

## 2 *REPORT SUMMARY*

This summary presents an overview of the proposed project and conclusions of the analysis contained in Chapter 4, Environmental Evaluation. The chapter also summarizes areas of controversy and alternatives to the project. For a complete description of the project, please consult Chapter 3, Project Description. For more information about project alternatives, please consult Chapter 5.

### *A. Proposed Project*

The Specific Plan would permit a mix of office, retail, industrial/research & development (R&D), single-family and multi-family residential, civic/community, and open space uses within the Plan Area. Table 3-1 shows development estimates for future buildout of the Plan Area. Figure 3-4 shows the proposed land use map for the Specific Plan Area, which would be used to amend the General Plan. It is assumed that this development would occur through 2035, which is considered the Plan Horizon. The rate of development within the Plan Area, and the timeframe, is subject to variation based on market demands, the regional economy, and other socioeconomic factors.

Bay Road is envisioned as an active and vibrant spine that serves as a focal point for Ravenswood and 4 Corners, as well as for East Palo Alto as a whole. It would become a mixed-use area to ensure an active pedestrian environment along Bay Road. Mixed uses would generally consist of upper-floor residential dwellings or offices with ground-floor active uses that would be mostly retail storefronts, although some ground-floor office uses would be allowed. Housing in this area would help provide activity into the nighttime hours.

Office uses are planned for the easternmost areas of the Plan Area along the Bay, as well as at the northern edge of Ravenswood. The offices would take advantage of views of the San Francisco Bay and recreational opportunities provided by the Bay Trail. It is anticipated that this office development would offer a large number of jobs to both local residents and people from around the region, helping to bring new tax dollars and spending to East Palo Alto.

Industrial uses are planned for the central portions of Ravenswood both north and south of Bay Road. The Specific Plan assumes that many of the existing industrial uses in this area would remain, but also that research and development (R&D) and other new industrial uses would likely develop in these areas. This would result in a mix of uses ranging from the heavier manufacturing, storage, and trucking uses that exist today, to new development of R&D uses including biotechnical research facilities, light manufacturing and supporting professional offices.

*B. Areas of Controversy*

A total of 17 comment letters were received during the scoping period and are included in Appendix 1. Comments were also received verbally at a public meeting held on May 19, 2011. Several comments pertained to the detailed contents of the Specific Plan. The Project Description of the EIR presents an abbreviated version of the Specific Plan, which itself describes development on a general level, and the land uses that would be permitted in the future. Development will occur on a project-by-project basis, at which time further details will be presented. Each of these projects (unless exempt) will undergo CEQA review.

The EIR analyzes the potential environmental impacts from the Plan and the merits of the Specific Plan are outside the scope of the analysis. The Specific Plan has already undergone a separate period of public input over a number of years. Issues of the merits of rezoning of particular parcels are outside the scope of the EIR.

Impacts from the possible location of a rail and Rapid Bus/BRT station in the Specific Plan Area for proposed Dumbarton Rail project were raised, as a station was shown just outside the western Plan boundary in some early presentations. The train service and station are not analyzed in the EIR. The Dumbarton Rail project is not part of the Specific Plan and will undergo separate CEQA review. As station locations have not yet been chosen, it would be highly speculative to analyze the traffic impacts from a station close

to the Specific Plan Area, at this point in time. If a future decision is made to site the station adjacent to the Plan Area, road crossings would be designed, and the project would undergo a separate environmental review in which safety and traffic issues would be assessed.

Several comments requested an economic analysis and asked why this was not specified as a component of the EIR. Economic analysis is not a component of an EIR under the CEQA Statute (Section 15382) unless there is evidence that the project would result in blight or physical deterioration. As the project would revitalize the area and bring in more people, no economic analysis is required. The Planning effort has included a Market Study, Fiscal Impact Report, and employment generation analysis.<sup>1</sup>

A letter was received requesting a public health, community health, or environmental justice subsection of the EIR. The EIR format and contents follow the standard CEQA Appendix G checklist. Environmental Justice is an issue required under the National Environmental Policy Act (NEPA) framework, but not under CEQA. However, health concerns are incorporated in several of the CEQA topics, as indicated below.

The following issues were raised in the scoping comments and will be addressed in these sections of the EIR:

- ◆ **Traffic/Transportation.** Buildout of the Specific Plan with its strong industrial, office, and mixed-use component will cause large changes in traffic volumes and patterns. This will affect adjacent jurisdictions such as the City of Menlo Park. A traffic impact study should be undertaken.

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<sup>1</sup> [http://www.ci.east-palo-alto.ca.us/economicdev/pdf/110910\\_CAC\\_Agenda\\_Staff\\_Report.pdf](http://www.ci.east-palo-alto.ca.us/economicdev/pdf/110910_CAC_Agenda_Staff_Report.pdf).  
[http://www.ci.east-palo-alto.ca.us/economicdev/pdf/12110\\_PC\\_CC\\_Jnt\\_Study\\_Session\\_Staff\\_Report.pdf](http://www.ci.east-palo-alto.ca.us/economicdev/pdf/12110_PC_CC_Jnt_Study_Session_Staff_Report.pdf).  
[http://www.ci.east-palo-alto.ca.us/economicdev/pdf/121310\\_PC\\_Staff\\_Report.pdf](http://www.ci.east-palo-alto.ca.us/economicdev/pdf/121310_PC_Staff_Report.pdf).  
[http://www.ci.east-palo-alto.ca.us/economicdev/pdf/021511\\_CC\\_Staff\\_Report\\_CPA.pdf](http://www.ci.east-palo-alto.ca.us/economicdev/pdf/021511_CC_Staff_Report_CPA.pdf).

- ◆ **Hazards and Hazardous Substances.** The Plan Area has a large number of industrial sites contaminated by past activities. Some of these have deed restrictions that prevent some future uses. Impact to humans from the rezoning or redevelopment of these parcels should be addressed.
- ◆ **Air Quality.** There is a high occurrence of asthma in the population. The impacts of newly industrial-zoned properties on the existing residential areas and schools, as well as recreational and open space areas, should be considered. The existing industrial parcels contain high levels of contamination that places residents at risk of cancer from toxic air contaminants.
- ◆ **Population and Housing.** Implementation of the Plan will bring a large number of new jobs to the Plan Area and City of East Palo Alto. The City has relatively large young population and a large sector without high educational skills. The number and type of jobs should be evaluated. There is a need for affordable housing, and the housing provided should be appropriate to the neighborhood.
- ◆ **Biological Resources.** There are several endangered species in East Palo Alto, such as the Salt Harvest Mouse and California Clapper Rail, that could be impacted by buildout under the Specific Plan.
- ◆ **Land Use & Planning.** The Plan Area is adjacent to lands under the jurisdiction of the Bay Area Conservation and Development Commission (BCDC), and BCDC authority may extend over parts of the Plan Area. In addition, the Plan Area intersects the area of the Comprehensive Airport Land Use Compatibility Plan (CLUP) for the Palo Alto Airport.

### *C. Summary of Impacts and Mitigation Measures*

According to CEQA (Section 15382), a significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.

Table 2-1 presents a summary of impacts and mitigation measures identified in this report. It is organized to correspond with the environmental issues discussed in Chapter 4.

The table is arranged in four columns: 1) environmental impacts, 2) significance prior to mitigation, 3) mitigation measures, and 4) significance after mitigation. For a complete description of potential impacts and suggested mitigation measures, please refer to the specific discussions in Chapter 4.

#### *D. Alternatives to the Plan*

This Draft EIR analyzes alternatives to the Plan that may feasibly attain some of the project objectives identified by the Plan. A total of four alternatives, including the CEQA-mandated No Project Alternative, are analyzed in detail. All are listed below, and each is described and analyzed in Chapter 5, Alternatives.

1. **No Project Alternative.** Under this alternative, the Plan would not be adopted, and future development in the Plan Area would be subject to existing policies, regulations, and land use designations as per the existing General Plan.
2. **Reduced Density Alternative.** Development under this alternative would occur as under the policies of the Plan, but with less intensive development of office and mixed uses, achieved through height restrictions, setbacks and reduced floor area ratios (FARs).
3. **Housing on 391 Demeter Street Alternative.** Development under this alternative would occur as under the policies of the Plan, but the developable area of the property at 391 Demeter Street is assumed to be developed with residential land uses (at approximately 20 dwelling units per acre) rather than office/industrial flex uses.
4. **Wetlands Setback Alternative.** With this alternative, a buffer zone would be drawn around the existing wetland edge, and new development would be prohibited in this zone. The buffer zone would be re-

stored as upland plant and wildlife habitat that would also serve to absorb flood waters. The same level of development would be accommodated on land set back from the wetlands edge, but at higher densities than the project. An optional item would be to build a new levee system on the landward side of the buffer and remove the existing levee to connect the newly restored area to the tidal wetlands in the Ravenswood Open Space area. An additional option would build a bridge over the wetlands area to Cooley Landing Park and restore the wetlands under the bridge, creating a continuous corridor for wildlife habitat from Menlo Park to Palo Alto.

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<b>AESTHETICS</b>			
<i>The project would not result in significant project or cumulative impacts related to aesthetics; therefore, no mitigation measures are required.</i>			
<b>AGRICULTURE AND FORESTRY RESOURCES</b>			
<i>The project would not result in significant project or cumulative impacts related to agriculture and forestry resources; therefore, no mitigation measures are required.</i>			
<b>AIR QUALITY</b>			
<b>Impact AQ-1:</b> Conflict with Clean Air Plan Projections and Control Measures. The proposed Plan would increase the rate of vehicle use at a greater rate than population growth. This would lead to greater regional emissions of nonattainment air pollutants (or their precursors) than assumed in the latest Air Quality Plan.	S	<b>Mitigation Measure AQ-1:</b> There are no measures available to mitigate this impact related to inconsistency with the Clean Air Plan.	SU
<b>Impact AQ-2:</b> The proposed Plan could locate sensitive receptors within 60 feet of University Avenue, which may expose sensitive receptors to unhealthy levels of TACs and PM <sub>2.5</sub> emitted by traffic. In addition, future development could generate new sources of TACs in the Plan Area, which could locate near existing or new sensitive receptors.	S	<b>Mitigation Measure AQ-2:</b> The following measures shall be utilized in site planning and building designs to reduce TAC and PM <sub>2.5</sub> exposure where new receptors are located within 60 feet of University Avenue: <ul style="list-style-type: none"> <li>◆ Future development under the Plan that includes sensitive receptors (such as schools, hospitals, daycare centers, or retirement homes) located within 60 feet of University Avenue shall require site-specific analysis to determine the level of TAC and PM<sub>2.5</sub> exposure. This analysis shall be conducted following procedures outlined by BAAQMD. If the site-specific analysis reveals significant exposures, such as cancer risk greater than 10 in one million, additional measures shall be employed to reduce the risk to below the threshold. If this is not possible, the sensitive receptors shall be relocated.</li> <li>◆ For significant cancer risk exposure, as defined by BAAQMD, indoor air</li> </ul>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact AQ-3:</b> New restaurants in mixed-use projects in the Plan Area could be a source of odors that result in complaints from new or existing residences.</p>	S	<p>filtration systems shall be installed to effectively reduce particulate levels to a less-than-significant level. Project sponsors shall submit performance specifications and design details to demonstrate that lifetime residential exposures would result in less-than-significant cancer risks (less than 10 in one million chances).</p> <ul style="list-style-type: none"> <li>◆ Tiered plantings of trees or shrubs along project boundaries closest to University Avenue shall be provided. Tiered plantings may include layering of trees or shrubs between the roadway and buildings within medians, setbacks, or within open spaces associated with buildings.</li> </ul> <p><u>Mitigation Measure AQ-3:</u> New restaurants located in mixed-use developments, or adjacent to residential developments, shall install kitchen exhaust vents with filtration systems, re-route vents away from residential development, or use other accepted methods of odor control, in accordance with local building and fire codes.</p>	LTS
<p><b>Impact AQ-CUM-1:</b> Conflict with Clean Air Plan Projections and Control Measures. The proposed Plan would contribute to a regional impact by increasing the rate of vehicle use at a greater rate than population growth. This would lead to greater regional emissions of nonattainment air pollutants (or their precursors) than assumed in the latest Air Quality Plan.</p>	S	<p><u>Mitigation Measure AQ-1:</u> There are no measures available to mitigate this impact related to inconsistency with the Clean Air Plan.</p>	SU
<b>BIOLOGICAL RESOURCES</b>			
<p><b>Impact BIO-1:</b> Special-status plant species, such as Congdon's tarplant, alkali milk vetch, Point Reyes' bird's beak, and California seablite, that could occur in the Plan Area, could be impacted by construction activities.</p>	S	<p><u>Mitigation Measure BIO-1:</u> If development is proposed on a site identified as "Natural Habitat" in Figure 4.4-1 of the Draft EIR, the site shall first be subjected to focused pre-construction surveys during the appropriate blooming seasons by a qualified biologist to assess for the presence of Congdon's tarplant, alkali milk vetch, Point Reyes' bird's beak, and California seablite. Survey</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact BIO-2:</b> Salt marsh harvest mouse and salt marsh wandering shrew could be impacted by construction activities.</p>	S	<p>methods shall comply with CNPS/CDFG rare plant survey protocols, and shall be performed by qualified field botanists. Any populations of special-status plant species that are detected shall be mapped.</p> <p>If special-status plant populations are detected, they shall be avoided to the greatest extent feasible; however, where construction would have unavoidable impacts, a compensatory mitigation plan shall be prepared and implemented in coordination with regulatory agencies. Such plans may include salvage, propagation, on-site reintroduction in restored habitats, and monitoring.</p> <p><u>Mitigation Measure BIO-2a:</u> Any development project in an area identified as Salt Marsh on Figure 4.4-1 of the Draft EIR shall be subject to a wetland delineation and habitat assessment prepared by a qualified biologist. All jurisdictional wetlands and areas of dense pickleweed identified by the biologist as suitable habitat for the salt marsh harvest mouse shall be avoided for development and preserved in their existing state, unless Mitigation Measure BIO-2b is implemented. This would also avoid impacts to the salt marsh wandering shrew, whose habitat overlaps with wetlands and that of the salt marsh harvest mouse.</p>	LTS
<p><b>Impact BIO-3:</b> Project construction activities could result in impacts to nesting birds, including California black rail, California clapper rail, and western burrowing owl, as a result of disturbance to active nests and breeding behavior.</p>	S	<p><u>Mitigation Measure BIO-2b:</u> Where avoidance of suitable habitat for salt marsh harvest mouse or salt marsh wandering shrew is not possible, the U.S. Fish and Wildlife Service shall be consulted.</p> <p><u>Mitigation Measure BIO-3a:</u> If construction activities are scheduled to occur during the breeding season (February 1 through August 31), a qualified wildlife biologist shall conduct pre-construction surveys of all potentially suitable nesting habitat within 0.25 miles of active construction areas, including trees, shrubs, grasslands and wetland vegetation. The qualified wildlife biologist shall determine the timing of pre-construction surveys based on the time of year and habitats that are present, and shall conduct the surveys no more than 15 days prior to construction.</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<p>a. If active California clapper rail or California black rail nests are found, a 500-foot no-disturbance setback zone shall be flagged and maintained around active nests until it is determined that young have fledged. If active nests for other bird species are found, a 250-foot no-disturbance setback zone shall be flagged and maintained around active nests until it is determined that young have fledged.</p> <p>b. If pre-construction surveys indicate that nests are inactive or potential habitat is unoccupied during the construction period, no further mitigation shall be required.</p> <p>c. If construction is scheduled to occur during the non-nesting season (September 1 - January 31), then no nesting bird surveys shall be required before the start of construction activity, except for provisions for surveys for wintering western burrowing owls, as specified in Mitigation Measure BIO-3b.</p> <p>d. A worker education program shall be provided to the construction crew. This program shall review sensitive species and habitats that might be present on the site. Workers shall be informed of mitigation and avoidance measures.</p>	
		<p><u>Mitigation Measure BIO-3b</u>: The following guidelines, adapted from the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 1995), shall be implemented:</p> <p>a. Pre-construction western burrowing owl surveys shall be conducted in all areas that may provide suitable nesting habitat according to CDFG (1995) guidelines. These likely areas are shown as areas of upland habitat on Figure 4.4-1 of the Draft EIR.</p> <p>i. No more than 30 days before construction, a habitat survey, including documentation of burrows and western burrowing owls, shall be con-</p>	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
	<p>ducted by a qualified wildlife biologist within 500 feet of the construction area in areas suitable for western burrowing owls. If no suitable habitat is found, no further mitigation is needed.</p> <ul style="list-style-type: none"> <li>ii. The survey shall conform to the protocol described by the California Burrowing Owl Consortium, including up to four surveys on different dates if there are suitable burrows present.</li> <li>iii. The survey shall identify as any impact any disturbance within 160 feet of occupied burrows during the non-breeding season of September 1 through January 31, or within approximately 250 feet during the breeding season of February 1 through August 31.</li> </ul>	<ul style="list-style-type: none"> <li>b. If, as determined by a qualified biologist, construction activities will not adversely affect occupied burrows or disrupt breeding behavior, construction may proceed without any restriction or mitigation measures for western burrowing owls.</li> <li>c. If construction could adversely affect occupied burrows during the February 1 through August 31 breeding season, a 250-foot no disturbance buffer shall be maintained around the occupied burrow until a qualified biologist has determined that the chicks have fledged. If construction could adversely affect occupied burrows during the September 1 through January 31 non-breeding season, the subject owls may be passively relocated from the occupied burrow(s) using one-way doors, according to CDFG guidelines, using the following measures:                         <ul style="list-style-type: none"> <li>i. There shall be at least two unoccupied burrows suitable for western burrowing owl within 300 feet of the occupied burrow before one-way doors are installed in the occupied burrow.</li> <li>ii. The unoccupied burrows shall also be located at least 160 feet from construction activities and can be natural burrows or artificial burrows constructed according to current design specifications.</li> <li>iii. If artificial burrows are created, these burrows shall be in place at least</li> </ul> </li> </ul>	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact BIO-4:</b> Northern coastal salt marsh could be impacted as a consequence of development under the Specific Plan.</p>	S	<p>one week before one-way doors are installed on the currently occupied burrows.</p> <p>iv. One-way doors must be in place for a minimum of 48 hours to ensure that owls have left the burrow before the burrow is excavated.</p> <p><u>Mitigation Measure BIO-4:</u> See <u>Mitigation Measure BIO-5.</u></p>	LTS
<p><b>Impact BIO-5:</b> Wetland habitat including northern coastal salt marsh could be disturbed to install subsurface infrastructure, or filled and lost as a consequence of development under the Specific Plan.</p>	S	<p><u>Mitigation Measure BIO-5:</u> During or prior to project design, a wetland delineation of the project area shall be conducted to determine precise boundaries of jurisdictional wetlands. If wetlands under State or federal jurisdiction occur in the construction areas and involve the placement of fill or dredged materials or other alteration, the necessary and appropriate permits and approvals from responsible resources agencies shall be secured. As appropriate for the type of permit to be considered, options that avoid, minimize, or mitigate potential impacts on jurisdictional wetlands shall be evaluated. Conditions of approval attached to the permits shall be followed. In addition, the following mitigations as described below shall be carried out.</p> <ul style="list-style-type: none"> <li>◆ Sensitive habitat areas including wetlands adjacent to, but outside of, the construction area shall be demarcated with orange construction fencing to exclude workers, vehicles, and equipment.</li> <li>◆ Construction and staging areas shall be flagged to clearly define the limits of the work area. The locations of habitats to be avoided shall be identified in the contract documents (plans and specifications) as “Sensitive Biological Resources – Do Not Disturb.”</li> <li>◆ Jack-and-bore or other trenchless methods shall be used to reduce the need for surface construction within identified sensitive habitats and exclusion zones, and construction activities and vehicles shall be restricted to a specified right-of-way.</li> </ul>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		<ul style="list-style-type: none"> <li>◆ Where possible, pre-project topography shall be restored.</li> <li>◆ Where possible, trenches shall be worked from only one side to minimize impacts on adjacent habitat.</li> <li>◆ Watering of exposed earth shall be conducted consistent with construction BMPs to minimize dust production.</li> <li>◆ Trench lines shall be reseeded with native vegetation appropriate for the affected habitat type, and/or a double-trenching technique shall be used through sensitive habitats to help preserve the existing seedbank.</li> <li>◆ When wetland impact avoidance is not possible, mitigation in the form of on-site or offsite habitat restoration/ revegetation, or purchase of mitigation bank credits shall be secured in accordance with resource agency guidelines, and subject to approval of all resource agencies with jurisdiction on the site.</li> </ul>	

**CULTURAL RESOURCES**

<p><b>Impact CULT-1:</b> Excavation of unique fossil deposits during development in the Plan Area could result in their destruction.</p>	S	<p><u>Mitigation Measure CULT-1:</u> If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet shall stop and the City shall be notified. A qualified paleontologist shall inspect the findings within 24 hours of discovery. If it is determined that the proposed development could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible, project applicants shall pay in-lieu fees to mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by a project. Possible mitigation under CEQA emphasizes preservation-in-place measures, including planning construction to avoid paleontologic sites, incorporating sites into parks and other open spaces,</p>	LTS
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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before Mitigation	Significance After Mitigation
Significant Impact	Mitigation Measures
S	LTS
<p><b>Impact GEO-1:</b> Strong ground shaking from earthquakes could cause major damage to buildings and other structures.</p>	<p>covering sites with stable soil, and deeding the site into a permanent conservation easement. Under CEQA Guidelines, when preservation in place is not feasible, data recovery through excavation shall be conducted with a data recovery plan in place. Therefore, when considering these possible mitigations, the City shall have a preference for preservation in place.</p> <p><u>Mitigation Measure GEO-1:</u> All structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements as a minimum. Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead and live loads. The code-prescribed lateral forces are generally substantially smaller than the expected peak forces that would be associated with a major earthquake. Therefore, structures shall be able to do all of the following:</p> <ul style="list-style-type: none"> <li>◆ Resist minor earthquakes without damage.</li> <li>◆ Resist moderate earthquakes without structural damage but with some non-structural damage.</li> <li>◆ Resist major earthquakes without collapse but with some structural as well as nonstructural damage.</li> </ul>
<p><b>Impact GEO-2:</b> Soils underlying the Plan Area could liquefy and/or settle differentially due to an earthquake.</p>	<p><u>Mitigation Measure GEO-2:</u> Foundations shall be designed to compensate for effects of liquefaction, differential settlement, and lateral spreading due to earthquakes. Foundations shall be designed by a qualified structural engineer using soil design parameters developed by qualified geotechnical consultants and verified by the City Building Department.</p>
<p><b>Impact GEO-3:</b> Construction in areas close to the Bay could be subject to lateral spreading due to earthquakes.</p>	<p><u>Mitigation Measure GEO-3:</u> Implement Mitigation Measure GEO-1 above. In addition, site development plans and foundations shall be designed to compensate for effects of lateral spreading due to earthquakes. Earthwork activities, including remedial grading, shall be performed using the recommendations pro-</p>

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<b>Impact GEO-4:</b> Areas of soft Bay Mud and artificial fill may be differentially compressed when structures and site improvements are built on these substrates, causing cracking, subsidence, and other damage to the overlying structure and adjacent structures.	S	<p>vided by qualified geotechnical consultants, and foundations shall be designed by a qualified structural engineers using soil design parameters developed by qualified geotechnical consultants and verified by the City Building Department.</p> <p><b>Mitigation GEO-4:</b> 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.</p>	LTS
<b>Impact GEO-5:</b> Foundations could heave and crack due to underlying expansive soils, unless they are appropriately designed.	S	<b>Mitigation Measure GEO-5:</b> 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 Department.	LTS
<b>GREENHOUSE GAS EMISSIONS</b>			
<i>The project would not result in significant project or cumulative impacts related to greenhouse gases; therefore, no mitigation measures are required.</i>			
<b>HAZARDS AND HAZARDOUS MATERIALS</b>			
<i>The project would not result in significant project or cumulative impacts related to hazards and hazardous materials; therefore, no mitigation measures are required.</i>			
<b>HYDROLOGY AND WATER QUALITY</b>			
<i>The project would not result in significant project or cumulative impacts related to hydrology and water quality; therefore, no mitigation measures are required.</i>			
<b>LAND USE</b>			
<i>The project would not result in significant project or cumulative impacts related to land use; therefore, no mitigation measures are required.</i>			

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	S	S		
<b>NOISE</b>				
<b>Impact NOI-1:</b> Future residential development in the Plan Area and existing residences bordering the Plan Area may be exposed to outdoor and indoor noise levels in excess of City and State 60 dBA CNEL outdoor and 45 dBA CNEL indoor noise limits. In addition, new residential uses proposed adjacent to existing and proposed noise-generating uses, including commercial uses could be exposed to noise levels that exceed the City's Noise Ordinance limits.	S	S	<p><u>Mitigation Measure NOI-1:</u> In areas where new residential development would be exposed to a CNEL of greater than 60 dBA, site-specific noise studies shall be conducted to determine the area of impact and to present appropriate mitigation measures, which may include the following:</p> <ul style="list-style-type: none"> <li>◆ Minimize noise in shared residential outdoor activity areas by locating the areas behind buildings or in courtyards, or by orienting the terraces to alleyways rather than streets, wherever possible.</li> <li>◆ Provide mechanical ventilation in conformance with UBC requirements and specified in the General Plan, in all residential units proposed along roadways or in areas where noise levels could exceed 60 dBA CNEL so that windows can remain closed at the choice of the occupants to maintain interior noise levels below 45 dBA CNEL.</li> <li>◆ Install sound-rated windows and use appropriate construction methods to provide the requisite noise control for residential units proposed along roadways or in areas where noise levels could exceed 70 dBA CNEL.</li> </ul>	LTS
<b>Impact NOI-2:</b> Mixed-use buildings identified in the Specific Plan may include residential uses within the same building as noise-generating commercial and retail uses. Noise levels resulting from operational noise from the non-residential use may exceed the City's noise ordinance limits within the affected residences.	S	S	<p><u>Mitigation Measure NOI-2:</u> Incorporate appropriate noise controls in residential mixed-use buildings so that noise levels produced by the non-residential use with the building comply with the exterior and interior noise standards contained in Sections 8.52.320 and 8.52.330 of the East Palo Alto Municipal Code.</p>	LTS
<b>Impact NOI-3:</b> Under the Specific Plan industrial uses and residential uses (with civic use envisioned) would be developed adjacent to existing and proposed residential areas. Noise levels resulting from the operation of these new uses could result in	S	S	<p><u>Mitigation Measure NOI-3:</u> Limit exterior noise levels in noise sensitive outdoor use areas to levels specified in Section 8.52.320 of the East Palo Alto Municipal Code as specified in Table 4.11-7 of this document. Meeting these noise performance standards would be the responsibility of the developer of the proposed use. In areas where new residential development would be located adja-</p>	LTS

S = Significant, LTS = Less Than Significant, SU = Significant Unavoidable Impact

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
noise levels exceeding the City's Noise Element and/or Ordinance limits at these existing residential uses.	S	<p>cent to noise-generating uses, site-specific noise studies shall be conducted to determine the area of impact and to present appropriate mitigation measures, which would include the measures recommended in Mitigation Measure NOI-1.</p> <p><b>Mitigation Measure NOI-4a:</b> The following measures, in addition to the best practices specified in Mitigation Measure NOI-5b, shall be followed to reduce vibration from construction activities and should be employed where feasible:</p> <ul style="list-style-type: none"> <li>◆ Avoid impact pile driving, where feasible. Drilled piles cause lower vibration levels where geological conditions permit their use.</li> <li>◆ Avoid using vibratory rollers and tampers near sensitive areas, where feasible.</li> </ul> <p><b>Mitigation Measure NOI-4b:</b> In areas where project construction is anticipated to include vibration-generating activities, such as pile driving, in close proximity to existing structures, site-specific vibration studies shall be conducted to determine the area of impact and to present appropriate mitigation measures that may include the following:</p> <ul style="list-style-type: none"> <li>◆ Identify projects that would include vibration generating activities, such as pile driving and heavy construction equipment, which have the potential to generate high ground-borne vibration levels at, nearby vibration sensitive structures. Vibration limits appropriate to the type of use and building structure shall be applied to all vibration-sensitive structures located within 200 feet of the project. Safe vibration limits that can be applied to assess the potential for damaging a structure vary by researcher and there is no general consensus as to what amount of vibration may pose a threat for structural damage to the building. However, the Federal Transit Administration's (FTA) has established guidelines for transit and related construction projects, which are deemed appropriate for the type of projects expected in the Specific Plan Area. Therefore these criteria, as shown in Table 4.11-10, should be utilized to assess potential construction vibration impacts due to project</li> </ul>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before Mitigation	Significance After Mitigation
<p><b>Significant Impact</b></p> <p>Although construction noise would be localized to the individual construction sites, businesses and residences throughout the Plan Area would be exposed to high levels of noise as construction occurs in the Plan Area. Noise levels at adjacent businesses and residences could increase by 15 to 20 dBA or more for relatively short periods of time during specific construction activity.</p>	<p><b>Mitigation Measures</b></p> <p>This task shall be conducted by a qualified structural engineer.</p> <ul style="list-style-type: none"> <li>◆ Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approach the limits identified in Table 4.11-10.</li> <li>◆ At a minimum, monitor vibration during initial demolition activities and during pile-driving activities. Monitoring results approaching the vibration thresholds shown in Table 4.11-10 may indicate the need for a more intensive measurement schedule and results significantly below the vibration thresholds may indicate a less intensive measurement schedule.</li> </ul>
<p><b>S</b></p> <p><b>Mitigation Measure NOI-5a:</b> Implement the provisions of Section 8.52.350-E of the East Palo Alto Municipal Code that regulate construction hours.</p> <p><b>Mitigation Measure NOI-5b:</b> Construction equipment shall be well-maintained and used judiciously to be as quiet as practical. The following measures, when applicable, shall be required to reduce noise from construction activities:</p> <ul style="list-style-type: none"> <li>◆ Ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good operating condition and appropriate for the equipment.</li> <li>◆ Utilize “quiet” models of air compressors and other stationary noise sources where such technology exists.</li> <li>◆ Locate stationary noise-generating equipment as far as reasonable from sensitive receptors where sensitive receptors adjoin or are near a construction project area.</li> </ul>	<p><b>LTS</b></p>

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
	<ul style="list-style-type: none"> <li>◆ Prohibit unnecessary idling of internal combustion engines in excess of 5 minutes.</li> <li>◆ Pre-drill foundation pile holes to minimize the number of impacts required to seat the pile.</li> <li>◆ Construct solid plywood fences around construction sites adjacent to operational business, residences or noise-sensitive land uses.</li> <li>◆ Erect a temporary noise control blanket barrier, if necessary, along building facades facing construction sites. This mitigation would only be necessary if conflicts occurred that were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected and with proper installation can typically lower construction noise levels by 10 dBA (10 dBA represents a perceived halving of noise levels).</li> <li>◆ Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.</li> <li>◆ Ensure that construction activities, including the loading and unloading of materials and truck movements, are limited to the hours specified in Section 8.52 of the East Palo Alto Municipal Code.</li> <li>◆ Notify businesses, residences, and noise-sensitive land uses adjacent to construction sites of the construction schedule in writing. Designate a “construction liaison” who is responsible for responding to any local complaints about construction noise. The liaison shall determine the cause of the noise complaints (for example starting too early, or a bad muffler) and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site.</li> </ul>		LTS
<p><b>Impact NOI-CUM-1:</b> If the Dumbarton Rail Service Corridor Project is implemented, and the Loop Road used according to cumulative traffic projections, the existing residences at the northern</p>	S	<p><u>Mitigation Measure NOI-CUM-1:</u> In areas where existing residential development would be exposed to a CNEL of greater than 60 dBA due to Loop Road traffic and/or Dumbarton Rail project noise, site-specific noise studies shall be conducted to determine the area of impact and to provide appropriate mitiga-</p>	LTS

S = Significant, LTS = Less Than Significant, SU = Significant Unavoidable Impact

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before	Significance After
Mitigation	Mitigation
<p><b>Significant Impact</b></p> <p>edge of the Specific Plan Area may be exposed to outdoor and indoor noise levels in excess of City and State 60 dBA CNEL outdoor and 45 dBA CNEL indoor noise limits.</p>	<p><b>Mitigation Measures</b></p> <p>tion measures, which may include the following:</p> <ul style="list-style-type: none"> <li>◆ Conduct area-specific noise studies to determine the need for sound walls, or sound walls in combination with earthen berms, to reduce noise levels to 60 dBA CNEL or less in rear yards of homes adjacent to the loop road.</li> <li>◆ Utilize roadway and site planning in the loop road design and layout to minimize noise in adjacent residential outdoor activity areas through the use of increased distances to these areas or the placement of intervening earthen berms.</li> <li>◆ If 60 dBA CNEL or less is not achieved in rear yards, mechanical ventilation shall be provided in the affected residences so that windows can remain closed at the choice of the occupants to maintain interior noise levels below 45 dBA CNEL as per the requirements of the City's Noise Ordinance.</li> </ul>
<b>POPULATION AND HOUSING</b>	
<i>The project would not result in significant project or cumulative impacts related to population and housing; therefore, no mitigation measures are required.</i>	
<b>PUBLIC SERVICES AND RECREATION</b>	
<i>The project would not result in significant project or cumulative impacts related to public services and recreation; therefore, no mitigation measures are required.</i>	
<b>TRANSPORTATION/TRAFFIC</b>	
<p><b>Impact TRA-1</b> (Willow Road and Bayfront Expressway): During the PM peak hour, the intersection currently operates at an unacceptable level of service (LOS E). The addition of project-generated traffic is expected to cause the critical-movement delay on the southbound approach to increase by three seconds. This constitutes a <i>significant adverse impact</i> according to the thresholds established by</p>	<p><b>S</b></p> <p><b>Mitigation Measure TRA-1:</b> The shared left-through lane on eastbound Willow Road shall be converted into a left-turn only lane and the signal phasing on the east and west approaches from split phase modified to protected lefts. With this improvement, the intersection would continue to operate at LOS E (58.2 seconds); however, the average delay would be less than that under existing conditions (60.8 seconds). Alternatively, the addition of a third right-turn lane on northbound Willow Road would reduce the intersection's average control delay to an acceptable LOS D. Implementation of any improvement at this intersec-</p>

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CITY OF EAST PALO ALTO  
RAVENS WOOD/4 CORNERS TOD SPECIFIC PLAN DRAFT EIR  
REPORT SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
the City of Menlo Park.		tion would require coordination with and approval by Caltrans and the City of Menlo Park.	
<b>Impact TRA-2</b> (University Avenue and Bayfront Expressway): During the PM peak hour, the intersection currently operates at an unacceptable level of service (LOSE). The addition of project-generated traffic is expected to cause the average control delay at the intersection to increase by 31.6 seconds. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of Menlo Park.	S	<b>Mitigation Measure TRA-2:</b> The implementation of adaptive signal timing could reduce delays and improve intersection operation; however, there are no feasible improvements within the existing right-of-way that would substantially reduce delay at this intersection.	SU
<b>Impact TRA-3</b> (University Avenue and Purdue Avenue): During the PM peak hour, the stop-controlled movements on Purdue Avenue currently operate at LOS F with over 100 seconds of delay. The loop road would reduce the traffic on Purdue Avenue. However, the project would add traffic to University Avenue. The addition of project-generated traffic to University Avenue is expected to cause the delay for the stop-controlled movements on Purdue Avenue to increase by more than 100 seconds, and the approach volumes on Purdue Avenue are expected to continue to satisfy the Peak-Hour Volume Warrant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.	S	<b>Mitigation Measure TRA-3:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b> , which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area. With this improvement the intersection would operate at an acceptable level (LOS A) during both the AM and PM peak hours.	LTS
<b>Impact TRA-4</b> (University Avenue and Bay Road): This intersection currently operates at	S	<b>Mitigation Measure TRA-4:</b> An exclusive northbound right-turn lane and a second westbound left-turn lane shall be built. The second westbound left-turn	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p>Significant Impact</p> <p>acceptable levels (LOS D or better) during the AM and PM peak hours. The addition of project-generated traffic is expected to cause the intersection to degrade to LOS F during the AM (94.7 seconds delay) and PM (109.8 seconds delay) peak hours. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p>Mitigation Measures</p> <p>lane would result in two left turn lanes, one through lane, and one right-turn lane in the westbound direction on Bay Road. With these changes the signal phasing on Bay Road could be modified from split phase operation to a standard phase sequence with protected left turns. The recommended mitigation measure would require the acquisition of additional right-of-way and roadway widening. At least 2 feet of additional right-of-way would be required on the east side of University Avenue. About 12 feet of additional right-of-way would be required on the north side of Bay Road. Roadway widening has the potential to make pedestrian and bicycle travel more difficult through the intersection. Therefore, any intersection widening or reconstruction should incorporate pedestrian and bicycle accommodation. This may include pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at an acceptable level (LOS D) during the AM and PM peak hours. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area. The Plan includes the requirement for TDM programs for new development. An effective TDM program would reduce the project impact at this intersection. However, to reduce the impact to a level of insignificance without any of the geometric improvements described above, the TDM program would need to achieve over a 50 percent reduction in trip generation, which is unlikely to be achieved</p>	<p>LTS</p>
<p>Impact TRA-5 (University Avenue and Donohoe Street): This intersection currently operates at an acceptable level (LOS D) during the PM peak hour. The addition of project-generated traffic is expected to cause the intersection to degrade to LOS E with 77.5 seconds of delay during the PM peak hour. This constitutes a <i>significant adverse</i></p>	<p>Mitigation Measure TRA-5: An exclusive southbound right-turn lane shall be built, restriping the westbound approach to include dual left-turn lanes, one through lane and one right-turn only lane, and the signal phasing on Donohoe Street modified from split phase operation to a standard phase sequence with protected left turns. The recommended mitigation measure would require the acquisition of additional right-of-way and roadway widening that affects properties outside the Plan area. About 12 feet of additional right-of-way would be</p>	<p>LTS</p>

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><i>impact</i> according to the thresholds established by the City of East Palo Alto.</p>		<p>needed on the west side of University Avenue. Roadway widening has the potential to make pedestrian and bicycle travel more difficult through the intersection. Therefore, any intersection widening or reconstruction should incorporate pedestrian and bicycle accommodation. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at LOS D with 42.6 seconds of delay during the PM peak hour. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area. The Plan includes the requirement for TDM programs for new development. An effective TDM program would reduce the project impact at this intersection. However, to reduce the impact to a level of insignificance without any of the geometric improvements described above, the TDM program would need to achieve over a 50 percent reduction in trip generation, which is unlikely to be achieved.</p>	LTS
<p><b>Impact TRA-6</b> (Clarke Avenue and Bay Road): The intersection currently operates at acceptable levels (LOS B) during the AM and PM peak hours. The addition of project-generated traffic is expected to cause the intersection to degrade to LOS F with 95 to 100 seconds of delay during the AM and PM peak hours, and the intersection traffic volumes are expected to satisfy the Peak-Hour Volume Warrant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	S	<p><b>Mitigation Measure TRA-6:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at an acceptable level LOS C with 24 to 28 seconds of delay during both the AM and PM peak hours. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>	LTS
<p><b>Impact TRA-7</b> (Demeter Street and Bay Road): The intersection currently operates at acceptable</p>	S	<p><b>Mitigation Measure TRA-7:</b> A new traffic signal at this intersection shall be installed at this location. Along with a new traffic signal, appropriate pedestrian</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Significant Impact</b></p> <p>levels (LOS A and B during the AM and PM peak hours, respectively). The addition of project-generated traffic is expected to cause the stop-controlled movements on Demeter Street to degrade to LOS F with over 100 seconds of delay during the AM and PM peak hours, and the intersection traffic volumes are expected to satisfy the Peak-Hour Volume Warrant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p>and bicycle accommodation should be provided. This includes pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at an acceptable level (LOS B and C during the AM and PM peak hours, respectively). To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>	LTS
<p><b>Impact TRA-8</b> (Pulgas Avenue and Bay Road): The intersection currently operates at acceptable levels (LOS B) during the AM and PM peak hours. The addition of project-generated traffic is expected to cause the stop-controlled movements on Pulgas Avenue to degrade to LOS F) with over 100 seconds of delay during the AM and PM peak hours, and the intersection traffic volumes are expected to satisfy the Peak-Hour Volume Warrant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p><b>Mitigation Measure TRA-8:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at LOS C with 23.2 seconds of delay during the AM peak hour and LOS D with 48.2 seconds of delay during the PM peak hour. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact TRA-9 (Freeway):</b> All of the freeway segments evaluated would be significantly impacted by the implementation of the Specific Plan. Project impacts on freeway segments would diminish as the distance from the Plan Area increases until eventually the project's impact on freeway segments would be below the threshold established for significant impacts. This would be considered a <i>significant adverse impact</i> to freeway segments close to the Plan Area.</p>	S	<p><b>Mitigation Measure TRA-9:</b> It is not within the City's jurisdiction nor is it financially feasible for the City of East Palo Alto to implement an extensive freeway widening project in order to mitigate the significant impacts associated with the Specific Plan.</p>	SU
<p><b>Impact TRA-10:</b> There are many portions of streets in the Plan Area that do not have continuous sidewalks. This is a major impediment to pedestrian travel in the Plan Area.</p>	S	<p><b>Mitigation Measure TRA-10a:</b> Continuous sidewalks shall be developed on all streets in the Plan Area as required under <b>Specific Plan Policy TRA-1.1</b>.</p> <p><b>Mitigation Measure TRA-10b:</b> Off-street pedestrian paths shall be provided as per <b>Specific Plan Policy TRA-1.2</b>. The paths can help promote walking by providing shorter connections between sites and buildings than could be offered by the street system. For example, a pedestrian path could be developed as an extension of Purdue Avenue. This would allow a much easier pedestrian connection to University Avenue than the existing street system.</p>	LTS
<p><b>Impact TRA-CUM-1 (Willow Road and Bayfront Expressway):</b> During the PM peak hour, the intersection is expected to operate at an unacceptable level of service (LOS F) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the critical-movement delay on the southbound approach to increase by 3.0 seconds. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of Menlo Park.</p>	S	<p><b>Mitigation Measure TRA-CUM-1:</b> The shared left-through lane on northbound Willow Road shall be converted into a left-turn only lane and the signal phasing on the east and west approaches from split phase modified to protected lefts. With this improvement, the intersection would continue to operate at LOS F (287.7 seconds of delay); however, the average delay would be less than that under cumulative no project conditions (327.5 seconds). Alternately, the addition of a third right-turn lane on northbound Willow Road would further reduce the intersection's average control delay although not to an acceptable level. Implementation of any improvement at this intersection would require coordination with and approval by Caltrans and the City of Menlo Park.</p>	SU

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before Mitigation	Significance After Mitigation
<p><b>Impact TRA-CUM-2</b> (University Avenue and Bayfront Expressway): During the AM and PM peak hours, the intersection is expected to operate at an unacceptable level of service (LOS F) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the average control delay at the intersection to increase by 17 to 28 seconds. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of Menlo Park.</p>	<p><b>Mitigation Measure TRA-CUM-2:</b> There are no feasible improvements within the existing right-of-way that would substantially reduce delay at this intersection. The implementation of adaptive signal timing could reduce delays and improve intersection operation, but would not reduce cumulative impacts to a less-than-significant level. Any potential mitigation measure would require coordination with and approval by Caltrans and the City of Menlo Park.</p> <p>This intersection is expected to operate at a poor level of service (LOS F) under the cumulative no project AM and PM peak-hour traffic volumes. Buildout of the Specific Plan would add a substantial number of trips to this intersection, which serves as a gateway to the East Bay. The threshold that defines a significant impact is an increase in the average control delay of four or more seconds. Buildout of the Specific Plan would increase the average control delay by as much as 34.6 seconds during the PM peak hour. Therefore, trip reduction measures alone would not be sufficient to fully mitigate the significant project impact at this intersection.</p>
<p><b>Impact TRA-CUM-3</b> (University Avenue and Purdue Avenue): During the AM and PM peak hours, the stop-controlled movements on Purdue Avenue are expected to operate at LOS F with over 100 seconds of delay under cumulative no project conditions. The loop road would reduce the traffic on Purdue Avenue. However, the project would add traffic to University Avenue. The addition of project-generated traffic on University Avenue is expected to cause the average delay for the stop-controlled movements on Purdue Avenue to increase by over 100 seconds, and the approach volumes on Purdue Avenue are expected to continue to satisfy the Peak-Hour Volume Warrant.</p>	<p><b>Mitigation Measure TRA-CUM-3:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at LOS A with 6.2 seconds of delay during the AM peak hour and LOS C with 24.6 seconds of delay during the PM peak hour. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p>This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p>S</p>	<p><b>Mitigation Measure TRA-CUM-4:</b> Fully mitigating the project impacts at this intersection under cumulative conditions would require adding through lanes on University Avenue and/or Bay Road. Because such improvements would entail extensive right-of-way acquisition and roadway widening extending beyond the Plan Area, this mitigation measure is considered to be infeasible.</p> <p>Under cumulative conditions, the impact from buildout of the Specific Plan could be partially mitigated by constructing the following improvements: an exclusive northbound right-turn lane and a second northbound left turn lane on University Avenue, a second westbound left-turn lane on Bay Road, a second southbound left-turn lane on University Avenue, and modified signal phasing. These recommended improvements would require additional right-of-way and roadway widening affecting only those properties in the immediate vicinity of the intersection. At least 14 feet of additional right-of-way would be required along the east side of University Avenue. About 12 feet of additional right-of-way would be required on the north side of Bay Road. Roadway widening has the potential to make pedestrian and bicycle travel more difficult through the intersection. Therefore, any intersection widening or reconstruction should incorporate pedestrian and bicycle accommodation. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With the recommended improvements, the intersection would continue to operate at an LOS F (124.5 seconds and 217.7 seconds in the AM and PM peak hours, respectively).</p> <p>The implementation of TDM measures outlined in the Specific Plan and the future construction of the Dumbarton Rail Corridor may cause a reduction in the vehicle trips generated by the buildout of the Specific Plan. In order to fully mitigate the Specific Plan's impact under cumulative conditions, a 19 percent</p>	<p>SU</p>
<p><b>Impact TRA-CUM-4</b> (University Avenue and Bay Road): This intersection is expected to operate at an unacceptable level (LOS F) during the AM and PM peak hours under cumulative no project conditions. The addition of project-generated traffic is expected to cause the intersection critical-movement delay to increase by at least 143 seconds and the V/C ratio to increase by at least 0.3 during the AM and PM peak hours. The average delay would be 265.1 seconds during the AM peak hour and 346.9 seconds during the PM peak hour. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p>S</p>	<p><b>Mitigation Measure TRA-CUM-4:</b> Fully mitigating the project impacts at this intersection under cumulative conditions would require adding through lanes on University Avenue and/or Bay Road. Because such improvements would entail extensive right-of-way acquisition and roadway widening extending beyond the Plan Area, this mitigation measure is considered to be infeasible.</p> <p>Under cumulative conditions, the impact from buildout of the Specific Plan could be partially mitigated by constructing the following improvements: an exclusive northbound right-turn lane and a second northbound left turn lane on University Avenue, a second westbound left-turn lane on Bay Road, a second southbound left-turn lane on University Avenue, and modified signal phasing. These recommended improvements would require additional right-of-way and roadway widening affecting only those properties in the immediate vicinity of the intersection. At least 14 feet of additional right-of-way would be required along the east side of University Avenue. About 12 feet of additional right-of-way would be required on the north side of Bay Road. Roadway widening has the potential to make pedestrian and bicycle travel more difficult through the intersection. Therefore, any intersection widening or reconstruction should incorporate pedestrian and bicycle accommodation. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With the recommended improvements, the intersection would continue to operate at an LOS F (124.5 seconds and 217.7 seconds in the AM and PM peak hours, respectively).</p> <p>The implementation of TDM measures outlined in the Specific Plan and the future construction of the Dumbarton Rail Corridor may cause a reduction in the vehicle trips generated by the buildout of the Specific Plan. In order to fully mitigate the Specific Plan's impact under cumulative conditions, a 19 percent</p>	<p>SU</p>

S = Significant, LTS = Less Than Significant, SU = Significant Unavoidable Impact

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact TRA-CUM-5</b> (University Avenue and Donohoe Street): This intersection is expected to operate at an unacceptable level (LOS F) during the AM and PM peak hours. The addition of Specific Plan-generated traffic is expected to cause the intersection critical-movement delay to increase by at least 35 seconds and the V/C ratio to increase by at least 0.09 during the AM and PM peak hours. The resulting delay would be 116 seconds during the AM peak hour and 186.7 seconds during the PM peak hour. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	S	<p>reduction in trips would need to be achieved in addition to the above listed intersection improvements.</p> <p><b>Mitigation Measure TRA-CUM-5:</b> An exclusive southbound right-turn lane on University Avenue, restriping the westbound approach on Donohoe Street to include dual left-turn lanes, one through lane and one right-turn only lane, shall be installed, and the signal phasing on Donohoe Street should be modified from split phase operation to a standard phase sequence with protected left turns. The recommended mitigation measure would require the acquisition of additional right-of-way and roadway widening that affects properties outside the Plan Area. About 12 feet of additional right-of-way would be required on the west side of University Avenue.</p>	LTS
<p>Roadway widening has the potential to make pedestrian and bicycle travel more difficult through the intersection. Therefore, any intersection widening or reconstruction should incorporate pedestrian and bicycle accommodation. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would continue to operate at a LOS F, however the average delay (84.1 seconds and 93.1 seconds during the AM and PM peak hours, respectively) would be less than that under cumulative no project conditions. The Plan includes the requirement for TDM programs for new development. An effective TDM program would reduce the project impact at this intersection. However, to reduce the impact to a level of insignificance without any geometric improvements, the TDM program would need to achieve over a 50 percent reduction in trip generation. This level of reduction is unlikely to be achieved. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>			

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact TRA-CUM-6</b> (University Avenue and Highway 101 SB Off-Ramp): This intersection is expected to operate at an unacceptable level (LOS F) during the PM peak hour under cumulative no project conditions. The addition of Specific Plan-generated traffic is expected to cause the intersection critical-movement delay to increase by 45.9 seconds and the V/C ratio to increase by 0.14 during the PM peak hour. The resulting average delay would be 155.2 seconds. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	S	<p><b>Mitigation Measure TRA-CUM-6:</b> Mitigation of the Specific Plan's impact at this intersection under cumulative conditions is considered to be infeasible as it would require reconstructing the interchange and/or widening the University Avenue overpass. Implementing such improvements would require the coordination with and approval of Caltrans. The Specific Plan includes the requirement for TDM programs for new development. An effective TDM program would reduce the project impact at this intersection. However, to reduce the impact to a level of insignificance, the TDM program would need to achieve over a 50 percent reduction in trip generation. This level of reduction is unlikely to be achieved.</p>	SU
<p><b>Impact TRA-CUM-7</b> (University Avenue and Woodland Avenue): This intersection is expected to operate at an unacceptable level (LOS F) during the PM peak hour under cumulative no project conditions. The addition of project-generated traffic is expected to cause the intersection critical-movement delay to increase by 8.5 seconds and the V/C ratio to increase by 0.02 during the PM peak hour. The resulting average delay would be 144.4 seconds. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	S	<p><b>Mitigation Measure TRA-CUM-7:</b> Mitigation of the Specific Plan's impact at this intersection under cumulative conditions is considered to be infeasible at it would require extensive right-of-way acquisition in order to add through lanes to University Avenue and/or Woodland Avenue. The Specific Plan includes the requirement for TDM programs for new development. An effective TDM program would reduce the project impact at this intersection. However, to reduce the impact to a level of insignificance, the TDM program would need to achieve over a 50 percent reduction in trip generation. This level of reduction is unlikely to be achieved.</p>	SU

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before Mitigation	Significant Impact	Mitigation Measures	Significance After Mitigation
S	<p><b>Impact TRA-CUM-8</b> (Clarke Avenue and Bay Road): The intersection is expected to operate at acceptable levels (LOS B) during the AM and PM peak hours under cumulative no project conditions. The addition of Specific Plan-generated traffic is expected to cause the intersection to degrade to LOS F with 115.7 seconds of delay during the AM and peak hour and 95.4 seconds of delay during the PM peak hour, and the intersection traffic volumes are expected to satisfy the Peak-Hour Volume Warrant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p><b>Mitigation Measure TRA-CUM-8:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at an acceptable level (LOS C) with 28.1 seconds of delay during the AM peak hour and 24.0 seconds of delay during the PM peak hour under cumulative plus project conditions. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>	LTS
S	<p><b>Impact TRA-CUM-9</b> (Demeter Street and Bay Road): The intersection is expected to operate at acceptable levels (LOS A and B during the AM and PM peak hours, respectively) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the stop-controlled movements on Demeter Street to degrade to an unacceptable level (LOS F) with over 100 seconds of delay during the AM and PM peak hours, and the intersection traffic volumes are expected to satisfy the Peak-Hour Volume Warrant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p><b>Mitigation Measure TRA-CUM-9:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown timers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detection loops. With this improvement, the intersection would operate at LOS B with 18.6 seconds of delay during the AM peak hour and LOS C with 27.6 seconds of delay during the PM peak hour under cumulative plus project conditions. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee developed that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact TRA-CUM-10</b> (Pulgas Avenue and Bay Road): The intersection is expected to operate at an acceptable level (LOS B) during the AM and PM peak hours under cumulative no project conditions. The addition of project-generated traffic is expected to cause the stop-controlled movements on Pulgas Avenue to degrade to LOS F with over 100 seconds of delay during the AM and PM peak hours, and the intersection traffic volumes are expected to satisfy the Peak-Hour Volume War-rant. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	S	<p><b>Mitigation Measure TRA-CUM-10:</b> A new traffic signal shall be installed at this intersection. Along with a new traffic signal, appropriate pedestrian and bicycle accommodation should be provided. This includes pedestrian countdown tim-ers, Americans with Disabilities Act (ADA) compliant curbs, and bicycle detec-tion loops. With this improvement, the intersection would operate at LOS C with 23.2 seconds of delay during the AM peak hour and LOS D with 48.2 sec-onds of delay during the PM peak hour under cumulative plus project condi-tions. To facilitate this, the City must implement <b>Specific Plan Policy TRA-2.5</b>, which requires a “nexus study” be undertaken and a traffic impact fee de-veloped that ensures that developers pay their “fair share” of necessary traffic improvements in the Specific Plan Area.</p>	LTS
<p><b>Impact TRA-CUM-11</b> (Pulgas Avenue and Bay-shore Road): This intersection is expected to oper-ate at an acceptable level (LOS D) during the PM peak hour under cumulative no project conditions. The addition of project-generated traffic is ex-pected to cause the intersection to degrade to LOS E with 74.5 seconds of delay during the PM peak hour. This constitutes a <i>significant adverse im-pact</i> according to the thresholds established by the City of East Palo Alto.</p>	S	<p><b>Mitigation Measure TRA-CUM-11:</b> Mitigation of the Specific Plan’s impact at this intersection under cumulative conditions is considered to be infeasible at it would require acquisition of additional right-of-way and demolition of existing structures on abutting parcels in order to widen the roadway.</p> <p>The possible implementation of TDM measures may cause a reduction in the vehicle trips generated by the proposed project. While the precise magnitude of trip reduction that may be achieved through TDM measures is uncertain, it is expected to be below the 50 percent reduction in trips that would be needed to fully mitigate the project impact under cumulative conditions.</p>	SU

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significance Before	Significance After
Mitigation	Mitigation
Significant Impact	Mitigation Measures
<p><b>Impact TRA-CUM-12</b> (Embarcadero Road and Bayshore Road): This intersection is expected to operate at an unacceptable level (LOS E) during the AM peak hour under cumulative no project conditions. During the AM peak hour, the addition of project-generated traffic is expected to cause the intersection critical-movement delay to increase by 21.4 seconds and the V/C ratio to increase by 0.056. The intersection would degrade to LOS F with an average delay of 97.4 seconds. During the PM peak hour, the intersection is expected to operate at an acceptable level (LOS D) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the intersection to degrade to LOS E with 67.3 seconds of delay. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of Palo Alto.</p>	<p><b>Mitigation Measure TRA-CUM-12:</b> There are no feasible improvements that would fully mitigate the project impact under cumulative conditions at this intersection. This intersection is expected to operate at an acceptable LOS D under the cumulative no project PM peak-hour traffic volumes; however the intersection average control delay (53.0 seconds) is very close to the LOS D/E threshold (55.1 seconds). Thus, an increase in average control delay of only 2.1 seconds would be considered a significant impact since the intersection would degrade to an unacceptable level. Buildout of the Specific Plan would increase the average control delay by 14.3 seconds during the PM peak hour. Therefore, trip reduction measures alone would not be sufficient to fully mitigate the significant impact at this intersection.</p>
<p><b>Impact TRA-CUM-13</b> (University Avenue and Loop Road (new intersection): This intersection would be constructed as part of the Specific Plan. The projected traffic volumes and assumed lane geometry under cumulative plus project conditions is expected to result in LOS F with 98.6 seconds of delay during the PM peak hour. This constitutes a <i>significant adverse impact</i> according to the thresholds established by the City of East Palo Alto.</p>	<p><b>Mitigation Measure TRA-CUM-13:</b> There are no feasible improvements that would achieve an acceptable level of service under cumulative plus project conditions at this intersection. The poor level of service is primarily due to the heavy traffic volumes forecast on University Avenue in the year 2035. A major roadway widening project to add through lanes on University Avenue would be necessary to achieve an acceptable level of service at this intersection under cumulative plus project conditions. The Plan includes the requirement for TDM programs for new development. An effective TDM program would reduce the project impact at this intersection. However, to reduce the impact to a level of insignificance, the TDM program would need to achieve over a 50 percent reduction in trip generation. This level of reduction is unlikely to be achieved.</p>

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CITY OF EAST PALO ALTO  
 RAVENSWOOD/4 CORNERS TOD SPECIFIC PLAN DRAFT EIR  
 REPORT SUMMARY

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
<p><b>Impact TRA-CUM-14 (Freeway):</b> The project trips on study area freeways are expected to be the same under the cumulative plus project scenario as under the existing plus project scenario. Thus, as previously concluded, the Specific Plan is expected to result in <i>significant adverse impacts</i> to segments of Highway 101 and State Route 84 in the vicinity of the project.</p>	S	<p>Mitigation Measure TRA-CUM-14: It is infeasible for the City of East Palo Alto to undertake an extensive freeway widening project as it is outside City of East Palo Alto jurisdiction.</p>	SU

**UTILITIES AND SERVICE SYSTEMS**

*The project would not result in significant project or cumulative impacts related to utilities and service systems; therefore, no mitigation measures are required.*

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