DEIR Comments – 231 Grant (Teacher Housing)

1. Under Executive Summary, Project Objectives – who specifically created the project objectives and when were they created? Was it a selected committee? This was never identified in the EIR. I know residents and the Mayfield neighborhood were never consulted, requested to comment, nor a part of selecting these objectives.
2. Under Project Objectives, #1 – who or how was the number “60” selected for rental housing units for teachers within Santa Clara County? Why not 10 or 20? How was this number selected and what was the process in selecting this number?
3. Under Project Objectives, #1 – what is the Facebook Grant criteria? – this is not disclosed in the DEIR. This document should be public and known to all parties, especially residents. Why weren’t these criteria, negotiated by the County, made public or disclosed to the public in the EIR, especially the neighborhood. Who agreed to the Facebook criteria – was there a County Supervisor vote, when?
4. Under Project Objectives, #1 – what does the words “accelerated rate” mean? No definition provided. Does this mean this is the only way the project can be built? What happens if a significant earthquake happens during construction or groundwater/soil contamination is found on-site, does “accelerated rate” mean construction continues non-stop? The public – especially the neighborhood (a six-block radius) – should be consulted first and throughout the project.
5. Under Project Objectives, #3 – the statement, “compatible with the surrounding neighborhood” is an incorrect, untrue statement of fact and needs to be corrected. All the residential multi-family complexes in the Mayfield area are zoned RM-40 (40 units per acre). The proposed 231 Grant project is DOUBLE that density (around 80 units per acre). That is not compatible nor even close to compatible with the surrounding residential complexes.
6. Project Description, 2.2 Project Objectives – again, specifically decided these “objectives”, who had “input” or “say” into the design of these objectives? The Mayfield neighborhood – the area most affected by the Project -- was never invited, asked to comment on, or requested to participate in the design of these “objectives”.
7. 2.2 – same as above, the number “60” seem arbitrary (no basis in any EIR fact or detail) and the statement, “compatible with neighborhood” is just simply false. What facts do you have to base the number “60” on and why is that so vital? The above statement is incorrect and needs to be changed.
8. 2.3.1 – roof height, extends beyond 50’ to approx. 60’ – this exceeds the City of Palo Alto’s height limitations by 10’. Residential buildings in the Mayfield neighborhood are limited to 40’.
9. 2.3.3 – Flex Space and Public Amenities – as outlined, a suggested café in this northeast corner, close to nearby residences, would have major daily operational problems, being along Park and Grant – where would patrons park? how would food deliveries be handled (blocking streets, bike paths, etc.)? Not a good location, -- as street parking is only for residents -- for any type of restaurant (recently a new restaurant went out of business in the new Park Place Apartment building, down on the corner of Park and Page Mill).
10. 2.3.4 – Landscaping, Utilities, and Other Site Improvements – the removal of two, beautiful, native mature trees (#64 and #67) are of deep concern to Mayfield neighborhood residents. These trees are landmarks in our neighborhood and beloved by many residents. Why was the neighborhood neither informed of this removal decision nor excluded from the tree removal decision-making process? Until an arborist report was requested (not included in the EIR) no one in the neighborhood knew of the trees removal (they were in the original Project plans to keep these trees).
11. 2.4 – Project Construction – “modular construction” is the Project’s preferred method of construction is nothing in the EIR describes the safety aspects of doing this construction. What happens in strong wind conditions? Nothing is described or detailed. Has this type of construction been done in Palo Alto before? No specifics provided.
12. 2.4 – “parking stackers and podium will be built on-site”, however no detail on the parking stackers or system provided. How will it be constructed “on site”? Again, no safety details on the parking stackers provided in the EIR.
13. 2.4.1 – Construction Phasing – a “15-18 month” construction period is mentioned through the EIR. Why is this “accelerate rate” necessary (who said so) and what are the sacrifices in safety and quality construction? Who is responsible for overseeing the overall safety and quality workmanship? If local residents see “safety conditions” being sacrificed, who do we contact and how quickly will they respond?
14. 2.4.1 – Construction hours – the City’s construction hours must be strictly adhered to for the peaceful and quality of life enjoyment of the neighborhood. “Early starts/late finishes” work is NOT ACCEPTABLE, without neighborhood involvement. What steps will the County take to ensure that the neighborhood (within a six-block radius) is involved in setting any special construction hours, so everyone can aware – in advance -- of any changes to the City’s allowable hours?
15. 2.4.1 – “abatement of hazardous materials” – what information methods and/or notification will be made to the neighborhood (six block radius) about the discover of hazardous materials or soil found on the project site? Those most affected in the neighborhood need to know if any hazardous material/soil is found, the type, and the significant potential health issues these that materials or soil may have for residents in the area.
16. 2.4.2 – Construction Haul Routes/Staging/Traffic Control – “workers would park in public parking lots within a quarter mile of the site” – Do you have a service agreement with the City of Palo Alto to provide this “worker parking”? When was this established and by who? The only Parking Garage/structure with a quarter mile is meant strictly for the commercial businesses on California Avenue (I participated in the planning of this Garage since it is in my neighborhood). This Garage is not for ‘construction workers to park in all day’. What specific City parking lots are you planning to park in? Street parking is for residents only.
17. 2.4.2 – street closures around project site – Sheridan, Birch, Grant, Park and Sherman are all narrow, connector or feeder streets to multi-family residences in this neighborhood. All are narrow two-lane roads with some limited street parking. Grant Avenue, specifically, is a major connector street for several residential complexes, including Birch Court, Grant Avenue, and especially Palo Alto Central. Literally, hundreds of residents use these streets -- Grant, Sheridan, Sherman (when it is open – which it isn’t) to connect to Park Blvd., Oregon Expressway, and El Camino. Question – why isn’t the neighborhood involved in the decision-making process of any of these street closure decisions? Neighbors insist on being part of this decision-making process. Lane and street closures are not acceptable when it affects the ability of residents to get to and from their homes each and every day. Delays, which could be critical, getting out or coming back to their homes is simple not acceptable and both the County and City should be aware of these issues.
18. Table 2.4-2 -- Estimated Material Import/Export Volumes – the estimated (not exact) # of truck trips is literally shocking for our quiet Mayfield neighborhood – nearly **3,000 truck visits**, back and forth, throughout the project’s building cycle. What will be done to reduce this huge level of truck traffic on our small neighborhood streets (Birch, Grant, Sherman, Park)? This level is not acceptable to the neighborhood. What will be done to reduce the truck noise and diesel exhaust from these trucks on a daily basis? Children, who live very close by and throughout our neighborhood, will be exposed to these trucks on a daily basis – what is being done to protect them from this diesel exhaust and noise on a daily basis?
19. 2.4.2 – “a traffic control plan will be implemented in consultation with the City of Palo Alto” – why doesn’t the “traffic plan” have any input or outreach to the neighborhood – the folks most affected by any plan? The neighborhood, MUST have input in any traffic plan that impacts them. No outreach or input from the neighborhood has been requested by the County or the City.
20. 2.4.2 – “72 hour advance notice to abutting property owners” – who selected this time frame of 72 hours and why weren’t residents a part of this decision on notification time? 72-hour notice is simply not enough notification for road closures and changes. In addition, “abutting property owners” should not be the only ones notified of changes. It is not enough to notify the “abutting residents of the project” about road closures/modifications.
21. 3.1.2 – Cumulative Impact Assessment Methodology – Under “List of Cumulative Projects” this table is significantly incomplete and excludes several major projects that being currently planned by the City of Palo Alto in the surrounding neighborhood of the project site. The project list includes 123 Sherman, 300 Lambert, 380 Cambridge, 200 Portage, and 2955 El Camino Real. All these projects have been included in your cumulative analysis because together they will impact the quality of life, traffic, parking, and congestion of the Mayfield neighborhood, where the project resides. Why were these projects ignored in the cumulative impact assessment and if they were for some “technicality”, please explain why these projects should not be examined now as part of “cumulative impact” now?
22. 3.2 – Aesthetics, Impact AES-1, Scenic Vistas – Analysis that there is “no impact” is incorrect. Being a 55-60-foot tall structure, immediately across the street, will severely impact and block the scenic view/vista of many residents that live in the Palo Alto Central residential complex, who face the Stanford foothills, looking west from Park Blvd. The statement, “construction would not obstruct background views of scenic resources”, is simply a false statement. How will this statement be corrected? The impact and loss of these scenic vistas will be significant to the residents facing the project from the east.
23. 3.2 – Impact AES-3, Scenic Quality – In the “Impact Analysis” section, the statement, “the project site is surrounded by urban development and the 50 feet (this is an error, the building is 55-60) is similar to existing buildings” excludes the fact that all other residential buildings in the area are 40-feet or below. This project is not like other residential buildings in the area – it exceeds it in height and density. This project will standout and not fit in with existing residences. Why is it necessary to exceed the existing residential neighborhood standards – not explained anywhere in the EIR?
24. 3.3.3 – Project Impacts and Mitigation – Impact AIR-2: Net Increase in Criteria Pollutants – it clear from this section that there will be “potentially significant” impacts to the residents who live in this neighborhood, especially air quality during and after construction. Nearly 3,000 truck visits to the site will increase air pollution in the area, including the amount of dust particles in the air, affecting all the neighboring residences. What will be done to decrease the amount of truck trips to the site – 3,000 is just excessively high? Why weren’t residents consulted or made aware of the level of truck visits required before this project’s design was finalized? What can be done to reduce the amount of truck visits?
25. 3.3.3 – “MM-AIR-2: Fugitive Dust Reduction Measures” – why no clear involvement by the neighborhood in monitoring the level of dust in the area and ways to report it back to the parties responsible of reducing it for the neighborhood? These measures don’t go far enough in involving the neighborhood.
26. 3.3.3 – “Idling times shall be minimized either by shutting them down or limiting them to 5 mins” – 5 mins is way too long of time for “idling equipment” – dangerous exhaust for children and young people to breathe in. Why can’t this time be reduced to 2 minutes? Who will monitor the time for idling trucks and equipment? How will it be done and what will be the consequences for exceeding it?
27. 3.3.3 “Impact AIR-3: Exposure of Sensitive Receptors” – EIR exclusion of several senior living facilities in the Mayfield neighborhood, like the Sunrise Assisted Living Facility, which has residents who are particularly sensitive receptors to the project site. Why were they excluded? Any neighborhood facility, which has large senior population, (within a six-block radius) should be examined and reviewed for possible impacts.
28. 3.3.3 “Impact AIR-3”, ‘the greatest potential for toxic air contaminant emissions would be diesel particulate matter” – the need to reduce the level of truck visits (approx. 2,800) and the use of heavy equipment is critical to people’s safety. What will the County do to reduce these truck visits and the use of heavy equipment is minimized? Again, numerous trucks idling for 5 minutes every day for 15 or 18 months is NOT acceptable to the Mayfield neighborhood and their air quality.
29. 3.3.3 “Impact AIR-3”, Operation section – No discussion in the EIR on the parking stacker equipment air emissions standards or the air quality impact inside the garage while cars are “queuing up” to either leave or come into the garage area while waiting to park. How will the vehicle exhaust exposure inside the garage area be measured?
30. Cumulative Impact C-AIR-1, Air Quality Plan Conflicts or Net Increase in Criteria Pollutants, -- again the EIR fails to take into account several neighborhood projects that have been approved or going through the approval process. These projects – should all be examined together before any cumulative impacts can be dismissed.
31. Cumulative Impact C-AIR-2 – same as above. Needs to examine more than two proposed additional projects that are planned in our neighborhood. The EIR analysis flawed, incomplete and inaccurate today.
32. 3.4, Biological Resources – “nesting habitats for common bird species would be reduced because of the mature tree removals” – Instead of the proposed mitigation measure suggested in the DEIR, why can’t these mature trees remain and a construction “work-around” be done to save these valuable mature trees? Who will monitoring the conditions of MM-BIO-4 measure? No monitoring system is established in the EIR. Who is the “qualified biologist” and how will residents be able to contact him/her?
33. 3.4, Impact BIO-5: Local Policy or Ordinance Conflicts – no neighborhood group or residents were ever contacted about the removal of street or property mature trees in their neighborhood – why? Residents disagree with the tree(s) conditions both on the property (Tree #64 and #75) on the street. Removal of the street trees is certainly not justified nor warranted and should be protected – explain the need for the street tree(s) removal? We understand Mr. Passmore is no longer with the City of Palo Alto and his opinion carries no official City capacity at this point or time.
34. 3.4, Impact BIO-5: Local Policy or Ordinance Conflicts – the two mature, “heritage” trees on the project site (#64 and #67) were both an original part of the design plans for the project and should remain in place. There is no need to remove these trees, except for the benefits of the project’s construction – which could be modified to save these beautiful and majestic trees. Both the coastal redwood (#64) and the camphor (#67) are landmark trees in our neighborhood and we want them retained. Why weren’t the residents who love these trees consulted before any decision was made about their removal? No one from the project team or the County or City every contacted the neighborhood.
35. Cumulative Impact C-BIO-4: Fish or Wildlife Movement, Migration or Nursery Sites – again the issue is not including these other planned projects that are proposed for the Mayfield neighborhood. All these projects mentioned earlier – 300 Lambert, 123 Sherman, 380 Cambridge, etc. are not included in this EIR analysis since they affect the cumulative effects of our neighborhood.
36. 3.5, Historical Resources, under “Built Environmental Survey” – statement made that two other additional resources (the Courthouse building and the Courthouse Plaza office building) were identified as potential historical resources due “to their age”. Question – why wouldn’t 231 Grant, the project – because of its age as well – be considered as a potential historical resource as well? Not explained nor detailed in the EIR.
37. 3.5, Impact CUL-1: Historical Resources – potential vibration damage due to construction equipment is studied only for abutting properties, but neighborhood concerns also arise from numerous residential buildings and underground garages that are close to the project site -- less than 100 yards away. What will be the process if damage occurs to these near-by residences because of vibration from project construction equipment? Who will be responsible for responding to vibration damage issues and how quickly will they respond? What mitigation steps will be taken if damage is found?
38. Cumulative Impact C-CUL-1: Historical Resources – again the omission of several proposed and planned projects in the area makes for a flawed EIR. Why can’t the cumulative effects of these other projects – which are in the planning process – be studied now?
39. 3.6.3 Impact ENE-1: Wasteful, Inefficient or Unnecessary Consumption of Energy Resources – under “construction”, it clear that additional truck trips (nearly 3,000) will be need for the modular construction being planned – why can’t this number of truck trips be minimized for reduced. Idling time up to 5 minutes is not acceptable to residents – this type of diesel fume exposure on a regular, daily basis needs to be reduced. What specific steps will the County take to reduce this fume/particle exposure to neighborhood residents? Reduction of truck trips is critical for residents.
40. Cumulative Impact C-ENE-1 – again, no study of the additional proposed projects in the Mayfield neighborhood. Two proposed projects the EIR included (one on El Camino and the other, the Public Safety Building) do not show the full impact of these proposed projects that are now in the pipeline to be built. These projects include: 300 Lambert, 123 Sherman, 2955 El Camino, 200 Portage and 380 Cambridge. All are within a 10-minute walk from the project site.
41. 3.7.3 Impact GEO-1: Seismic Hazards – under “impact analysis”, it’s clear that the project site is in a very seismically active area/neighborhood. A major quake and resulting damage are nearly a certainty in the lifetime of 231 Grant. Why then no details in the EIR about how seismically safe and strong is the 231 “modular” construction to withstand a 7 or 8 magnitude earthquake? Nothing specific is in there about the construction details. In addition, why is there is no details in the EIR on the seismic abilities of the parking “stacking” system that will be enclosed under the living areas of the building? What specific steps are being taking to ensure the seismic capabilities of the parking stackers? What steps will be taken if the parking stackers collapse in an earthquake? What fire prevention steps will be taken in regard to the parking stackers in an earthquake? No facts or information on the parking stackers provided in the EIR. What are the environmental effects to entire neighborhood if a major fire erupts when a stacker collapses (after an earthquake) that is enclosed in the garage area of 231 Grant? No professional fire support will be available, after a major quake.
42. 3.7.3 Impact GEO-3: Unstable Soils or Geological Units – “under Impact Analysis”, it’s clear that the soil beneath the site is not very stable, so footings/foundations must be deeper than originally planned. There are concerns over the soil, so that a deepening of the foundation may be necessary, affecting abutting buildings. What specific steps will be taken to ensure the safety of all future building occupants? Concern is also raised about the need to go ‘deeper” into the ground – 27 feet bags – 10 feet below ZOI – which is where the contaminated groundwater is located from the hazardous waste toxic plume which is a Super Fund site. What steps will be taken if this groundwater is contacted by construction activities and how will residents be notified of this discovery? It’s vital to inform residents of any contact by construction crews with this groundwater and its impact on the neighborhood.
43. MM-GEO-3: Preparation of the Geotechnical Report and Implementation of a Monitoring Program” – vital that such a “geotechnical report” be made available to the public and distributed to the neighborhood residents. Explain that this will be done. In addition, any monitoring program should be fully disclosed and details provide to the residents in the neighborhood. Please provide details on the monitoring program.
44. Cumulative Impact C-GEO-1: Seismic Hazards – again, the cumulative effects of proposed projects in the neighborhood have not been studied in the EIR. Why? There are several projects being planned in our neighborhood that are not included in the EIR analysis. List of projects already mentioned. The dangers of parking stackers (being planned beyond 231 Grant – 123 Sherman plans “stackers” too) is not fully understood with regards to “seismic hazards” and this should be provided in the EIR. If a major quake occurs (which is likely) in the next 30 years, what will be parking stackers impact on the environment and the neighborhood? Not explained in the EIR.
45. Cumulative Impact C-GEO-3: Unstable Soils – under “cumulative impact analysis”, statement that “none of the identified cumulative projects (only two) are in the immediate vicinity” is true, but only because there is a clear EIR omission of several planned, proposed projects in the immediate area – 300 Lambert, 200 Portage, 123 Sherman, etc. These projects should be part of any “cumulative analysis”.
46. 3.8.3 Impact GHG-1: GHG Emissions – Why has the County not established “thresholds” for determining whether a project’s GHG emissions are significant? That’s inexcusable to residents who are concerned about global warming and its impacts on our environment.
47. 3.8.3 under “Impact Analysis”, construction – it’s clear that significant GHG emissions will occur from construction equipment during the project’s construction. Why are these emissions allowed to be “amortized” over the life of the project? Construction emissions should remain separate from “operational” emissions. What can be done to reduce this sizeable net increase in CO2 emissions from construction and future operations as indicated in this section?
48. Cumulative Impact C-GHG-1: GHG Emissions – again, there are several proposed projects omitted by this EIR design that should have been studies in this EIR – including 123 Sherman, 380 Cambridge, 200 Portage, etc. These projects are listed previously in these comments.
49. 3.9.3 Impact HAZ-3: Hazards from Cortese-List Sites – major concerns by neighborhood residents regarding construction and possible release of contaminated groundwater from the Super Fund toxic groundwater plume under the project site. As stated in EIR, this groundwater is located at 16.5 to 18 feet bags, which is the range of where the project’s foundation (between 17-27 feet bags) is to be built. This means that contaminated groundwater is likely to be encountered during construction. What is the process (in detail) that will be done when contaminated soil is found? How will residents in the neighborhood be informed and what steps will be taken to minimize any residential contact with the contaminated soil? The California-Olive-Emerson contaminant plume is a Federal Super Fund site and therefore is a major concern to all neighborhood residents. Residents must be informed whenever this contaminated soil is encountered.
50. MM-HAZ-3A: Perform Site Assessment and Implement Associated Recommendations – a statement reads – that “The Developer shall provide the results from a completed Site Assessment and Conceptual Site Model to a “selected regulatory agency” – BUT, this isn’t enough for residents. Why aren’t residents involved in getting the results from a completed Site Assessment and Conceptual Site Model? It’s vital that the neighborhood be involved and aware of what the Site Assessment says and have an opportunity to comment on it. Who is this “selected regulatory agency” and who do they represent --- the County? No, it needs to be the residents who live in the neighborhood.
51. MM-HAZ-3B: “Obtain permit for construction dewatering of contaminated groundwater” (as needed) – the neighborhood needs to be informed and be asked to comment on any construction permit – before it is issued -- regarding the removal of any toxic plume soil and/or its groundwater. Details on what is being dewatered, where on the site it is being done, the amount of dewatering that will be done, and for how long a period of time must be provided residents. The correct federal or state agencies and developer must contact and inform the neighborhood and its residents about any contact the construction crews encounter with contaminated soil or groundwater immediately.
52. MM-HAZ-3D: Prepare and Implement a Site-Specific Health/Safety Plan – this plan must be available for review and inspection by all residents in the neighborhood, not just the proper federal and state responsible agencies. It is not enough to have this plan reviewed by the proper agencies – the local neighborhood should also be aware of any safety plan involving hazardous materials.
53. MM-HAZ-3D, under “operation”, the statement reads “groundwater contamination from the Superfund plume has migrated beneath the project site” – clearly this presents a dangerous situation for not only the project’s residents, but all neighborhood residents as well. The statement continues, “volatile organic compounds present in the groundwater could migrate upward through soil pores and potentially impact air quality in the new building” – this is MAJOR warning about the dangers of this toxic groundwater plume.
54. MM-HAZ-3E: Install vapor barrier and perform periodic indoor air testing -- Installation of a building vapor barrier is critically important for not only the project residents, but the entire neighborhood. Details on the vapor barrier, how it will be installed, by whom, and when are all details critically for the neighbors to be aware about. Who is doing the monitoring of the air quality is important as well – how often will this be done, by who, will a report be issued?
55. Impact HAZ-5: Emergency Response or Evacuation Plan Impairment – under “construction”, residents are extremely sensitive and concerned about lane or street closures. Sherman, Grant, Park, and Sheridan are all connector streets to our residences and are major pathways to our jobs and other activities throughout our daily routines. Closing streets and not allowing for quick and easy access to these streets will not be acceptable to the neighborhood. It vital that emergency vehicles (Fire trucks, ambulances and police) have total access, at all times of the day or night on these streets. With the construction of the Public Safety Building (new headquarters for Police and Fire in Palo Alto), it’s of vital necessity that our roads -- Sherman, Sheridan, Grant, and especially Park, be open and available all day, everyday. Park, especially, is a major connector to Oregon Expressway and the 101 freeway and its closure is not acceptable at any time of the day and won’t be by residents. Any discussion of a “Traffic Control Plan” or TCP needs to have discussion with neighborhood residents – NOT just the City Staff, who don’t live here. Residents and the Mayfield neighborhood need to be involved on any traffic control process or decisions.
56. Impact HAZ-5 – under “operation”, no impacts are discussed in the EIR about the stacked parking operation or its impact on car fire situations – why? It’s obvious that there will be car fires and in an emergency situation (earthquake or just a car fire), what will happen to a car that is “stacked” in a parking stall. How will it be handled? What is the potential for the fire to spread to other cars and what preventative steps are being taken since fire personnel will be in an enclosed space (the garage)? Again, neighbors should be aware of how these potential problems will be handled.
57. 3.9.4 Cumulative Impacts/Mitigation -- under C-HAZ-3 -- the statement, “any measures necessary to protect construction and operation related to health and environment at other cumulative sites would be “confined” to those sites and would not be an additive in nature” is totally false and misleading. It’s been known for over 30 years, that this toxic plume does affect our residents and the future health of its people, children, especially. Again, not all the proposed projects in the area are being examined in this EIR in a cumulative way.
58. Cumulative Impact C-HAZ-5 – in this section you have a totally false statement -- “the only known past, present, or reasonably foreseeable project is the Public Safety Building”. Not true, not even close. As mentioned earlier, there are at least 5 or 6 other neighboring projects being planned for in this neighborhood that are not a part of the cumulative study of this EIR.
59. 3.10.3 Impact HYD-1: Water Quality Standard Violations, under “construction”, construction dewatering “may be necessary”. It’s vital that any dewatering process be fully disclosed to the neighborhood before the process is allowed to start. Full disclosure of the process, who is doing it, how long it will take, how many gallons are being extracted, and the dewatering process details need to be made public. What specific steps will the County take to ensure that any dewatering process is full disclosed to the neighborhood?
60. Impact HYD-2 Groundwater Supply and Recharge, under “construction” – that in the eastern portion of the project site, excavation would occur up to a max. depth of 17-27 feet bags, which is below the current known position of the toxic Super Fund plume. Any excavation or penetration of the contaminated soil or the toxic plume needs to disclosed publicly and communicated quickly to local residents and the entire neighborhood. Dewatering is not considered “minor” in Palo Alto and it certainly is not considered. “short term” as the EIR states. Dewatering is a major concern in any construction project and we take its impacts very seriously. We consider any dewatering to be significant and the neighbors need to be made aware of this potential activity and the process.
61. Impact HYD-5, under “Impact Analysis”, any dewatering of the project needs public awareness and what the process will be. During construction, any contact with contaminated soil or groundwater should be automatically disclosed to the neighborhood and all residents. Having just a “Plan”, as outlined in MM-HAZ-3B is not enough – disclosure to residents must happen.
62. 3.10.4, Cumulative Impact C-HYD-1, again, there were a range of proposed projects that were never studied or analyzed in this EIR. There are 5 or 6 projects in the immediate area – 300 Lambert, 200 Portage, 123 Sherman, etc. which were never studied nor included in this EIR.
63. 3.11.3, Impact LUP-1: Physically Divide A Community, under “construction”, residents believe that the impacts would be “unavoidable” and “more than significant” if changes in the road closures are not made. EIR claims that the road closures would be “temporary disruption” is totally false and not acceptable to residents. For example, Grant is one of the main connector roads to Park Blvd., which is a main pathway to Oregon Expressway (freeways, 101 and 280). Hundreds of residents in our neighborhood use this road to connect to jobs in Silicon Valley and beyond. These are not “short-term” inconveniences that is portrayed in the EIR – did anyone from AECOM (the EIR authors) contact the neighbors about their thoughts on road closures – never once! These are not “temporary disruptions” AT ALL! It’s a falsehood. A “traffic control plan or TCP” is ridiculous without serious discussion, communication involving the neighborhood. It’s a falsehood of lies to say that there is “no impact”. County and AECOM officials should be ashamed of themselves.
64. Impact LUP-1, under “operation”, the EIR has a false and misleading statement – “proposed land uses are compatible with the existing development in the surrounding area”. It’s false and misleading statement because all other residential complexes in the Mayfield area are zoned RM-40 (40 units per acre). There are no RM-80’s (the density of 231 Grant is approx., 80 units per acre) in the Mayfield area. This should be clarified and corrected in the final EIR.
65. 3.11.4, Cumulative Impacts/Mitigation – this project will have “significant and unavoidable” impacts to the community, especially during the construction timeframe. Why didn’t the EIR include any analysis of the road closure impacts of the Public Safety Building (Sherman is closed now) or is the on-going, possible permanent closure of California Avenue (due to COVID concerns) a part of the cumulative impacts that the EIR should have studied. These road and street closures are going on now and impacting residents daily.
66. 3.12, Noise and Vibration, under “Ambient Noise-Level Surveys”, statement reads, “ambient noise levels in the vicinity of the project site were measured between February 3rd and February 4th, 2021 (this year)”. These ambient noise levels were taken during the worst COVID months of the past year (there was a major lock-downs of many businesses going on at the same time). Obviously, these measures – however accurate they may be – do not reflect the true noise level measure of the surrounding area. At this time, travel was discouraged –except for essential workers. These measures are inaccurate by normal standards and need to be changed or adjusted, using more correct measurements in the area.
67. 3.12, under “Existing Vibration”, Were there any accurate measurements taken of the vibrations taken around the project site now? Not clear if the data presented was from 2018, which would not be accurate to today’s measurement of vibration surrounding the project site. Were any measurements taken during our most severe COVID-impacted months? If so, when exactly? No clarification in the EIR about how these measurements were taken -- in COVID months?
68. 3.12, Impact NOI-1: Ambient Noise Levels, clearly a major problem (found to be “significant” and “unavoidable” in EIR). NOT ACCEPTABLE. Construction traffic and the volume of truck visits is simply not acceptable by the residents. Contrary to the EIR, it’s clear that the addition of at least 65 construction related vehicle trips PER HOUR would generate several major traffic noise congestion issues and an endless bottleneck of honking horns for residents, given the already road closures of Sherman (for the Public Safety Building) and California Avenue (due to COVID-related decisions). The falsehood that somehow because traffic volume is not “doubled”, so it wouldn’t cause any perceptible increase in traffic noise” is a simply totally false and a misunderstanding EIR statement of the neighborhood noise levels today (remember these noise levels were not measured correctly anyways).
69. Impact NOI-1, under “construction equipment” – the noise impacts on residents, especially construction hour changes (some starting as early as 5 a.m.) are unacceptable and will not be tolerated. At no time, has County or City officials come to the neighborhood to discuss these possible extreme construction hours or the impacts on their daily quality of life in the neighborhood. Construction work must be conducted during the normal construction hours (8 a.m. to 6 p.m.) each weekday. Why isn’t the neighborhood involved or outreach done on any extreme construction hours? This is a “residential neighborhood” and the project designers, engineers, construction crews, need to understand that fact each and every day they come to work. The City/County must contact the neighborhood and residents about any extreme construction hours, outside the normal ones.
70. MM-NOI-1: Construction Noise Reduction Measures – as indicated in the EIR, these impacts would be significant and unavoidable, but not just to abutting residences, but to the entire neighborhood. Question – who wrote the section on “construction hours”? – certainly not the EIR authors, since they don’t know that adherence to the City construction hours is paramount for residents. Any advance notice for extreme construction hours should go to residences first beyond 50 feet (which is a ridiculous #). The distance should be at least 150 feet or within a two/three block distance from the project site. Many residents, outside 50 feet, will be affected by the extreme construction hours. How was this number (50 feet) established, and by who? What is this number based on? Explain in detail how the 50 feet was decided upon.
71. MM-NOI-1, statement – “staging areas and stationary noise-generating equipment, such as compressors, shall be located – as far away – from noise-sensitive uses as feasible” – what does this mean? What do you mean, specifically, about “as far away”? Not clear.
72. MM-NOI-1, statement, “Idling times of equipment, up to 5 minutes” – who is monitoring this? How will this be accurately measured? Who is responsible? Phone #’s, etc.?
73. MM-NOI-1, statement, “smart back-up alarms will automatically adjust to ambient noise levels” -- all back-up alarms on construction equipment should be silent and replaced with human spotters, period – no back-up alarms activated on project site. Back-up alarms are too loud and disturb residents.
74. MM-NOI-1, D. “Temporary sound barriers” – Sound barriers should be used and maintained around the entire project site. Street frontage barriers MUST be higher than 8 feet (not only up to 8 feet) – recommend the height of these barriers be discussed and adjusted with residential/neighborhood input and outreach. No neighborhood outreach on these barriers have been made.
75. MM-NOI-1, “even with implementation of MM-NOI-1A through NOI-1D, the construction noise will be significant and unavoidable” – **this is a major and very concerning statement by the EIR**. Most neighborhood residents are not even aware of this statement – no neighborhood outreach has been done – why? Community meetings are NOT neighborhood meetings – inviting the entire “community” (from Palo Alto and beyond) is not inviting the neighborhood. Why can’t County officials (not the PR firm of the Developer’s) meet with the neighborhood (defined by a six-block radius from the project site) and explain these concerns and what their impacts are? No County officials have met with the neighborhood exclusively.
76. MM-NOI-1, under “Project-Generated Traffic” – the problem with the EIR’s entire Traffic Impact Assessment is that assumes that daily traffic patterns remain consistent and regular each day. The increase suggested – 145 average daily trips – is totally underestimated because many residents who live in the project building will take several car/vehicle trips each and every day – trips to the grocery store, trips to the kids to school and bring them back, trips to soccer practices, etc. etc. These trips are irregular and do not represent a true reflection of the vehicle trips this project will present to the neighborhood. To say that only because the “project doesn’t double the existing traffic volume – volumes which was measured during COVID and/or more than 5 years ago (during the Public Safety Building traffic study) – so there will be no imperceptible increase in traffic-related noise” is simply a false and misleading statement by the EIR/County authors.
77. MM-NOI-1, under “Delivery and Trash/Recycling Trucks” – several points, why would delivery or trash trucks ever be allowed to “idle” at all? What warnings do you give? At many residences in the neighborhood, trucks are asked to “turn off” their engines when delivering food or other services. Statement – “driveway design positions the delivery vehicles under the upper floors of the building creates a physical noise barrier for residents” – however, what are the sound barriers for the residents surrounding the building? What are the plans to deal with idling delivery trucks that surround the building? The neighborhood should be considered first and the noise impacts from these vehicles. No delivery vehicles should limit access to Grant, Birch, or Park at any time.
78. MM-NOI-1, under “Outdoor Courtyards” – concern over loud music and/or voices coming into the neighborhood from the courtyards. No parties, with amplified music, should be allowed in these courtyards at anytime, day or night. What rules will residents have to follow in regards to these courtyards? These rules should be disclosed to the neighborhood residents.
79. MM-NOI-1, under “Summary of Operational Noise Impacts” – once again, any information on the daily noise levels of the parking stacking system is omitted by the EIR. Why? What are the noise impacts on a daily basis? No mention of this system or its operational capabilities are even mentioned by the EIR authors.
80. Impact NOI-2: Groundborne Vibration – again, EIR states, this impact is “significant and unavoidable” to the neighborhood. Has this fact been communicated or any outreach done to the neighborhood – nothing by either the County or its Developer has been done. Most neighborhood residents (those in a 6-block radius) are not even aware of this “significant or unavoidable” impact and why hasn’t this outreach been done? Doing nothing to inform the neighborhood is NOT ACCEPTABLE.
81. NOI-2, under “Construction” – “structural damage occurs only when certain types of construction activity – earth moving, heavy truck traffic – occur very close to existing structures”. There are many residential structures next to or within 100 yards of the project site which could experience structural damage due to vibration activities at the project site – what kind of process will be put in place to not only minimize vibrations, but to ensure that abutting or near-by residential structures are not damaged? Who is responsible for the vibration issue during construction? If damage does occur to either residential buildings or our underground garages, how will that process be handled? By whom and when will the damage be fixed?
82. MM-NOI-2: Vibration. Reduction Measures, A. In this section, the only neighborhood residents considered are those in either 200 Sheridan or the Courthouse Plaza office building. Construction vibration and its affects are well known to travel beyond simply 50 feet from any construction project. All of the surrounding residential properties, around the project site – on Birch, Park, and Sheridan – should be included in these vibration reduction measures. B. No vibration equipment usage outside City construction hours – who is monitoring and how will it be enforced – by who?
83. MM-NOI-2, “real-time vibration monitoring” – how often and by who (names, phone #’s)? by a “qualified acoustic consultant” (again, who is this and how is he/she to be contacted?).
84. Impact NOI-2, under “operation” – once again, total lack of omission on any information on the parking stacker system or its vibrations on the neighborhood. What are these details? No provided in the EIR or to the neighborhood.
85. 3.12.4 Cumulative Impacts and Mitigation – once again, the omission of many of the proposed projects in the area – 300 Lambert, 200 Portage, 123 Sherman, 380 Cambridge is surprising in this EIR given the cumulative impacts all these projects will have to our Mayfield neighborhood. Some of these projects will be going on at the same time and will impact traffic noise and vibrations in the area.
86. Cumulative Impact C-NOI-1, EIR states this impact is “significant and unavoidable”. Has this impact been communicated or outreach done to the neighborhood (six-block radius) area? So far, no one from the County or Developer has contacted this neighborhood or has done any outreach about any “significant or unavoidable” impacts in this area. Why?
87. Cumulative Impact C-NOI-1, under “Operation” – given the Public Safety Building position as the main police headquarters and primary vehicle station, plus being the fire department’s headquarters as well, the amount of traffic noise and vibration will like increase to double or triple the current traffic noise levels. We believe the current Table 3.12-14 to be inaccurate based on police traffic (study of traffic in and around Palo Alto’s City Hall, where the current police headquarters is) and additional demands if California Avenue re-opens fully for commercial use. Cumulative traffic will increase significantly once the Public Safety Building is in place and 231 Grant will only increase it further. A new cumulative traffic and noise study should be conducted using the current police traffic information from the area around City Hall in downtown Palo Alto.
88. Cumulative Impact C-NOI-2: Vibration – EIR states, “significant and unavoidable”. Has any outreach or communicate been done to the neighborhood about this impact? None has been to our knowledge. Other cumulative projects should be considered and their impacts – 300 Lambert, 200 Portage, etc.
89. 3.13 Impact POP-1: Growth Inducement – contrary to the EIR conclusion of at the end of this section, this project is “oversized” for the neighborhood (it exceeds the normal City height limitations, and its density is double what is currently allowed in the area). In addition, the impact on traffic, congestion, and the connector roads will be significant and not minor, as the EIR claims. Obviously, this project is “growth inducing” to this residential neighborhood.
90. 3.14 Public Services and Recreation – under “Parks” – misstatement of facts in EIR – the Stanford/Palo Alto Community Playing Fields is NOT a Park or usable for the “walk-up” resident to use. This facility is by “reservation only” and is only for use for soccer and field hockey type games/practices. It is NOT a Park! No one “picnics” there – a total misrepresentation of what is there and how it is used. The Sara Wallis Park is also misrepresented at a “park”. No kids play there – is not a park for kid to play in. Too small and no playground equipment there. Bowden Park has a small playground but requires kids/parents to go underground (thru a tunnel by the Cal Avenue Train Station) to get there –not acceptable to most parents. NO useable park space for kids, within a half mile from the project site – this is not pointed out in the EIR.
91. 3.14 Public Service and Recreation – under “Parks” – EIR statement, “With these four recreation areas, the nearest being less than a quarter mile away, the project site is considered relatively well served with park and recreational facilities.” Who wrote this outright misstatement and lie? Where is it in the City’s Parks Master Plan? This is totally inaccurate and a misrepresentation of the Mayfield neighborhood and its lack of real parks in the immediate area. Another fact – where is the community indoor recreation center, within a half mile of the project site, that is quoted in the EIR? What are you talking about (be specific)?
92. Impact PSR-1: Demand for Public Services – under Operation, Fire Protection – no mention of the additional fire resources needed or the fire suppression plan for the project’s car stacker system or how fire control would work in the event of a major earthquake or collapse of the building structure (due to poor construction)? Details need to be known to the neighborhood so to prevent fires from getting out of control in the building and spreading to neighboring residential complexes/buildings. The car stacker system is a total mystery and the details of how fire suppression will work in this type of situation must be known by the entire neighborhood (especially if professional fire fighters are not available to assist, such as in a major earthquake situation). City Fire officials should meet with neighbors about the fire suppression plans for the building.
93. Impact PSR-2: Existing Recreational Facilities, under “Operation” – although the EIR does acknowledge an “increase” in the use of existing par and recreational facilities, it does recognize the fact that the City of Palo Alto, including the Mayfield neighborhood, has a huge deficit in existing park space for its residents. Palo Alto should have at least 4 acres of available park space for every 1,000 residents – a standard and practice well known in park space management. The City does not meet this standard today. If you truly exclude the park space that is outside the six-block radius of our neighborhood (which is likely the furthest distance any parents and kids would walk to a park) and the Stanford Playing Fields (which are not a Park), you come up with only 2.3 acres of park space for more than 1,500 residents who live in the Mayfield neighborhood. Anyway you cut it, it means there is a deficit of park space in Mayfield. Why are these data excluded from the EIR?
94. Impact PSR-2, under “Operation” – EIR statement says, that “the project would provide approx. 10,000 square feet of private open space to residents”. However, using these data and the ratio that all cities should have at least 4 acres of park space for every 1,000 residents, means that the project site should have 1.2 acres of park space for its approx. 300 residents. This means that that the 10,000 square feet of open space is totally inadequate and an under estimate of the amount of park/open space that that building should have.
95. Impact PSR-2, under “Operation” – EIR statement that states, “residents will be dispersed among existing parks and recreational facilities, thereby minimizing substantial impacts on a single existing recreational area” is based on what actual facts? This is an obviously an opinion – with no basis in any facts about Palo Alto. On what basis you do you have any evidence of this “dispersion”? In fact, the truth is most residents – including those in the Mayfield neighborhood -- gravitate toward the “nearest park” and do not travel to distance parks. Most residents will use the nearest parks that are close to their homes – period.
96. Impact PSR-3: New Recreational Facilities, under “Operation” – again, the same false statement about “dispersion”, based on no facts about Palo Alto or how we use our parks here. Undoubtedly, as I have spoken to several in our own City’s Parks Department, an increase in demand for parks and park space is already clearly a need for our City. The City already has a major deficit in park space, which the EIR never pointed out. Contrary to what is stated in the EIR, more residents will require more dedicated park space. This impact is significant and unavoidable, unlike what the EIR states. Why is the park space deficit in Palo Alto omitted and not stated correctly in the EIR?
97. Cumulative Impact C-PSR-1: Public Services – again, the cumulative effects of a variety of proposed Mayfield neighborhood projects were omitted from the EIR. No acknowledgement was given to projects that are on the planning table – 300 Lambert, 200 Portage, 380 Cambridge, 123 Sherman. All these projects should have been reviewed and studied for this EIR for their cumulative impacts on the neighborhood.
98. Cumulative Impact C-PSR-2: Existing or New Recreational Facilities – same as #97 above, cumulative effects of the proposed projects on existing or the need for new park space or recreational facilities should have been studied. Why were these projects omitted from this EIR review? EIR states the following – “that cumulative impacts to parks and recreational facilities would be less than significant through compliance with the City’s Municipal Code, which requires the provision of recreational space or payment of applicable park impact fees” – is the County or its 231 Grant Developer going to create this additional park space or pay the impact fees for this project? What will the in-lieu fee be and when will it be paid by the County?
99. 3.15 Transportation, under “Existing Road Network” – errors in this section for the street closures of both California Avenue (due to COVID decisions) and Sherman Avenue (lasting for another year through the Public Safety Building construction project). Why were these closures, which could be permanent, excluded from this EIR analysis?
100. 3.15.3, Impact TRA-1: Transportation Plan or Program Conflicts, under “Construction” – it states that “a construction traffic management plan would be established and implemented in accordance with City requirements”. However, nowhere does it stress the importance of direct communication and involvement with the neighborhood about such a plan. It’s vital that such plan have residential input and decisions made based on this neighborhood input. Closure of roads or lane changes cannot be made without neighborhood approval and to give residents a say in what happens on the project site, when, and where.
101. 3.15.3, Impact of TRA-1, under “Transit” – can someone explain why they anticipate only 11 new transit riders from a potential 275 residents in the project building? How will this be measured and by whom? This means that almost all of the building residents will drive and have multiple vehicle trips between home and work.
102. 3.15.3, Impact TRA-2: Vehicle Miles Traveled – the EIR states, “Because the project site is within a low-VMT area, and because the Project would have a “similar density”, mix of uses, and transit accessibility, the Project meets the City’s Screening Criteria 2 and therefore, a significant VMT impact would not be anticipated”. The key part of this message is “similar density” which is inaccurate since the planned project has a density that is double the existing densities in the entire residential area (the project density is nearly 80 units per acre, when all the other residential areas are zoned RM-40). The density is not the same so it doesn’t meet the same standard.
103. Impact TRA-3: Traffic Safety Hazards, under “Construction” – EIR states “the contractor would prepare and implement a traffic control plan a part of the Project, in consultation with the City of Palo Alto”, however, there is no mention of involvement of the residents in the neighborhood in such a plan. Communication and involvement and have a voice in this plan is critical. Residents need to have a voice in what happens in their neighborhood and any plan needs to be approved by the neighborhood. Why wouldn’t the neighborhood have a say in this traffic control plan?
104. MM-TRA-3B, Maximize Site Distance – the neighborhood and its residents need to be involved and participate in any discussion eliminating on-street parking in their neighborhood. Parking is a premium in the Mayfield neighborhood and eliminating parking spaces need to have neighborhood involvement and discussion. Safety is important, but so too is the issue around eliminating parking spaces.
105. Impact TRA-4: Emergency Access – again, the major concern by residents is quick and easy access to our connector roads (Park, Grant, Birch, Sheridan, Sherman, and even California Avenue) which lead to work, hospitals, medical appointments, and other important daily activities that affect our lives. At no time, can quick assess be denied by construction work. Traffic delays could mean lives in danger and this needs to be recognized by all parties. Road closures, even for short period of time, could impact resident’s lives. A traffic control plan must have neighborhood involvement and a say in what happens on our neighborhood streets.
106. 3.15.4, Cumulative Impact C-TRA-1: Transportation Plan or Program Conflicts – again, there are a number of proposed projects – 300 Lambert, 200 Portage, etc. that were not studied or examined for their cumulative impacts in this EIR. Need to be.
107. 3.15.4, Cumulative Impact C-TRA-3: Traffic Safety Hazards and Emergency Access – EIR states, “Along with the Project, construction-related traffic and road closures associated the PSB project could cause additional detours, lane closures . . . overall cumulative impact could be **potentially significant**. This NOT ACCEPTABLE to residents!
108. MM-C-TRA-3: Coordination of Construction Traffic Plans – this mitigation is critical and essential to all residents who live in the Mayfield neighborhood. However, beyond just emergency access to all neighborhood properties, residents need to be involved In the planning of any traffic control plan that is implemented between the PSB project and 231 Grant. It is not enough to simply “notify” residents what is happening – they need to be involved in the entire planning process.
109. 3.17.3, Impact UTI-1: New or Expanded Utility Services – under “Construction and Operation” – EIR states, “Construction of new connections to existing utilities would result in the potentially significant environmental impacts identified in relevant sections of this document”. This section concerns residents because digging into the project site soil and ground means possible exposure and release of contaminated toxic groundwater – previously discussed in these comments. All measures need to be taken to ensure groundwater exposure doesn’t happen and if it does, it is reported not only to the relavant state and local agencies, but the neighborhood residents as well. Communication and quick outreach to the neighborhood is essential for this project.
110. 3.17.4, Cumulative Impact C-UTI-2: Water Supply Availability – as residents and believers in a sustainable future for our children, we believe this issue “water supply availability” is nothing less than “significant” and “unavoidable” for California and for the Bay Area. Water is becoming a major issue in California and having enough for the residents who already live here is a concern. The cumulative effect of more buildings, especially office development, should be studied in this EIR and how these project impact our water supply for future generations.