the library at a level of detail that currently exists and provides program-level review of the library development project. The City will complete supplemental environmental review, i.e., project-level, as necessary and as more project details become available prior to approval of a contract to construct the library.

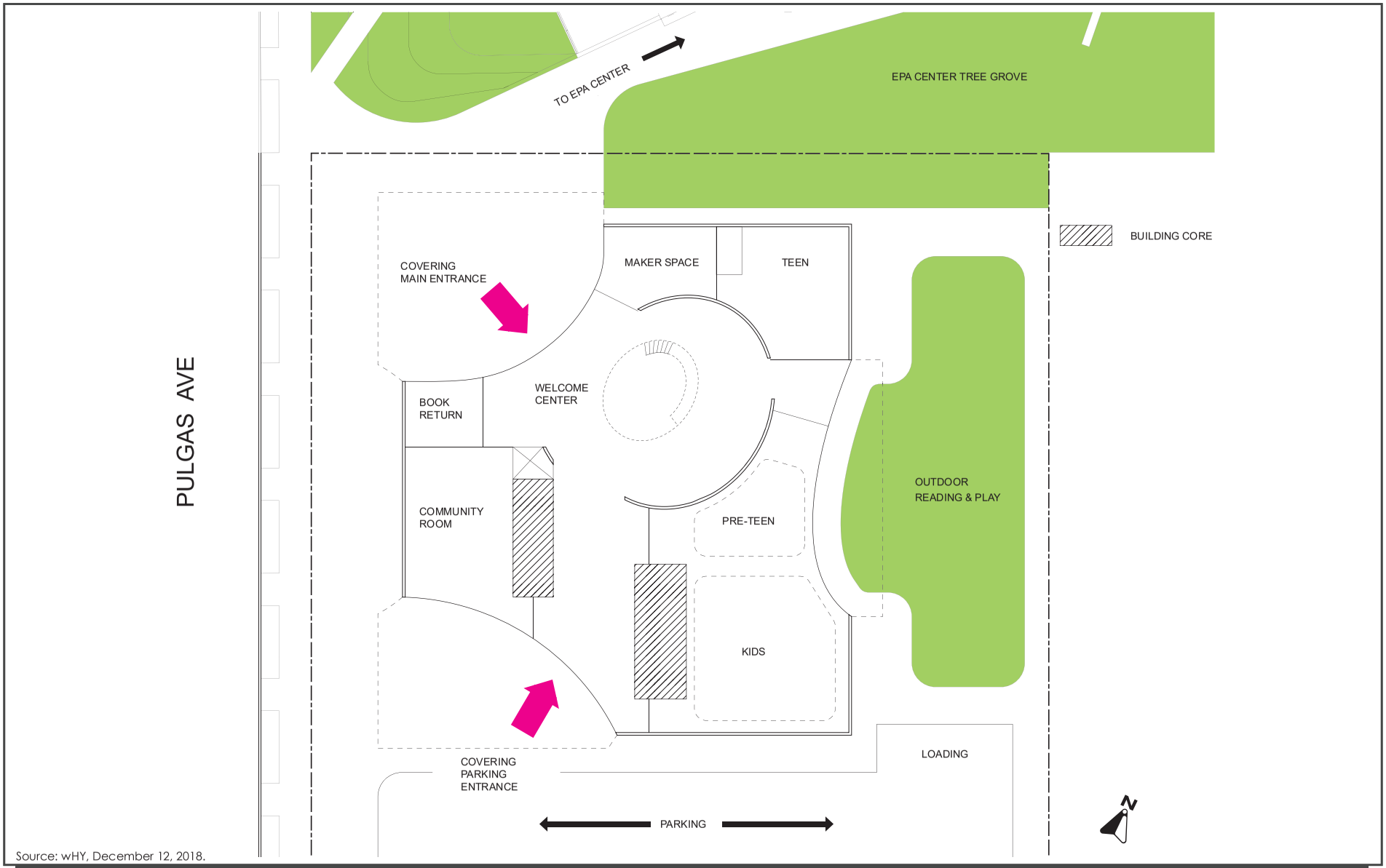
3.3.1 Library Building

Two conceptual design options for the library building have been proposed: Option 1 and Option 2. On March 3, 2020, the East Palo Alto City Council selected Option 1 as their preferred conceptual design. Under both design options, the project would remove the existing fencing and improvements on-site and redevelop the site with a new two-story, approximately 34,300-square-foot library, approximately 23,275-square-foot surface parking lot, and approximately 3,135 square feet of landscaping. Both design options would also include a new library building on the northern half of the project site and a new surface parking lot located on the southern half of the site. Additionally, both options would include spaces for various uses, including community activity, coworking, library, culinary literacy center, meeting and study areas, and a maker's space.[1] Space for book return processing, storage, kitchen, and mechanical equipment would also be provided within the library building under either option.

Option 1 would feature two y-shaped floor levels, with the upper level flipped 180 degrees, creating overhangs on the southwest and northwest corners and second floor terraces on the northeast and southeast corners of the building. This option would allow for two main pedestrian entrances along Pulgas Avenue adjacent to the proposed surface parking lot on the southern half of the site and the existing EPACENTER adjacent to the north. An outdoor reading and play area would also be included in the rear of the site and landscaping along the northern project boundary would be incorporated into the landscaping for the adjacent EPACENTER. A conceptual site plan of Option 1 is depicted in Figure 3.3-4.

Option 2 would feature a u-shaped ground-floor level oriented configuration in a north-south direction, opening up to the north and a rectangular upper floor crossing the "u" in an east-west direction, creating three independent second floor terraces. This option would include one main pedestrian entrance along Pulgas Avenue and a secondary pedestrian entrance at the rear of the building providing access from the surface parking lot. Three separate outdoor spaces would be provided along the east, northeast, and northern property lines with landscaping along the northern property line connecting to the adjacent EPACENTER landscaping. A conceptual site plan of Option 2 -is depicted in Figure 3.3-5.

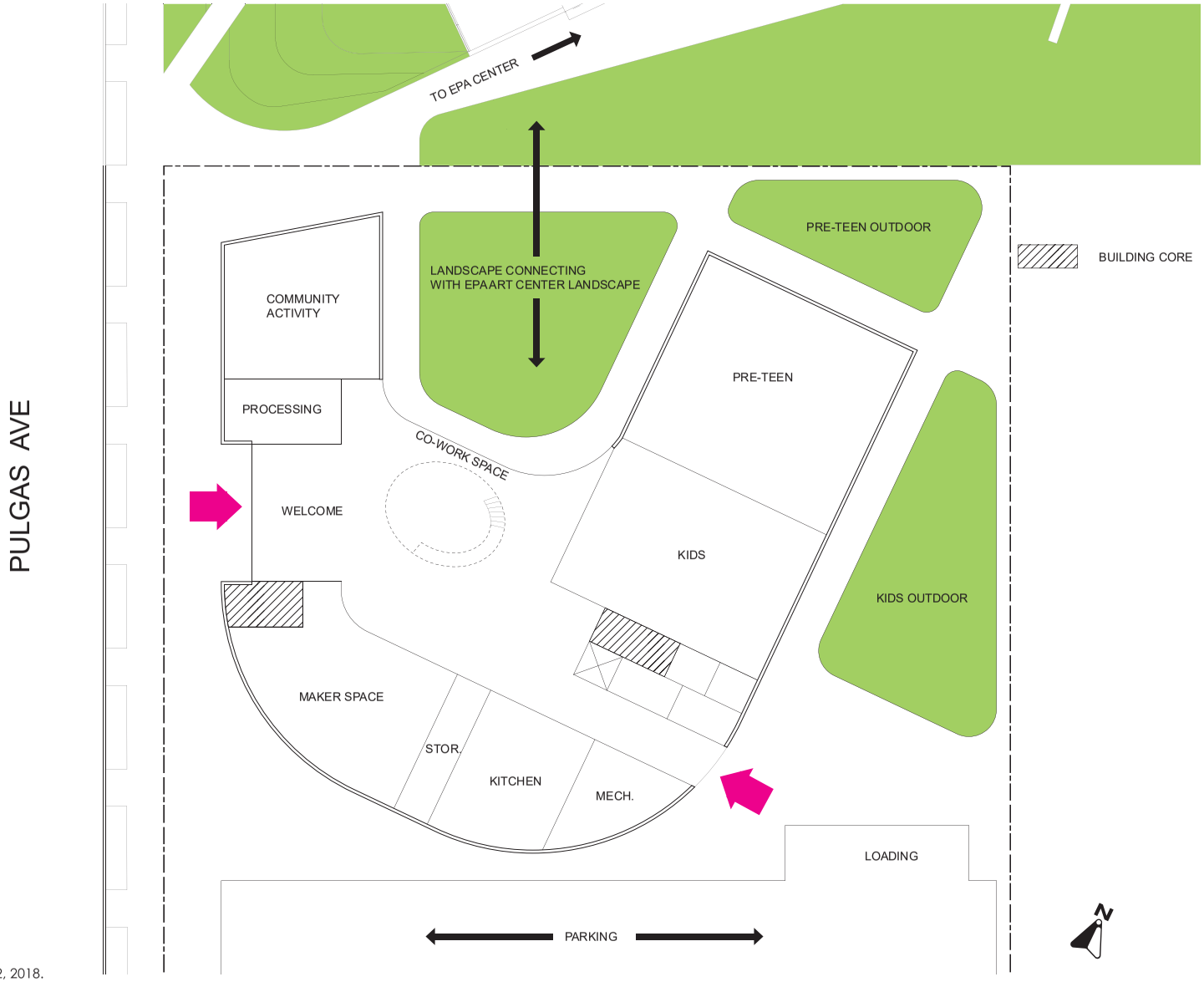
[1] Maker's Space is a place in which people with shared interests, especially in computing or technology, can gather to work on projects while sharing ideas, equipment, and knowledge.



Source: wHY, December 12, 2018.

CONCEPTUAL SITE PLAN, OPTION 1

FIGURE 3.3-4



Source: wHY, December 12, 2018.

CONCEPTUAL SITE PLAN, OPTION 2

FIGURE 3.3-5

3.3.2 Site Access and Parking

As mentioned previously, a landscaped surface parking lot would be constructed in the southern approximately one half of the project site and would provide up to 61 parking spaces for the proposed library. A two-directional driveway is proposed in the southeast corner of the site and would provide access to the surface parking lot via Pulgas Avenue.

3.3.3 Hours of Operation

If the property is acquired by the City and the library is constructed, the library would be open to the public from 8 am to 6 pm daily.

3.3.4 Landscaping

There are currently two trees and ornamental plants along the Pulgas Avenue frontage. None of the existing trees are considered protected trees under the East Palo Alto Tree Preservation and Management Regulations. With project implementation, all existing trees and shrubs on-site would be removed, and new trees and shrubs would be planted around the perimeter of the library building and site, within the surface parking lot, and within the proposed landscaping connection with EPACENTER.

3.3.5 Utilities

The project would connect to the existing eight-inch water main in Pulgas Avenue. At this time, no new off-site water system connections are proposed by the project.

The proposed project would connect to the existing 15-inch storm drain line in Pulgas Avenue. At this time, the project would incorporate stormwater treatment measures to meet the City of East Palo Alto stormwater requirements.

The proposed project would connect to the existing six-inch sewer main in Pulgas Avenue. The sanitary sewer system serving the project area is owned and operated by the East Palo Alto Sanitary District (EPASD).

3.3.6 Project Construction

Details of the specific construction activity required to implement the library are not yet known, as the design has not yet advanced to that stage. For purposes of the analysis in this document to inform the decision to acquire the property, it is assumed that construction of the proposed project (either design option) would be completed in one phase, which would take approximately 24 months. During this time, construction would occur during the City's allowed construction hours (7:00 a.m. to 6:00 p.m. Monday – Friday, from 9:00 a.m. to 5:00 p.m. on Saturdays and no work on Sundays and holidays).[2] Construction activities would include demolition of the existing surface parking lot, fence, and landscaping, as well as excavation, and construction of the two-story library building, outdoor areas, and surface parking lot. Prior to construction of the proposed library building, approximately one- to three-feet of fill would be imported to the site to elevate the building above the

[2] East Palo Alto. Municipal Code Section 15.04.125. Last amended August 9, 2021.

current flood plain (13 feet above mean sea level (amsl)). This equates to approximately 1,855 to 5,621 cubic yards or 155 to 468 truckloads of imported soil.[3] After fill is imported, the proposed project would involve excavation of up to approximately five feet below ground surface (bgs) for foundation construction and utility installation. Therefore, excavation would not extend greater than four feet below the current ground surface levels.

3.3.7 Project-Related Approvals, Entitlements, and Actions

The project would require the following approvals and permits issued by the City:

- General Plan Amendment and Rezoning
- Development Review

[3] Assuming 12 cubic yards per truckload.

SECTION 4.0 ENVIRONMENTAL SETTING, CHECKLIST, AND IMPACT DISCUSSION

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.12	Mineral Resources
4.2	Agriculture and Forestry Resources	4.13	Noise
4.3	Air Quality	4.14	Population and Housing
4.4	Biological Resources	4.15	Public Services
4.5	Cultural Resources	4.16	Recreation
4.6	Energy	4.17	Transportation
4.7	Geology and Soils	4.18	Tribal Cultural Resources
4.8	Greenhouse Gas Emissions	4.19	Utilities and Service Systems
4.9	Hazards and Hazardous Materials	4.20	Wildfire
4.10	Hydrology and Water Quality	4.21	Mandatory Findings of Significance
4.11	Land Use and Planning		

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.

4.1 AREAS OF NO MEASURABLE IMPACT

The proposed project would be to purchase a one-acre site and the subsequent development of plans to construct a new 34,300-square-foot library building, surface parking lot, and landscaping on a site that is partially developed with a gravel surface parking lot. Because the project's impacts under CEQA are measured against the baseline that consists of existing physical conditions, impacts in certain resource areas that are typically evaluated within an Initial Study will not occur. In the case of

the proposed project, impacts to agricultural, forest, and mineral resources, and wildfire hazards are not anticipated because these resources or hazards are not located in the project area. The project site, which is located in an urban area, is not farmland[4] or forest land, is not a source of mineral resources[5], and is not subject to wildfire.[6] Thus, these areas are not further analyzed in this Initial Study.

[4] California Natural Resources Agency. San Mateo County Important Farmland 2016. Published February 2018.
[5] City of East Palo Alto. Vista 2035 General Plan. March 17, 2016
[6] California Department of Forestry and Fire Protection. Fire Hazard Severity Zones Maps. Accessed April 22, 2021. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414.

4.2 AESTHETICS

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. There are no state-designated scenic highways within or near East Palo Alto. The closest officially designated state scenic highway to the project site is Interstate 280 from the San Mateo County/Santa Clara County line north to approximately Interstate 380.[7] This segment of 280 is located approximately 5.5-miles west of the project site.

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating aesthetic impacts resulting from planned development within the City, including the following:

Policy	Land Use and Urban Design
13.8	Viewsheds. Encourage developers to design projects that capitalize on views of adjacent natural resources. Require viewshed analysis as part of any potential development application. New development shall allow for the proposed east-west view corridor through Ravenswood north of Bay Road (see Specific Plan for details)

Ravenswood/ 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies and guidelines, as well as development regulations applicable to development within the Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating aesthetic impacts resulting from planned development within the Plan Area including the following:

Policy	Land Use and Urban Design
4.4	Ensure that new development respects existing public view corridors within the Plan Area and also allows for the proposed east-west view corridor through Ravenswood north of Bay Road. (More information on this proposed view corridor is provided in Chapters Six and Seven.)

[7] California Department of Transportation. "Scenic Highways." Accessed May 17, 2021. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

4.7	Ensure that all new development adheres to this Specific Plan's development standards, as well as its design standards and guidelines.
4.11	Create a distinctive design and architectural sense of place by encouraging public projects and public/community buildings to use a design/architecture component.
5.8	**Streetscape beautification.** Proactively beautify existing streetscapes with pedestrian-scaled lighting, and drought-tolerant street trees and landscaping
Policy	**Utilities and Public Services**
5.1	Ensure that new development does not adversely affect the Ravenswood Open Space Preserve and the Palo Alto Baylands Nature Preserve.
5.2	Encourage developers to design projects that capitalize on views of adjacent natural resources
Policy	**Infrastructure, Services, and Facilities**
8.6	Role of civic buildings. Require civic buildings to be distinctive, beautiful, and architecturally beneficial to the fabric of the City.

City of East Palo Alto Municipal Code and RBD

The City of East Palo Alto addresses visual considerations for development in various City documents, including the RBD Specific Plan and the Municipal Code. The library site is located within the RBD Specific Plan area. The RBD Specific Plan and the City Zoning Ordinance (Development Code) set forth specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, and open space and setback requirements.

4.2.1.2 *Existing Conditions*

Project Site

The project site consists of a partially developed one-acre lot with the northern approximately one third of the site developed with a gravel surface parking lot and the remaining approximately two-thirds undeveloped grasses. Chain-link and metal fencing surrounds the entire project site and a gated driveway at the northwest corner of the site provides the sole access to the site from Pulgas Avenue. The site is utilitarian and lacks substantial ornamental landscaping with the exception of two ornamental trees along the western project boundary. Photos 1, 2, 3, 4, and 5 illustrate the existing conditions of the project site and surrounding area.

Photo 1: View of the Project Site looking east from Pulgas Avenue.

Photo 2: View of the Project Site looking east from the property line.

PHOTOS 1 & 2

Photo 3: Residential Uses across Pulgas Avenue from the project site.

Photo 4: Industrial Uses adjacent to the south of the project site.

Photo 5: EPA Center, adjacent to the north of the project site.

Visual Character of Project Area

The project site is located in the eastern portion of East Palo Alto. The project site is bounded by industrial buildings to the south, east and northeast, Pulgas Avenue and residential uses to the west, and the EPACENTER, a community center, to the north. Existing development in the project area consists primarily of one- and two-story industrial buildings of corrugated metal, wood frame, and concrete tilt-up construction and two-story wood frame residential buildings with stucco and wood facades. The two-story community center building is of wood frame and features stucco, tile, wood panel facades. The Ravenswood Open Space Preserve and Bay Trail are located approximately 780-feet east of the project site.

Scenic Views and Resources

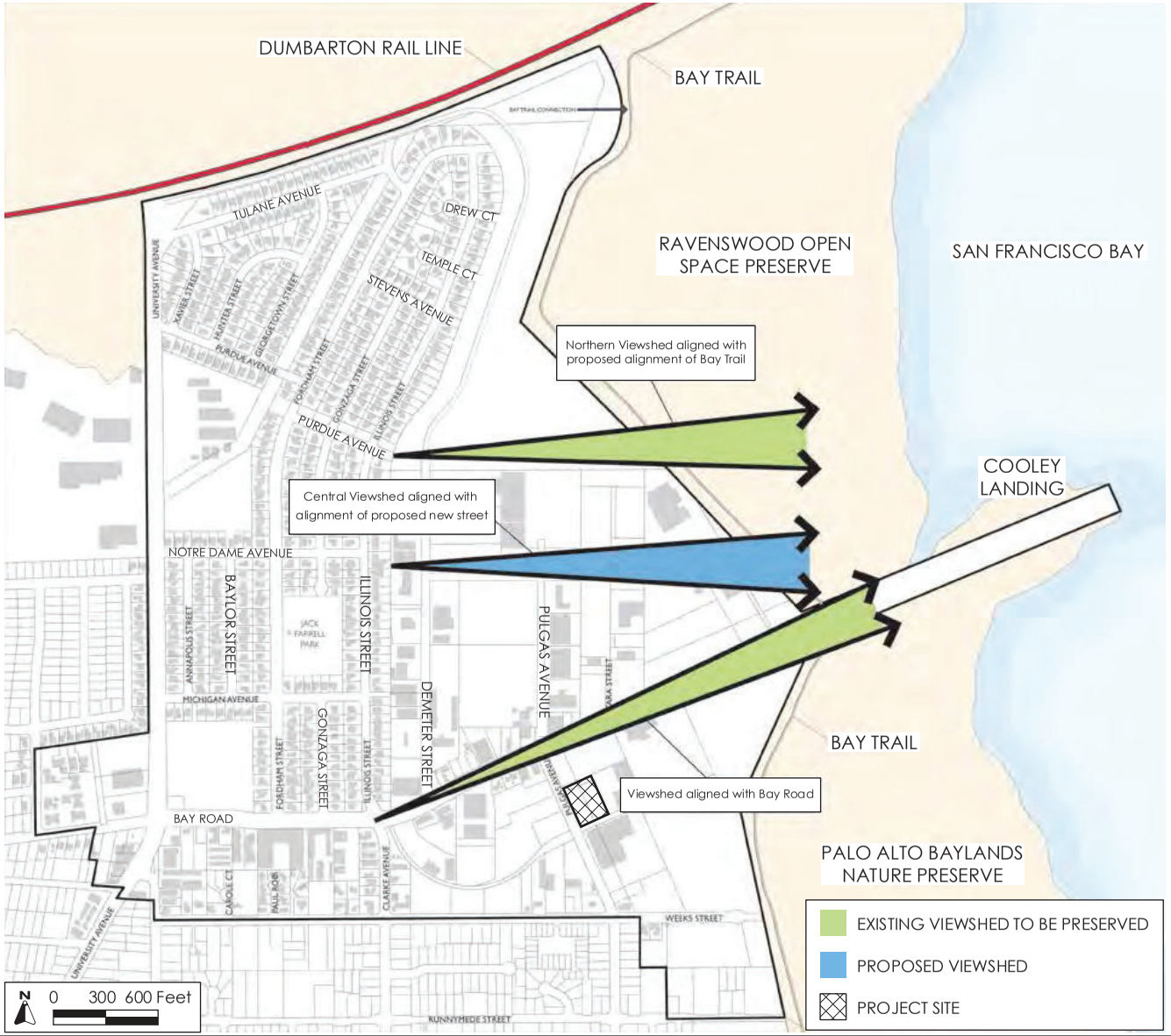
As discussed in the General Plan and Specific Plan, views of the San Francisco Bay and Mount Diablo Range are considered scenic resources in the City of East Palo Alto. As shown on Figure 4.2-1, the Specific Plan identifies two existing viewsheds and a proposed viewshed that should be preserved. All three viewsheds are from the City looking east toward the San Francisco Bay. The project site is not located within any portion of the three identified viewsheds. The South viewshed, which aligns with Bay Road, is located north of the project site.

Hillsides are visible across the San Francisco Bay to the east of the site; however, these views are substantially obstructed by existing development. The nearest designated state scenic highway is Interstate 280, approximately 6.5-miles west of the site. Due to the distance of the project site from the nearest scenic highway and the presence of intervening structures, the project site is not visible from a state designated scenic highway.

Light and Glare

Existing lighting at the project site is currently limited to streetlights along Pulgas Avenue and building mounted security lighting on adjacent buildings.

Glare can be caused by sunlight or artificial light reflecting from finished surfaces. The existing streetlights and building-mounted security lights adjacent to the site are directed downwards.



DESIGNATED VIEWSHEDS

FIGURE 4.3-1

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
1) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? [8] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact AES-1: The project would not have a substantial adverse effect on a scenic vista. (Less than Significant Impact)

The RBD Specific Plan identifies scenic vistas within the project area as bay views and views of the Mount Diablo Range to the east, which are visible from public viewpoints and street corridors. The RBD Specific Plan includes goals and policies related to preservation of scenic views and identifies viewshed standards for projects located within an existing or proposed viewshed. Policy LU-4.4 calls for new development to respect existing public view corridors within the plan area and allow for the proposed east-west view corridor through Ravenswood north of Bay Road.

As shown in Figure 4.2-1, the project site is not located within an existing or proposed viewshed. The south viewshed, which aligns roughly with Bay Road, is located approximately 215 feet north of the project site and does not overlap with any portion of the site. For these reasons, the proposed project would not be subject to viewshed standards identified in the Specific Plan, and the proposed project would have a less than significant impact on scenic vistas. **(Less than Significant Impact)**

Impact AES-2: The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. (No Impact)

The nearest officially designated state scenic highway to the project site is Interstate 280, which is located approximately 6.5-miles west of the project site. The site is not visible from Interstate 280.

[8] Public views are those that are experienced from publicly accessible vantage points.

For this reason, the project would not damage scenic resources within a designated state scenic highway. **(No Impact)**

Impact AES-3:	**The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Less than Significant Impact)**

The project site is located in an urbanized area and is zoned Ravenswood Employment Center (REC) in the RBD Specific Plan and East Palo Alto Development Code. The East Palo Alto Development Code does not include policies related to preserving scenic quality. However, such policies are included in the General Plan and RBD Specific Plan.

The General Plan identifies goals to preserve the scenic quality of the city, including through the identification of Gateway areas and viewsheds. Specifically, General Plan Urban Design Policy 13-8 calls for developments to capitalize on views of adjacent natural resources, allow for viewsheds through Ravenswood including along Bay Road, requires a viewshed analysis as part of any development application, and refers readers to the RBD Specific Plan for details on implementation. RBD Specific Plan Land Use and Community Character Policy 4.4 calls for the City to ensure new development respects existing public view corridors within the Plan area and also allows for the proposed east-west view corridor through Ravenswood north of Bay Road. This is achieved through implementation of development standards contained in the RBD. Figure 4.2-1 identifies the existing and planned viewsheds within the RBD Specific Plan area. As shown on this figure and as noted above in Section 4.2-1, Environmental Setting, the project site is not located within an identified viewshed and would, therefore, not be subject to viewshed standards identified in the RBD. The project site is not located within a designated gateway area. Therefore, the project would not impact the scenic quality within an identified gateway area.

Existing development surrounding the project site consists of one- and two-story industrial, institutional and residential buildings on Pulgas Avenue and Bay Road. The project would allow for future construction of a two-story library building on a site where buildings up to two stories or 26 feet are allowed, whichever is greater. Development of the library would require the approval of a development review application, which would require compliance with the development code. Therefore, the future library development on-site would be consistent with the height of surrounding development. For these reasons, the proposed project would not conflict with applicable zoning and other regulations governing scenic quality. **(Less than Significant Impact)**

Impact AES-4:	**The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (Less than Significant Impact)**

The project site is located in a developed area of East Palo Alto and is located approximately 750 feet west of the Ravenswood Nature Preserve. Existing lighting at the project site is produced by streetlights on Pulgas Avenue and building-mounted security lighting on the surrounding industrial buildings.

The project would be required to comply with lighting requirements in Section 18.22.050 of the

Municipal Code as well as development standards and design guidelines identified in the RBD. Specifically, the Municipal Code Section 18.22.050 limits the average maintained lighting levels for non-residential uses to five foot-candles for parking lots and other open areas; 10 foot-candles along fonts of structures and along main drive aisles within parking lots, and 20 foot-candles for high security areas (not including parking areas) as measured at all property line boundaries. Light fixtures under canopy are required to be recessed into the canopy ceiling with a flat lens to prevent glare. Additionally, Section 18.22.050.3 requires lighting levels not exceed 0.1 foot-candles at any common property line with property zoned, used as, or planned for residential uses, including residential uses in a mixed-use zone.

The RBD Specific Plan Design Standards and Guidelines include standards for lighting within new development in the RBD Specific Plan area. Standard III.C.4.a, c, and e call for lighting sources to be kept low to the ground as possible while ensuring safe and functional levels of illumination, up lighting of buildings be designed to light the building rather than the sky, and exterior lighting be placed to mitigate security concerns, especially in parking lots, pedestrian paths, outdoor gathering spaces, building entries, and any other pedestrian-accessible area.

As discussed in Section 3.3 Proposed Project, the proposed project involves the acquisition of property for future library development on-site. Design level details of the future library development such as the number, design, location and future illumination levels are yet to be developed and are not currently known. A design review permit approval would be required for the construction of the library. Project lighting would be reviewed for consistency with Municipal Code Section 18.22.050 and RBD Specific Plan Design Standards and Guidelines during the building permit review process. Compliance with Municipal Code regulations and RBD Specific Plan Design Standards and Guidelines would ensure exterior building lighting does not create a new source of light and glare. Furthermore, due to the presence of existing development and because the intensity of light decreases with increasing horizontal distance from the source,[9] any increased lighting resulting from the proposed project would be incremental and would not result in impacts to wildlife within the Ravenswood Nature Preserve.

For these reasons, the proposed library building would not result in significant impacts as a result of lighting and glare. **(Less than Significant Impact)**

[9] National Aeronautics and Space Administration. More on Brightness as a Function of Distance. May 5, 2016. https://imagine.gsfc.nasa.gov/features/yba/M31_velocity/lightcurve/more.html#:~:text=The%20intensity%20or%20brightness%20of,follows%20an%20inverse%20square%20relationship.&text=Notice%20that%20as%20the%20distance,one%20over%20r%20squared%22%20relationship.

4.3 AIR QUALITY

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O_3), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.[10] Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health are summarized in Table 4.3-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 4.3-1: Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	• Aggravation of respiratory illness • Reduced visibility
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

High O_3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O_3 levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

PM is a problematic air pollutant of the Bay Area. PM is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and

[10] The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions.

Toxic Air Contaminants

TACs are a broad class of compounds known to have health effects. They include but are not limited to criteria pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).[11] Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

4.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O_3, CO, SO_x, NO_x, and lead.

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant.

[11] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed May 6, 2022. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, the plan involves application of emission control strategies to existing diesel vehicles and equipment to reduce DPM (in additional to other pollutants). Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment (including off-road equipment), will significantly reduce emissions of DPM and NO_X.

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.[12]

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating air quality impacts resulting from development in the City, including the following:

[12] BAAQMD. *Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

Policy	Health and Equity
10.7	**Other mobility strategies.** Implement the strategies in the Transportation Element that improve air quality. These include transit, walking, biking, and Transportation Demand Management strategies.

Policy	Parks, Open Space, and Conservation
6.2	**New tree planting.** Prioritize the planting of new trees on sites designated as sensitive receptors (e.g., schools, health centers) or that are in close proximity to sources of air pollution such as freeways and heavily traveled road corridors.

Ravenswood/ 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies and guidelines, as well as development regulations, applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating air quality impacts resulting from planned development within the Plan Area including the following:

Policy	Land Use and Urban Design
6.3	Ensure that a Health Risk Assessment is prepared in accordance with BAAQMD permit requirements for facilities producing new potentially hazardous air emissions in the Plan Area. If the health risk assessment concludes that an unacceptable risk would be posed to nearby sensitive receptors, including schools, ensure adequate mitigation is provided to reduce the emissions to the extent possible.
6.4	Follow the regulations pertaining to siting of new schools in California described in Public Resources Code Section 21151.8 and Education Code Section 17123 to identify facilities within a one quarter mile radius of a proposed school site that might emit hazardous air emissions and require a Health Risk Assessment to ensure these emissions do not pose an unacceptable risk to the school, or if there is no suitable alternative site, that these risks are mitigated to the extent possible and publicly acknowledged.

4.3.1.3 *Existing Conditions*

The San Francisco Bay Area Air Basin, within which the project site is located, has non-attainment status for ground level ozone, fine particulate matter ($PM_{2.5}$), and respirable particulate matter (PM_{10}). The San Francisco Bay Area Air Basin has attainment or undetermined status for all other regional criteria pollutants for which the US EPA and CARB have set standards. The nearest official monitoring station which monitors all of the criteria pollutants and ozone precursors is located at 158 East Jackson Street in San José, approximately 15-miles southeast of the site.[13] Pollutant monitoring results for the years 2017 to 2019 at the San José monitoring station are shown in Table 4.3-2. The

[13] BAAQMD, Meteorology and Measurement Division. 2017 Air Monitoring Plan. July 1, 2018. Accessed May 17, 2022. http://www.baaqmd.gov/~/media/files/technical-services/2017_network_plan_20180701-pdf.pdf?la=en. There is a BAAQMD monitoring station located at 897 Barron Avenue, Redwood City approximately four miles west of the site. This station monitors ground-level ozone, nitrous oxide, carbon monoxide and $PM_{2.5}$. The station does not monitor PM_{10}.

station monitors ozone, carbon monoxide, nitrogen oxide, PM_{10} and $PM_{2.5}$ levels.

Table 4.3-2: Ambient Air Quality Standards Violations and Highest Concentrations

Pollutants	Standard	Days Exceeding Standard		
		2017	2018	2019
SAN JOSÉ STATION				
Ozone	State 1-hour	4	0	2
	Federal 8-hour	4	0	2
Carbon Monoxide	Federal 8-hour	0	0	0
Nitrogen Dioxide	State 1-hour	0	0	0
PM_{10}	Federal 24-hour	0	0	0
	State 24-hour	6	0	4
$PM_{2.5}$	Federal 24-hour	6	15	0

Source: BAAQMD. Air Pollution Summaries (2017-2019). Available at: https://www.baaqmd.gov/about-air-quality/air-quality-summaries

Sensitive Receptors

The closest sensitive receptors to the project site are residences located on the west side of Pulgas Avenue, approximately 50 feet west of the project site.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
2) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
3) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.2.1 *Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of East Palo Alto has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 4.3-3, below.

Table 4.3-3: BAAQMD Air Quality Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG, NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	**Single Source**	**Combined Cumulative Sources**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual $PM_{2.5}$	0.3 $\mu g/m^3$	0.8 $\mu g/m^3$ (average)	

In addition to the thresholds listed above, BAAQMD also identifies screening criteria to provide lead agencies with a conservative indication of whether a project could result in potentially significant air quality impacts. If all of the screening criteria are met by a project, then the project's air quality emissions would be less than significant and a detailed air quality assessment is not required.[14] The screening criteria for construction emissions associated with libraries is 277,000 square feet. The screening criteria for operational emissions associated with libraries is 78,000 square feet.

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan. (Less than Significant Impact)

The proposed property acquisition would not directly result in any air pollutant emissions. If the City decides to proceed with the property acquisition, future library development would generate long-

[14] BAAQMD. *BAAQMD CEQA Guidelines.* May 2017. Page 3-1.

term emissions during operation and short-term emissions during construction.

Future library development on-site would not conflict with the 2017 CAP because it is below the screening criteria of 78,000 square feet for operational impacts associated with libraries and the 277,000 square feet screening criteria for construction related impacts associated with libraries. The project would, therefore, not generate criteria pollutant emissions in excess of the BAAQMD operational or construction criteria pollutant significance thresholds. Future library development on-site would be considered urban infill and would be located near bike paths and transit with regional connections. Thus, future library development would not be required to incorporate project-specific control measures listed in the 2017 CAP. Further implementation of the project would not inhibit BAAQMD or partner agencies from continuing progress toward attaining state and federal air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 CAP. **(Less than Significant Impact)**

Impact AIR-2:	**The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. (Less than Significant Impact)**

As noted in Section 4.3.2.2 Existing Conditions, the Bay Area is considered a non-attainment area under applicable state and federal ambient air quality standards.

The proposed property acquisition would not directly result in any criteria pollutant emissions, but if the City decides to proceed with the property acquisition, future library development would generate emissions during construction and operations. However as discussed under Impact AQ-1 above, future library development would not exceed the BAAQMD screening criteria for libraries and can therefore be presumed to result in a less than significant net increase in criteria pollutant emissions in a region that is in non-attainment. **(Less than Significant Impact)**

Impact AIR-3:	**The project would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant Impact)**

Exposure of sensitive receptors to substantial pollutant concentrations creates a community risk. Project impacts related to increased community risk can occur by introducing a new source of TACs with the potential to adversely affect new or existing sensitive receptors in the project vicinity.

Construction

Fugitive Dust Emissions

Construction activities associated with future library development on-site would include grading, site preparation and relocation of soil, which would generate fugitive dust and other particulate matter that could affect nearby sensitive receptors. BAAQMD considers construction emissions that are below the threshold of significance (such as those of the proposed project) less than significant if Best Management Practices (BMPs) are implemented. The project would implement the following Standard Permit Conditions for Entitlement Projects to reduce fugitive dust impacts during

construction. A development review would be required for the development of the library, which would include standard permit conditions.

Standard Permit Condition for Entitlement Projects:

- Air Quality. The following measures shall be implemented during all phases of construction to control dust and exhaust at the project site:
    - Water active construction areas at least twice daily or as often as needed to control dust emissions.
    - Cover trucks hauling soil, sand, and other loose materials and/or ensure that all trucks hauling such materials maintain at least two feet of freeboard.
    - Remove visible mud or dirt track-out onto adjacent public roads using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
    - Enclose, cover, water twice daily or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
    - Pave new or improved roadways, driveways, and sidewalks as soon as possible.
    - Lay building pads as soon as possible after grading unless seeding or soil binders are used.
    - Replant vegetation in disturbed areas as quickly as possible.
    - Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
    - Minimize idling times either by shutting off equipment when not in use, or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage for construction workers at all access points.
    - Maintain and property tune construction equipment in accordance with manufacturer's specifications. Check all equipment by a certified mechanic and record a determination of running in proper condition prior to operation.
    - Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints.

With implementation of the standard permit condition limiting construction dust and exhaust, future library development would not result in a cumulatively considerable net increase in criteria pollutant emissions from fugitive dust.

Toxic Air Contaminants

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust are known sources of TAC emissions. Construction exhaust emissions pose health risks for sensitive receptors such as surrounding residents. The primary health risk impact issues associated with construction emissions are cancer risk and exposure to DPM and $PM_{2.5}$. As discussed under Impact AQ-1 above, construction activities associated with future library development on-site would last for approximately 24 months and involve truck traffic and heavy equipment use approximately 25 feet from the EPACENTER and 50 feet from the nearest residential uses on Pulgas Avenue. Due to the

length of the construction period, work proposed, and proximity to receptors, future library development on-site could expose sensitive receptors to substantial pollutant concentrations.

Impact AQ-1: Emissions of toxic air contaminants during construction of a library on-site could exceed BAAQMD thresholds and result in a significant impact.

Mitigation Measure:

MM AQ-1.1: A health risk assessment shall be completed for the proposed project once construction equipment and phasing details are available to identify impacts, and if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds. The health risk assessment shall also evaluate cumulative health risk levels, considering other TAC sources within 1,000 feet, consistent with BAAQMD methodology, and identify measures to ensure the project would not contribute to a cumulative health risk based on cumulative thresholds.

Implementation of MM AQ-1.1 would reduce TAC impacts associated with future library development to a less than significant level. **(Less than Significant Impact)**

Impact AIR-4:	**The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (Less than Significant Impact)**

Odors are generally considered an annoyance rather than a health hazard. Land uses that have the potential to be sources of odors that generate complaints include, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities.

If the City decides to proceed with the proposed property acquisition, future library operations on-site would not generate objectionable odors during operations. Construction activities associated with potential future library development would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors; however, diesel exhaust has highly diffusive properties, and the odors would be localized and temporary. Therefore, the proposed property acquisition would not result in other emissions adversely affecting a substantial number of people. **(Less than Significant Impact)**

4.4 BIOLOGICAL RESOURCES

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. The taking and killing of birds resulting from an activity is not prohibited by the MBTA when the underlying purpose of that activity is not to take birds.[15] Nesting birds are considered special-status species and are protected by the USFWS. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

[15] United States Department of the Interior. "Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take." Accessed April 15, 2021. https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts to biological resources resulting from planned development within the City including the following:

Policy	Parks, Open Space, and Conservation
4.1	**Public access.** Ensure that public access to the Bay is designed, developed, and maintained in a manner that protects the existing natural resources and habitats.
4.2	**Human activities.** Protect wildlife from adverse impacts caused by human activities.
4.3	**Don Edwards NWR management.** Coordinate with federal agencies and neighboring cities to manage the Don Edwards San Francisco Bay National Wildlife Refuge in a manner consistent with the Conservation Plan, including: • Increased survey efforts on native fauna and flora • Additional improvements to tidal marsh areas • Enhanced visitor service and expanding the volunteer program • Adopt the 15 Comprehensive Conservation Plan
4.4	**Light Pollution.** Require that new buildings located adjacent to Baylands Nature Preserve or Ravenswood Open Space Preserve shield any site lighting from the Bay.
4.5	**Predation.** Ensure that new development and landscaping adjacent to tidal marshes and other Bayfront areas avoids tall perches for raptors or other predatory birds. Protect the salt-marsh harvest mouse from feral cat predation.
4.6	**Native Species.** Encourage or require the use of native and/or non-invasive plants in privately built landscaping or new open spaces near natural open space areas, in order to provide foraging, nesting, breeding, and migratory habitat for wildlife. Discourage use of herbicides and fertilizers.
4.7	**Interagency coordination**. Coordinate with other public agencies such as the San Francisquito Creek Joint Powers Authority, Army Corps of Engineers, National Fish and Wildlife Service, and other similar entities on construction or development activities occurring within or adjacent to the City.
6.1	**Urban forestry.** Expand the urban forest in East Palo Alto by adding street trees and landscaping throughout the City.

Ravenswood 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies and guidelines, including development regulations, applicable to development within the RBD Specific Plan area, including Bird-Safe

Building Standards. These standards provide development requirements that are intended to reduce the number of bird strikes against buildings. The standards apply to development located less than 300 feet from an open space that meets the following criteria:

- The open space has an area of at least two acres.
- The open space is open water or wetlands, or it is dominated by vegetation, including vegetated landscaping.

City of East Palo Alto Municipal Code

Sections 12.16 and 18.28 of the City's Municipal Code states that it is unlawful for any person to destroy, remove, cause to be destroyed, or removed any protected tree upon any private or public property in the City without first having obtained a Tree Removal Permit, unless an exemption applies. Protected trees are defined as:

a.) Any tree having a main stem or trunk that measures 24 inches or greater in circumference at a height of 40 inches above grade;
b.) Any tree within a public street or public right-of-way, regardless of size;
c.) Any tree that was required to be preserved as a condition of development approval granted by the City;
d.) Any tree required to be planted as a replacement for any unlawfully removed tree

Furthermore, the following activities are exempt from the permitting process:

- **Emergencies.** If the condition of a tree presents an immediate hazard to life or property, as defined by ANSI A300, it may be removed without a permit on order of the City Manager, the Building Official, or the Director;
- **Trees on public property (18.16).** Employees of the City may take action with regard to trees on City-owned property as may be necessary to maintain safety;
- **Public utilities.** Public utilities subject to the jurisdiction of the State Public Utilities Commission may, without a permit, take such actions necessary to comply with the safety regulations of the Commission and as may be necessary to maintain a safe operation facilities. Where possible, trees shall be preserved;

Replacement trees shall be of an equivalent value as calculated in the latest edition of the Council of Tree and Landscape Appraisers Guidelines for Establishing Values of Trees and Other Plans on-site or if replacement cannot be fully accomplished on-site, staff may authorize in-lieu fees.

Urban Forestry Master Plan

The Urban Forest Master Plan is a document that guides urban forestry in East Palo Alto to maximize long-term climate, biodiversity and health benefits for the community and to ensure that urban forest management aligns with the City's strategic goals. This plan highlights existing needs and resources and presents recommendations for the protection, maintenance, sustainability, and enhancement of the City's tree canopy.

4.4.1.2 *Existing Conditions*

On-site Habitats

The RBD Specific Plan EIR identifies the project site as urban landscape. According to the RBD Specific Plan EIR, typical ruderal vegetation within the urban setting includes wild radish, yellow star thistle, Italian thistle, black mustard, and non-native annual grasses.

The urban setting provides some habitat value for urban-adapted bird species, such as house finch, mourning dove, American robin (*Turdis migratorius*), and Brewer's blackbird (*Euphagus cyanocephalus).*

Special-Status Species

Special-Status Plan Species

The RBD Specific Plan EIR evaluated the potential occurrence of 21 special-status plant species that are documented in the greater plan area by the California Natural Diversity Database (CNDDB) and determined that the following four species have the potential to occur in the Specific Plan Area: California seablite, alkali milk vetch, Point Reyes Bird Beak, and Congdon's tarplant. The project site is covered by gravel surface parking lot and grassland and, therefore, special-status plant species are not expected to occur on the site.

Special-Status Animal Species

The RBD Specific Plan EIR evaluated the potential occurrence of 10 special-status species that are documented in the greater project area by the CNDDB. The following animal species were determined to potentially occur in the project area: the burrowing owl, western snowy plover saltmarsh common yellowthroat, Alameda song sparrow, California black rail, California Ridgway's rail, California least tern, pallid bat, salt marsh harvest mouse, and salt marsh wandering shrew. The project site is covered by gravel surface parking lot and grassland and, therefore, special-status animal species are not expected to occur on the site.

Migratory Wildlife Corridors

Generally, the project site does not function as a movement corridor. Although the northern coastal salt marsh habitat to the east of the project site, located within the Ravenswood Open Space Preserve, provides valuable habitat for large numbers of birds, including several special-status species, the site is not located along movement pathways between high-quality habitats. Additionally, existing fencing around the project site and the presence of extensive urban land uses surrounding the site do not allow for movement of wildlife species through the project site.

On-site Trees

The project site is located in a developed, urban area and contains a gravel surface parking area and minimal landscaping. Landscaping at the site is minimal and limited to two trees and shrubs along the project perimeter. The nearest wetland area (Ravenswood Open Space Preserve) is located approximately 730 feet east of the project site.

Conservation Plan

The project site is not within the boundaries of an adopted or pending Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☐	☒
3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Impact BIO-1:	**The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. (Less than Significant Impact)**

Special-Status Plant Species

The project site is currently partially developed with a gravel surface parking lot, undeveloped grass area, and two trees. Special-status plant species that are known to occur in the project area would not occur on the project site because suitable habitat, such as saltwater marshes, vernal pools, and grasslands, are absent from the project site. The Specific Plan EIR identifies the site as urban habitats and therefore, special-status species would not be affected during construction of the proposed project. Nonetheless, construction of a library on-site would be subject to project-level environmental review when they are proposed, which would address habitat impacts at that time. Therefore, the proposed property acquisition would not have a substantial adverse effect on candidate, sensitive, or special-status species. **(Less than Significant Impact)**

Special-Status Animal Species

The project site includes a grass area and two trees. Suitable habitat for most of the special-status animal species known to occur in the project area is not present on the project site. However, nesting birds may be present in on-site trees or in mature trees adjacent to the project site prior to or during construction of a library on-site. Nesting birds, including urban adapted raptors, are protected under the provisions of the MBTA and the CDFG Code 3503.5. Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings or could otherwise lead to nest abandonment. Nest abandonment and/or loss of reproductive effort caused by disturbance are considered "take" by the CDFG, and, therefore, would constitute a significant impact. Based on the preliminary library designs, future development of a library on-site would likely require removal of the two existing trees on-site. Furthermore, construction activities on-site could result in disturbance of nesting birds during the breeding season which could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance on and adjacent to the construction zone would constitute a significant impact.

Impact BIO-1: Future library development would result in impacts to nesting birds, if present on or adjacent to the site at the time of construction.

Mitigation Measures: The following mitigation measures would reduce and/or avoid impacts to nesting birds (if present on or adjacent to the site) to a less than significant level.

MM BIO-1.1: Prior to the start of any tree removal, or any grading or demolition activities (whichever occurs first), the project applicant shall schedule demolition and construction activities to avoid the nesting season. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1st through August 31st (inclusive). Construction activities include any site disturbance such as, but not limited to, tree trimming or removal, demolition, grading, and trenching.

MM BIO-1.2: If demolition and construction cannot be scheduled between September 1st and January 31st (inclusive), pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests shall be disturbed during construction activities. This survey shall be completed no more than 14 days prior to the initiation of construction activities during the early part of the breeding season (February 1st through April 30th inclusive) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May 1st through August 31st inclusive). During this survey, the ornithologist shall inspect all trees and other possible nesting habitats on-site and within 250 feet of the site for nests.

MM BIO-1.3: If an active nest is found within 250 feet of the project area to be disturbed by construction, the ornithologist, in consultation with the California Department of Fish and Wildlife, shall determine the extent of a construction free buffer zone to be established around the nest, (typically 250 feet for raptors and 100 feet for other birds), to ensure that raptor or migratory bird nests shall not be disturbed during project construction.

MM BIO-1.4: Prior to any tree removal, or any grading or demolition activities (whichever occurs first), the ornithologist shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the City's Director of Planning or Director's designee of the Department of Planning, Building and Code Enforcement.

With implementation of MM BIO-1.1 through MM BIO-1.4, the project's impact to nesting birds would be less than significant. **(Less Than Significant Impact with Mitigation)**

Impact BIO-2:	**The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. (Less than Significant Impact)**

The project site is partially developed with a gravel surface parking lot, undeveloped grass area, and minimal landscaping. There is no riparian habitat/sensitive natural community on or adjacent to the site.[16] The nearest riparian habitat/sensitive natural community are wetlands located approximately 730 feet east of the project site.[17] Therefore, the acquisition of property for and development of a library on-site would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. **(No Impact)**

[16] USFWS. National Wetlands Inventory, Wetlands Mapper. Accessed December 22, 2022.
[17] Ibid.

Impact BIO-3:	The project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. (No Impact)

The project site is partially developed with a gravel surface parking lot, undeveloped grass area, and minimal landscaping. There are no wetlands on the site.[18] The nearest wetlands are located approximately 730 feet east of the project site.[19] Therefore, the acquisition of property for and development of a library on-site would not have a substantial adverse effect on wetlands. **(No Impact)**

Impact BIO-4:	The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Less than Significant Impact)

As discussed in Section 3.2 Proposed Project, design details for the proposed library building are currently conceptual and would be further developed if the City commits to purchasing the property.

It has been well documented that glass windows and building facades can result in injury or mortality of birds due to birds' collision with these surfaces. Because birds do not perceive glass as an obstruction the way humans do, they may collide with glass when the sky or vegetation is reflected in glass (e.g., they see the glass as sky or vegetated areas); when transparent windows allow birds to perceive unobstructed flight routes through the glass (such as at corners); and when the combination of transparent glass and interior vegetation (such as in planted atria) result in attempts by birds to fly through glass to reach that vegetation. The majority of avian collisions with buildings occur within the first 60 feet of the ground, where birds spend the majority of their time engaging in foraging, territorial defense, nesting, and roosting activities, and where vegetation is most likely to be reflected in glazed surfaces.

The bird species with the greatest potential to collide with the proposed library building would consist primarily of the common, urban-adapted species that currently use the site and adjacent parcels.

As noted previously, the RBD Specific Plan contains Bird-Safe Building Standards which apply to projects located less than 300 feet from an open space that meets the following criteria:

- The open space has an area of at least two acres.
- The open space is open water or wetlands, or is dominated by vegetation, including vegetated landscaping.

The project site is not located within 300 feet of open space areas meeting the criteria listed above and would, therefore, not be required to comply with the RBD Specific Plan Bird-Safe Building Standards. For these reasons, the proposed property acquisition would not have a substantial adverse

[18] Ibid.
[19] Ibid.

effect on wildlife movement and nursery sites. **(Less than Significant Impact)**

Impact BIO-5:	**The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Less than Significant Impact)**

As noted in Section 3.2.3 Landscaping above, there are two trees on-site. Based on the conceptual designs provided, future library development would result in the removal of both existing trees on-site to accommodate a future driveway and replacement landscaping. Removal of trees would be required to conform to the replacement requirements as identified in the East Palo Alto Tree Ordinance (Municipal Code Section 18.16 and 18.28). Therefore, the proposed property acquisition would not conflict with any local policies or ordinances protecting biological resources. **(Less than Significant Level)**

Impact BIO-6:	**The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (No Impact)**

The project site is not located within an adopted or pending habitat conservation plan or natural community conservation plan. Therefore, the proposed property acquisition and development of the proposed project would not conflict with the provisions of an adopted habitat conservation or natural community conservation plan. **(No Impact)**

4.5 CULTURAL RESOURCES

The following discussion is based on a Literature Search completed by Holman & Associates in connection with the adjacent EPACENTER project on April 21, 2017. A copy of the Literature Search, which is a confidential document, is on file at the City of East Palo Alto Community and Economic Development Department and is available upon request with appropriate credentials.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[20]

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

[20] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." March 14, 2006.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease, and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts to cultural resources resulting from planned development within the City, including the following:

Policy	Parks, Open Space, and Conservation
9.1	Archaeology, paleontology, and natural resources. Protect areas of important archaeological paleontological and natural resources.
9.7	Construction impacts. Suspend development activity when archaeological resources are discovered during construction. The project sponsor will be required to retail a qualified archaeologist to oversee the handling of resources in coordination with appropriate local and State agencies and organizations and local Native American representatives, as appropriate.

Ravenswood/ 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The Plan contains policies and guidelines, as well as development regulations applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating cultural resources impacts resulting from planned development within the RBD Specific Plan area including the following:

Policy	Cultural Resources
1.1	Ensure that City, State, and Federal historic preservation laws, regulations, and codes are implemented, including State laws related to archaeological resources, to ensure that adequate protection of historic and prehistoric resources.
1.3	Require preparation of a project-specific Archaeological Resources Assessment (ARA) by a professional Archaeologist for any construction that will impact native soils in the parts of the Plan Area known to be archaeologically sensitive, that are within 200-foot buffer of known historic and prehistoric resources, as recorded on the supplemental figure Archaeological Sensitive Zones on file with the City. The ARA will provide background context, identify any archaeological resources, and provide an evaluation using the criteria of the California Register of Historic Resources. ARA recommendations must be followed to avoid and minimize damage to these resources. These may include archeological testing, data recovery, and archaeological monitoring during construction.
1.4	Recognize Native American human remains may be encountered at unexpected locations impose a requirement on all development permits and tentative sub-division maps that upon their discovery during construction, development activity will cease until professional archaeological examination confirms that the burial is human. If the remains are determined to be Native, applicable State laws shall be implemented. A professional Archeologist with expertise in human remains must be retained to review, identify, and evaluate the discovery. The County Coroner and Native American Heritage Commission must be notified, and the remains treated in accordance with State law.

4.5.1.2 *Existing Conditions*

Historic Resources

Historic resources are generally 50 years or older in age and include, but are not limited to, buildings districts, structures, sites, objects, and areas. According to the Phase I Environmental Site Assessment (see Appendix B) prepared for the project, the project site was used for agricultural purposes and contained a single-family residence until the mid-1960's when the residence was demolished and the site was used for storage of vehicles and stockpiled soils to the present day. Thus, there are no existing structures on-site and the site does not contain any resources listed on or eligible for listing on the NRHP or the CRHP; nor does it contain any resources listed on the City of East Palo Alto's Historic Resources Inventory Report.[21] The nearest historic resource is a single-family residential building located at 962 Garden Street that is listed on the City's Historic Resources Inventory and is located approximately 0.3-mile from the southwest of the project site.[22] Additional historic resource were identified in the General Plan and are located more than 0.5 miles from the project site.[23]

Archaeological Resources

A records search was completed at the Northwest Information Center of the California Historical

[21] City of East Palo Alto. *City of East Palo Alto Historic Resources Inventory Report.* February 1994.
[22] Ibid.
[23] City of East Palo Alto. *Draft Environmental Impact Report, City of East Palo Alto General Plan Update*. April 2016.

Resources Information System (CHRIS) to determine if any recorded archaeological resources are present on the project site or within 0.25-mile of the site.[24] No recorded archaeological resources are located on the project site. One recorded archaeological site is located within a quarter-mile radius of the project site. Several additional archaeological resources have been recorded within the project vicinity greater than 0.25-mile from the project site including the University Village site, a prehistoric village site encountered during road construction in 1951. Although no cultural resources have been recorded on the site, due to the proximity of the site to the original bay shoreline and nearby recorded archaeological resources, the project site has moderate to high potential for previously unrecorded archaeological resources.[25]

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☐	☒
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
3) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. (No Impact)

The project site is currently partially developed with a gravel surface parking lot and undeveloped grass area. There are no existing structures located on-site. Based on the historic/potentially historic resources identified in the General Plan EIR, there are no historic resources located on or adjacent to the project site. As discussed in Section 4.5.1 above, the nearest historic resource is a single-family residential building located at 962 Garden Street that is listed on the City's historic resources inventory and is located approximately 0.3-mile from the southwest of the project site.[26] For these reasons, future development of a library on-site would not result in a substantial adverse change in the significance of a historic resource. Therefore, the proposed property acquisition and library development would not cause a substantial adverse change in the significance of a historical resource. **(No Impact)**

[24] At the time of its preparation, the project site was considered a part of the project site for the EPACENTER. Therefore, the Archaeological Literature Search prepared for that project included the project site as well as the adjacent parcel which is now developed as EPACENTER.
[25] Holman & Associates. *Results of a CEQA Archaeological Literature Search for EPA Center Arts 1950 Bay Road, East Palo Alto, San Mateo County.* April 2017.
[26] City of East Palo Alto. *City of East Palo Alto Historic Resources Inventory Report.* February 1994.

Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. (Less than Significant Impact)

Construction activities associated with future library development would require excavation which could result in impacts to archaeological resources, if encountered.

As discussed in Section 4.5.1.2 Existing Conditions above, no archaeological resources have been recorded on the project site. The nearest recorded archaeological resource is located approximately 0.25 mile west of the project site. Due to the proximity of the site to this known resource, the site is considered to have moderate to high potential for archaeological resources. Construction of a future library on-site would require excavation to a maximum depth of five feet bgs which could result in impacts to unrecorded archaeological resources.

Impact CUL-1: Ground disturbing activities associated with construction of the proposed project could disturb previously unrecorded archaeological resources.

Mitigation Measures: The following mitigation measures shall be implemented to reduce impacts to archaeological resources that may be present on-site.

MM CUL-1.1: The following mitigation measures are based on the recommendations in the archaeological literature search and based on tribal consultation with the Tamien Nation. Implementation of these mitigation measures would reduce impacts to archaeological resources to a less than significant level:

- As part of the project-level CEQA review for the future library development, a qualified archaeologist shall conduct presence/absence exploration for archaeological deposits and cultural materials and the City shall consult with the Tamien Nation on the manner of the site investigation. If presence/absence exploration for archaeological deposits and cultural materials is infeasible, an archaeological monitor shall be present during remediation efforts and construction activities. If archaeological monitoring is the only option, the monitor in consultation with the project archaeologist, shall determine when a sufficient sample of ground disturbing activities for remediation and select construction activities has occurred. When a sufficient sample has been examined and no cultural resources have been identified, no more monitoring will be required. If any archaeological evidence is identified, additional recommendations will be tailored to the type of resource identified and the proposed improvements. A report documenting the results of presence/ absence exploration and monitoring and any data recovery shall be submitted to the City of East Palo Alto Community Development Director prior to issuance of building permits.

- In the event that buried, or previously unrecognized archaeological deposits or materials of any kind are inadvertently exposed during remediation and construction activities, work within 50 feet of the find shall cease until the City of East Palo Alto is notified and a qualified archaeologist can assess the find and provide recommendations for further treatment, if warranted. Construction and potential impacts to the area(s) within a radius determined by the archaeologist shall not recommence until the assessment is complete. If the find is discovered during remediation efforts, consultation between the project archaeologist and the lead remediation person shall formulate the best approach to address the level and kind of toxin(s) in concert with the type of cultural resource identified. A report documenting the results of presence/absence exploration and monitoring and any data recovery shall be submitted to the City of East Palo Alto Community Development Director prior to issuance of building permits.

With implementation of the above mitigation measures, impacts to archaeological resources associated with the proposed property acquisition and future library construction would be reduced to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Impact CUL-3:	**The project would not disturb any human remains, including those interred outside of dedicated cemeteries. (Less than Significant Impact with Mitigation Incorporated)**

As discussed under Impact CUL-2 above, the project site has moderate to high potential for unrecorded archaeological resources and is located approximately 0.25 miles from known prehistoric archaeological resources, including a prehistoric occupation site. Human remains are often associated with prehistoric occupation sites. Therefore, ground disturbing activities associated with future library development on-site could disturb human remains.

Impact CUL-3: Ground disturbing activities associated with future library development could disturb human remains interred outside of dedicated cemeteries. **(Significant Impact)**

Mitigation Measure: Future library development would implement the following mitigation measures to reduce impacts to human remains to a less than significant level.

MM CUL-3.1: If human remains are encountered as a result of construction activities, all work in the vicinity shall be halted and the County Coroner contacted. In the event that the County Coroner determines that the human remains are Native American, notification of the Native American Heritage Commission (NAHC) is required, who shall appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The qualified archaeologist, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5(d). The agreement shall incorporate ‘best practices’

as identified by the state NAHC. A final report shall be prepared by the project archaeologist in consultation with the MLD and approved by the City of East Palo Alto. Work on the project may proceed upon City approval.

With implementation of MM CUL-3.1 ground disturbing activities associated with future library development would be halted if human remains are discovered and the remains would be properly handled, resulting in less than significant impacts to human remains. **(Less than Significant Impact)**

4.6 ENERGY

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. In 2008, Executive Order S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years, and the 2022 Title 24 updates went into effect on January 1, 2023.[27] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[28]

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. The most recent update to CALGreen went into effect on January 1, 2017, and covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

[27] California Building Standards Commission. "Welcome to the California Building Standards Commission." Accessed February 6, 2018. http://www.bsc.ca.gov/.
[28] California Energy Commission (CEC). "2022 Building Energy Efficiency Standards." Accessed January 25, 2023. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[29]

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating energy use impacts resulting from planned development within the City including the following:

Policy	Parks, Open Space, and Conservation
7.1	**Citywide building energy efficiency.** Promote and encourage citywide building energy efficiency through strategies that may include the following: • Retrofits of buildings with energy-efficient technology • High energy performance in new buildings, in excess of CALGreen when possible.
7.4	**Renewable energy**. Encourage the use of renewable energy in the City, including solar and wind in new and existing development.
8.11	**Green building certification**. Require that new residential, commercial, or mixed-use buildings over 20,000 square feet earn LEED Silver certification (or equivalent) including meeting the minimum CALGreen code requirements.
8.12	**Green waste management practices.** Support ongoing green waste recycling efforts to facilitate composting opportunities for residents and businesses in order to reduce surface ozone pollution and offset greenhouse gas emissions and provide soil nutrients.

Ravenswood/ 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies and guidelines, including development regulations, applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating energy impacts resulting from planned development within the RBD Specific Plan area including the following:

Policy	Land Use and Community Character
4.6	Verify that Green Building standards are part of every development project application, and that these standards would reduce energy-related GHG emissions beyond 15 percent from those that would occur under the most recent Title 24 Building Code requirement (Tier 1 standard)

[29] California Air Resources Board. "The Advanced Clean Cars Program." Accessed April 6, 2018. https://www.arb.ca.gov/msprog/acc/acc.htm.

Policy	Transportation and Traffic
1.2	Implement the Specific Plan's proposed network of off-street pedestrian paths, which can help promote walking by providing more direct pedestrian connections between sites and buildings than could be offered by the street system. In addition, encourage developers to follow Specific Plan's guidelines regarding pedestrian connections between sidewalks and building entrances.

City of East Palo Alto Climate Action Plan

The City of East Palo Alto Climate Action Plan includes a prioritized list of actions for reducing the City's GHG emissions. To achieve the City's GHG reduction goal of 15 percent below 2005 levels by 2020, the Climate Action Plan includes objectives and measures related to energy use in buildings, transportation and land use, waste, and municipal operations. The Climate Action Plan notes that energy efficiency is the most cost-effective measure for GHG reductions and has co-benefits. Continued implementation of the transportation-oriented development (TOD) in the Ravenswood Specific Plan and encouraging walking and biking are two of the actions listed in the Plan that would also reduce energy use.

The City is currently in the process of updating the Climate Action Plan. A draft of the updated plan was released to the public in April of 2022 and is expected to be brought to City Council for approval in the middle of 2023.[30] The City of East Palo Alto's draft 2030 Climate Action Plan includes a prioritized list of actions for reducing the City's greenhouse gas emissions, such as increasing electrification efforts in commercial and residential properties, encouraging swapping for electric vehicles with the assistance of rebates, and improving the walkability and bike-ability of the City over the long term. The goal of this draft plan is to improve the health and resilience of the community in the face of climate change, as well as to stay on track to comply with the State's goal of achieving carbon neutrality by 2045. Future library development on-site would be subject to the Climate Action Plan in effect at the time of design development.

City of East Palo Alto Building Electrification and Electric Vehicle Infrastructure Reach Codes Ordinance

City Council adopted the City of East Palo Alto Building Electrification and Electric Vehicle Infrastructure Reach Codes Ordinance on October 20, 2020. The ordinance includes requirements for electrification, solar, and EV infrastructure on all new residential and commercial buildings and other non-residential buildings within the city. The City is currently in the process of updating the Reach Codes Ordinance. Future library development would be required to comply with the Reach Codes Ordinance in effect at the time of design development.

[30] City of East Palo Alto. Draft 2030 Climate Action Plan and Adaptation Strategies. April 2022. Accessed January 26, 2023. https://www.cityofepa.org/sites/default/files/fileattachments/community_amp_economic_development/page/9041/draft_epa_community_cap_and_adaptation_strategies_2030_04.26.2020.pdf

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,956.6 trillion British thermal units (Btu) in the year 2020, the most recent year for which this data was available.[31] Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 21.8 percent (1,507.7 trillion Btu) for residential uses, 19.6 percent (1,358.3 trillion Btu) for commercial uses, 24.6 percent (1,701.2 trillion Btu) for industrial uses, and 34 percent (2,355.5 trillion Btu) for transportation.[32] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in San Mateo County in 2020 was consumed primarily by the non-residential sector (60 percent), with the residential sector consuming 40 percent. In 2020, a total of approximately 4,167 GWh of electricity was consumed in San Mateo County.[33]

Natural Gas

PG&E provides natural gas services within East Palo Alto. In 2020, approximately two percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.[34] In 2020 California used 2,144 trillion Btu of natural gas.[35] In 2020, San Mateo County used less than one percent of the state's total consumption of natural gas.[36]

Fuel for Motor Vehicles

In 2019, 15.4 billion gallons of gasoline were sold in California.[37] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.4 mpg in 2020.[38] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of

[31] United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed July 5, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.
[32] United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed July 2, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.
[33] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed July 5, 2022. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[34] California Gas and Electric Utilities. 2020 *California Gas Report.* Accessed August 2, 2021. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.
[35] United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed July 5, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.
[36] California Energy Commission. "Natural Gas Consumption by County." Accessed July 5, 2022. http://ecdms.energy.ca.gov/gasbycounty.aspx.
[37] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed September 19, 2022. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.
[38] United States Environmental Protection Agency. "The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2021. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1010U68.pdf

35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026. [39,40]

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Impact EN-1: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. (Less than Significant Impact)

If the City decides to proceed with the property acquisition, construction and operation of a future library would result in consumption of energy during construction and operations.

Energy Use During Construction

Future library construction would require energy for the manufacture and transportation of building materials, preparation of the site for grading, and the actual construction of the building. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks. The construction schedule and processes are already designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel would not be used wastefully on the site because of the added expense associated with renting the equipment, maintaining it, and fueling it. As discussed in Section 4.3 Air Quality, implementation of BAAQMD BMPs would reduce energy consumption by restricting equipment idling times to five minutes or less and would require the applicant to post signs on the project site reminding workers to shut off idling equipment. Future library development would be located in an urban setting, close to existing transportation and building materials sources. Thus, energy would not be used wastefully or inefficiently during transport of materials and worker vehicle trips.

[39] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed May 13, 2022. http://www.afdc.energy.gov/laws/eisa.

[40] United States Department of Transportation. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed May 13, 2022. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026

Energy Use During Operations

Future library operations would consume energy in the form of electricity primarily from building heating and cooling, lighting, and water heating, as well as gasoline for vehicle trips to and from the building site. Future library would operate in accordance with the current CALGreen requirements and the Title 24 energy efficiency standards. Electrical power would be supplied to the future library building by Peninsula Clean Energy.

As discussed in Section 4.16, the addition of another library location to serve the public could result in a VMT reduction because it would give existing library users options to take shorter trips to the library when compared to the current conditions.

Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

Impact EN-2:	**The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (Less than Significant Impact)**

The proposed property acquisition would not result in any direct energy use and does not include any language conflicting with existing energy efficiency policies or codes. If the City decides to proceed with the property acquisition, future library development on-site would be consistent with the regulations described in Section 4.6.1 (including General Plan policies) by:

- Complying with Title 24 and CALGreen
- Complying with the Reach Codes Ordinance
- Complying with the Climate Action Plan

The project, therefore, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

4.7 GEOLOGY AND SOILS

The following discussion is based, in part, on a Preliminary Geotechnical Report prepared for the project by Cornerstone Earth Group, Inc. in July 2022. This report is included as Appendix A to this Initial Study.

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The CBC prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating geology and soils impacts resulting from planned development within the City including the following:

Policy	Safety and Noise
1.1	Construction Requirements. Apply the proper development engineering and building construction requirements to avoid or mitigate risks from seismic and geologic hazards.
1.2	Robust Seismic Guidance. Utilize and enforce the most recent State guidance for seismic and geologic hazards when evaluating development proposals.
1.3	Licensed Geologist. Require that a State licensed engineering geologist prepare and/or review development proposals involving grading, unstable soils, and other hazardous conditions. Incorporate recommendations of the geologist into design plans, potentially including building modifications and open space easements.

Ravenswood/ 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies and guidelines, and development regulations, applicable to development within the RBD Specific Plan area, including the following policy adopted for the purpose of avoiding or mitigating geology and soils impacts resulting from planned development within the RBD Specific Plan area. The policy includes the following:

Policy	Land Use and Community Character
9.3	Require preparation of a geotechnical report calculating the building load and placement of fill for each development. Verify that environmental review of this report includes an assessment of flood risks to the building itself and the impacts on neighboring flood risks to other structures from displacement of flood waters. Require the report to consider the cumulative flood risks to other structures from buildings in addition to other known, planned, and reasonably foreseeable development.

The RBD Specific Plan also identifies five mitigation measures (mitigation measures GEO-1 through GEO-5) that shall be utilized in site planning and building designs in the RBD Specific Plan area to

reduce geologic and seismic hazards.[41] These mitigation measures would be implemented by the project and are presented in Section 4.7.2 below.

City of East Palo Alto Municipal Code

Title 15 (Building and Construction) of the City of East Palo Alto Municipal Code includes the currently adopted Building Code as well as requirements in Chapter 15.48 for excavation, grading, filling, and clearing. In accordance with the Municipal Code, procedures for the issuance, administration, and enforcement of a building and grading permits are employed in order to protect health and safety, which includes the reduction or elimination of the hazards of undue settlement, erosion, siltation, and flooding, or other special conditions.

4.7.1.2 *Existing Conditions*

The City of East Palo Alto is located on the San Francisco Peninsula. The Peninsula is bounded by the Pacific Ocean to the west and the San Francisco Bay to the east.

On-Site Topography and Soils

The project site is situated on an alluvial fan on the western shore of San Francisco Bay at an elevation of approximately 10-12 feet amsl. On-site topography is generally flat. There are no steep slopes on or adjacent to the project site subject to landslide hazards.

Soils underlying the project site are classified as Botella-Urban land complex with zero to five percent slopes.[42] Urban land is comprised of disturbed and human transported material. The Botella complex soil at the site are mostly comprised of clay loam from zero-to five-feet bgs.[43] On-site soils have moderate potential for expansion.[44]

Groundwater

Groundwater at the project site fluctuates. Testing conducted for the proposed project revealed the current depth to groundwater at the project site ranges from approximately 4.5 – 10.5 feet bgs; however, historic groundwater levels have been recorded at a depth of six feet bgs. Fluctuations in groundwater levels occur due to many factors including seasonal fluctuations and underground drainage patterns. Therefore, the design level geotechnical report assumes a design groundwater level of four feet bgs.[45]

Seismicity and Seismic Hazards

The San Francisco Bay Area is considered to be one of the most seismically active regions in the United States. The nearest active faults to the project site include the Monte-Vista Shannon (6.3 miles southwest of the site), San Andreas (eight miles west of the site), and Hayward (approximately

[41] City of East Palo Alto. *Ravenswood 4 Corners TOD Specific Plan Final EIR.* July 30, 2012.
[42] United States Department of Agriculture. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed August 29, 2022.
[43] Ibid.
[44] Cornerstone Earth Group. *Preliminary Geotechnical Investigation, East Palo Alto Library 2474 Pulgas Avenue, East Palo Alto, California.* July 15, 2022.
[45]

10.9 miles east of the site). The site is not located within a state designated Alquist Priolo Earthquake Fault Zone and no known faults cross the site.[46] The site could, however, experience strong ground shaking during a moderate to severe earthquake.

Liquefaction

Liquefaction is the result of seismic activity and is characterized as the transformation of loose water-saturated soils from a solid state to a liquid state during ground shaking. During ground shaking, such as during earthquakes, cyclically induced stresses may cause increased pore water pressures within soil voids, resulting in liquefaction. Liquefied soils may lose shear strength that may lead to large shear deformations and/or flow failure under moderate to high shear stresses, such as beneath foundations or sloping ground. Soils most susceptible to liquefaction are loose, non-cohesive soils that are saturated and are bedded with poor drainage, such as sand and silt layers bedded with a cohesive cap. The project site located within a State-designated liquefaction hazard zone.[47]

Lateral Spreading

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open area, such as the steep bank of a stream channel. The nearest waterway to the project site is San Francisco Bay, approximately 0.25-mile east of the site. The project site is relatively flat and is not adjacent to a creek or any other unsupported face. For these reasons, the potential for lateral spreading at the site is low.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments from in geologic strata. These are valued for the information they yield about the history of the earth and its past ecological settings. According to the RBD Specific Plan EIR, Holocene-age deposits which may contain fossils underlie the Plan Area, including the project site.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

[46] State of California Seismic Hazard Zones. Palo Alto Quadrangle. October 18, 2006. Available at: http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/PALO_ALTO_EZRIM.pdf. Accessed January 2, 2020

[47] Cornerstone Earth Group. *Preliminary Geotechnical Investigation, East Palo Alto Library 2474 Pulgas Avenue, East Palo Alto, California.* July 15, 2022.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
– Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☐	☒
– Strong seismic ground shaking?	☐	☐	☐	☒
– Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
– Landslides?	☐	☐	☐	☒
2) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐

Impact GEO-1: The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides. (No Impact)

Ground Surface Rupture

Ground surface displacement closely follows the trace of geologically young faults. The project site is not located within an Alquist-Priolo Earthquake Fault Zone and no known active or potentially active faults exist on the site. Therefore, the potential for ground surface rupture to occur at the site from a known active fault is very low. Therefore, the proposed acquisition and development of a

library would not result in significant impacts associated with ground surface rupture. **(Less than Significant Impact)**

Seismicity

The project site is located within a seismically active region and the potential exists for a large earthquake to induce strong to very strong ground shaking at the site. Ground shaking could damage structures and threaten future occupants of the proposed project. Consistent with the RBD Specific Plan requirements, the following standard measures would be implemented by the future library development to reduce potential impact associated with seismic ground shaking on-site:

Standard Measures for Projects identified in the RBD Specific Plan Area

- All structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements at a minimum. Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead and live loads. Structures shall be able to do all of the following:

  a) Resist minor earthquakes without damage
  b) Resist moderate earthquakes without structural damage but with some nonstructural damage
  c) Resist major earthquakes without collapse but with some structural as well as nonstructural damage
- The foundation shall be designed to compensate for effects of liquefaction, differential settlement, and lateral spreading due to earthquakes. The foundations shall be designed by a qualified structural engineer using soil design parameters developed by qualified geotechnical consultants and verified by the City Building Division.
- Earthwork activities, including remedial grading, shall be performed using the recommendations provided by a qualified geotechnical consultant, and the foundation shall be designed by a qualified structural engineer using soil design parameters developed by a qualified geotechnical consultant to ensure that the underlying substrate is capable of withstanding the load. Existing fills may need to be removed and replaced with engineering fills.
- Improvements on areas of soft Bay Mud and artificial fill must be designed with under the guidance of suitably qualified geotechnical consultants to ensure that the underlying substrate is capable of withstanding the load. Existing fills may need to be removed and replaced with engineered fills.

Earthwork and foundations shall be designed to compensate for effects of expansive soils. Fill placement and foundation design criteria shall be developed by a qualified geotechnical consultant and verified by the City Building Division.

The proposed future library development would be required to implement the RBD Specific Plan EIR measures identified above, at a minimum. Therefore, the project would not directly or indirectly cause potential substantial adverse effects including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthqake Fault Zoning Map or based on other substantial evidence of a known fault; strong seismic ground shaking. **(No Impact)**

Liquefaction

The project site is located within a State designated liquefaction hazard zone.[48] Therefore, the site is susceptible to liquefaction and liquefaction induced differential settlement during seismic events. However, future library development would be reviewed for compliance with General Plan Safety and Noise Element Policies 1.1, 1.2, and 1.3 to ensure the project applies proper engineering and construction requirements and complies with state guidance to minimize risks form geologic hazards, such as liquefaction. The project would also be reviewed for compliance with the CBC requirements, Chapter 15.48 of the Municipal Code, and the Geotechnical Investigation recommendations to address unstable soils and ensure that appropriate fill materials are used to reduce potential for liquefaction. Compliance with these policies and regulations would ensure the project would not directly or indirectly cause substantial adverse effects from liquefaction. Therefore, there would be no CEQA impact associated with liquefaction **(No Impact)**

Landslides

The project site is flat and does not contain steep slopes or other features that would result in a landslide or collapse. Therefore, the proposed property acquisition and future library would not cause significant direct or indirect impacts associated with landslides. **(No Impact)**

Impact GEO-2:	**The project would not result in substantial soil erosion or the loss of topsoil. (Less than Significant Impact)**

Potential future development of a library would involve construction activities such as grading and excavation which could result in erosion and loss of topsoil. The NPDES Construction General Permit and the City's Municipal Code (which are discussed in more detail in Section 4.10 Hydrology and Water Quality) are the primary means of enforcing erosion and sediment control measures. Future construction activities in conformance with these permit requirements and regulations would result in a less than significant soil erosion impact. **(Less than Significant Impact)**

Impact GEO-3:	**The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (No Impact)**

Due to the flat topography of the project site and surrounding area, there are no existing slope instability or landslide related hazards on or adjacent to the site. The project site is not in an area susceptible to lateral spreading. However, as discussed in Section 4.7.1 Environmental Setting, the project site is located within a liquefaction hazard zone. Therefore, future library development would be located on a site that is subject to liquefaction. As stated under Impact GEO-1 above, the proposed project would be reviewed for compliance with General Plan Safety and Noise Element Policies 1.1, 1.2, and 1.3 and for compliance with the CBC requirements, Chapter 15.48 of the Municipal Code,

[48] California Geologic Survey. *Earthquake Zones of Required Investigation, 2474 Pulgas Avenue, East Palo Alto, California.* Accessed August 29, 2022. https://maps.conservation.ca.gov/cgs/EQZApp/app/

and the Geotechnical Investigation recommendations to address unstable soils and appropriate fill material. The proposed project would be designed and constructed to not cause the project site or immediately surrounding sites to experience unstable ground failure or liquefaction. Therefore, the project would not create substantial direct or indirect risks to life or property due to landslides, lateral spreading, subsidence, liquefaction, or collapse. **(No Impact)**

Impact GEO-4:	**The project would not be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property. (No Impact)**

Existing on-site soil has moderate expansion potential.[49] As noted in Section 3.2.6 Project Construction, approximately 1,855 to 5,621 cubic yards of soil would be imported to the site during construction to elevate the future building above flood levels. However, consistent with General Plan Safety and Noise Policies 1.1 through 1.3 the future library development would be designed to comply with CBC requirements, Chapter 15.48 of the Municipal Code, and the Geotechnical Investigation recommendations to address the effect of expansive soil on the project. Therefore, the project would not create substantial direct or indirect risks to life or property due to expansive soils. **(No Impact)**

Impact GEO-5:	**The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)**

Future library development would be served by the existing EPASD wastewater system. No septic systems would be required to serve the library on-site; therefore, the proposed project would not result in direct or indirect soils impacts due to the installation of septic tanks or alternative wastewater disposal systems. **(No Impact)**

Impact GEO-6:	**The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. (Less than Significant Impact with Mitigation Incorporated)**

There are no unique geologic features at the project site. The Holocene-age deposits that underlie the project site could contain paleontological resources. Therefore, future library development would include ground-disturbing construction activities that could potentially impact currently unknown paleontological resources during construction.

Impact GEO-6: Ground disturbing activities associated with project construction could disturb currently unrecorded paleontological resources or a unique geologic feature. (Significant Impact)

[49] Cornerstone Earth Group. *Preliminary Geotechnical Investigation, East Palo Alto Library 2474 Pulgas Avenue, East Palo Alto California*. July 15, 2022.

Mitigation Measure: Consistent with the General Plan EIR, the proposed project would implement the following mitigation measures to reduce impacts to unrecorded paleontological resources during project construction activities to a less than significant level.

MM GEO-6.1: If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet of the find shall stop and the City of East Palo Alto Director of Community and Economic Development shall be notified. A qualified paleontologist shall inspect the find within 48 hours of discovery. If it is determined that the proposed development could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible. (e.g., planning construction activities to avoid paleontological sites, incorporating sites into parks and other open spaces, covering sites with stable soils, and deeding the site into a permanent conservation easement) data recovery through excavation shall be conducted by a qualified paleontologist with a data recovery plan in place.

With implementation of MM GEO-6, if previously unrecorded paleontological resources are discovered during project construction, halting and avoiding or implementing a data recovery plan as required under MM GEO-6.1 would reduce potential impacts to unique paleontological resources to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

4.7.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on residents or future users of a proposed project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of East Palo Alto has policies that address existing geology and soils conditions affecting a proposed project.

City of East Palo Alto General Plan policies and RBD Specific Plan policies (specifically Safety and Noise policies 1.1 through 1.3 in the General Plan and Land Use Community Character Policy 9.3 in the RBD) would be incorporated into the project to address the effect of geology and soil conditions on the project. In conformance with the certified RBD Specific Plan EIR and current standard practices in the City of East Palo Alto, the project proposes to implement the following, previously approved mitigation measures to reduce hazards associated with seismically induced ground shaking and expansive fill on the site.

Standard Permit Condition for Projects in the RBD Specific Plan **Area:**

- All structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements as a minimum. Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead and live loads. The code-prescribed lateral forces are generally substantially smaller than the expected peak forces that would be associated

with a major earthquake. Therefore, structures shall be able to do all of the following:

a. Resist minor earthquakes without damage.
b. Resist moderate earthquakes without structural damage but with some nonstructural damage.
c. Resist major earthquakes without collapse but with some structural as well as nonstructural damage.

- The foundation shall be designed to compensate for effects of liquefaction, differential settlement, and lateral spreading due to earthquakes. The foundations shall be designed by a qualified structural engineer using soil design parameters developed by qualified geotechnical consultants and verified by the City Building Division.
- Earthwork activities, including remedial grading, shall be performed using the recommendations provided by a qualified geotechnical consultant, and the foundation shall be designed by a qualified structural engineer using soil design parameters developed by a qualified geotechnical consultant and verified by the City Building Division.
- Improvements on areas of soft Bay Mud and artificial fill must be designed with under the guidance of suitably qualified geotechnical consultants to ensure that the underlying substrate is capable of withstanding the load. Existing fills may need to be removed and replaced with engineered fills.
- Earthwork and foundations shall be designed to compensate for effects of expansive soils. Fill placement and foundation design criteria shall be developed by qualified geotechnical consultants and verified by the City Building Division.

With implementation of the geotechnical evaluation recommendations, General Plan and RBD Specific Plan policies and RBD Specific Plan EIR measures, the proposed project would not expose people or structures associated with the proposed project to potential substantial adverse effects due to seismic ground shaking or seismic-related ground failure, including liquefaction.

4.8 GREENHOUSE GAS EMISSIONS

4.8.1 Environmental Setting

4.8.1.1 *Background Information*

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2 and N_2O are byproducts of fossil fuel combustion.
- N_2O is associated with agricultural operations such as fertilization of crops.
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

4.8.1.2 *Regulatory Framework*

State

Assembly Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO_2E ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$ and net zero by 2045.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per-capita GHG emissions reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2040. Plan Bay Area 2040 establishes a course for reducing per-capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

Regional and Local

2017 Clean Air Plan

To protect the climate, the 2017 CAP (prepared by BAAQMD) includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating greenhouse gas emissions impacts resulting from planned development within the City including the following:

Policy	Parks, Open Space, and Conservation
7.1	**Citywide building energy efficiency.** Promote and encourage citywide building energy efficiency through strategies that may include the following: • Retrofits of buildings with energy-efficient technology • High energy performance in new buildings, in excess of CALGreen when possible.
7.2	**Municipal building energy efficiency.** Strive for high levels of energy efficiency in municipal facilities
7.3	**Energy-efficient infrastructure.** Whenever possible, use energy efficient models and technology when replacing or providing new city infrastructure such as streetlights, traffic signals, water conveyance pumps, or other public infrastructure.
8.1	**Climate Action Plan**. Implement and regularly update the City's Climate Action Plan (CAP). Update the City's Greenhouse Gas Inventory and associated implementation actions matric every 2 to 3 years, and the overall CAP framework document every 5 to 10 years.
8.2	**Heat island reductions.** Require heat island reduction strategies in new developments such as light-colored cool roofs, light-colored paving, permeable paving, right-sized parking requirements, vegetative cover and planting, substantial tree canopy coverage, and south and west side tree planting.
8.3	**Public realm shading.** Strive to improve shading in public spaces such as bus stops, sidewalks and public parks and plazas through the use of trees, shelters, awnings, gazebos, fabric shading and other creative cooling strategies.
8.4	**Reducing GHG emissions.** In consulting with applicants and designing new facilities, prioritize the selection of green building design features that enhance the reduction of GHG emissions.
8.11	**Green building certifications.** Require that new residential, commercial, or mixed-use buildings over 20,000 square feet earn LEED Silver certification (or equivalent) including meeting the minimum CALGreen code requirements.
8.12	**Green waste management practices.** Support ongoing green waste recycling efforts and facilitate composting opportunities for residents and businesses in order to reduce surface ozone pollution and offset greenhouse gas emissions and provide soil nutrients.

Policy	Transportation
2.1	**Accommodating all modes.** Plan, design and construct transportation projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists, people with disabilities, and persons of all ages and abilities.
3.2	**Pedestrian network.** Create a safe, comfortable, and convenient pedestrian network that focuses on a) safe travel; b) improving connections between neighborhoods and commercial areas, and across existing barriers; c) providing places to sit or gather, pedestrian-scaled street lighting, and buffers from moving vehicle traffic; and d) includes amenities that attract people of all ages and abilities**.**
4.1	**Bicycle network.** Improve facilities and eliminate gaps along the bicycle network to connect destinations across the city and create a network of bicycle facilities of multiple types that connect to neighboring cities, including a path along Newell Road between Highway 101 and San Francisquito Creek. The network should facilitate bicycling for commuting, school, shopping, and recreational trips by riders of all ages and levels of experience.

4.5	**Public bicycle parking.** Increase the amount of safe and convenient short- and long-term bicycle parking and storage available to the public throughout the city.
4.6	**Bicycle parking standards.** Require large public and private development projects to provide sufficient bicycle parking, shower and locker facilities.

City of East Palo Alto Climate Action Plan

On December 2011, the City of East Palo Alto adopted the City of East Palo Alto Final Climate Action Plan Twenty-Three Actions to Address Our Changing Climate. This document includes goals and actions that the City of East Palo Alto can take to reduce their GHG emissions. The City's emissions reduction goal is to reduce GHG emissions 15 percent below the baseline 2005 levels by 2020. This climate action plan is considered a qualified GHG Reduction Strategy.

The City is currently in the process of updating the Climate Action Plan. A draft of the updated plan was released to the public in April of 2022 and is expected to be brought to City Council for approval in the middle of 2023.[50] The City of East Palo Alto's draft 2030 Climate Action Plan includes a prioritized list of actions for reducing the City's greenhouse gas emissions, such as increasing electrification efforts in commercial and residential properties, encouraging swapping for electric vehicles with the assistance of rebates, and improving the walkability and bike-ability of the City over the long term. The goal of this draft plan is to improve the health and resilience of the community in the face of climate change, as well as to stay on track to comply with the State's goal of achieving carbon neutrality by 2045. Future library development on-site would be subject to the Climate Action plan in effect at the time of design development.

City of East Palo Alto Building Electrification and Electric Vehicle Infrastructure Reach Codes Ordinance

City Council adopted the City of East Palo Alto Building Electrification and Electric Vehicle Infrastructure Reach Codes Ordinance on October 20, 2020. The ordinance includes requirements for electrification, solar, and EV infrastructure on all new residential and commercial buildings and other non-residential buildings within the city. The City is currently in the process of updating the Reach Codes Ordinance. Future library development would be required to comply with the Reach Codes Ordinance in effect at the time of project design.

4.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in the weather patterns.

The project site is currently partially developed with a gravel parking lot and undeveloped grass area. Use of the site is minimal, therefore, operational GHG emissions were not estimated.

[50] City of East Palo Alto. Draft 2030 Climate Action Plan and Adaptation Strategies. April 2022. Accessed January 26, 2023. https://www.cityofepa.org/sites/default/files/fileattachments/community_amp_economic_development/page/9041/draft_epa_community_cap_and_adaptation_strategies_2030_04.26.2020.pdf

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	☐	☐	☒	☐

Impact GHG-1: The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Less than Significant Impact)**

Construction Emissions

Future development that could occur with project approval would result in GHG emissions associated with construction activities, including operation of construction equipment and emissions from construction worker's personal vehicles traveling to and from the construction site. Construction-related GHG emissions vary depending on the level of activity, length of construction period, types of equipment, etc. Neither the City nor BAAQMD has established a qualitative threshold or standard for determining whether a project's construction related GHG emissions are significant. Future development is assumed to last approximately 24 months. Because future construction would be temporary and potential development would implement construction BMPs (see Section 4.3 Air Quality) that would reduce construction equipment idling (thereby reducing GHG emissions), construction related emissions of any future development project would be less than significant. **(Less than Significant Impact)**

Operational Emissions

The General Plan EIR concluded that GHG emissions from buildout of the General Plan would be less than significant.[51] If the City decides to proceed with the purchase of the property, a library would be developed on the project site at a future date. Development of a library in the RBD Specific Plan area was previously assumed and analyzed in the General Plan and General Plan EIR. Therefore, GHG emissions associated with future library development on-site, i.e. within the RBD Specific Plan area, has already been estimated in the General Plan and General Plan EIR. Future library development would be required to comply with the City's GHG reduction policies such as the Reach Code, Municipal Code, and applicable General Plan Policies listed in Section 4.8.1.2 Regulatory Framework. During operation, the library would receive electricity from Peninsula Clean Energy and would receive 100 percent GHG emissions free electricity. Additionally, future library development would be required to demonstrate compliance with the City's policies and regulations.

[51] City of East Palo Alto. East Palo Alto General Plan Update Draft EIR. April 2016. P. 4.7-15.

Therefore, the project would not directly or indirectly generate significant amounts of GHG emissions or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

Impact GHG-2:	**The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. (Less than Significant Impact)**

CARB Climate Change Scoping Plan

The CARB Scoping Plan provides a framework for state government to lower GHG emissions statewide in order to reach GHG reduction goals. Local governments play a role in these statewide efforts by enforcing the California Building Code and CALGreen Building Code on individual development projects. The proposed project would comply with requirements of the City-adopted CALGreen Building Code requirements. The project would be required to comply with the City's Reach Code requirements for all electric building operations, rooftop solar panels, and electric vehicle infrastructure. The project would also be required to comply with Municipal Code requirements for on-site bicycle parking and water efficient landscaping and stormwater management. While the measures in the Scoping plan are not generally directly applicable to individual land use projects, the energy efficiency and water conservation measures included in the project would be consistent with the intent of this statewide plan to reduce GHG emissions through 2030.

Plan Bay Area and 2017 CAP

Although the project site is not located within an identified PDA, as discussed in Section 4.8.1 Environmental Setting, future library development on-site would be considered an infill development and would not conflict with the latest clean air plan and GHG reduction planning efforts. The project would provide an additional library facility where one currently exists. Therefore, vehicle trips from library users located closer to the project site would be shorter as users would no longer travel as far to access library facilities, reducing emissions of methane or other super-GHGs from vehicle trips. As discussed in Section 4.14, Public Services, the City's General Plan calls for the City to coordinate with San Mateo County to provide 750 square feet of library facilities for every 1,000 residents.[52] The estimated emissions associated with future library development were previously assumed and analyzed in the General Plan and General Plan EIR. Furthermore, because growth assumptions for Plan Bay Area are based on locally adopted general plans, the proposed project would be consistent with the growth assumptions for development contained in Plan Bay Area 2040. For these reasons, the proposed project would not conflict with Plan Bay Area or the 2017 CAP.

East Palo Alto General Plan and Climate Action Plan

Future library development on the site would be designed to conform with energy, transportation, water conservation, and waste reduction policies and regulations of the City of East Palo Alto, including the Climate Action Plan in effect at the time of project design development. As noted previously, consistent with the General Plan's Parks, Open Space and Conservation Policy 8.4, the

[52] City of East Palo Alto. Vista 2035 East Palo Alto General Plan. October 4, 2016. Page 9-11.

project would include the following green building features design features that would reduce GHG emissions.

- Compliance with the current CALGreen code requirements, as adopted by the City of East Palo Alto;
- Water conservation measures for landscaping, consistent with the City's landscape ordinance;
- Energy Star appliances and water-reducing fixtures; and

Climate Action Plan implementation Measures E-1.3 and MU-1.3 apply to the proposed project and future library development. Measure E-1.3 calls for the City to promote water efficiency. Measure MU-1.3 calls for installation of solar panels on City-owned buildings/land. As discussed under CARB Climate Scoping Plan, future library development on-site would be subject to and comply with the City's CALGreen Building Code requirements and Reach Code which requires use of water efficient plumbing fixtures and appliances in new construction and the installation of solar panels. For these reasons, the project would be consistent with Measure E-1.3 and Measure MU-1.3 of the City's Climate Action Plan.

As discussed above, the proposed project would be consistent with the goals, policies, and development standards in the General Plan, measures in the City's Climate Action Plan, the City's CALGreen Building Code requirements, CARB Scoping Plan, Plan Bay Area, 2017 CAP and the City's Reach Code. Following the City's expected 2023 adoption of the draft CAP addressing 2030, the future library design would be subject to the 2030 CAP. These measures would reduce energy consumption and therefore would reduce GHG emissions. For this reason, the project would not conflict with applicable plans adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

4.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based, in part, on a Phase I Environmental Site Assessment and Phase II Environmental Site Assessment prepared for the project by Cornerstone Earth Group, Inc. in November 2021 and July 2022, respectively. These reports are included as Appendix B to this Initial Study.

4.9.1 Environmental Setting

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[53]

[53] California Environmental Protection Agency. "Cortese List Data Resources." Accessed September 16, 2022. https://calepa.ca.gov/sitecleanup/corteselist/.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The San Mateo County Department of Environmental Health reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA phased out use of friable asbestos products between 1973 and 1978. National Emission Standards for Hazardous Air Pollutants guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Local Regulations

Comprehensive Land Use Plan for Palo Alto Airport

The project site is approximately one-mile northwest of the Palo Alto Airport; the closest airport to the site. The Palo Alto Airport Comprehensive Land Use Plan (CLUP) is intended to safeguard the general welfare of inhabitants within the Airport vicinity and aircraft occupants.[54] The CLUP is also intended to ensure that surrounding new land uses do not affect the Airport's continued operation.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating hazards and hazardous materials impacts resulting from planned development within the Plan Area including the following:

[54] Santa Clara County Airport Land Use Commission. *Palo Alto Airport – Comprehensive Land Use Plan*. Amended November 2016.

Policy	Health and Equity
4.2	**Pollutants.** Continue to work with state, federal, regional, and local agencies to eliminate and reduce concentrations of regulated legacy pollutants.
4.4	**Agricultural Pesticides.** Reduce exposure to legacy pesticides, particularly in areas previously under agricultural use, and whenever possible work with landowners and developers to eliminate concentrations of pesticides from soil and groundwater.
Policy	**Infrastructure, Services, and Facilities**
10.7	**Code enforcement.** Work to ensure that buildings, homes, yards, businesses and public spaces are free from hazards. Maintain cooperation and communication between the Code Enforcement Division (within EPAPD), the Planning Division, and the Building Department on issues relating to neighborhood quality of life.
Policy	**Parks, Open Space, Conservation**
9.8	**Soil Quality.** Require soil testing for contaminants on sites that have historically, or currently, been exposed to chemical releases. If contamination does exist, require remediation strategy to reduce or eliminate contamination on site.
Policy	**Safety and Noise**
4.1	**Contamination.** Avoid or minimize risk to the community from exposure to contaminated soils or groundwater.
4.2	**Management of Hazardous Materials.** Continue to cooperate with federal, State, and county agencies to effectively regulate the management of hazardous materials and hazardous wastes.
4.5	**Airport Land Use Plan.** Coordinate with the Santa Clara County ALUC and Palo Alto Airport Comprehensive Land Use Plan (CLUP) and consider the CLUP in making any land use decisions in airport influence area.
5.4	**Emergency Access Routes.** Ensure the City's designated system of emergency access routes is coordinated with regional activities for both emergency operations and evacuation.

Ravenswood/ 4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies, development standards and guidelines applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating hazards and hazardous materials impacts resulting from planned development within the RBD Specific Plan area including the following:

Policy	Land Use and Urban Design
6.1	Reduce the risk of exposure to accidents at adjacent industrial sites by restricting the density of development in sites immediately adjacent to industries that use hazardous chemicals
6.2	Monitor and control the type and quantity of chemical use by businesses that are located adjacent to mixed-use and residential sites to minimize exposure in the event of accidental chemical releases to the environment

7.1	For all new development, or substantial renovation or redevelopment (greater than 20 percent of assessed valuation) of sites in Subareas II and III (as defined by Figure 4.8-3 in the Specific Plan EIR), in the 4 Corners area, or on the south side of Bay Road, require a Phase I Environmental Site Assessment (ESA), and, if recommended by the Phase I ESA, a Phase II ESA to include soil and groundwater sampling and analysis. Share the results of the Phase I/II ESA with appropriate regulatory agencies to enable an appropriate remediation plan is to be developed. The remediation plan may include soil and groundwater cleanup, engineering controls such as vapor barriers or venting systems, and institutional controls such as deed restrictions or activity use restrictions.
7.5	For development sites in the Plan Area adjacent to active remediation systems or groundwater monitoring systems, the lead agency in charge of remediation shall be notified of the development proposal. Provide an opportunity for the lead agency to comment on the development proposal, acknowledge any justifiable concerns expressed by the agency and verify that appropriate changes are made to development plans to address the agency's concerns.
8.1	Prohibit land uses that encourage a very high concentration of people or negatively affect air navigation as described in the Airport Land Use Control Plan (ALUCP), or are in excess of maximum heights recommended in the ALUCP, from the Traffic Pattern Zone of the Plan Area. Evaluate development applications on properties in this zone for their adherence to these regulations.

City of East Palo Alto Municipal Code

Chapter 18.34, Hazardous Materials, and Chapter 8.40, Hazardous Materials: Toxic Waste Disposal, in the City of East Palo Alto's Municipal Code seek to protect the citizens of East Palo Alto through prevention and control of unauthorized discharges of hazardous materials and establish performance standards for all activities involving storage of hazardous materials.

East Palo Alto Hazard Mitigation Plan

In 2016, the City of East Palo Alto, in coordination with the County of San Mateo, adopted a local Multi-Jurisdictional Hazard Mitigation Plan (HMP). The HMP is designed to conform to requirements of the Federal Disaster Mitigation Plan of 2000, which requires all cities counties, and special districts to adopt an HMP to receive disaster mitigation funding from FEMA.

City of East Palo Alto Emergency Operations Plan

The City of East Palo Alto adopted its Emergency Operations Plan (EOP) in January 2011. The City of East Palo Alto EOP defines the scope of preparedness and incident management activities necessary for the City and multi-jurisdictional partners. The EOP describes organizational structures, roles and responsibilities, policies, and protocols for providing emergency support. The EOP facilities response and short-term recovery activities (which set the stage for successful long-term recovery). It drives decisions on long-term preparedness and mitigation efforts, or risk-based preparedness measures directed at specific hazards. The EOP is flexible enough for use in all emergencies. It also describes the purpose of the plan, situation and assumptions, concept of operations, organization and assignment or responsibilities, administration and logistics, plan development and maintenance, and authorities and references. It contains functional sections (EOC Checklists), hazard-specific appendices (Event Specific Checklists), and a glossary. It identifies pre-designated jurisdictional and/ or functional area representatives to the EOC Emergency Response

Team to facilitate responsive and collaborative incident management.[55]

4.9.1.1 *Existing Conditions*

Historic Uses of the Project Site

The project site was used for agricultural purposes and contained a single-family residence between the 1930s and the mid-1960's. In the 1960s, the residence was demolished and the site was converted to vehicle and stockpiled soils storage areas and was occupied by various industrial and commercial businesses to the present day. Previous occupants of the site since it was converted to a storage area included a moving and storage company, iron fabrication company, and a sign company which used the site and used to cut, paint, and assemble wooden signs. The site is currently unoccupied.

On-site Sources of Contamination

The project site is located within the Ravenswood Industrial Area, a designated redevelopment area in the City of East Palo Alto subject to Site Cleanup Requirements Orders issued by the San Francisco Bay Regional Water Quality Control Board (Waterboard). The project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 for being the site of an open Site Cleanup Program case under Waterboard oversight.[56] [57]

Due to the location of the project site within the Ravenswood Industrial Area and Active Clean Up Case on-site, the Phase I Environmental Site Assessment prepared for the project recommended completion of a Phase II subsurface investigation to confirm the presence and extent of contamination in on-site soils and soil vapor.

In July 2022, a Phase II Subsurface investigation was completed for the project site. Soil sampling completed for the proposed project identified dieldrin above residential ESLs but below the commercial ELS and arsenic above ESLs. Soil vapor samples detected benzene, PCE, and TCE above their respective residential ESLs.

Off-site Conditions

Arsenic releases from the 1990 Bay Road property, approximately 216 feet east of the project site, have impacted multiple parcels in the general site vicinity, including the properties at 1950 Bay Road and 2470 Pulgas Avenue that border the site to the northeast and southeast. Portions of these arsenic-impacted properties have been capped with three layers of asphalt and are subject to recorded deed restrictions. Elevated arsenic concentrations were also identified in soil along the former railroad right-of-way, adjacent to the south of the project site. Soil removal and capping was performed along this former railroad right-of-way and a deed restriction was recorded on December 8, 1993.

[55] City of East Palo Alto. *Emergency Operations Plan.* January 2011.
[56] Cornerstone Earth Group. *Soil and Soil Vapor Sampling Services Proposed Public Library Assessor Number 063-240-490 Pulgas Avenue East Palo Alto, CA*. July 25, 2022.
[57] California State Water Resources Control Board. Geotracker Database. Accessed September 15, 2022. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2474+pulgas+avenue+east+palo+alto

Other Hazards

Airports

The nearest airport to the site is Palo Alto Airport, located approximately 0.8 miles southeast of the project site. The project site is located within the airport influence area and Traffic Pattern Zone of the Palo Alto Airport. [58] The project site is within an area regulated by the FAA Federal Aviation Regulations (FAR) Part 77 where height requirements for new developments are restricted to 154 feet amsl given the distance of the site from the airport.[59]

Wildfire

The project site is surrounded by urban development and is not located within a Very-High Fire Hazard Severity Zone for wildland fires designated by CalFIRE.[60]

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐

[58] County of Santa Clara. *Comprehensive Land Use Plan Santa Clara County, Palo Alto Airport.* November 19, 2008, Amended November 16, 2016.
[59] Ibid.
[60] California Department of Forestry and Fire Protection. Santa Clara County FHSZ Map. October 8, 2008. Accessed January 14, 2022. https://osfm.fire.ca.gov/media/6764/fhszl_map43.pdf

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Impact HAZ-1: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant Impact)

Future library development would include use and storage of cleaning supplies and maintenance chemicals in small quantities, typical for standard maintenance of the building and consistent with the limits for very small quantity generators. Therefore, the quantities of domestic chemicals used on-site would not pose a risk to adjacent land uses. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant Impact)

As discussed in Section 4.9.1.2 Existing Conditions above, on-site soil is impacted by dieldrin, arsenic, and on-site soil vapor is impacted by benzene, PCE, and TCE. Therefore, ground disturbing activities associated with future library development on-site would create a significant hazard to the public and the environment.

Impact HAZ-2.1: Development of the proposed project could result in impacts to construction workers and nearby residents by exposing them to on-site soils with elevated levels of contamination.

Mitigation Measure:

MM HAZ-2.1: The project applicant shall retain a qualified environmental professional to prepare a Corrective Action/Risk Management Plan. The Corrective Action/Risk Management Plan shall describe mitigation measures necessary to protect the health and safety of construction workers, nearby residences, and future site occupants, and establish appropriate management practices for handling and monitoring of impacted soil, soil vapor, and groundwater. The Corrective Action/Risk Management Plan shall be submitted to the Waterboard for review and approval prior to issuance of grading or building permits, whichever occurs

first. The Corrective Action/Risk Management Plan shall include the following:

- Air monitoring plan that assesses potential for exposure of construction workers and neighboring occupants to contaminants of concern during construction.
- Vapor intrusion mitigation plan
- Operations, maintenance, and monitoring plan
- Health and safety plan

With implementation of MM HAZ-2.1, future library development on-site would result in less than significant impacts associated with upset and accident conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Impact HAZ-3:	**The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Less than Significant Impact)**

The nearest school to the project site is East Palo Alto Charter School, located at 1286 Runnymede Street, approximately 0.25 mile southeast of the project site. As discussed under Impact HAZ-1 above, future library development would include use and storage of cleaning supplies and maintenance chemicals in small quantities; however, the quantities of domestic chemicals used on-site would not pose a risk to adjacent or nearby land uses. Therefore, the library would not emit hazardous materials or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(Less than Significant)**

Impact HAZ-4:	**The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. (Less than Significant Impact with Mitigation)**

As discussed in Section 4.9.1.2 Existing Conditions above, the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 for an active Waterboards Cleanup Program case.[61] However, with implementation of MM HAZ-2.1, future library development would not create a significant hazard to the public or the environment. Therefore, the proposed library would not create a significant hazard to the public or the environment. **(Less than Significant Impact with Mitigation)**

[61] California State Water Resources Control Board. Geotracker Database. Accessed September 15, 2022. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2474+pulgas+avenue+east+palo+alto

Impact HAZ-5:	**The project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The project would not result in a safety hazard or excessive noise for people residing or working in the project area. (Less than Significant Impact)**

As discussed in Section 4.9.1.2 Existing Conditions above, the project site is located approximately 0.8-mile northwest of Palo Alto Airport. The project site is located within the airport influence area and traffic pattern zone of the Palo Alto Airport and within the 60 dBA noise contour. Future library development on-site would be subject to the policies contained within the CLUP for Palo Alto Airport including the FAR Part 77 building height restriction of 154 feet amsl. As noted in Section 3.0 Project Description, although the exact height of the library building is not known at this time, the building would be two stories tall, and well below 154 amsl, given the site is 10 feet amsl. Assuming a standard floor height of 10 feet for commercial construction, it is estimated that future library development would have a maximum height of approximately 20 feet and would not exceed the FAR Part 77 height restriction for the site. Additionally, future library development would be subject to project-level environmental review pursuant to CEQA and would be required to document impacts due to airport hazards and incorporate mitigation measures to avoid or minimize such impacts, if necessary. Therefore, the proposed future library would not result in a safety hazard or excessive noise for people working due to location within an airport land use plan. **(Less than Significant Impact)**

Impact HAZ-6:	**The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Less than Significant Impact)**

As discussed in Section 4.16 Transportation, future library development would include adequate emergency access and would not conflict with any applicable City and County emergency response plans and emergency evacuation plans during the project-level environmental review process. Therefore, the proposed library would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. **(Less than Significant Impact)**

Impact HAZ-7:	**The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. (Less than Significant Impact)**

As noted in Section 4.9.1.2 Existing Conditions above, the project site is located within a developed urbanized area of East Palo Alto and is not located within a wildfire hazard severity zone. Therefore, future library development would not expose people or structures to a significant risk of loss injury or death involving wildland fires. **(Less than Significant Impact)**

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the RWQCB's website.[62]

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

[62] San Francisco Regional Water Quality Control Board. "The 303(d) List of Impaired Water Bodies." Accessed June 21, 2022. https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/303dlist.html.

Regional and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[63] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the minimized size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating hydrology and water quality impacts resulting from planned development within the City, including

[63] MRP Number CAS612008

the following:

Policy	Infrastructure, Services, and Facilities
1.1	**NPDES compliance.** Ensure compliance with all NPDES requirements for litter control, dumping, pollutants of control, business operations, and new/re-development.
1.2	**On-site stormwater management.** Encourage development projects to manage stormwater on-site to reduce burdens on the City's stormwater system. Whenever possible, stormwater should be infiltrated, evaporated, reused, or treated on-site in other ways to improve stormwater quality and reduce flows into the storm drain system.
1.3	**Stormwater infrastructure for new development.** Require development projects to pay for their share of new stormwater infrastructure or improvements necessitated by that development.
1.4	**Stormwater re-use and recycling.** Encourage innovative ways of capturing and reusing stormwater for non-drinking purposes to reduce the use of potable water, including the creation of a recycled water system and installation of purple pipe in private and public projects.
1.5	**Collaborative stormwater management.** Encourage collaborative, integrated stormwater management between multiple property owners and sites.
1.7	**Regional and local collaboration.** Collaborate with Palo Alto, Menlo Park, the San Francisquito Creek Joint Powers Authority and other jurisdictions and agencies in the watershed to reduce and remove contaminants from stormwater runoff.
1.8	**Stormwater best practices.** Encourage the use of best practices in stormwater treatment, retention, and quality and quantity control into flood control efforts, ensuring that flood control measures do not have negative ecological impacts on stormwater runoff.
1.9	**Stormwater and flooding.** Integrate stormwater management efforts with floor control efforts, seeking synergies and innovative strategies for stormwater treatment to reduce flood risks and volumes.
2.7	**Municipal water conservation and efficiency.** Seek to reduce municipal water use through the following strategies: • Implement aggressive indoor and outdoor water efficiency measures in all new city developments, substantial rehabs, and remodels. • Prioritize water efficiency upgrades to existing buildings, such as water efficient fixtures. • Reduce potable water used for parks by planting drought-tolerant species and implementing other water saving practices.
2.11	**Groundwater recharge.** Working with regional partners, explore options for groundwater recharge and prohibit new private groundwater wells.
2.12	**Maximizing infiltration.** Consider requiring all new development to provide roof catchment systems, irrigated landscaping, and permeable pavements (where feasible), or other means to enhance on-site infiltration of stormwater runoff or landscape irrigation water.
3.2	**Sewer infrastructure for new development.** Require development projects to pay for their

share of new sewer infrastructure or improvements necessitated by that development

Policy	Parks, Open Space, and Conservation
4.7	**Inter-agency coordination.** Coordinate with other public agencies such as the San Francisquito Creek Joint Powers Authority, Army Corps of Engineers, National Fish and Wildlife Service, and other similar entities on construction or development activity occurring within or adjacent to the City.

Policy	Safety and Noise
2.1	**Flood Insurance Program.** Continue to participate in the National Flood Insurance Program and FEMA's voluntary programs, such as the Community Rating System.
2.2	**Flood related to sea level rise.** Consider expanding boundaries of development control particularly where sea level rise could worsen flooding above predicted conditions.
2.3	**Development in floodways.** Continue to control development in the floodway and floodway fringe.
2.4	**Floodplain Management Ordinance.** Continue to enforce and consider strengthening the City's Floodplain Management Ordinance.
2.6	**Public buildings.** Work to enhance flood protection for essential public buildings and associated parking areas.

Ravenswood/4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies, development standards and guidelines applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating hydrology and water quality impacts resulting from planned development within the RBD Specific Plan area including the following:

Policy	Land Use and Urban Design
9.1	Ensure that new development in the Specific Plan area maximizes the amount of area available for groundwater recharge by requiring features such as roof catchment systems, irrigated landscaping, and permeable pavements (where feasible), or other means to enhance on-site infiltration of stormwater runoff or landscape irrigation water. Ensure all applicable projects under the Specific Plan comply with Provision C.3 of the Regional Municipal NPDES Permit and incorporate Low Impact Development measures to ensure that runoff is not increased.
9.2	As per Chapter 15.52 of the Municipal Code, ensure that at the time a project is proposed in the Plan Area that each proposed new structure in the 100-year flood plain as identified in the current Flood Insurance Rate Map (FIRM) is elevated so that the bottom of the lowest floor is one foot above the base flood elevation (1 BFE) for residential structures, flood-proofed to 1 BFE for nonresidential structures, or granted a Variance pursuant to the procedures outlines in Section 15.52080 (a) to (k).
9.3	Require preparation of a geotechnical report calculating the building load and placement of fill for each development. Verify that environmental review of this report includes an assessment of flood risks to the building itself and the impacts on neighboring structures from displacement of flood waters. Require the report to consider the cumulative flood risks to

other structures from the building in addition to other known, planned, and reasonably foreseeable development

City of East Palo Alto Municipal Code

Chapter 15.52, Flood Plain Management, in the City of East Palo Alto's Municipal Code seeks to promote the health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas of East Palo Alto by establishing development standards and review process for development projects within identified flood hazard zones.

City of East Palo Alto Groundwater Management Plan

The City of East Palo Alto Groundwater Management Plan is a comprehensive integrated resource management plan for the groundwater within the jurisdictional boundaries of the City of East Palo Alto. The Groundwater Management Plan was developed with the goal of providing the City with a long-term, reliable and affordable high quality water supply during droughts and service interruption and emergencies.

4.10.1.2 *Existing Conditions*

Water Quality

The project site is partially developed with a gravel surface parking lot and undeveloped grass area. Stormwater runoff from the project site enters the City's storm drain system which discharges to the San Francisco Bay. The project site and surrounding area are not located in an area of San Mateo County subject to the MRP hydromodification controls.[64]

Groundwater

Groundwater at the project site fluctuates. Testing conducted for the proposed project revealed the current depth to groundwater at the project site ranges from approximately 4.5 – 10.5 feet bgs; however, historic groundwater levels have been recorded at a depth of six feet bgs. Fluctuations in groundwater levels occur due to many factors including seasonal fluctuations and underground drainage patterns. Therefore, the design level geotechnical report assumes a design groundwater level of four feet bgs.[65]

Storm Drainage

The project site is located in a developed area served by an existing storm drainage system. Approximately one-acre of the project site is partially developed with an approximately 17,940 square foot gravel surface parking lot and an 25,130 square foot undeveloped grass area. For the purpose of this analysis, it is conservatively assumed that the site is composed of 100 percent pervious surfaces.

Storm drainage lines in the project area are owned and maintained by the City of East Palo Alto. There is a 15-inch storm drain main along the Pulgas Avenue frontage, which serves the project site and leads to a storm drain outfall in San Francisco Bay.

[64] San Mateo Countywide Water Pollution Prevention Program. *HM Control Map*. March 2009.
[65]

Flooding

The majority of the project site is located within flood zone X where there is a 0.2% Annual Chance Flood Hazard, however a portion of the site along the northern and eastern perimeter is located within special flood hazard zone AE with base elevation of 11 feet amsl.[66] Flood Zone X is not considered a special flood hazard zone. Flood zones affecting the project site are shown in Figure 4.10-1.

Seiches, Tsunamis, and Mudflows

Coastal and shoreline portions of California must consider the potential for tsunamis and seiches. Tsunamis can damage coastal areas, like the surges generated by the March 11, 2011 Tōhoku earthquake in northeast Japan, which resulted in substantial damage to harbors in Crescent City and Santa Cruz.

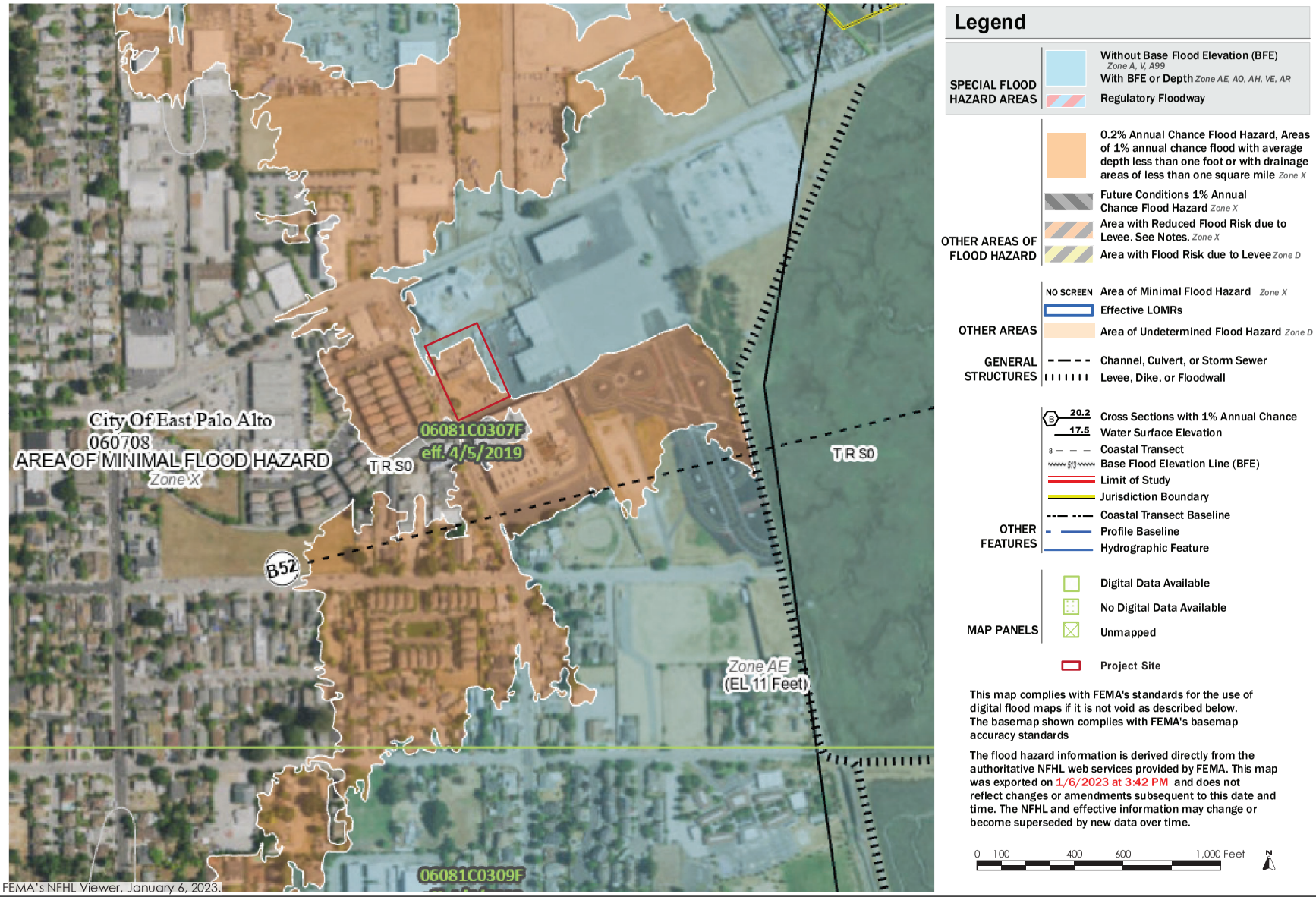
Seiches are earthquake-induced waves within an enclosed or partially enclosed body of water like a lake or reservoir. San Francisco Bay is partially enclosed with outlets to San Pablo Bay and the Pacific Ocean and is relatively shallow with a mean depth of approximately 27.6 feet. Geologic-induced seiche events have not been documented in San Francisco Bay and meteorological effects are quickly dissipated due to the connection with the Pacific Ocean.[67] The project site is not located within a tsunami hazard zone.

A mudflow is the rapid movement of a large mass of mud formed from loose soil and water. The project area is flat and there are no slopes near the project site that in the event of a mudflow would affect the site.

Sea Level Rise

The Bay Conservation and Development Commission (BCDC) have mapped areas throughout the Bay region susceptible to inundation from potential sea level rise scenarios. Even under the low sea level rise scenario (16 inches), substantial bayside portions of East Palo Alto would be at risk of inundation if no inundation protections are implemented. The Sea Level Rise map in the General Plan shows that the project site would be inundated under a condition with approximately three feet of sea level rise, though a small portion of the site at the middle of the would not be inundated with sea level rise.[68]

[66] Federal Emergency Management Agency. Flood Rate Insurance Map 06081C0307F. April 5, 2019.
[67] Metropolitan Transportation Commission and Association of Bay Area Governments. *Plan Bay Area 2040 Draft Environmental Impact Report.* April 2017.
[68] City of East Palo Alto. *Vista 2035 East Palo Alto General Plan.* October 2016. P. 10-8.



Source: FEMA's NFHL Viewer, January 6, 2023.

FLOOD ZONE MAP OF PROJECT SITE

FIGURE 4.10-1

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
– result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
– impede or redirect flood flows?	☐	☐	☒	☐
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact HYD-1: The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. (Less than Significant Impact)

Future library development could result in sediment being discharged in runoff during construction. Assuming that the entire site is disturbed during development of a library on-site, future library development would disturb more than one acre and would be required to conform with the NPDES Construction General Permit, which includes the preparation of a Stormwater Pollution Prevention Program to minimize erosion, sedimentation, and water quality impacts from disposal of dewatering effluent during construction, and comply with Provision C.3 which requires projects incorporate site

design measures, source controls, and runoff treatment controls to minimize stormwater pollutant discharges during operations. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impacts)**

Impact HYD-2:	**The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. (Less than Significant Impact)**

Future library development would include excavation to a maximum depth of four feet to accommodate the building foundations and utility connections. As noted above, the project site has a design level groundwater level of four feet bgs and approximately one to three feet of fill would be imported to the site to elevate the site above base flood elevations. Excavation for building foundations and utility connections would extend between two and four feet bgs. Therefore, groundwater may be encountered during construction and dewatering may be required. As noted in Impact HYD-2, the project would be required to implement NPDES Construction General Permit standard measures to prevent impacts to surface and groundwater quality. Construction dewatering would result in a temporary reduction in groundwater levels at the project site. Due to the temporary nature, dewatering during construction is not considered a substantial decrease in groundwater supplies. Therefore, the project and future library development would not interfere with groundwater recharge activities or substantially deplete groundwater levels. **(Less than Significant Impact)**

Impact HYD-3:	**The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. (Less than Significant Impact)**

Stormwater Runoff

Future library development could alter the existing drainage patterns of the site as a result of increased impervious surface area. However, future library development would be required to comply with the City's Grading Ordinance, prepare a hydrology study that analyzes the flow and sizing of the storm drain system as a part of the grading permit approval process and ensure that site is graded to drain properly and does not impact adjacent properties, exceed the municipal stormwater drainage system, or create erosion problems. The project site is located in a developed area of East Palo Alto which has adequate storm drain capacity to accept increased flows from future development under the project. Compliance with existing policies and regulations for the management of surface runoff and erosion would reduce the drainage impact of any proposed development on the site to a less than significant level. **(Less than Significant Impact)**

Flood Flows

As discussed in Section 4.10.1.2 above, the site is located outside of a special flood hazard zone, with the exception of the northern and eastern perimeter of the site that is designated flood zone AE with base elevation of 11 feet amsl. The project site is located at the terminus of the flood zone, meaning that the water would flow inland from the bay and stop on the project site. Flooding at the project site is the result of a high tide event in the San Francisco Bay overtopping the levees in the project area.[69] Future library development could place fill and concrete within the designated special flood hazard zone in order to elevate the first floor of the building above the base flood elevation of 11 feet amsl. A Flood Displacement Memorandum prepared for a recent development project in the vicinity of the project site, found that new structures or fill placed at the terminus of flood hazard zones would not substantially redirect flood flows, as tidal flood flows would flow up to the point of higher elevation and then recede, similar to existing conditions.[70] As shown in Figure 3.3-4 and Figure 3.3-5, the library building (under either design option) would be located outside of the special flood hazard zone in the northern and eastern perimeters of the site and, therefore, would not impede or redirect flood flows. The library building would be required to comply with the standard construction measures identified in Municipal Code Chapter 15.52.070, Provisions for Flood Hazard Reduction, to reduce hazards from construction within a flood zone, and Flood Displacement Memorandum prepared by a licensed engineer documenting the library (based on whichever design option was selected) would not substantially redirect or impede flood flows. For these reasons, the proposed property acquisition and future library development would not substantially alter the existing drainage pattern of the site, create or contribute runoff which would exceed existing stormwater drainage capacity, or impede or redirect flood flows. **(Less than Significant Impact)**

Impact HYD-4:	**The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. (Less than Significant Impact)**

Future library development would occur on a site that is not subject to inundation from tsunami and or seiche, but that is partially designated as special flood hazard zone (a portion of the site in the northern and eastern perimeter is designated flood zone AE with base elevation of 11 feet amsl).[71] Based on the conceptual library plans (refer to Figure 3.3-4 and Figure 3.3-5), the library building would be located in a portion of the site outside of the special flood hazard zone. Consistent with the City's Floodplain Management Ordinance, the finished floor elevation of the library building would be at least 13 feet amsl and above the base flood elevation for Zone AE, i.e., 11 amsl. For these reasons, the proposed property acquisition would not result in release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(Less than Significant Impact)**

Impact HYD-5:	**The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (Less than Significant Impact)**

Future library development would be required to comply with the Construction General Permit and

[69] BKF Engineers, Surveyors, Planners. *Memorandum, 2535 Pulgas Avenue – Flood Displacement Memorandum.* November 23, 2020.
[70] Ibid.
[71] Federal Emergency Management Agency. Flood Rate Insurance Map 06081C0307F. April 5, 2019.

MRP. Future library development would connect to the existing City water supply, and thus, would not conflict with water quality or groundwater management plans. By adhering to these policies and regulations, future library development would not conflict with the RWCQB Basin Plan or the East Palo Alto Groundwater Management Plan. Therefore, the proposed property acquisition and future library development would not conflict with or obstruct implementation of a water quality plan or sustainable groundwater management plan. **(Less than Significant Impact)**

4.11 LAND USE AND PLANNING

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Palo Alto Airport – Comprehensive Land Use Plan

The project site is approximately 0.8-mile northwest of the Palo Alto Airport, the closest airport to the site. The site is not located within the CLUP's Airport Influence Area nor any airport safety zones.

Local

Local land use is governed by the City's General Plan, which in turn provides the basis for the City's Zoning Ordinance, Specific Plan, and design guidelines. The current General Plan, RBD Specific Plan and the City's Zoning Ordinance are described below.

Vista 2035 East Palo General Plan

The City's General Plan represents the East Palo Alto Community's statement of its core values and vision for its future. The current General Plan was adopted by the City Council in October 2016 and provides the City with a guide for future land use decisions within the City. The General Plan divides the City into land use designations, which specify the type of development that could occur throughout the City that would be consistent with the City's values and vision.

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating land use impacts resulting from planned development within the City including the following:

Policy	Land Use and Urban Design
1.1	**Balanced land uses.** Create a balanced land use pattern to support a jobs-housing balance, minimize traffic and vehicle miles traveled, reduce greenhouse gas emissions, and promote a broad range of housing choices, retail businesses, employment opportunities, cultural venues, educational institutions, and other supportive land uses.
1.3	**Coherent pattern of land uses.** Ensure that new development occurs in a unified and coherent pattern that avoids conflicts between uses and promotes job creation and fiscal stability, creating a high-quality environment for East Palo Alto residents.
1.4	**Unique neighborhoods, districts, and corridors.** Enhance the unique character and identity of the City's neighborhoods, districts and corridors through land use and design decisions. Allow policies and programs to be focused on each unique area of the City.
13.6	**Adjacent neighborhoods and uses.** Ensure that new development throughout the Plan Area maintains or improves the character of any adjacent neighborhoods, including the following: • Require project proponents to design all new development so that it responds to the scale, grain, and character of existing nearby development. • Ensure that new development not adversely affect the Ravenswood Open Space Preserve and Palo Alto Baylands Natural Preserve.

- Maintain adequate separation between potentially incompatible land uses.

Ravenswood/4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies, development standards and guidelines applicable to development within the RBD Specific Plan area, including the following land use and urban design policies:

Policy	Land Use and Urban Design
1.4	Ensure that community facilities such as open space, parks, trails, an expanded library, space for non-profits, and a community center are provided as new development comes to the Plan Area.
1.6	Require project proponents to design all new development so that it responds to the scale, grain, and character of existing nearby development.
4.7	Ensure that all new development adheres to this Specific Plan's development standards, as well as its design standards and guidelines.
4.10	Development should provide the minimum number of parking spaces necessary to avoid excessive parking lots, which impair community character. Ensure that building forms face onto streets and sidewalks to enhance the pedestrian environment and that parking areas are concentrated toward the inner core of parcels.
4.11	Create a distinctive design and architectural sense of place by encouraging public projects and public/community buildings to use design/architecture competition.

City of East Palo Alto Zoning Ordinance

As long-range planning documents, the General Plan and RBD Specific Plan outline long-term visions, policies, and actions designed to shape future development within East Palo Alto generally, and the RBD Specific Plan area, specifically. The Zoning Ordinance and the RBD Specific Plan serve as an implementing tool for the General Plan by establishing detailed, parcel-specific development regulations and standards in each area of the City. Although they are distinct documents, the General Plan, RBD Specific Plan, and Zoning Ordinance are closely related, and State law mandates that zoning regulations be consistent with the General plan maps and policies.

4.11.1.2 *Existing Conditions*

Project Site

General Plan Land Use Designation

The project site is designated General Industrial in the City's General Plan. The General Industrial land use designation is intended for industrial or manufacturing activities that may occur inside or outside of an enclosed building. Large-scale warehouse, distribution, and logistics facilities are also allowed in this designation. Libraries are not among the land uses allowed in this designation.

Zoning

The project site is zoned Ravenswood Employment Center (R-EC) per the RBD Specific Plan. The R-EC zone supports the development of a variety of job-creating uses, including high quality research and development (R&D) facilities. This district also allows for nonprofit uses and performing arts centers, as well as businesses that produce goods, distribute merchandise or repair equipment that do not negatively affect surrounding uses or properties. Libraries are not among the land uses allowed in this district.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Physically divide an established community?	☐	☐	☐	☒
2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Impact LU-1: The project would not physically divide an established community. (No Impact)

A physical division of an established community typically refers to the construction of a physical feature (such as a wall, roadway, or railroad line) or the removal of a means of access (such as a roadway or bridge) that would impair mobility within an existing community or between communities. Future development of a library on-site would not include construction of features or require extension of infrastructure that would divide an existing community. For these reasons, the proposed property acquisition and future library development would not physically divide an established community. **(No Impact)**

Impact LU-2: The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant Impact)

General Plan and RBD Specific Plan

As described in Section 3.2 Project Description, the project involves the acquisition of the one-acre project site for future development of a library. Library uses are not allowed within the current land use designation and zoning district for the site. Therefore, a General Plan Amendment and Rezoning from General Industrial/Ravenswood Employment Center to the Public/Institutional land use designation and Public Institutional zoning district would be required prior to future development of a library on-site.

The proposed Public Institutional zone is intended for development of a variety of support uses

including City buildings, City corporation yards, public schools, fire stations, police stations, and other public uses with no maximum FAR. The maximum building height allowed under the proposed Public Institutional zoning district is two-stories or 26 feet, whichever is greater.

General Plan Policy LU-13.63 calls for the City to ensure that new development maintains or improves the character of adjacent neighborhoods. As discussed in Section 4.2.2, existing development surrounding the project site consists of one- and two-story industrial, institutional, and residential buildings on Pulgas Avenue and Bay Road. The project would allow for future construction of a two-story library building on-site. Future library development would, therefore, be consistent with the height of surrounding development and consistent with General Plan Policy LU-13.63.

As discussed in Section 4.11.1, the project would be consistent with RBD Specific Plan Policy 1.4 which calls for the City to ensure community facilities such as a new library is provided within the RBD area. Furthermore, consistent with Specific Plan Policies 1.6, 4.7, and 4.11, which call for new developments to respond to the scale, grain, and character of existing nearby development, adhere to the Specific Plan development standards and create a distinctive design and architectural sense of place, the project would develop a two story library building consistent with the scale of the nearby residential and commercial buildings and in a modern style, consistent with the character of the adjacent EPACENTER building. As shown in Figure 3.3-4 and Figure 3.3-5, under both design options, the proposed building would be oriented to the street with a surface parking lot located along the southern property line. This site design would be consistent with RBD Specific Plan Policy 4.10 which calls for building forms to face onto the street and sidewalks to enhance the pedestrian environment and that parking areas are concentrated toward the inner core of parcels.
With approval of the General Plan Amendment and rezoning, proposed with the pending RBD Specific Plan Update, the project would be consistent with the Public/Institutional General Plan Requirements and would not conflict with any applicable land use plan. **(Less than Significant Impact)**

Zoning

The site's Ravenswood Employment Center zone is intended to support the development of a variety of job-creating uses including high quality research and development facilities as well as nonprofit uses, performing arts centers and businesses that produce goods, distribute merchandise, or repair equipment. This current zoning does not allow for the future development of a library on-site. Therefore, the proposed project would require rezoning of the site to Public Institutional which would allow for development of a library. With approval of the rezoning, as part of the pending RBD Specific Plan Update, the project would not conflict with any applicable zoning regulations. **(Less than Significant Impact)**

Land Use Conflicts

Land use conflicts can arise from a new development or land use that would cause impacts to persons or the physical environment in the vicinity of the project site or elsewhere. Potential incompatibility may arise from placing a particular development or land use at an inappropriate location, or from some aspect of the project's design or scope. Depending on the nature of the impact and its severity, land use compatibility conflicts can range from minor irritations to nuisance to potentially significant

effects on human health and safety. The project is surrounded by community center, residential, and industrial uses.

The General Plan includes policies that address several key environmental issues in the area, including development on contaminated sites, noise, and transportation. The project's consistency with General Plan policies related to hazardous materials contamination, noise, and transportation are discussed in Sections 4.9, 4.12, and 4.16 of this Initial Study. There are no additional policies pertaining specifically to land use and planning that were adopted for the purpose of avoiding or mitigating an environmental effect. For these reasons, the project would not result in significant environmental impacts due to a conflict with any land use plan. **(Less than Significant Impact)**

4.12 NOISE

4.12.1 Environmental Setting

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[72] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

4.12.1.1 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event.

[72] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

State and Local

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating noise and vibration impacts resulting from planned development within the City, including the following:

Policy	Safety and Noise
6.1	Noise standards. Use the Interior and Exterior Noise Standards (Table 10-1) for transportation noise sources. Use the City's Noise Ordinance for evaluating non-transportation noise sources when making planning and development decisions. Require that applicants demonstrate that the noise standards will be met prior to project approval.

Table 10-1: Interior and Exterior Noise Standards

Land Use	Noise Standard	
	Interior[1,2]	Exterior
Residential – Single family, multifamily, duplex, mobile home.	CNEL 45 dB	CNEL 65 dB[3]
Residential – Transit lodging, hotels, motels, nursing home, hospitals	CNEL 45 dB	CNEL 65 dB
Private offices, church sanctuaries, libraries, board rooms, conference rooms, theaters, auditoriums, concert halls, meeting halls, etc.	$L_{eq(12)}$ 45 dBA	–
Schools	$L_{eq(12)}$ 45 dBA	$L_{eq(12)}$ 67 dBA
General offices, reception, clerical, etc.	$L_{eq(12)}$ 50 dBA	–
Bank lobby, retail story, restaurant, typing pool, etc.	$L_{eq(12)}$ 55 dBA	–
Manufacturing, kitchen,	$L_{eq(12)}$ 65 dBA	–

warehousing, etc.		
Parks, playgrounds	–	CNEL 65 dB[4]
Golf courses, outdoor spectator sports, amusement parks	–	CNEL 70 dB

Notes:

1. Noise standard with windows closed.
2. Indoor environment excluding bathrooms, toilets, closets, and corridors.
3. Outdoor environment limited to rear yard of single-family homes, multi-family patios, and balconies (with a depth of six feet or more) and common recreation areas.
4. Outdoor environment limited to playground areas, picnic areas, and other areas of frequent human use.

6.2 **Compatibility standards.** Utilize noise/ land use compatibility standards and the Noise Ordinance as guides for future development decisions.

6.3 **Noise control.** Provide noise control measures, such as berms, walls, and sound attenuating construction in areas of new construction or rehabilitation.

6.4 **Vibration Impacts.** The City shall require new developments to minimize vibration impacts to adjacent uses during demolition and construction. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV will be used to minimize the potential for cosmetic damage to the building. A vibration limit of 0.30 in/sec PPV will be used to minimize the potential for cosmetic damage to buildings of normal conventional construction.

6.5 **Airport-adjacent land uses.** Maintain the non-residential designation for land near the airport in order to prevent new noise-sensitive residential uses from being constructed in areas with excessive aircraft noise.

7.1 **Noise ordinance.** Continually enforce and periodically review the City's Noise Ordinance for adequacy (including requiring construction activity to comply with established work schedule limits). Amend as needed to address community needs and development patterns.

7.2 **CEQA acoustical analysis.** Require an acoustical analysis to evaluate measures for noise generating projects that are likely to cause the following criteria to be exceeded or to cause a significant adverse community response:

Cause the Ldn/CNEL at noise-sensitive uses to increase by 3 dBA or more and exceed the "normally acceptable" level.

Cause the Ldn/ CNEL at noise-sensitive uses to increase 5 dBA or more and remain "normally acceptable."

7.7 **Site development review.** Utilize site design review to identify potential noise impacts on new development, especially from nearby transportation sources. Encourage the use of noise barriers (walls, berms, or landscaping), setbacks and/ or other buffers.

7.11 **Construction noise.** The City shall require that contractors use available noise suppression devises and techniques and limit construction hours near residential uses. Reasonable noise reduction measures shall be incorporated into the construction plan and implemented during all phases of construction activity to minimize the exposure of neighboring properties. The City considers significant construction noise impacts to occur if a project located within 500 feet of residential uses or 200 feet of commercial or office uses would:

- Involve substantial noise generating activities (such as building demolition, grading, excavation, pile driving, use of impact equipment, or building framing) continuing for more than 12 months.

For such large or complex projects, construction noise and vibration minimization measures, posting or notification of construction schedules, and designation of a noise disturbance coordinator who would respond to neighborhood complaints will be required to be in place prior to the start of construction and implemented during construction to reduce noise impacts on neighboring residents and other uses. A typical construction noise logistics plan would include, but not be limited to, the following measures to reduce construction noise levels as low as practical:

- Limit construction activity to weekdays between 7:00 a.m. and 7:00 p.m. and Saturdays and holidays between 9:00 a.m. and 7:00 p.m., with no construction Sundays;[73]
- Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;
- Locate staging areas and construction materials as far away as possible from adjacent land uses;
- Prohibit all unnecessary idling of internal combustion engines;
- If impact pile driving is proposed, multiple-pile drivers shall be considered to expedite construction. Although noise generated by multiple pile drivers would be higher than the noise generated by a single pile driver, the total duration of pile driving activities would be reduced;
- If impact pile driving is proposed, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected;
- Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented; and
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.

City of East Palo Alto Municipal Code

Chapter 8.52, Noise Control, in the City of East Palo Alto's Municipal Code seeks to protect the citizens of East Palo Alto from unnecessary, excessive, and annoying noise, to maintain quiet in areas where noise levels are low, and to implement programs to reduce unacceptable noise. The regulations limit the amount of noise that may be created as measures at the exterior of any dwelling unit, school, hospital, church, or public library. Table 4.12-1 below provides the Municipal Code's exterior noise standards. Additionally, Chapter 8.52 limits the creation of noise that results in excessive noise levels within any dwelling unit. Table 4.12-2 below provides the standards for

[73] Per Municipal Code Section 15.040125B(3) an exception to the permitted construction hours may be granted by Planning Commission.

interior noise in dwelling units. Exemptions to these standards are provided for special events and construction activities not taking place between 8:00 PM and 7:00 AM.

Table 4.12-1: Exterior Noise Level Standards

Category	Cumulative Numbers of Minutes in Any 1- Hour Time Period	Noise Level Standards, dBA	
		Daytime (7:00 AM – 10:00 PM)	Nighttime (10:00 PM – 7:00 AM)
1	30	55	50
2	15	60	55
3	5	65	60
4	1	70	60
5	0	75	70

Sources: City of East Palo Alto Municipal Code. 2019.

Notes:

1. In the event the measured background noise level exceeds the applicable noise level standard in any category above, the applicable standard shall be adjusted in five dBA increments so as to encompass the background noise level.
2. Each of the noise level standards specified above shall be reduced by five dBA for simple tone noises, consisting primarily of speech or music, or for recurring or intermittent impulsive noises.
3. If the intruding noise source is continuous and cannot reasonably be stopped for a period of time whereby the background noise level can be measured, the noise level measured while the source is in operation shall be compared directly to the noise level standards in this table.

Table 4.12-2: Interior Noise Level Standards

Category	Cumulative Numbers of Minutes in Any 1- Hour Time Period	Noise Level Standards, dBA	
		Daytime (7:00 AM – 10:00 PM)	Nighttime (10:00 PM – 7:00 AM)
1	5	45	40
2	1	50	45
3	0	55	50

Sources: City of East Palo Alto Municipal Code. 2019.

Notes:

1. In the event the measured background noise level exceeds the applicable noise level standard in any category above, the applicable standard shall be adjusted in five dBA increments so as to encompass the background noise level.
2. Each of the noise level standards specified above shall be reduced by five dBA for simple tone noises, consisting primarily of speech or music, or for recurring or intermittent impulsive noises.
3. If the intruding noise source is continuous and cannot reasonably be stopped for a period of time whereby the background noise level can be measured, the noise level measured while the source is in operation shall be compared directly to the noise level standards in this table.

Section 15.04.125 of the City's Municipal Code limits construction activity to the hours of 7:00 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays. No construction activity is allowed on Sundays or national holidays.[74]

[74] Per Municipal Code Section 15.040125B(3) an exception to the permitted construction hours may be granted by Planning Commission.

Palo Alto Airport – Comprehensive Land Use Plan

The project site is approximately 0.8-mile northwest of the Palo Alto Airport is not located within the CLUP's Airport Influence Area; however, it is located within the 60 CNEL aircraft noise contour for Palo Alto Airport.[75]

4.12.1.2 *Existing Conditions*

Existing Ambient Noise Levels

The project site is located on Pulgas Avenue in the Ravenswood Business District of East Palo Alto. The noise environment at the project site is currently dominated by vehicular traffic noise along nearby roadways, such as Bay Road and Pulgas Avenue, and noise generated by the industrial uses on surrounding sites. Aircraft overflights associated with nearby airports (i.e., Palo Alto Airport, Moffett Federal Airfield, San Francisco International Airport, and Norman Y. Mineta San José International Airport) also contribute to the existing noise environment.

Noise data contained in the East Palo Alto General Plan, the East Palo Alto General Plan Update Draft EIR, and measurements from previous projects were reviewed to establish ambient noise levels in the project area. A summary of the noise levels from these prior studies is included in Table 4.12-3: Summary of Existing Noise Levels below.

Table 4.12-3: Summary of Existing Noise Levels

Noise Measurement Location	Date, Time	dBA CNEL	Daytime dBA Leq	Nightime dBA Leq
General Plan Noise Element Noise Contour				
Approximate location of the project site		60-65		
Development Project – Noise Measurements				
LT-1, 15-feet from centerline of Bay Road at 2020 Bay Road	04/20/2017 - 04/24/2017	63 on weekdays 60-61 on weekends	50-70	42 to 57
LT-2, 40 feet north of the centerline of Bay Road and 125 feet west of the centerline of Pulgas Avenue	04/20/2017 - 04/24/2017	71 on weekdays 67 to 69 on weekends	59 to 73	51 to 68
LT-3, 30 feet from centerline of Pulgas Avenue at 530 Pulgas Avneue	04/05/2017 - 04/06/2017	66	61 to 68	49 to 60

Source: City of East Palo Alto. *Draft Environmental Impact Report City of East Palo Alto General Plan Update.* April 2016. City of East Palo Alto. *JobTrain Office Project Initial Study*. November 2021.

[75] County of Santa Clara. *Comprehensive Land Use Plan for Palo Alto Airport.* November 19, 2008. Figure 5.

Existing Noise-Sensitive Receptors

The nearest noise sensitive receptors to the project site are the EPA Art Center adjacent to the north of the project site, and residences to the west, across Pulgas Avenue, approximately 50 feet.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
2) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Impact NOI-1: The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Less than Significant Impact with Mitigation Incorporated)

Construction Noise

Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time. General Plan Safety and Noise Policy 7.11 states that a significant construction noise impact would occur if substantial noise-generating construction activity (such as building demolition, grading, excavation, pile driving, or use of impact equipment, or building framing) occurred within 500 feet of residential uses or 200 feet of commercial or office uses for more than 12 months.

Project construction would take approximately 24 months and be located adjacent to a commercial use (EPACENTER) and approximately 50 feet east of residential uses. Therefore, construction associated with future library development on-site would result in a significant noise impact.

Impact NOI-1.1: Construction of the proposed project would occur for more than 12 months and be located within 500 feet of residential uses, resulting in a significant noise impact.

Mitigation Measure: Consistent with General Plan Policy 7.11. the following standard noise control measures shall be implemented during project construction.

MM NOI-1.1: The following measures shall be implemented during construction:

- Limit construction activity to weekdays between 7:00 a.m. and 7:00 p.m. and Saturdays and holidays between 9:00 a.m. and 7:00 p.m., with no construction on Sundays;
- Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;
- Locate staging areas and construction material areas as far away as possible from adjacent land uses;
- Prohibit all unnecessary idling of internal combustion engines;
- Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented.
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction

With implementation of mitigation measures MM NOI-1.1, temporary construction noise impacts from the proposed project would be reduced to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Operational Noise

Mechanical Equipment Noise

Future library operations would include mechanical equipment operations for building heating and cooling. The most substantial noise-generating equipment would likely be building HVAC units. The proposed project would include HVAC unit; however, the location and specific type, location, and operation of the HVAC unit is not known at this time. Depending on the specific type, location, and operation of the project HVAC equipment, noise levels generated by the HVAC equipment could

potentially exceed the City's Municipal Code thresholds.

Impact NOI-1.2: Mechanical equipment operations associated with the future library development would result in noise levels in excess of exterior noise thresholds at the property line of nearby sensitive receptors.

Mitigation Measure: Incorporation of the following mitigation measure would reduce mechanical equipment noise impacts on nearby sensitive receptors to a less than significant level.

NOI-1.2: Prior to issuance of building permits, project mechanical equipment shall be selected and designed to reduce impacts on surrounding uses and meet the City's exterior and interior noise level requirements. A qualified acoustical consultant shall be retained to review mechanical noise as the equipment systems are selected and determine specific noise reduction measures necessary to reduce noise to comply with the City's 55 dBA L50 daytime exterior limit and 50 dBA L50 nighttime exterior limit at the nearest residential property lines. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls to block the line-of-sight between the noise receptors. Alternate measures may include locating equipment in less noise-sensitive areas.

With implementation of this measure, the impact would be reduced to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Traffic Noise

Based on the General Plan Safety and Noise Policy 7.2, a significant impact would occur if the permanent noise level increase due to project-generated traffic was three dBA CNEL and exceeded the "normally acceptable" level or was five dBA CNEL or greater and remained "normally acceptable." Existing noise levels at the residences to the west exceed 65 dBA CNEL (LT#3 measure 66 dBA CNEL, refer to Table 4.12-3). A significant impact would, therefore, occur if project-generated traffic increased levels by three dBA CNEL or more. For reference, a three dBA CNEL noise increase would be expected if the project would double existing traffic volumes along a roadway.

As discussed in Section 4.16 Transportation, future library development would add a new library within the City, providing an alternative location for library users to choose from. The addition of a second library would; therefore, redirect trips from the existing library to the new library. Based upon standard trip generation rates for Library uses, future library development would generate approximately 2,471 daily vehicle trips.[76] Pulgas Avenue has an existing average daily traffic volume of approximately 7,137 vehicle trips per day.[77] Therefore, the project would not result in a doubling of existing traffic volumes and the permanent traffic noise increase attributable to the project would be two dBA CNEL or less in the project vicinity. This would not be considered a significant permanent noise level increase. For these reasons, the proposed library acquisition and future library

[76] Institute of Transportation Engineers. *Trip Generation Manual, 11th Edition.* September 2021. Land Use Code 590: Library in General Urban/Suburban.
[77] City of East Palo Alto. *East Palo Alto General Plan Update EIR.* April 2016. Page 4.14-4.

development would have a less than significant traffic noise impact. **(Less than Significant Impact)**

Impact NOI-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels. (Less than Significant Impact)

Future library development on the project site could generate temporary construction vibration that could affect adjacent uses. Construction activities such as drilling, the use of jackhammers (approximately 0.035 in/sec PPV at 25 feet), rock drills and other high-power or vibratory tools (approximately 0.09 in/sec PPV at 25 feet), and rolling stock equipment such as tracked vehicles, compactors, etc. (approximately 0.89 in/sec PPV at 25 feet) may generate substantial vibration in the immediate site vicinity.[78]

Policy 6.4 of the City's General Plan limits vibration levels to 0.08 in/sec PPV at sensitive historic structures and 0.03 in/sec PPV at buildings of normal conventional construction to minimize the potential for cosmetic damage. As discussed in Section 4.5 Cultural Resources, the nearest historic resource is a single-family residential building located at 962 Garden Street, approximately 0.3-mile from the southwest of the project site.[79] Therefore, groundborne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in a significant vibration impact on the surrounding buildings.

The nearest structure to the project site is the adjacent EPACENTER building, located approximately 25 feet north of the project boundary. At this distance, operation of jackhammers, rock drills, and rolling stock equipment would generate vibration levels exceeding the City's threshold of 0.03 in/sec PPV.

Impact NOI-2.1: Construction-related vibration levels at the existing EPACENTER building to the north of the project site would exceed the City's 0.03 in/sec PPV threshold. **(Significant Impact)**

Mitigation Measure: The following measure shall be implemented during construction of the proposed project.

MM NOI-2.1: The proposed project shall incorporate the following measures to reduce vibration levels to 0.03 or less at nearby structures.

- Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
- Use of smaller equipment to minimize vibration levels below the limits near existing or on-site buildings shall be required.
- Modify/design or identify alternative construction methods to reduce vibration levels below the limits.
- Avoid dropping heavy objects or materials.

[78] U.S. Department of Transportation, Office of Planning and Environment. *Transit Noise and Vibration Impact Assessment Manual*. September 2018.
[79] Ibid.

With implementation of MM NOI-2.1, the project-generated construction vibration would be reduced below the City's threshold of 0.03 in/sec PPV. **(Less than Significant Impact)**

Impact NOI-3:	**The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The project would not expose people residing or working in the project area to excessive noise levels. (Less than Significant Impact)**

Future library development would occur on a site located approximately 0.8-miles northwest of Palo Alto Airport and within the 60 CNEL noise contour for the airport. Future library development would be required to meet the interior noise standards set by CalGreen and the City's General Plan interior noise standard of 45 dBA Leq for libraries. Standard commercial construction provides 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Therefore, assuming standard construction, interior noise levels at the project site would be approximately 45 dBA with windows partially open which would not exceed the City's threshold. Therefore, the proposed project and future library development would not expose people working in the project area to excessive noise levels due to proximity to an airport. **(Less than Significant)**

4.13 POPULATION AND HOUSING

4.13.1 Environmental Setting

4.13.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[80] The City of East Palo Alto Housing Element and related land use policies were last updated on May 5, 2015. The City is in process of preparing the Housing Element addressing the upcoming 2023-2031 RHNA timeframe.

Regional and Local

Plan Bay Area 2040

Plan Bay Area 2040 is a long-range transportation, land-use, and housing plan intended support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution and GHG emissions in the Bay Area. Plan Bay Area 2040 promotes compact, mixed-use residential and commercial neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).[81]

ABAG allocates regional housing needs to each city and county within the nine-county San Francisco Bay Area, based on statewide goals. ABAG also develops forecasts for population, households, and economic activity in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Regional Forecast of Jobs, Population, and Housing, which is an integrated land use and transportation plan through the year 2040 (upon which Plan Bay Area 2040 is based).

4.13.1.2 *Existing Conditions*

In 2020, the City of East Palo Alto had an approximate population of 28,155.[82] The ABAG Plan Bay Area Projections 2040 estimates that by 2040, the City's projected population would be 36,090

[80] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed January 3, 2020. http://hcd.ca.gov/community-development/housing-element/index.shtml.
[81] Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." http://projectmapper.planbayarea.org/.
[82] California Department of Finance. *E-1 Population Estimates for Cities, Counties, and the State – January 1, 2011 and 2020.* April 2020.

residents in 8,675 households.[83] ABAG is projecting that jobs in the City will increase from approximately 5,810 in 2020 to 6,660 in 2040.[84]

The project site is currently partially developed with a gravel surface parking lot and undeveloped grass area. There are no existing on-site residences or employment uses.

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Impact POP-1: The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (Less than Significant Impact)

Given the use and the size of future library development, it could result in an incremental increase in jobs in the City. It is not currently known how many employees would be generated by the project. However, pursuant to General Plan Policy ISF 7.10, the General Plan assumed development of 750 square feet of library for every 1,000 residents and development of a new library in the Ravenswood RBD Specific Plan area to achieve this library service ratio. Therefore, the new jobs generated by the proposed property acquisition have been accounted for in the growth assumptions of the General Plan (11,650 total jobs within the City by 2040).[85] Thus, any indirect population growth resulting from implementation of the library would not be substantial or unplanned. **(Less than Significant Impacts)**

[83] Association of Bay Area Governments. "Plan Bay Area Projections 2040." Accessed December 1, 2020. http://projections.planbayarea.org/data
[84] Ibid.
[85] City of East Palo Alto. *East Palo Alto General Plan Update Draft EIR.* Page 4.7-15

Impact POP-2:	**The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. (Less than Significant Impact)**

Future library development would not involve conversion or removal of existing housing as no housing currently exists on-site. Therefore, the project would not induce substantial unplanned population growth or displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. **(Less than Significant Impact)**

4.14 PUBLIC SERVICES

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Regional and Local

Bay Trail Plan

The Association of Bay Area Governments' Bay Trail Plan proposes development of a continuous regional hiking and bicycling trail around the perimeter of the San Francisco and San Pablo Bays.[86] Within East Palo Alto, there are two gaps in the Bay Trail: an unimproved section between Weeks Street and Bay Road and a planned section between University Avenue and the northern boundary of the Ravenswood Open Space Preserve.

San Mateo County Trails Plan

The San Mateo County 2001 Trails Plan is a regional trails plan prepared for the San Mateo County Parks and Recreation Commission. It provides a framework for implementing the County's vision of providing a contiguous trail network that identifies the latest desired alignments, connections

[86] San Francisco Bay Trail. Bay Trail Plan. Accessed May 26, 2022. https://mtc.ca.gov/operations/regional-trails-parks/san-francisco-bay-trail/about-bay-trail.

between cities and adjacent counties, access ways for recreational and educational activities to portions of the County currently lacking access, access ways to and along the coast, recreational opportunities to area residents, commuter routes, and trail construction guidelines and policies.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts to public services resulting from planned development within the City, including the following:

Policy	Land Use and Urban Design
7.1	**Public Uses.** Allow municipal facilities, structures, and projects in all land use designations.
7.3	**Continuation of public and institutional uses.** Allow for the continuation of recreational, cultural, public, and religious land uses.
Policy	**Transportation**
1.5	**Coordination with public safety.** Ensure that the Menlo Park Fire Protection District (MPFPD) and the City's Police Department review construction plans for roadway modifications, internal circulation, and establish, if needed, temporary alternative emergency routes to be used the duration of any construction project. During design review, ensure that roads and driveways are established that meet applicable code requirements for emergency access, including potentially including signal preemption mechanisms. Ensure that the MPFPD reviews related building plans for compliance with the Fire Code and establishes a future inspection schedule for continued compliance. Continue the existing practice of informing the MPFPD and the Police Department of projects and proactively engaging with the MPFPD and the Police Department through the Development Review Committee (DRC) and the plan check process.
Policy	**Infrastructure, Services, and Facilities**
7.10	**Libraries.** Coordinate with San Mateo County to provide library services for the community, aiming to provide approximately 750 square feet of equipped and staffed library space per 1,000 residents.
10.1	**Crime prevention through Environmental Design** (CPTED)**.** Work with the police and planning departments to deter crime by encouraging CPTED strategies in new and existing development, including the following strategies: • Active public space. • Building design to promote "eyes on the street." • Clear delineation between private and public space. • Natural access control between public and private space. • Maintenance of public places. • Removal or repair of vandalism or broken property
10.3	**Fire and emergency services.** Continue to coordinate with Menlo Park Fire Protection District (MPFPD) to ensure excellent fire and emergency services.
10.4	**Excellent police service.** Strive to continuously improve the performance and efficiency of the East Palo Alto Police Department.

Policy	Parks, Open Space, and Conservation
1.1	**New parks and open space.** Maintain a park standard of 3 acres per 1,000 residents. Undertake a program to add 79 acres of new formalized park spaces, prioritizing the areas of the City currently underserved by parks (Weeks, Kavanaugh, Willow, and Woodland).

4.14.1.2 *Existing Conditions*

Fire Protection Services

The Menlo Park Fire District (MPFD) provides fire protection and emergency medical services to the City of East Palo Alto as well as the City of Menlo Park, the Town of Atherton and unincorporated areas of San Mateo County.[87] The MPFD responds to approximately 8,500 emergencies a year with approximately 60 percent of the emergencies being emergency medical incidents.[88] Additionally, the MPFD is part of the greater San Mateo County boundary drop plan whereby the closest apparatus responds to each emergency services call.

The MPFD has seven stations that are strategically placed to provide the most efficient response times. The closest MPFD station to the project site is Station 2, which is located at 2290 University Avenue approximately 0.58-miles west of the site. Station 2 was rebuilt in 2016 with a new fire station approximately three times the size of the original Station 2.[89]

Police Protection Services

The East Palo Alto Police Department (EPAPD) provides police services in the City of East Palo Alto. The EPAPD patrols four beats in the City. EPAPD headquarters are located at 141 Demeter Street, approximately 0.2-miles northwest of the project site.

Schools

The project site is located within the Ravenswood City Elementary School District and the Sequoia Union High School District. The Ravenswood City Elementary School District operates three K-5 schools and one middle school. The closest elementary school to the project site is Costano Elementary School (2695 Fordham Street), approximately 0.5-mile northwest of the project site. Cesar Chavez Ravenswood Middle School is the nearest middle school to the project site, located at 2450 Ralmar Avenue, approximately 7.6-miles northwest of the project site. The Sequoia Union High School District operates seven high schools and one adult school.[90] The closest high school to the site is the East Palo Alto Academy, located approximately 0.57-mile southeast of the project site at 1050 Myrtle Street. The nearest school to the project site is East Palo Alto Charter School, located at 1286 Runnymede Street, approximately 0.25 mile southeast of the project site.

[87] Menlo Park Fire District. "About the Fire District." Accessed May 26, 2022. https://www.menlofire.org/about-the-fire-district.
[88] Ibid.
[89] San Jose Mercury News. "Menlo Park: Fire district on track to replace seven stations in 10 years." Accessed May 26, 2022. Available at: https://www.mercurynews.com/2016/03/16/menlo-park-fire-district-on-track-to-replace-seven-stations-in-10-years/.
[90] Sequoia Union High School. "Schools". Accessed May 27, 2022. https://www.seq.org/SCHOOLS/index.html.

Parks

The City of East Palo Alto owns and maintains eight parks and contains 225 acres of the Don Edwards San Francisco Bay National Wildlife Refuge.[91]

The nearest park to the project site is Jack Farrell Park located at 2509 Fordham Street, approximately 0.27 mile north of the site. Jack Farrell Park includes softball field, play structure, workout equipment, restrooms, three tables, and a small grass area.

Libraries

East Palo Alto Library is part of the San Mateo County Libraries system.[92] The existing East Palo Alto Library is located approximately 0.45-mile northwest of the site on 2415 University Avenue. Library features include book rentals, computer and paper-printing services, wireless internet, and access to 3D printers.

The proposed project would construct a new library on the project site.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
1) Fire Protection?	☐	☐	☒	☐
2) Police Protection?	☐	☐	☒	☐
3) Schools?	☐	☐	☒	☐
4) Parks?	☐	☐	☒	☐
5) Other Public Facilities?	☐	☐	☒	☐

[91] City of East Palo Alto. "Parks, Open Space & City Facilities." Accessed May 26, 2022. https://www.cityofepa.org/parksrec.
[92] San Mateo County Libraries. "East Palo Alto." Accessed May 26, 2022. https://smcl.org/locations/1E/.

Impact PS-1:	**The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. (Less than Significant Impact)**

Future library development would incrementally increase demand for fire protection services in the area. While there would be increased demand placed on the MPFPD, the site is already within the MPFPD's service area and in close proximity to existing fire stations. Future development of the site would be required to be constructed in a fire-safe manner in accordance with current building codes. New library facilities were already identified for development in the RBD Specific Plan area in the General Plan, therefore, any increased demand for fire protection services associated future library development would have been included in the growth assumptions of the General Plan and analyzed in the General Plan EIR. The General Plan EIR concluded that MPFPD has no immediate need to expand its facilities to accommodate planned growth in the General Plan therefore, impacts associated with the provision of new or physically altered fire facilities would be less than significant impact. For these reasons, the proposed property acquisition and future library development would not result in substantial adverse effects associated with the provision of new or altered fire protection facilities. **(Less than Significant Impact)**

Impact PS-2:	**The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. (Less than Significant Impact)**

Future library development would incrementally increase demand for police protection services in the area. While there would be increased demand placed on the EPAPD, the site is already within the EPAPD's service area and in close proximity to the existing police station. Future development of the site would be reviewed by EPAPD to ensure that it is not constructed in a manner that increases potential for crime because new library facilities were already identified for development in the RBD Specific Plan area in the General Plan, any increased demand for police protection services associated future library development would have been included in the growth assumptions of the General Plan and analyzed in the General Plan EIR. The General Plan EIR concluded that EPAPD has no immediate need to expand its facilities to accommodate planned growth in the General Plan therefore, impacts associated with the provision of new or physically altered police facilities would be less than significant impact. For these reasons, the proposed property acquisition and future library development would not result in substantial adverse effects associated with the provision of new or altered police protection facilities. **(Less than Significant Impact)**

Impact PS-3:	**The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. (Less than Significant Impact)**

As discussed in Section 4.14, Population and Housing, the addition of a new library would result in modest job growth in East Palo Alto. Although the project site was not specifically identified for future library development, because new library facilities were already accounted for in the development assumptions for the RBD Specific Plan area in the General Plan, any job/population growth associated with buildout of the General Plan would have been included in the growth assumptions of the General Plan. As the library project does not include housing, it would not result in additional student population. Therefore, the proposed property acquisition and future library development would not result in the need for new or altered school facilities. **(Less than Significant Impact)**

Impact PS-4:	**The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. (Less than Significant Impact with Mitigation Incorporated)**

Unlike residential development, future library development would not create demand for more parks within the City. While employees and patrons of a future library may use nearby parks such as the Bay Trail, Cooley Landing, or Jack Farrell Park, usage of these facilities by future employees and patrons would not be substantial and require the construction of new parks. Therefore, the proposed property acquisition and future library development would not result in the need for new or physically altered parks in the project area. **(Less than Significant Impact)**

Impact PS-5:	**The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. (Less than Significant Impact)**

Impacts associated with construction of a library facility are discussed at a programmatic level throughout this document. Future library development would be subject to project-level environmental review pursuant to CEQA and would be required to analyze impacts to public facilities as well as the physical impacts associated with provision of the library facility and incorporate mitigation measures to avoid or minimize such impacts, if necessary. Therefore, the proposed project would not result in significant impacts related to new or physically altered public

facilities, beyond what has been disclosed throughout this initial study, based on the level of project information and detail that exists. **(Less than Significant Impact)**

4.15 RECREATION

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Regional

Bay Trail Plan

The Association of Bay Area Governments' Bay Trail Plan proposes development of a continuous regional hiking and bicycling trail around the perimeter of the San Francisco and San Pablo Bays.[93] Within East Palo Alto, there are two gaps in the Bay Trail: an unimproved section between Weeks Street and Bay Road and a planned section between University Avenue and the northern boundary of the Ravenswood Open Space Preserve.

San Mateo County Trails Plan

The San Mateo County 2001 Trails Plan is a regional trails plan prepared for the San Mateo County Parks and Recreation Commission. It provides a framework for implementing the County's vision of providing a contiguous trail network that identifies the latest desired alignments, connections between cities and adjacent counties, access ways for recreational and educational activities to portions of the County currently lacking access, access ways to and along the coast, recreational opportunities to area residents, commuter routes, and trail construction guidelines and policies.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding mitigating recreation impacts resulting from planned development within the City, including the following:

Policy	Parks, Open Space, and Conservation
1.1	**New parks and open space.** Maintain a park standard of 3 acres per 1,000 residents. Undertake a program to add 79 acres of new formalized park spaces, prioritizing the areas of the City currently underserved by parks (Weeks, Kavanaugh, Willow, and Woodland).
1.6	**Park variety.** Seek to maintain a diversity of park spaces throughout the City, including recreation areas and sports fields, pools, hardscaped plazas, children's play areas, and linear

[93] San Francisco Bay Trail. Bay Trail Plan. Accessed May 26, 2022. https://mtc.ca.gov/operations/regional-trails-parks/san-francisco-bay-trail/about-bay-trail.

greenways.

1.7	**Community Involvement.** Encourage public involvement in every aspect of park and open space acquisition, design, construction, and programming.
1.8	**Parks and open space.** Establish a range of parks and open spaces, including tot lots, neighborhood parks, community parks, plazas/greens and/or greenways/parkways within all new Neighborhoods, Centers, and Districts.
1.9	**Measure AA projects.** With the financial and administrative support of Mid-Peninsula Regional Open Space, build new Bayfront trails and City-to-Bay trails. Support wetland restoration and science education exhibits.
1.10	**New trails and paths.** Construct new trails or multiuse paths, particularly along the San Francisquito Creek or in the Baylands.
1.12	**Opportunistic conversions.** Work to convert unused utility rights-of-way (including the Hetch Hetchy ROW), railroad rights-of-way (including the UP Spur) and alleys into attractive open space corridors.
2.3	**Access to parks.** Improve bike and pedestrian access to existing parks and schools.
2.5	**Park improvements.** Maintain and renovate existing parks with new equipment and features (especially drinking fountains, lighting, fitness equipment, and restrooms) to ensure continued use, accessibility, and quality facilities.
2.7	**Baylands Use.** Encourage public recreational use and access to the Baylands, South Bay Salt Pond, and other nearby open space, in coordination with the Don Edwards San Francisco Bay National Wildlife Refuge and other partners and in a manner that does not adversely impact the natural environment.

City of East Palo Alto Parks Master Plan

The City is currently in the process of developing a Citywide Parks Master Plan to guide future improvements of existing parks and the development of new parks and open spaces.

4.15.1.2 *Existing Conditions*

The City of East Palo Alto owns and maintains eight parks and contains 225 acres of the Don Edwards San Francisco Bay National Wildlife Refuge.[94] The nearest park to the project site is Jack Farrell Park located at 2509 Fordham Street (approximately 0.27-mile northwest of the project site) and includes softball field, play structure, workout equipment, restrooms, three tables, and a small grass area.

[94] City of East Palo Alto. "City Parks." Accessed January 7, 2021. Available at: https://www.cityofepa.org/parksrec.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
2) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Impact REC-1: The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. (Less than Significant Impact)

Unlike residential development, future library development would not create demand for more parks within the City. While employees and patrons of a future library may use nearby parks such as the Bay Trail, Cooley Landing, or Jack Farrell Park, usage of these facilities by future employees and patrons would not be substantial and require the construction of new parks. Therefore, the proposed property acquisition and future library development would not result in the need for new or physically altered parks in the project area. **(Less than Significant Impact)**

Impact REC-2: The project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Less than Significant Impact)

Future library development could include outdoor public recreational facilities the environmental effects of which are analyzed at a programmatic level in this Initial Study and would be analyzed as a part of project-level environmental review pursuant to CEQA, including the incorporation of mitigation measures to avoid or minimize impacts, if necessary. Therefore, the proposed project would not have a significant impact from construction of new recreational facilities. **(Less than Significant Impact)**

4.16 TRANSPORTATION

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including San Mateo County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2040 in July 2017, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2040.

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle-miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires the replacement of automobile delay—described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion—with VMT as the recommended metric for determining the significance of transportation impacts. The Governor's Office of Planning and Research (OPR) approved the CEQA Guidelines implementing SB 743 on December 28, 2018. Local jurisdictions are required to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Congestion Management Program

The City/ County Association of Governments of San Mateo County (C/CAG) oversees the area's Congestion Management Program (CMP), which identifies strategies to respond to future transportation needs, development procedures to alleviate and control congestion, and promotes countywide solutions to congestion issues. State legislation requires that urbanized counties in California prepare a CMP in order to alleviate and control congestion and promotes countywide solutions to congestion issues. State legislation requires that urbanized counties in California prepare a CMP in order to obtain their share of increased gas tax revenues. The legislation requires that each CMP contain the following elements: 1) a system definition and traffic level of service standard element; 2) a transit service and standard element; 3) a trip reduction and transportation demand management element; 4) a land use impact analysis program element; and 5) a capital improvement

element. CCAG is currently in the process of updating the County TDM program.

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating transportation/traffic impacts resulting from planned development within the City, including the following:

Policy	Transportation
1.4	**ADA-compliant Sidewalks.** Ensure sidewalks are ADA compliant and free of blockage resulting from parked vehicles or other obstructions.
1.5	**Coordination with public safety.** Ensure that the Menlo Park Fire Protection District (MPFPD) and the City's Police Department review construction plans for roadway modifications, internal circulation, and establish, if needed, temporary alternative emergency routes to be used the duration of any construction project. During design review, ensure that roads and driveways are established that meet applicable code requirements for emergency access, potentially including signal preemption mechanisms. Ensure that the MPFPD reviews related building plans for compliance with the Fire Code and establishes a future inspection schedule for continued compliance. Continue the existing practice of informing the MPFPD and the Police Department of projects and proactively engaging with the MPFPD and the Police Department through the Development Review Committee (DRC) and the plan check process.
3.3	**Pedestrian network.** Create a safe, comfortable, and convenient pedestrian network that focuses on a) safe travel; b) improving connections between neighborhoods and commercial areas, and across existing barriers; c) providing places to sit or gather, pedestrian-scaled street lighting, and buffers from moving vehicle traffic; and d) includes amenities that attract people of all ages and abilities.
4.1	**Bicycle network.** Improve facilities and eliminate gaps along the bicycle network to connect destinations across the city and create a network of bicycle facilities of multiple types that connect to neighboring cities, including a path along Newell Road between Highway 101 and San Francisquito Creek. The network should facilitate bicycling for commuting, school, shopping, and recreational trips by riders of all ages and levels of experience.
4.6	**Bicycle parking standards.** Require large public and private development projects to provide sufficient bicycle parking, shower, and locker facilities.
6.2	**Parking requirements.** Maintain efficient parking standards that consider the effect on demand due to various contextual conditions such as parking prices, transportation demand management strategies, transit accessibility, walkability, and bike ability. Study establishing a density bonus program for developments that utilize mechanized parking lifts.
7.1	**Automobile Level of Service Standards.** Improve the East Palo Alto circulation system roadways in concert with land development to maintain adequate LOS for automobile travel. Automobile LOS performance can be measured using a volume-to-capacity (V/C) ratio. V/C ratios are calculated based on existing or future average daily traffic (ADT) volumes and daily capacity values for various types of roadways. A level of service scale is used to evaluate roadway performance based on V/C ratios. These

	levels range from "A" to "F", with LOS A representing free flow conditions and LOS F representing severe traffic congestion. Descriptions of traffic flow for the different levels of service are provided in Table 6-4 Standards for Roadway Level of Service. The performance criteria for evaluating volumes and capacities of the East Palo Alto roadway system is LOS D. At a signalized intersection, an impact is considered significant if it causes operations to degrade from LOS D or better to LOS E or F; or exacerbates LOS E of F conditions by increasing critical delay by >4 seconds and increasing volume to capacity ration (V/C ratio) by 0.01; or increases the V/C ratio by >0.01 at an intersection that exhibits unacceptable operations, even if the calculated LOS is acceptable. At an un-signalized intersection, an impact is considered significant if it: causes operations to degrade from LOS D or better to LOS E or F; or exacerbates LOS E or F conditions by increasing control delay; or causes volumes under project conditions to exceed the Caltrans Peak Hour Volume Warrant Criteria. Where the City determines that proposed development projects will cause LOS standards to be exceeded, appropriate mitigation will be required to improve roadways to meet LOS standards.
7.3	**Multimodal transportation impact fee.** Adopt a transportation impact fee for new development that raises funds for improving all modes of transportation.
U8.1	**Transportation Demand Management (TDM).** Promote effective TDM programs to reduce travel demand from existing and new development, shifting trips to alternative modes. Regularly update the TDM ordinance to establish effective requirements that reduce travel demand from existing and new development. Require projects to implement TDM programs, as defined in the TDM ordinance.

Policy	Safety and Noise
4.4	**Transportation safety.** Minimize transportation accidents by considering pedestrian safety in all land use decisions and working closely with CHP, Caltrans, SamTrans, and other relevant agencies to identify safety problems and implement corrective measures.

Ravenswood/4 Corners Transit Oriented Development Specific Plan

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies, development standards and guidelines applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating transportation impacts resulting from planned development within the RBD Specific Plan area including the following:

Policy	Transportation and Traffic
1.2	Implement the Specific Plan's proposed network of offstreet pedestrian paths, which can help promote walking by providing more direct pedestrian connections between sites and buildings than could be offered by the street system. In addition, encourage developers to follow the Specific Plan's guidelines regarding pedestrian connections between sidewalks and building entrances
1.4	Implement the General Plan's proposed network of on-street bicycle lanes, off-street bicycle paths, and signed on-street bicycle routes.
2.4	Promote use of "quieter" paving types such as Open-Grade Rubberized Asphaltic Concrete along Bay Road, Pulgas Avenue and Weeks Street in the Plan Area and vicinity.

5.2	Provide on-street parking based on the Streetscape Standards contained in this Specific Plan.

City of East Palo Alto Municipal Code

The City of East Palo Alto Municipal Code Chapter 10.32, Transportation System Management (TSM) Plan, was adopted with the following purposes:

- To reduce peak hour traffic congestion in the city, county, and surrounding region by reducing the number of vehicular trips and vehicular miles travelled related to work travel;
- To reduce vehicular emissions, energy usage, and ambient noise levels as a result of fewer vehicle trips, fewer vehicle miles travelled, and reduced traffic congestion;
- To achieve, as an initial goal, a twenty-five (25) percent participation rate by employees who work in the County in alternatives to single-occupancy vehicle commuting during weekday peak hours. The county will periodically reevaluate this goal in conjunction with the countywide TSM program and will revise it upward when warranted by traffic conditions and demonstrated results of the TSM program.

This chapter of the Municipal Code outlines requirements for TSM programs based on the number of employees, with thresholds for employer program requirements at 25 and 100 employees (refer to Municipal Code section 10.32.040, Trip Reduction Program).

On June 1, 2021, City Council adopted a resolution to repeal the existing Chapter 10.32 of the East Palo Alto Municipal Code and enact a new Chapter 10.32 establishing a transportation demand management (TDM) ordinance. The new TDM ordinance requires non-residential development approved after January 1, 2022, to achieve a 40 percent reduction in daily vehicle trips and existing developments with 100 or more employees to submit TDM plans that demonstrate how the worksite will achieve a 40 percent reduction in average daily trips.

City of East Palo Alto Bike Master Plan

The East Palo Alto Bicycle Transportation Plan, adopted in 2011, was created to reflect the goals and policies of the 1999 General Plan and Bay Access Master Plan and improve the overall community health through improved air-quality and by helping people stay physically fit. The plan embraces a reduction in greenhouse gas emissions and advocates for connectivity of schools with residential areas, shoppers with businesses, and commuters to employment centers.

4.16.1.2 *Existing Conditions*

Regional Access

Regional access to the project site is provided by US 101 and Bayfront Expressway (SR 84), as described below.

US 101 is a north-south freeway in the vicinity of the project site. US 101 extends northward through San Francisco and southward through San Jose. Within East Palo Alto, US 101 has three general-purpose travel, lanes one high-occupancy vehicle (HOV) lane, and one auxiliary lane in each

direction. Access to and from the project study area is provided via full-access interchanges at Embarcadero Road and University Avenue.

Bayfront Expressway (SR 84) is a six-lane expressway that extends along the northern edge of East Palo Alto. SR 84 extends across the Dumbarton Bridge into Alameda County and westward through San Mateo County. Bayfront Expressway provides access to the project study area via University Avenue.

Local Roadway Access

Local access to the project site is provided via University Avenue, Embarcadero Road, East Bayshore Road, Willow Road, Bay Road, Clarke Avenue, Pulgas Avenue, and Donohoe Street. These facilities are described below.

University Avenue (SR 109) is a north-south arterial that extends from Stanford University in Palo Alto to Bayfront Expressway just north of the City of East Palo Alto. Within East Palo Alto, University Avenue is a four-lane divided roadway with no on-street parking. South of Bay Road, University Avenue has continuous sidewalks on both sides of the street. Between Bay Road and Purdue Avenue, University Avenue has a sidewalk on only one side of the street. The posted speed limit on University Avenue is 25 mph.

Embarcadero Road is a four-lane east-west arterial street. Embarcadero Road extends from El Camino Real in the west to the Baylands Nature Reserve in the east. With the exception of the Embarcadero Road overpass at US 101, where sidewalks are present on only the north side of the street, Embarcadero Road has continuous sidewalks on both sides of the street with no on-street parking. The posted speed limit on Embarcadero Road is 25 mph.

East Bayshore Road is a two-lane north-south frontage road with two disjointed segments directly east of US 101. East Bayshore Road extend southward from Saratoga Avenue near Willow Road to Euclid Avenue, where it becomes Donohoe Street. East of University Avenue, East Bayshore Road extends southward from Donohoe Street to San Antonio Road where it becomes Bayshore Parkway in Palo Alto. East Bayshore Road has on-street parking on the east side of the street between Clarke Avenue and Pulgas Avenue. East of Donohoe Street, East Bayshore Road is 25 mph.

Willow Road (SR 114) is a four-lane north-south divided arterial that serves as a border between Menlo Park and East Palo Alto in some sections, while the majority of the roadway is within the city limits of Menlo Park. Willow Road extends from Alma Street in the south to Bayfront Expressway in the north.

Bay Road is a four-lane east-west collector street within the project vicinity beginning at East Bayshore Road continuing to Pulgas Avenue. From Pulgas Avenue, Bay Road is a two-lane road that terminates at Cooley Landing and the San Francisco Bay. Bay Road has continuous sidewalks with on-street parking on both sides of the street west of Pulgas Avenue. However, east of Pulgas Avenue, Bay Road has no sidewalks. The posted speed limit on Bay Road is 25 mph.

Clarke Avenue is a two-lane north-south local collector street within the vicinity of the site extending from East Bayshore Road in the south to Bay Road to the north, where it becomes Illinois

Street. Clarke Avenue has continuous sidewalks with on-street parking on both sides of the street. The posted speed limit on Clarke Avenue is 25 mph.

Pulgas Avenue is a two-lane north-south collector street directly adjacent to the eastern boundary of the project site with on-street parking on both sides of the street. Pulgas Avenue extends from East Bayshore Road in the south to just north of Bay Road. Near the project site, sidewalks are provided on both sides of Pulgas Avenue north of Bay Road. The posted speed limit on Pulgas Avenue is 25 mph. Pulgas Avenue provides direct access to the project site via one full access gated driveway.

Donohoe Street is an east-west street that extends from East Bayshore Road in the west to Clarke Avenue in the east. Its classification varies from a local street to a major thoroughfare, while the cross section varies from a two-lane street with on-street parking to a divided six lane street. Donohoe Street has continuous sidewalks on both sides of the street east of University Avenue. Donohoe Street has a prima facia speed limit of 25 mph.

Planned Future Improvements

The RBD Specific Plan identified construction of a loop road as a planned transportation improvement. The loop road would extend northward from the current northerly terminus of Demeter Street and then turn westward to connect to University Avenue. Creating this new connection is expected to help alleviate traffic congestion on Bay Road and at the Bay Road/ University Avenue intersection by diverting some existing traffic.

Existing Bicycle, Pedestrian, and Transit Facilities

Bicycle Facilities

Bicycle facilities in the project vicinity consist of Class I bike paths and Class II bike lanes. Class II bike lanes exist on Bay Road from Newbridge Street to Clarke Avenue, and on University Avenue starting just north of Donohoe Street and extending to the location of the future loop road. Between the future loop road and Bay Front Expressway, there is a bike lane on the west (southbound) side of University Avenue and a separate bikeway on the east side of University Avenue. Additionally, the Bay Trail, a Class I bike and pedestrian path, runs along the west boundary of the Baylands Nature Preserve area, which is about one quarter mile east of the project site. The Bay Trail connects to several local neighborhood streets, including Week Street and Runnymede Street. There is also a short paved mixed-use trail known as the Rail Spur that extends from Bay Road to Pulgas Avenue. These bicycle facilities are not well-connected. No bicycle lanes are provided on the other local and neighborhood street in the vicinity of the project site. However, due to low traffic volumes, many of the residential streets south of the project site are conducive to bicycle traffic.

Pedestrian Facilities

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. In the vicinity of the project site, sidewalks are provided on both sides of Bay Road west of Pulgas Avenue. Between Pulgas Avenue and Tara Street, there are no sidewalks. A short sidewalk (approximately 400 feet long) is provided on the south side of Bay Road east of Tara Street.

Sidewalks are provided on both sides of Pulgas Avenue south of Bay Road. North of Bay Road, a short sidewalk (about 200 feet long) is available only on the west side of the street.

Crosswalks are found on one or more approaches on most of the signalized study intersections. The intersection of University Avenue and Bay Road has crosswalks on all approaches.

The all-way stop controlled intersection of Clarke Avenue/Illinois Street and Bay Road has crosswalks on all four approaches. The intersection of Pulgas Avenue and Bay Road has a crosswalk on only the west approach while the intersection of Pulgas Avenue and Runnymede Street has crosswalks on all legs except the north approach. There are no crosswalks available at the following four unsignalized study intersections:

- Demeter Street and Bay Road
- Pulgas Avenue and Weeks Street
- Clarke Avenue and Weeks Street
- Clarke Avenue and Runnymede Street

Transit Facilities

Existing transit services in the study area are provided by the San Mateo County Transit District (Samtrans). The bus stops closest to the project site are at the intersection of Pulgas Avenue and Bay Road and at the intersection of Pulgas Avenue and Weeks Street. Samtrans bus service and the locations of the nearest bus stops are described below.

The **81 line** operates on Bay Road, University Avenue, and Pulgas Avenue within the study area, looping throughout East Palo Alto and providing service to Menlo-Atherton High School. The line operates twice in the morning and once in the afternoon on school days only and stops at the Pulgas Avenue and Bay Road bus stop.

The **280 line** operates on Bay Road and Pulgas Avenue within the study area, providing service between the Stanford Shopping Center and East Palo Alto. The line operates with approximately 60-minute headways during the AM and PM peak periods. The bus stop closest to the project site is at the intersection of Pulgas Avenue and Bay Road.

The **296 line** operates on Bay Road, Pulgas Avenue, and Clarke Avenue within the study area, providing service between the Redwood City Caltrain Station and East Palo Alto. The line operates with 20-minute headways during the AM and PM peak periods. The bus stop closest to the project site is at the intersection of Clarke Avenue and Bay Road.

4.16.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	☐	☐	☒	☐
2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
4) Result in inadequate emergency access?	☐	☐	☒	☐

Impact TRN-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. (Less than Significant Impact)

Pedestrian Facilities

Pedestrian facilities in the project area consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. In the vicinity of the project site, sidewalks are provided on both sides of Bay Road west of Pulgas Avenue, on the south side of Bay Road east of Tara Street, on both sides of Pulgas Avenue south of Bay Road, and on the west side of Pulgas Avenue north of Bay Road. There are sidewalks on both sides of Pulgas Avenue adjacent to the project site. Although designs for the future library development have not been finalized, the City would either retain the existing sidewalk or replace it with construction of a library building consistent with City standards. Future library development would; therefore, not conflict with a program, plan, ordinance, or policy addressing the pedestrian circulation system. **(Less than Significant Impact)**

Bicycle Facilities

Designated bicycles facilities in the immediate vicinity of the project site include bike lanes on Bay Road west of Clarke Avenue and the Bay Trail, a bike and pedestrian path that runs along the west boundary of the Baylands Nature Preserve area about one quarter mile east of the project site. There is also a short paved multi-use trail known as the Rail Spur that extends from Bay Road to Pulgas Avenue. These bicycle facilities are not well-connected. However, many of the residential streets south of the project site are conducive to bicycle travel due to their low traffic volumes and low speeds.

The East Palo Alto General Plan 2035 includes planned improvements to bicycle facilities in the project vicinity including Class II bike lanes along the entirety of Bay Road and Pulgas Avenue and Class III bike routes along Weeks Street, Cooley Avenue, East Bayshore Road, Euclid Avenue, and

Runnymede Street between Cooley Avenue and Euclid Avenue. These additions to the bicycle network would improve bike access to the site. Future library development on-site would not impede implementation of these planned improvements nor conflict with another program, plan, ordinance, or policy addressing the bicycle circulation system. **(Less than Significant Impact)**

Transit Facilities

The project area is served by three SamTrans bus routes that stop within walking distance of the project site each hour during the peak commute periods. Future library users may utilize these transit facilities to access the library, however, transit riders would not increase to the extent that capacity of the existing transit facilities would be exceeded. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the transit circulation system. **(Less than Significant Impact)**

Impact TRN-2:	**The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). (Less than Significant Impact)**

CEQA Guidelines Section 15064.3, subdivision (b) describes the criteria for analyzing transportation impacts using a VMT metric. The City of East Palo Alto adopted a VMT policy on July 1, 2020. Based on the City's policy, the project would meet the definition of a local-serving public facility and assumed to have a less than significant impact on VMT because it would give existing library users an additional option to take shorter trips to access library facilities compared to existing conditions in the City. Therefore, the proposed property acquisition would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact)**

Impact TRN-3:	**The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (Less than Significant Impact)**

Future library development would be subject to project-level CEQA review. During the environmental review process, the site plan would be reviewed for compliance with the Building Code and Fire Code, and other applicable codes, so that safety would not be compromised. Any mitigation measures required to minimize or avoid impacts due to geometric design features would be identified during the site-specific environmental review process. Therefore, the proposed project would not substantially increase hazards due to geometric design feature. **(Less than Significant Impact)**

Impact TRN-4:	**The project would not result in inadequate emergency access. (Less than Significant Impact)**

Future library development would be subject to project-level CEQA review. During the environmental review process, the site plan would be reviewed for compliance with the Building Code and Fire Code, and other applicable codes, so that emergency access and safety would not be compromised. Any mitigation measures required to minimize or avoid such impacts due to inadequate emergency access would be identified during the site-specific environmental review

process. Therefore, the proposed project would not result in inadequate emergency access. **(Less than Significant Impact)**

4.17 TRIBAL CULTURAL RESOURCES

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Assembly Bill (AB) 52, effective July of 2015, established a new category of resources for consideration by public agencies when approving discretionary projects under CEQA, called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or when it is concluded that mutual agreement cannot be reached.

Under AB 52, a TCR is defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources[95]
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1 (k)
- A resource determined by the lead agency to be a TCR.

4.17.1.2 *Existing Conditions*

On June 14, 2021, Tamien Nation requested notification of all non-exempt projects within the City of East Palo Alto.

On October 14, 2022, a records search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the site and the results were positive.[96] The City contacted the Tamien Nation (i.e., the California Native American tribe traditionally affiliated with the project area). The tribe was notified of the proposed project via email and certified mail on January 26, 2023 and invited to initiate formal consultation with the City of East Palo Alto under AB 52. On February 2, 2023, the City received a request from Tamien Nation for formal consultation with under AB 52. The City met with a representatives of Tamien Nation on February 14, 2023. During the meetings, the tribal representatives requested that mitigation measure MM CUL-2.1 be modified to include a requirement for non-invasive methods to be used during presence/absence surveys of the project site, rather than mechanical methods. The tribal representative did not indicate that any known TCRs are present on the site.

[95] See Public Resources Code section 5024.1. The State Historical Resources Commission oversees the administration of the CRHS and is a nine-member state review board that is appointed by the Governor, with responsibilities for the identification, registration, and preservation of California's cultural heritage. The CRHR "shall include historical resources determined by the commission, according to adopted procedures, to be significant and to meet the criteria in subdivision (c) (Public Resources Code, Section 5024.1 (a) (b)).

[96] Cody Campagne, Cultural Resources Analyst, Native American Heritage Commission. Personal Communication. October 14, 2022.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☒	☐
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Impact TCR-1: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). **(Less than Significant Impact)**

As noted in Section 4.17.1.2, the Tamien Nation has requested to be informed of proposed projects in East Palo Alto under AB 52. In addition, after receiving notice of the proposed project, Tamien Nation requested formal consultation on the project. The City met with a representative of the tribe on February 14, 2023. During the meetings, the tribal representatives requested that mitigation measure MM CUL-2.1 be modified to include a requirement for non-invasive methods to be used during presence/absence surveys of the project site rather than mechanical methods. The tribal representatives did not indicate that any known TCRs are present on the site or in the project area. As noted in Section 4.5 Cultural Resources, the project site is not listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). Additionally, because no tribal cultural resources were identified on-site during the tribal consultation process, the project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in

the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). **(Less than Significant Impact)**

Impact TCR-2:	**The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Less than Significant Impact)**

As discussed under Impact TCR-1, no tribal cultural resources were identified during the Native American consultation process. If cultural resources are encountered during construction, mitigation measure MM CUL 2.1 would be implemented to reduce impacts to cultural resources and human remains to a less than significant level. For these reasons, the project would not result in a substantial adverse change to a tribal cultural resource. **(Less than Significant Impact)**

4.18 UTILITIES AND SERVICE SYSTEMS

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and adopt a Water Shortage Contingency Plan to outline the water supplier's response and plan for changes or shortages in water supplies. The City of East Palo Alto adopted its most recent UWMP in June 2021.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

Local

Vista 2035 East Palo Alto General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating utilities and service systems impacts resulting from planned development within the City

including the following:

Policy	Economic Development
3.2	**Concurrency.** Require that infrastructure be in place or planned and funded prior to approval of new development projects that require such infrastructure, including water availability.
Policy	**Infrastructure, Services, and Facilities**
1.1	**NPDES compliance.** Ensure compliance with all NPDES requirements for litter control, dumping, pollutants of control, business operations, and new/re- development.
1.2	**On-site stormwater management.** Encourage development projects to manage stormwater on site to reduce burdens on the City's stormwater system. Whenever possible, stormwater should be infiltrated, evapotranspirated, reused or treated on-site in other ways that improve stormwater quality and reduce flows into the storm drain system.
1.3	**Stormwater infrastructure for new development.** Require development projects to pay for their share of new stormwater infrastructure or improvement necessitated by that development.
1.4	**Stormwater re-use and recycling.** Encourage innovative ways of capturing and reusing stormwater for non-drinking purposes to reduce the use of potable water, including the creation of a recycled water system and installation of purple pipe in private and public projects.
1.8	**Stormwater best practices.** Encourage the use of best practices in stormwater treatment, retention, and quality and quantity control into flood control efforts, ensuring that flood control measures do not have negative ecological impacts on stormwater runoff.
1.9	**Stormwater and flooding.** Integrate stormwater management efforts with flood control efforts, seeking synergies and innovative strategies for stormwater treatment to reduce flood risks and volumes.
1.10	**Storm Drain Master Plan.** Implement the adopted East Palo Alto Storm Drain Master Plan. Seek funding sources to complete the identified capital improvements.
2.2	**Water supply infrastructure.** Improve infrastructure to ensure the provision of a clean, reliable citywide water supply sufficient to serve existing and planned development.
2.4	**Water supply planning and demand offset regulations for new or intensified development.** Consider and adopt a water offset ordinance or other policy to reduce the water demand and to ensure adequate water supply exists to meet the needs of new projects or intensified development. Allow the City the right to require a Water Supply Assessment of any development project. The policy will consider the type and size of projects that might be exempt, the water offset ratio, the method for analyzing the projected water demand and methods for offsetting demand, the types of demand reduction/ mitigation implementation options (e.g., onsite or offsite design or building modification), including an in-lieu fee, that will be required, a method for estimating the savings from onsite or offsite efficiency measures, and the appropriate regulatory instruments to enforce, implement, and monitor the offset policy.
2.6	**Water infrastructure for new development.** Require development projects to pay for

	their share of new water infrastructure or improvements necessitated by that development, including but not limited to water supply, storage, and conservation, and recycled water.
2.7	**Municipal water conservation and efficiency.** Seek to reduce municipal water use through the following strategies: • Implement aggressive indoor and outdoor water efficiency measures in all new city developments, substantial rehabs, and remodels. • Prioritize water efficiency upgrades to existing buildings, such as water efficient fixtures. • Reduce potable water used for parks, by planting drought-tolerant species and implementing other water saving practices.
2.8	**Citywide water conservation and efficiency.** Encourage and promote community water conservation and efficiency efforts, including indoor and outdoor efforts that exceed CALGreen requirements.
2.12	**Maximizing infiltration.** Consider requiring all new development to provide roof catchment systems, irrigated landscaping, and permeable pavements (where feasible), or other means to enhance onsite infiltration of stormwater runoff or landscape irrigation water.
3.2	**Sewer infrastructure for new development.** Require development projects to pay for their share of new sewer infrastructure or improvements necessitated by that development.
4.2	**Waste reduction.** Seek to reduce East Palo Alto's rate of waste disposal per capita, and to increase the diversion rate of recycling and green waste.
4.4	**Construction waste.** Encourage all construction projects to divert 80% of their construction waste away from landfills, exceeding CALGreen requirements.
5.2	**Community benefits.** For large-scale projects, negotiate with developers to maximize the potential for acquiring community benefits like new facilities and infrastructure.
8.6	**Role of civic buildings.** Require civic buildings to be distinctive, beautiful, and architecturally beneficial to the fabric of the City.
8.7	**Family-friendly gathering spaces and businesses.** Encourage safe and family-friendly public gathering spaces and private businesses such as community centers, movie theaters, entertainment center and other uses focused on youth and families to locate in the City.

The RBD Specific Plan is a long-range plan for future development of the RBD Specific Plan area of East Palo Alto. The RBD Specific Plan contains policies, development standards and guidelines applicable to development within the RBD Specific Plan area, including various policies adopted for the purpose of avoiding or mitigating utilities impacts resulting from planned development within the RBD Specific Plan including the following:

Policy	Utilities and Public Services
1.1	In coordination with the East Palo Alto Sanitary District (EPASD) and West Bay Sanitary District (WBSD), ensure that development of each parcel includes an adequate sanitary and storm sewer infrastructure to prevent discharge of untreated water to surface waters

1.2	Work with EPASD to ensure that additional wastewater treatment capacity is available as development occurs under the Specific Plan.
1.3	Work with WBSD to ensure that peak wet weather flows of wastewater do not increase above the present 14.4 million gallons per day (MGD) maximum, despite any increase in development. Encourage WBSD to conduct increased inspection and maintenance of the sanitary sewer system, and repair any points of entry for rainwater. In addition, ensure that new development conforms to C-3 stormwater regulations.
2.1	Prior to developing an increased municipal water supply, conduct a project-level environmental analysis of the environmental effects of obtaining the increased supply. For any proposed new groundwater well, or increase in pumping from existing wells, ensure that the analysis considers, at a minimum, a) land subsidence and exacerbation of existing flood risks; b) salt-water infiltration of the aquifer; c) entrainment of contamination; d) cumulative effects from drawdown of the aquifer; e) impacts from construction of a new treatment facility, including storage reservoirs; and f) installation of additional piping. For any proposed recycled water usage, ensure that the analysis contains, at a minimum, verification that the water quality is adequate and that there would be no adverse health effects from its use.
2.2	Before individual development projects are approved in the Plan Area, require the developer to demonstrate verifiable, enforceable proof that either they have secured new water supplies to serve the new development or that the proposed development will create no net increase in total water demand in East Palo Alto. Ensure that environmental review is carried out for augmentations to the supply from additional groundwater pumping in the Specific Plan area and within a quarter mile radius.
3.1	Ensure that the storm sewer system described in the 2008 Draft Engineering Plan (DEPLAN) for the Ravenswood Business District (RBD), or one that is functionally similar, is built.
3.3	Where feasible, incorporate trash capture devices into storm drain inlets, and the outlet to the detention basin at the end of Runnymede Street.

City of East Palo Alto Urban Water Management Plan

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and a Water Supply Contingency Plan for changes and shortages in water supplies. The City of East Palo Alto adopted its most recent UWMP in June 2021.

The East Palo Alto UWMP was developed based on the growth projections and land use changes included in the Vista 2035 General Plan and based on the Water Supply Assessment prepared in support of the General Plan. The UWMP concluded that the City would have adequate supplies during normal years through 2045. However, under both single- and multiple-dry years beginning in 2025, the City would experience water supply shortages. Additionally, from 2023 through 2025, if the Bay-Delta Plan Amendment is implemented, under single- and multiple dry-years, water supplies

from SFPUC are expected to be reduced further contributing to additional water supply shortages.[97] To address these potential water shortages, the UWMP identifies water conservation measures such as restricting the time and duration of potable water use for irrigation, requiring hotels and motels to limit laundry service to at the end of a guests stay or at the guest's request, requiring restaurants to only serve water when requested by customers, as well as limiting the number and times of day when agricultural and commercial nursery operations are allowed to use potable water. Additionally, the City could explore extending a recycled water system from Palo Alto Regional Water Quality Control Plant (RWQCP) to the City of East Palo Alto and adopting an emergency ordinance temporarily prohibiting new or expanded water service connections during drought conditions. Implementation of water conservation measures identified in the UWMP and Water Supply Contingency Plan would ensure adequate water supplies would be available during single- and multiple-dry years.

4.18.1.2 *Existing Conditions*

Water Service and Supply

Water service at the project site is provided by the Veola, under contract with the City of East Palo Alto. Water provided by Veolia comes from the SFPUC Hetch Hetchy water supply and distribution system. The Hetch Hetchy Aqueduct carries water from the Tuolumne River watershed in Yosemite National Park to San Francisco and other cities on the peninsula, including East Palo Alto. In addition, the City has acquired permanent water transfers from adjacent municipalities served by the SFPUC Hetch Hetchy water supply, including 1,000,000 gpd from the City of Mountain View in July 2017 and 500,000 gpd from the City of Palo Alto in May 2018.

There is currently no storage within the City of East Palo Alto's managed water system. The City is reliant upon the SFPUC supply system for the necessary storage equalization, fire flows, and emergency use. According to the City's 2020 UWMP the water supply from the SFPUC would be capable of meeting water demand in the City through the year 2045, with the demand within the City's service area expected to exceed projected supplies in single- and multiple-dry years beginning in 2025. The UWMP update projects shortfalls during single- and multiple-dry years.[98]

The City of East Palo Alto owns and operates one groundwater well located at the intersection of Gloria Way and Bay Road. Use of the well for potable purposes ceased shortly after construction in 1981, due to customer complaints related to elevated concentrations of manganese. The groundwater well is currently used for nonportable purposes (e.g., street cleaning and construction).

The City is in the process of expanding groundwater production to meet and supplement future water demands The City plans to develop its local groundwater supplies by constructing a new water supply well and treatment system (the Pad D Well).

[97] The Bay-Delta Plan Amendment requires the release of waters in SFPUC supplies to three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta, reducing the amount of water available to serve SFPUC customers during single and multiple-dry years. Source: City of East Palo Alto. *Final Urban Water Management Plan.* June 2021.
[98] City of East Palo Alto. *Final Urban Water Management Plan.* June 2021.

The project site is served by an eight-inch water line in Pulgas Avenue. Existing water demand from the site is minimal and limited to irrigation of the landscaping along Pulgas Avenue. Thus, for the purpose of this analysis, existing water demand was conservatively assumed to be zero gpd.[99]

Wastewater Services

Sanitary sewer lines serving the site are owned and maintained by the EPASD. There is an existing 6-inch sanitary sewer main along the Pulgas Avenue project frontage.

Wastewater from the City of East Palo Alto is treated at the RWQCP. The RWQCP provides primary, secondary, and tertiary treatment of wastewater and has the capacity to treat 39 million gallons of wastewater a day. The RWQCP treats an average of 20 million gallons of wastewater per day.[100] The RWQCP has a remaining treatment capacity of 19 million gallons of wastewater per day. The tertiary recycled water facilities have a capacity of 4.5 million gallons per day and currently produce an annual average of 0.6 million gallons per day of recycled water. Recycled water from the RWQCP is available to the Cities of Palo Alto, Los Altos, Los Altos Hills, Stanford University and EPASD.[101]

As noted above, there are no structures on the project site, therefore there is no existing wastewater generation.

Storm Drainage

The project site is located in a developed area served by an existing storm drainage system. The approximately one-acre of the project site is partially developed with an approximately 17,940 square foot gravel surface parking lot and an 25,130 square foot undeveloped grass area. For the purpose of this analysis, it is conservatively assumed that the site is composed of 100 percent pervious surfaces.

Storm drainage lines in the project area are owned and maintained by the City of East Palo Alto. There is a 15-inch storm drain main along the Pulgas Avenue frontage, which serves the project site and leads to a storm drain outfall in San Francisco Bay.

Solid Waste

East Palo Alto is a member of the South Bay Waste Management Authority (SBWMA), a joint powers authority whose other members include Atherton, Belmont, Burlingame, Foster City, Hillsborough, Menlo Park, Redwood City, San Carlos, San Mateo, the West Bay Sanitary District, and San Mateo County.[102] The Shoreway Environmental Center (SEC), located at 333 Shoreway Road in San Carlos (approximately 7.6 miles northwest of the project site), serves as a regional solid waste and recycling facility for the receipt, handling, and transfer of solid waste and recyclables collected from the SBWMA service area.

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[99] California Air Pollution Officers Association (CAPCOA). *CalEEMod Appendix D: Default Data Tables.* May 2021.
[100] Woodard & Curran. Technical Memorandum: Northwest County Recycled Water Strategic Plan. December 30, 2020. https://www.cityofpaloalto.org/files/assets/public/public-works/water-quality-control-plant/recycled-water/2021/tm-6.5_30dec2020.pdf
[101] Ibid.
[102] City of East Palo Alto. *Vista 2035 East Palo Alto General Plan.* October 2016.

The vast majority of solid waste generated in East Palo Alto (as well as other SBWMA member communities) is transported to the Ox Mountain Landfill near Half Moon Bay. The remaining permitted capacity of the landfill is 22,030,078 cubic yards (as of December 31, 2015).[103] Based on current waste disposal rates, the estimated closure date for the landfill is 2034.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
4) 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?	☐	☐	☒	☐
5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact UTL-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (Less than Significant Impact)

Future library development would connect to existing utility service lines, as discussed below.

[103] CalRecycle. SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Accessed May 18, 2022.

Water Supply Infrastructure

The proposed project would connect to the eight-inch water main in Pulgas Avenue. The proposed project would have a water demand of approximately 3,361 gallons per day (0.01 acre-feet per day).[104] Connections and any off-site improvements to water supply lines needed would be constructed on-site or within existing street right-of-way, per City standards for construction and sizing. Coordination would be required with existing infrastructure projects, such as the Bay Road Phase II project and improvements identified in the RBD, such as a new 12-inch water pipe in Bay Road. For these reasons, the City's water supply infrastructure would have capacity to serve a future library development on-site. The project would not result in the relocation or construction of new or expanded water facilities that would cause significant environmental effects. **(Less than Significant Impact)**

Wastewater Infrastructure

As discussed in Section 4.18.1 above, the project would connect to the existing six-inch sewer main in Pulgas Avenue. Future development of a library on-site would generate an increase of approximately 1,042,641 gallons per year of wastewater on-site compared to existing conditions.[105] According to the EPASD, sanitary sewer mains in the project vicinity are currently at capacity and need to be replaced in order to adequately serve future development. Information regarding the sewer main improvements required to accommodate demand associated with a future library development on-site is not known at the time of preparation of this Initial Study. Any analysis of potential impacts associated with these improvements at this time would be speculative. Sanitary sewer improvements would be subject to subsequent environmental review pursuant to CEQA to document impacts associated with construction of these improvements and incorporate mitigation measures to avoid or minimize such impacts, if necessary. For these reasons, the proposed property acquisition and future library development would not result in significant environmental effects related to the provision of wastewater infrastructure. **(Less than Significant Impact)**

Storm Drainage Infrastructure

As discussed above, the project site is currently partially developed with an approximately 17,940 square foot gravel surface parking lot and an 25,130 square foot undeveloped grass area. However, for the purpose of this analysis, it is conservatively assumed that the site is composed of 100 percent pervious. Runoff from the project site currently enters the storm drainage system untreated and unimpeded. As discussed in Section 4.10 Hydrology and Water Quality, compared to existing conditions, future library development would increase impervious surfaces on-site and thereby increase stormwater runoff. However, future library development would be required to comply with the City's Grading Ordinance, prepare a hydrology study that analyzes the flow and sizing of the storm drain system as a part of the grading permit approval process, and ensure that the site is graded to drain properly and does not impact adjacent properties, exceed the municipal stormwater drainage system, or create erosion problems. The project site is located in a developed area of East Palo Alto which has adequate storm drain capacity to accept increased flows from future development under

[104] California Air Pollution Officers Association (CAPCOA). CalEEMod Appendix D: Default Data Tables. "Table 9.1 Water Use Rates." 2021. Library land use sub type. May 2021. Assuming 34,300 sf building, 3,135 sf landscaping.

[105] Assumes wastewater is 85 percent of water demand. Water demand 1,226,636 gallons per year x 0.85 = 1,042,641 gallons per year wastewater generation.

the project. Compliance with existing policies and regulations for the management of surface runoff and erosion would reduce the drainage impact of any proposed development on the site to a less than significant level. For these reasons, the proposed property acquisition and future library development would not require or result in the relocation or construction of new or expanded storm drainage infrastructure. **(Less than Significant Impact)**

Electric Power, Natural Gas, and Telecommunications Facilities

Existing natural gas, electricity, and telecommunications utilities currently serve the project site. No improvements or relocation are proposed for these utilities. Furthermore, as discussed in Section 4.6 Energy, above, the project would comply with the City's Reach Code and include no natural gas connections or appliances. Therefore, the proposed property acquisition would not result in a significant environmental effect from the construction or relocation of natural gas, electricity, or telecommunication utilities. **(Less than Significant Impact)**

Impact UTL-2:	**The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. (Less than Significant Impact with Mitigation Incorporated)**

RBD Specific Plan Policy UTIL-2.2 requires individual development projects in the RBD Specific Plan area to demonstrate verifiable, enforceable proof that either they have secured new water supplies to serve the new development or that the proposed development will create no net increase in water demand in East Palo Alto. The proposed property acquisition does not include any direct physical changes to the environment. If the City decides to proceed with the property acquisition, future library development would increase water demand on-site compared to existing conditions. A water supply analysis will be prepared for the project during the design phase to verify adequate water supplies are available at that time to meet the project demand. The following estimate of project-generated water demand and existing supplies is provided for informational purposes.

As noted in Section 4.18.1.2 Existing Conditions, existing water demand at the project site is negligible and limited to irrigation for the landscaping trees and shrubs along the Pulgas Avenue frontage. Therefore, for the purposes of this analysis, it is conservatively assumed to be zero. Water demand associated with development of a library on-site is estimated to be 1,226,636 gallons per year (3.76 acre-feet per year).[106]

In June 2021, the City adopted an updated Urban Water Management Plan which includes water supply and demand estimates for the City of East Palo Alto through the year 2045. These estimates are summarized in Table 4.18-1 below.

[106] California Air Pollution Officers Association (CAPCOA). CalEEMod Appendix D: Default Data Tables. "Table 9.1 Water Use Rates." 2021. Library land use sub type. May 2021. Assuming 34,300 sf building, 3,135 sf landscaping.

Table 4.18-1: Estimated Water Supply and Demand (acre feet per year)					
	2025	**2030**	**2035**	**2040**	**2045**
Normal Year					
Supply	1,271	1,271	1,271	1,271	1,271
Demand	692	721	779	927	1,078
Difference	578	578	549	492	193
Single Dry Year					
Supply	445	463	492	583	583
Demand	692	721	779	927	1,078
Difference	(248)	(258)	(287)	(344)	(495)
Multiple Dry Years					
1st Year Supply	445	463	492	583	583
1st Year Demand	692	721	779	927	1,078
Difference	(248)	(258)	(287)	(344)	(495)
2nd Year Supply	383	397	423	503	583
2nd Year Demand	692	721	779	927	1,078
Difference	(310)	(324)	(356)	(424)	(495)
3rd Year Supply	383	397	423	503	583
3rd Year Demand	692	721	779	927	1,078
Difference	(310)	(324)	(356)	(424)	(495)
4th Year Supply	383	397	423	445	496
4th Year Demand	692	721	779	927	1,078
Difference	(310)	(324)	(356)	(482)	(582)
5th Year Supply	383	397	390	445	496
5th Year Demand	692	721	779	927	1,078
Difference	(310)	(324)	(389)	(482)	(582)
Source: City of East Palo Alto. *2020 Urban Water Management Plan.* June 2021.					

As shown in Table 4.18-1, the City has sufficient water supplies to meet existing and planned development during normal years through 2045. Since adoption of the Urban Water Management Plan, one project (JobTrain Office project) was approved which has a water demand of 6.41 acre-feet per year. Thus, the City has sufficient water supplies to meet additional demand generated by the proposed project and approved development during normal years through 2045 and additional supplies, as well as conservation measures to reduce demand, would be required to meet the demand of the proposed project under single and multiple dry years.

Impact UTL-2: The City does not have sufficient water supplies available to serve the project

and reasonably foreseeable future development during single-dry and multiple-dry years in 2025 and beyond. **(Significant Impact)**

Mitigation Measure: The following mitigation measures shall be implemented by the proposed project to ensure adequate water supplies are available to serve the project and reduce impacts to a less than significant level.

MM UTL-2.1: To address the discrepancy between the proposed project's 3.76 acre feet per year of water demand and the available water supply, the City shall secure the additional water supplies needed for the proposed project. To do so, the City shall implement one of the following programs to supply a minimum of 3.76 acre feet per year:

- **Groundwater Opportunities.** The City is addressing the supply shortfall by developing new groundwater well and treatment facility at Pad D. This project is expected to produce 32.85-acre feet per year. Implementation of this measure alone would provide sufficient water supplies to serve the proposed project.
- **Transfer and Exchange Opportunities.** The City's agreement with SFPUC allows for the transfer or exchange of unused portions of water allocations among contracting agencies within the SFPUC system. Additionally, the agreement allows for purchase and transfer of water from outside the SFPUC service area through third party transmission systems. The City of East Palo Alto is seeking other opportunities for water supply transfers. However, no specific agreements are currently being negotiated by the City.

With implementation of these programs, total projected water supplies available during normal, single-dry, and multiple-dry years through 2045 would meet the projected water demand associated with the proposed project, in addition to the City's existing and planned developments.

Mitigation Measure UTL-2.1 would require the City to implement programs to offset potable supply with recycled water, thereby making potable water supplies available for the demands of the proposed project. The City would be required to demonstrate that sufficient water supplies have been secured prior to issuance of occupancy permits for the project. With implementation of this mitigation measure, impacts related to water supply sufficiency would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

Impact UTL-3:	**The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (Less than Significant Impact)**

Future library development would increase wastewater generation on-site compared to existing conditions. As noted in Section 4.18.1.2 Existing Conditions, the project site does not currently generate wastewater as there are no existing structures or wastewater generating uses. Wastewater

generation associated with the potential future library development would be 1,042,641 gallons per year.[107]

As noted in Section 4.18.1.2, the RWQCP has an excess treatment capacity of 19 million gpd. Thus, increased wastewater generation resulting from future library development would represent less than one percent of the available wastewater treatment capacity, and the project would be adequately served by the existing facilities. Therefore, the project would have a less than significant impact related to provision of wastewater treatment service for the project site. **(Less than Significant Impact)**

Impact UTL-4:	**The project would not 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. (Less than Significant Impact)**
Impact UTL-5:	**The project would not be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste. (Less than Significant Impact)**

Future library development on-site would result in solid waste generation during construction and operations. During project construction, 80 percent of construction waste would be diverted away from landfills in accordance with General Plan policy ISF-4.4 Construction Waste and CALGreen requirements. During operations, the library would generate approximately 43.8 tons of solid waste per year.[108]

The Ox Mountain Landfill has an agreement with San Mateo County to provide disposal capacity for development within East Palo Alto. The Ox Mountain Landfill has sufficient capacity to accommodate waste materials from East Palo Alto through the year 2034 and increased recycling throughout the City would extend the useful life of the landfill. Therefore, no new landfill facilities would be needed to serve the proposed project. Furthermore, the project would be required to comply with AB 939, AB 341, and SB 1383 statewide goal to reduce the statewide disposal of organic waste by 75 percent by 2025. For these reasons, the project and future library development would not generate solid waste in excess of state standards or in excess of the capacity of local infrastructure. **(Less than Significant Impact)**

[107] Assumes wastewater is 85 percent of water demand. Water demand 1,226,636 gallons per year x 0.85 = 1,042,641 gallons per year wastewater generation.
[108] Proposed project waste generation assumes 0.007 lbs per square foot per day x 34,300 square feet = 240 lbs per day or 0.12 tons per day. 0.12 tons per day x 365 – 43.8 tons per year. Source: CalRecycle. "Estimated Solid Waste Generation Rates." Accessed January 3, 2023. https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

4.19 MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
2)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
3)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact MFS-1: The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. (Less than Significant Impact with Mitigation Measures Incorporated)

As discussed in the individual resources sections of this Initial Study, the proposed project would not degrade the quality of the environment with the implementation of identified standard conditions of approval and mitigation measures. The project would implement mitigation measures MM BIO-1.1 through MM BIO-1.4 (see Section 4.4 Biological Resources) to reduce potential disturbance to nesting birds and raptors and mitigation measures MM CUL-1.1 and CUL-2.1 to reduce potential impacts to archaeological resources and human remains to a less than significant level (see Section 4.5 Cultural Resources). **(Less than Significant Impact with Mitigation Measures Incorporated)**

Impact MFS-2: The project does not have impacts that are individually limited, but cumulatively considerable. (Less than Significant Impact)

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." In addition, under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail.

Resource Areas not Impacted by the Project

Future library development would occur in a developed area of East Palo Alto and would not impact agricultural, forestry, mineral resources, or wildfires. Therefore, the future library development would not contribute to cumulative impacts to these resources.

Cumulative Air Quality Impacts

By its nature, air pollution is largely a cumulative impact. The geographic area for cumulative air quality impacts is the San Francisco Bay Area Air Basin. By its nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The project would emit criteria air pollutants and contribute to the overall regional emissions of these pollutants. The project-level BAAQMD thresholds identified in Sections 4.3, are the basis for determining whether a project's individual impact is cumulatively considerable. For this reason, the project would have a less than significant cumulative impact on criteria air pollutant emissions. Therefore, the project's incremental contribution to regional air quality impacts would not be cumulatively considerable, resulting in a less than significant cumulative impact.

As discussed in Section 4.3, community health risk impacts from toxic air contaminants (TACs) associated with construction of the future library development cannot be modeled given the current level of project details precludes modeling, but project TACs emissions have the potential to be significant, and therefore, the project includes mitigation measure MM AQ-1.1 to ensure TAC impacts are reduced to a less than significant level. The health risk assessment during future project-level environmental review will analyze the individual and cumulative health risk levels, considering other TACs sources within 1,000 feet, consistent with BAAQMD methodology, and identify measures needed to ensure health risk won't exceed applicable individual and cumulative thresholds. Therefore, the proposed property acquisition and future library development would not result in a cumulatively considerable contribution to a significant cumulative health risk from TAC emissions.

Cumulative Aesthetics Impacts

The geographic area of cumulative aesthetics impacts is the project vicinity. Future cumulative

projects in the project vicinity could result in a significant cumulative aesthetics impacts; however, they would be reviewed for compatibility with the general character of the surrounding area as part of the City's architectural and/or environmental review processes. Specifically, cumulative projects would be required to complete a viewshed analysis consistent with RBD Specific Plan Policy LU-4.4 to reduce impacts to public view corridors and be reviewed for consistency with RBD Specific Plan design standards and guidelines to avoid conflicts with existing City policies and regulations governing scenic quality. Additionally, future cumulative projects would be required to comply with Municipal Code Section 18.22.050 which limits the average maintained lighting levels for land uses to avoid lighting impacts. Through appropriate site design and review of these urban projects, impacts due to conflicts with applicable plans and policies would be avoided.

As discussed in Section 4.2, the project site is located in a developed urban area with existing sources of light and is not located within a public view corridor or along a state designated scenic highway. The project would not result in a significant impact to scenic vistas, scenic resources, or result in a substantial increase in light and glare. For these reasons, the proposed project, in combination with cumulative projects, would not result in a significant cumulative aesthetics impacts. **(Less than Significant Cumulative Impact)**

Cumulative Greenhouse Gas Emissions and Energy Impacts

The proposed project, past, present, and future development projects worldwide contribute to global climate change. No single project is sufficient in size to, by itself, change the global average temperature. Therefore, due to the nature of GHG impacts, a significant project impact is a significant cumulative impact. As discussed in Section 4.8, the future library development on the site would be designed to conform with energy, transportation, water conservation, and waste reduction policies and regulations of the City of East Palo Alto, including the Climate Action Plan in effect at the time of project design development. Therefore, the project would, not result in a significant GHG impact. For these reasons, the project would not result in a cumulatively considerable contribution to a significant cumulative GHG impact.

The geographic area for cumulative energy impacts is the State of California. Past, present, and future development projects contribute to the state's energy impacts. If a project is determined to have a significant energy impact, it is concluded that the impact is cumulatively considerable. The project would not result in significant energy impacts or conflict with or obstruct a state or local plan for energy efficiency. The project, therefore, would not have a cumulatively considerable contribution to a significant cumulative energy impact.

Cumulative Biological Resources Impacts

The geographic area for cumulative impacts to trees includes the project site and adjacent parcels. Future cumulative projects on adjacent parcels could result in the removal of trees; however, as noted in Section 4.4, the proposed project and cumulative projects would be required to conform to the tree replacement requirements as identified in the East Palo Alto Tree Preservation and Management Regulations (Municipal Code Section 18.28.040) which would reduce impacts associated with tree removal to a less than significant level. For these reasons, the project would not have a cumulative impact due tree removal. **(Less than Significant Cumulative Impact)**

The geographic area for cumulative impacts to sensitive habitats such as wetland, riparian habitats, and serpentine habitats, and special-status species would be San Mateo County. The project would have no impact on riparian, wetland habitats or special-status species and, therefore, would not combine impacts to these habitats with other projects elsewhere. **(No Cumulative Impact)**

The project site is not located within an adopted Habitat Conservation Plan; therefore, the project would not have a cumulative impact due to a conflict with an adopted Habitat Conservation Plan. **(No Cumulative Impact)**

The geographic area for cumulative impacts to migratory wildlife would be San Mateo County. Construction of projects throughout the County, including the proposed project, could result in a significant cumulative impact on nesting birds. Each project is subject to federal, state, and local regulations (including the MBTA, Fish and Game Code, and CEQA), which would avoid and/or minimize impacts to nesting birds. The project, with the implementation of mitigation measure MM BIO-1.1 would comply with the MBTA and Fish and Game Code, would not result in a cumulatively considerable contribution to a significant cumulative impact to nesting birds. **(Less than Significant Cumulative Impact)**

Cumulative Noise Impacts

The geographic area for cumulative noise impacts is approximately 1,000 feet radius from the site, given noise generated at locations beyond 1,000 feet are unlikely to combine with noise from the project to affect common receptors. The timing of construction of the proposed library relative to other pending or approved development projects in the vicinity (1,000 feet), which could contribute to noise impacts is unknown. However, the project construction would be subject to a series of noise controls as detailed in Section 4.12 and it is reasonable to assume other pending or approved projects would also be subject to noise controls to minimize their construction noise impacts, as is common practice as each project is evaluated under CEQA for its construction noise impacts. **(Less than Significant Cumulative Impact)**

Operation of a future library on-site would result in noise from operational rooftop mechanical equipment, truck loading, and parking lot activity. However, implementation of mitigation measure MM NOI-2.1 would reduce the project's operational noise impacts to a less than significant level and the project's contribution to cumulative noise impacts would not be cumulatively considerable. **(Less than Significant Cumulative Impact)**

A significant cumulative traffic noise impact would occur if two criteria are met: 1) the cumulative traffic noise level increase was three dBA CNEL or greater for future levels exceeding 65 dBA CNEL or was five CNEL or greater for future levels at or below 65 dBA CNEL; and 2) the project would make a "cumulatively considerable" contribution to the overall traffic noise increase. A "cumulatively considerable" contribution would be defined as an increase of one dBA CNEL or more attributable solely to the proposed project.

Cumulative traffic volumes and traffic noise from buildout of the RBD Specific Plan area were previously analyzed in the RBD Specific Plan EIR. Traffic noise increases of less than one to five

dBA were predicted for roadways throughout the RBD Specific Plan area.[109] However, this cumulative traffic noise increase would be reduced to a less than significant level (less than one to by two to three dBA increase) with implementation of Specific Plan Policy TRA-2.4 which requires the use of "quieter" paving types along Bay Road, Pulgas Avenue, and Weeks Street in the Specific Plan area. As discussed in Section 4.16, future development of a library on-site would meet the definition of a community serving use and result in a less than significant VMT impact. Therefore, the project's contribution to cumulative traffic noise impacts in the project area would not be cumulatively considerable. **(Less than Cumulatively Considerable Impact)**

Cumulative Cultural Resources, Tribal Cultural Resources, and Geology Impacts

The project would have no impact on historic resources, and therefore, would not combine impacts to these resources with other projects or contribute to any cumulative impacts to these resources. **(No Cumulative Impact)**

The geographic area for archaeological resources, human remains, and tribal cultural resources is the project site and parcels in the project area with similar resources. Cumulative projects would be subject to State law requiring halting of construction activities if archaeological resources (including those of Native American origins), tribal cultural resources, and/or human remains are discovered. Accordingly, with implementation of the mitigation measures identified in this Initial Study, construction-level impacts would be mitigated to a less than significant level and would not be considered cumulatively considerable. Therefore, the project would not contribute to a significant cumulative impact on archaeological resources, tribal cultural resources, or human remains. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The geographic area for cumulative geological impacts would be locations adjacent to the site. As discussed in Section 4.7, the project would not result in substantial adverse effects related to seismic ground shaking, soil erosion, unstable soils, expansive soils, or septic tanks. As discussed in Section 4/7, the subject site and surrounding area are not subject to significant geologic hazards. With implementation of Mitigation Measure MM GEO-6.1, impacts to paleontological resources would be reduced. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative geology and soils impact. **(Less than Significant Cumulative Impact)**

Cumulative Hazards and Hazardous Materials Impacts

The geographic area for hazards and hazardous materials impacts is the project site and adjacent parcels. The project site is located within the Ravenswood Industrial Area, a designated redevelopment area in the City of East Palo Alto subject to Site Cleanup Requirements Orders issued by the San Francisco Bay Regional Water Quality Control Board (Waterboard). As discussed in Section 4.9, with implementation of Mitigation Measure MM HAZ-1.1 through 1.3, the project would not result in significant hazards and hazardous materials impacts. Additionally, given the regulatory oversight of the Ravenswood Industrial Area, cumulative projects would be subject to Waterboard review and mitigation measures to address on-site contamination. Therefore, the project,

[109] 5 DBA increase in existing noise levels with implementation of the adopted RBD Specific Plan assumes existing noise levels with airplane overflight. Source: City of East Palo Alto. *Ravenswood/Four Corners TOD Specific Plan Draft EIR*. SCH#2011052006. January 16, 2012. Page 4.11-37.

in combination with cumulative projects in the area, would not result in a cumulative hazardous materials impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Cumulative Hydrology Impacts

The geographic area for cumulative hydrology and water quality impacts is the San Francisquito Creek watershed. Cumulative developments within the watershed would have similar hydrological and stormwater runoff conditions. All projects occurring within East Palo Alto would be required to implement the same standard measures/best management practices related to construction water quality as the proposed project. In addition, all cumulative projects that would disturb more than one acre of soil or replace/add at least 10,000 square feet of impervious surfaces would be required to meet applicable San Francisco RWQCB requirements and the City's SWCP requirements on a project-specific basis. For these reasons, the cumulative projects, including the proposed project, would not result in significant cumulative hydrology or water quality impacts. **(Less than Significant Cumulative Impact)**

Cumulative Land Use Impacts

The geographic area for cumulative land use impacts is the RBD Specific Plan area. Cumulative projects would generally consist of development of undeveloped and redevelopment of previously developed sites. Development of a number of these sites could result in a change in use and/or intensification of development.

The compatibility of new development with adjacent land uses is considered as a part of the City's architectural and environmental review processes. Through appropriate site design and review of these projects, impacts due to conflicts with applicable plans and policies would be avoided.

Additionally, future projects, including future library development on the project site would be subject to General Plan and Specific Plan goals, policies, and actions that require appropriate buffers, edges, and transition areas between conflicting land uses. In addition, the setback, design, and operational requirements of the East Palo Alto Municipal Code and RBD Specific Plan would minimize land use impacts. The project, in conformance with the applicable General Plan and Specific Plan goals, policies, and actions and with implementation of mitigation measures, would minimize land use impacts. For these reasons, the proposed project, in combination with the other cumulative projects, would not result in significant land use impacts. **(Less than Significant Cumulative Impact)**

Cumulative Population and Housing Impacts

The geographic area for cumulative population and housing impacts is the City of East Palo Alto. As discussed in Section 4.13, the proposed project and future development of a library on-site would not increase the number of housing units or population in East Palo Alto; however, it would increase the number of jobs. The new jobs generated by the proposed property acquisition have been accounted for in the growth assumptions of the General Plan (11,650 total jobs within the City by 2040).[110] Thus, any indirect population growth resulting from implementation of the library would not be substantial or unplanned. For these reasons, the jobs added by the project would not make a

[110] City of East Palo Alto. *East Palo Alto General Plan Update Draft EIR.* Page 4.7-15

cumulatively considerable contribution to a worsening of the jobs/housing imbalance. **(Less than Significant Cumulative Impact)**

Cumulative Public Services and Recreation

The geographic area for cumulative public services impacts is the City of East Palo Alto. Development in the project area would increase demand on fire and police protection services, schools, and recreational facilities. All cumulative projects would be subject to state, county, and City policies and regulations associated with public services within East Palo Alto (such as payment of in-lieu park fees). The library project would not generate additional school age children, nor would the project produce additional residents who would use recreational facilities. Usage of these facilities by future library employees and patrons would not be substantial and would therefore, not result in a cumulatively considerable impact on public services and recreation. **(Less than Significant Cumulatively Considerable Impact)**

Cumulative Transportation Impacts

The geographic area for cumulative traffic impacts is the City of East Palo Alto. Since the project is the acquisition of property for future development of a library, the project would meet the definition of a community serving use and result in a less than significant VMT impact. Therefore, the project would result in a less than significant contribution to a cumulatively significant Citywide VMT impact. **(Less than Significant Contribution to a Significant Cumulatively Considerable Impact)**

Cumulative Utility and Service Systems Impacts

The geographic area for cumulative water supply impacts is the City of East Palo Alto service area. The City of East Palo Alto is responsible for supplying potable water to all residential, commercial, and industrial uses and for supplying firewater for fire protection within the service area. Cumulative development includes past, present, and future development projects in the East Palo Alto service area.

Cumulative development within the City of East Palo Alto service area will contribute to an increase in water demand. As shown in Table 4.18-1, by 2045 total demand within the City is estimated to be 1,078 acre feet per year, an increase of 386 acre feet per year from 2025 demands. As discussed in Section 4.19, Utilities and Service Systems, the City does have sufficient supplies to meet demand from projected growth and the proposed project during normal years; however, it would not have sufficient water supplies to meet demand from projected growth and the proposed project during single-dry and multiple-dry years in 2025 and beyond. This represents a significant cumulative impact. However, with implementation of conservation measures and mitigation measure MM UTL-1.1, overall potable water demand within the City would be reduced and supply would be adequate to meet the projected demand, resulting in a less than significant cumulative impact. **(Less than Cumulatively Considerable Contribution to a Significant Cumulative Impact)**

Impact MFS-3:	The project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. (Less than Significant Impact)

Under this standard, a change to the physical environmental that might otherwise by minor must be treated as significant if it would cause substantial adverse effects to humans, either directly or indirectly. This factor relates to adverse changes to the environment of human beings generally, and not effects on particular individuals.

The potential for future library development to result in changes to the environment that could directly or indirectly affect human beings is evaluated to a level of specificity corresponding to the level of detail in the project plans and included in each section of this Initial Study using the CEQA Checklist. As discussed in detail in Section 4.9 Hazardous Materials, the project would implement mitigation measure MM HAZ-2.1 to reduce impacts from exposure of construction workers to on-site soil contamination during excavation and grading activities. This mitigation measure would reduce all project-related impacts to a less than significant level. Additionally, due to the limited construction and operational information available, community health risk and noise and vibration impacts associated with construction and operation of future library development on-site would be evaluated during project-level environmental review pursuant to CEQA. For these reasons, the proposed property acquisition would have a less than significant effect and would not cause substantial adverse effects on human beings. **(Less than Significant Impacts)**

SECTION 5.0 REFERENCES

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." http://projectmapper.planbayarea.org/.

Association of Bay Area Governments. "Plan Bay Area Projections 2040." Accessed December 1, 2020. http://projections.planbayarea.org/data

BAAQMD, Meteorology and Measurement Division. 2017 Air Monitoring Plan. July 1, 2018. Accessed May 17, 2022. http://www.baaqmd.gov/~/media/files/technical-services/2017_network_plan_20180701-pdf.pdf?la=en.

BAAQMD. *Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

BKF Engineers, Surveyors, Planners. *Memorandum, 2535 Pulgas Avenue – Flood Displacement Memorandum.* November 23, 2020.

California Air Pollution Officers Association (CAPCOA). *CalEEMod Appendix D: Default Data Tables.* May 2021.

California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed May 6, 2022. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

California Air Resources Board. "The Advanced Clean Cars Program." Accessed April 6, 2018. https://www.arb.ca.gov/msprog/acc/acc.htm.

California Building Standards Commission. "Welcome to the California Building Standards Commission." Accessed February 6, 2018. http://www.bsc.ca.gov/.

California Department of Conservation. Accessed August 29, 2022. https://maps.conservation.ca.gov/cgs/EQZApp/app/

California Department of Finance. *E-1 Population Estimates for Cities, Counties, and the State – January 1, 2011 and 2020.* April 2020.

California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed January 3, 2020. http://hcd.ca.gov/community-development/housing-element/index.shtml.

California Department of Forestry and Fire Protection. Santa Clara County FHSZ Map. October 8, 2008. Accessed January 14, 2022. https://osfm.fire.ca.gov/media/6764/fhszl_map43.pdf

California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed September 19, 2022. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

California Department of Transportation. "Scenic Highways." Accessed May 17, 2021. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

California Energy Commission (CEC). "2016 Building Energy Efficiency Standards." Accessed February 6, 2018. http://www.energy.ca.gov/title24/2016standards/index.html.

California Energy Commission. "Natural Gas Consumption by County." Accessed July 5, 2022. http://ecdms.energy.ca.gov/gasbycounty.aspx.

California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed July 5, 2022. http://ecdms.energy.ca.gov/elecbycounty.aspx.

California Environmental Protection Agency. "Cortese List Data Resources." Accessed September 16, 2022. https://calepa.ca.gov/sitecleanup/corteselist/.

California Gas and Electric Utilities. 2020 *California Gas Report.* Accessed August 2, 2021.

California Geologic Survey. *Earthquake Zones of Required Investigation, 2474 Pulgas Avenue, East Palo Alto,*

California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." March 14, 2006.

California State Water Resources Control Board. Geotracker Database. Accessed September 15, 2022. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2474+pulgas+avenue+east+palo+alto

California State Water Resources Control Board. Geotracker Database. Accessed September 15, 2022. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2474+pulgas+avenue+east+palo+alto

CalRecycle. SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Accessed May 18, 2022.

Cody Campagne, Cultural Resources Analyst, Native American Heritage Commission. Personal Communication. October 14, 2022.

City of East Palo Alto. "City Parks." Accessed January 7, 2021. Available at: https://www.cityofepa.org/parksrec.

City of East Palo Alto. "Parks, Open Space & City Facilities." Accessed May 26, 2022. https://www.cityofepa.org/parksrec.

City of East Palo Alto. *City of East Palo Alto Historic Resources Inventory Report.* February 1994.

City of East Palo Alto. *East Palo Alto General Plan Update Draft EIR*. April 2016.

City of East Palo Alto. *Emergency Operations Plan.* January 2011.

City of East Palo Alto. *Final Urban Water Management Plan.* June 2021.

City of East Palo Alto. *Vista 2035 East Palo Alto General Plan.* October 2016.

Cornerstone Earth Group. *Preliminary Geotechnical Investigation, East Palo Alto Library 2474 Pulgas Avenue, East Palo Alto, California.* July 15, 2022.

Cornerstone Earth Group. *Soil and Soil Vapor Sampling Services Proposed Public Library Assessor Number 063-240-490 Pulgas Avenue East Palo Alto, CA*. July 25, 2022.

County of Santa Clara. *Comprehensive Land Use Plan Santa Clara County, Palo Alto Airport.* November 19, 2008, Amended November 16, 2016.

East Palo Alto. Municipal Code Section 15.04.125. Last amended August 9, 2021.

Federal Emergency Management Agency. Flood Rate Insurance Map 06081C0307F. April 5, 2019.

Federal Emergency Management Agency. Flood Rate Insurance Map 06081C0307F. April 5, 2019.
https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.

Menlo Park Fire District. "About the Fire District." Accessed May 26, 2022. https://www.menlofire.org/about-the-fire-district.

Metropolitan Transportation Commission and Association of Bay Area Governments. *Plan Bay Area 2040 Draft Environmental Impact Report.* April 2017.

National Aeronautics and Space Administration. More on Brightness as a Function of Distance. May 5, 2016.
https://imagine.gsfc.nasa.gov/features/yba/M31_velocity/lightcurve/more.html#:~:text=The%20intensity%20or%2

Public views are those that are experienced from publicly accessible vantage points.

San Francisco Bay Trail. Bay Trail Plan. Accessed May 26, 2022. https://mtc.ca.gov/operations/regional-trails-parks/san-francisco-bay-trail/about-bay-trail.

San Francisco Regional Water Quality Control Board. "The 303(d) List of Impaired Water Bodies." Accessed June 21, 2022. https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/303dlist.html.

San Jose Mercury News. "Menlo Park: Fire district on track to replace seven stations in 10 years." Accessed May 26, 2022. Available at: https://www.mercurynews.com/2016/03/16/menlo-park-fire-district-on-track-to-replace-seven-stations-in-10-years/.

San Mateo County Libraries. "East Palo Alto." Accessed May 26, 2022. https://smcl.org/locations/1E/.

San Mateo Countywide Water Pollution Prevention Program. *HM Control Map*. March 2009.

Santa Clara County Airport Land Use Commission. *Palo Alto Airport – Comprehensive Land Use Plan*. Amended November 2016.

Sequoia Union High School. "Schools". Accessed May 27, 2022. https://www.seq.org/SCHOOLS/index.html.

State of California Seismic Hazard Zones. Palo Alto Quadrangle. October 18, 2006. Available at: http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/PALO_ALTO_EZRIM.pdf. Accessed January 2, 2020

City of East Palo Alto. *Final Urban Water Management Plan.* June 2021.

U.S. Department of Transportation, Office of Planning and Environment. *Transit Noise and Vibration Impact Assessment Manual*. September 2018.

United States Department of Agriculture. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed August 29, 2022.

United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed May 13, 2022. http://www.afdc.energy.gov/laws/eisa.

United States Department of the Interior. "Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take." Accessed April 15, 2021. https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf.

United States Department of Transportation. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed May 13, 2022. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026

United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed July 5, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.

United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed July 2, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.

United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed July 5, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.

United States Environmental Protection Agency. "The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2021.

Woodard & Curran. Technical Memorandum: Northwest County Recycled Water Strategic Plan. December 30, 2020. https://www.cityofpaloalto.org/files/assets/public/public-works/water-quality-control-plant/recycled-water/2021/tm-6.5_30dec2020.pdf

SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

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ACRONYMS AND ABBREVIATIONS

2017 CAP	Bay Area 2017 Clean Air Plan
Asml	Above mean sea level
ARA	Archaeological Resource Assessment
ACM	Asbestos containing materials
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADT	Average daily traffic
BAAQMD	Bay Area Air Quality Management District
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
BCDC	Bay Conservation and Development Commission
Btu	British thermal units
CalARP	California Accidental Release Prevention
CalOSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CalEPA	California Environmental Protection Agency
CAP	Climate Action Plan
CAPCOA	California Air Pollution Officers Association
CARB	California Air Resources Board
CBC	California Building Code
C/CAG	City/County Association of Governments of San Mateo County
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHRIS	California Historical Resources Information System
CLUP	Comprehensive Land Use Plan
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide

CO_2	Carbon dioxide
CO_2e	CO_2 equivalents
CPTED	Crime prevention through environmental design
CRHR	California Register of Historic Resources
CUPA	Certified Unified Program Agency
DNL	Day-Night Level
DTSC	Department of Toxic Substances Control
DRC	Development Review Committee
EIR	Environmental Impact Report
EPAPD	East Palo Alto Police Department
EPASD	East Palo Alto Sanitary District
EOP	Emergency Operations Plan
FAA	Federal Aviation Administration
FAR Part 77	Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace
FEMA	Federal Emergency Management Agency
FIRMs	Flood Insurance Rate Maps
FTA	Federal Transit Administration
GHG	Greenhouse Gas Emissions
GWP	Global warming potential
HMP	Hazard Mitigation Plan
HFCs	Hydrofluorocarbons
LOS	Level of service
LID	Low impact development
MBTA	Migratory Bird Treaty Act
$MMTCO_2e$	Million metric tons of CO_2e
MND	Mitigated Negative Declaration
MPFPD	Menlo Park Fire Protection Department
Mpg	Miles per gallon
MRP	Municipal Regional Permit
MTC	Metropolitan Transportation Commission
NAHC	Native American Heritage Commission
NFIP	National Food Insurance Program
NHPA	National Historic Preservation Act of 1966

NO_2	Nitrogen Dioxide
NO_x	Nitrogen oxide
N_2O	Nitruous oxide
NOD	Notice of Determination
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O3	Ground-level ozone
OPR	Office of Planning and Research
OITC	Outdoor-Indoor Transmission Class
PDAs	Priority Development Areas
PFCs	Perfluorocarbons
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Course Particulate Matter
PPV	Peak Particle Velocity
R&D	Research and Development
RBD Specific Plan EIR	Ravenswood/4 Corners Transit Oriented Development Specific Plan EIR
REC	Ravenswood Employment Center
RHNA	Regional Housing Needs Allocation
ROG	Reactive organic gases
RWQCB	Regional Water Quality Control Board
SBWMA	South Bay Waste Management Authority
SCS	Sustainable Communities Strategy
SEC	Shoreway Environmental Center
SF_6	Sulfur hexafluoride
SFHAs	Special Flood Hazard Areas
SHMA	Seismic Hazards Mapping Act
SO_x	Sulfur oxides
STC	Sound Transmission Class
SWRCB	State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminants

TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
Title 24	California Code of Regulations
TMDL	Total maximum daily loads
TOD	Transportation-oriented development
TSM	Transportation System Management
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle miles traveled
V/C	Volume-to-capacity