

**From:** [REDACTED]  
**To:** [Architectural Review Board](#)  
**Subject:** FW: San Antonio Road -- Managing Existing and Future Traffic Impacts  
**Date:** Monday, March 18, 2024 1:50:34 PM

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Fyi...

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**From:** [REDACTED] >  
**Sent:** Monday, March 18, 2024 11:22 AM  
**To:** 'Council, City' <city.council@cityofpaloalto.org>  
**Cc:** Planning.commission@cityofpaloalto.org; pabacpaloalto@googlegroups.com  
**Subject:** San Antonio Road -- Managing Existing and Future Traffic Impacts

Honorable City Council Members,

**Re: San Antonio Road -- Managing Existing and Future Traffic Impacts**

Here is Mountain View's North Bayshore Precise Plan (P39—Nov. 25, **2014**) and its gateway plan (referencing San Antonio Road in Palo Alto as a gateway). This document is worth briefly perusing if you have not already seen it before tonight.

<https://www.mountainview.gov/home/showpublisheddocument/4406/638214110650830000>

Please note the gateway connectivity is mapped on p. 151 and gateway concepts for MV gateways follow that. Portions of this plan are helpful to Palo Altans who are trying to understand what's happening with regional bike/transit connectivity. Here are all of the materials related to this process for those who are interested. <https://www.mountainview.gov/our-city/departments/community-development/planning/regulations/precise-plans/north-bayshore-precise-plan>

From some reading this weekend, I learned that when City Council approved plans for the 788 San Antonio TOD housing project on November 16, 2020, they also approved a Comp Plan change, and certified a Final EIR that also applies to future TOD housing projects on the block of San Antonio between Charleston and Middlefield which are now moving into and through the planning/approval pipeline. While I support creating new housing at this location, I am very concerned about what appears to be a failure to incorporate requirements for ROW for future San Antonio Road bicycle facilities and bus transit in these TOD projects. The traffic study for 788 San Antonio allowed continued use of sharrows on San Antonio—a contraindicated bicycle facility for a multi-lane road with these auto volumes and speeds. Also, it is important to consider that San Antonio is, and will continue to be, a truck route. **Question I have asked staff:** Will all of the projects on that corridor also get only sharrows? Did any of this ever come to PABAC for review? When?

**According to Action Minutes, at the time of the 788 San Antonio Project approval in 2020, Council voted to direct staff to “return with the parameters for a San Antonio Corridor transportation study.”** I searched for a transportation study and could not find one. If TOD projects

continue to be approved on San Antonio with sharrows and street parking, the city will have to fight future building occupants for street parking removal to get ROW to create room for appropriate bike/ped/transit facilities in a TOD area. (If we have learned nothing else from the recent El Camino Real debacle, I hope we have learned that bike/ped transit facilities need to be built at the SAME time new development and parking decisions are underway.) A very high density San Antonio Area streetscape that preserves no ROW for future bike facilities or bus transit stops along and across San Antonio Road (as well as connectors like Middlefield which also lacks bike lanes on the San Antonio approach) is not sensible planning. It cannot deliver trip reduction that one would expect and the city needs from TOD.

When I asked staff why no bike facilities (or ROW for bike facilities and bus transit) were incorporated in these TOD Area projects, I was told that “it was impossible to plan bike facilities piecemeal.” However, it appears, **from the 11/16/ 2020 Council Meeting Action Minutes that planning staff was directed not to plan piecemeal for the Charleston to Middlefield portion of San Antonio. They were directed to “return with the parameters for a San Antonio Corridor transportation study.” Did staff follow up on this direction? When? Where can interested citizens find it?**

Our city should be thinking about this corridor in context of Mountain View’s aforementioned Precise Plans as well.

**Council also is talking about staff’s Work Plan tonight. If the Transportation Study that Council directed staff to do in 2020 was never done, what action might be taken now to preserve San Antonio Road ROW and plan bike and bus transit facilities before it is too late?**

It saddens me to see that Mountain View has been much more forward-thinking than my own city on this matter.

I realize there may be pieces I am missing here. Please do fill me in if that is so.

Thank you in advance for giving my comments your usual thoughtful attention.

Penny Ellson

(speaking as an individual, though I cc my PABAC colleagues and PTC here informationally)



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**From:** [Dashiell Leeds](#)  
**To:** [Architectural Review Board](#)  
**Cc:** [Raybould, Claire](#); [advocate@scvas.org](mailto:advocate@scvas.org); [James Eggers](#); [Mike Ferreira](#)  
**Subject:** SCLP SCVAS Joint Letter to Palo Alto ARB March 3, 2024  
**Date:** Wednesday, April 3, 2024 3:55:33 PM  
**Attachments:** [March 3 SCLP SCVAS ltr to PA ARB.pdf](#)

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Dear Chair Baltay and commissioners,

The Santa Clara Valley Audubon Society and the Sierra Club Loma Prieta Chapter are organizations united by our shared commitment to the protection of the environment, nature, and open space, and we represent thousands of members in the City of Palo Alto. We have been advocating for a reduction of light pollution in the region, and have engaged with the City of Palo Alto in promoting human and environmental health through reducing, and preventing the proliferation of artificial light at night. Recognizing that the proposed project, a local advanced water purification system, provides important infrastructure, we remain concerned with the lighting plan for the proposed water treatment plant at 2501 Embarcadero in the Baylands area of Palo Alto.

Please read the attached letter for our full comments.

Thank you,  
Matthew Dodder  
Executive Director  
Santa Clara Valley Audubon Society

James Eggers  
Chapter Director  
Sierra Club Loma Prieta Chapter

email sent from account of  
Dashiell Leeds  
Conservation Coordinator  
Sierra Club Loma Prieta Chapter



**SIERRA CLUB**  
LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES



April 3 2024

To: Palo Alto Architectural Review Board

By email to: [arb@CityofPaloAlto.org](mailto:arb@CityofPaloAlto.org)

CC: [claire.raybould@cityofpaloalto.org](mailto:claire.raybould@cityofpaloalto.org)

Re: Lighting at 2501 Embarcadero Way - Local Advanced Water Purification System

Dear Chair Baltay and commissioners,

The Santa Clara Valley Audubon Society and the Sierra Club Loma Prieta Chapter are organizations united by our shared commitment to the protection of the environment, nature, and open space, and we represent thousands of members in the City of Palo Alto. We have been advocating for a reduction of light pollution in the region, and have engaged with the City of Palo Alto in promoting human and environmental health through reducing, and preventing the proliferation of artificial light at night. Recognizing that the proposed project, a local advanced water purification system, provides important infrastructure, we remain concerned with the lighting plan for the proposed water treatment plant at 2501 Embarcadero in the Baylands area of Palo Alto<sup>1</sup>.

The State of the World's Migratory Species report, a first-of-its-kind assessment by the Convention on the Conservation of Migratory Species (CMS, an environmental treaty of the United Nations) – paints a stark picture. One in five migratory species listed by the CMS is at risk of extinction and almost half (44%) are decreasing in numbers<sup>2</sup>. Birds are especially vulnerable since most species migrate at night<sup>3</sup>.

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<sup>1</sup> <https://www.cityofpaloalto.org/files/assets/public/v/1/agendas-minutes-reports/agendas-minutes/architectural-review-board/2024/arb-4.04-2501-embarcadero.pdf>

<sup>2</sup> - 1 in 5 migratory species are at risk of extinction, says a new UN report. World Economic Forum Feb 21, 2024  
<https://www.weforum.org/agenda/2024/02/migratory-species-decline-extinction-un-report/>  
See also, <https://www.cms.int/en/publication/state-worlds-migratory-species-report>

<sup>3</sup> Burt et. Al. 2022. The effects of light pollution on migratory animal behavior. 2022. Trends in Ecology & Evolution, Special Issue: Animal behaviour in a changing world.  
[https://lightsoutheastland.org/images/articles/Burt\\_TREE\\_2023EcolandEvolrevlighteffectsonmigration2023.pdf](https://lightsoutheastland.org/images/articles/Burt_TREE_2023EcolandEvolrevlighteffectsonmigration2023.pdf)

Lights with lower color temperatures (typically below 3000K) are better for wildlife because they have less impact on the natural behaviors and activities of nocturnal animals<sup>4</sup>. Nocturnal animals such as birds, bats, and insects rely on natural light cues to navigate and carry out essential functions such as feeding, breeding, and migration. Artificial light sources with higher color temperatures (typically above 3000K) can interfere with these natural cues, disrupting the animals' circadian rhythms and affecting their behavior. For example, high-color-temperature lights can attract insects, which in turn attract birds, bats and other animals that feed on them, leading to changes in insect populations and affecting the ecosystem. Additionally, high-color-temperature lights can cause birds to become disoriented during migration<sup>5</sup>, leading to collisions with buildings and other structures. Lights with lower color temperatures are less disruptive to wildlife because they produce light that is closer in color to natural moonlight and starlight. This can help minimize the impact of artificial light on nocturnal animals and allow them to carry out their natural behaviors without interference<sup>6</sup>.

The Staff Report for the ARB meeting of April 4th refers to the DarkSky International "Five Principles for Responsible Outdoor Lighting"<sup>7</sup> (PDF p. 31). However, we believe that the Staff Report is inconsistent with Principle Five (Correlated Color Temperature, CCT). The Staff Report provides, "Warm-colored – Industry standard recommendation is around 5000K to promote safety and alertness." However, 5000K is not "warm-colored" and contradicts the DarkSky International guidance on that point. Safety considerations are important, but when CCTs values higher than 3000 are used, DarkSky International would recommend additional actions to reduce the impact of this lighting.

The point about higher CCT values for worker alertness (same page) doesn't take into account the body of scientific research indicating that exposing workers to blue-rich white light at night is associated with health problems<sup>8</sup>.

In our conversation with experts, it was recommended that Palo Alto use 3000K. Should the City use 4000K white LED lighting, the intensity of the light should be reduced by 50% to achieve the same visual response

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- Effects of LED Lighting on Terrestrial Wildlife. 2023. State of California Department of Transportation Technical Report. Prepared by Travis Longcore, Ph.D., UCLA.

<https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/final-reports/ca23-3696-finalreport.pdf>

- US Department of Fish and Wildlife. Threats to Birds: Collisions - Nighttime Lighting Protecting our Night Skies for Birds. <https://www.fws.gov/story/threats-birds-collisions-nighttime-lighting>

<sup>5</sup>L.S.A. Huson 2021. Spatiotemporal effects of artificial lighting on migratory birds  
[https://fse.studenttheses.ub.rug.nl/24449/1/bBIO\\_2021\\_HusonLSA.pdf](https://fse.studenttheses.ub.rug.nl/24449/1/bBIO_2021_HusonLSA.pdf)

<sup>6</sup> Effects of LED Lighting on Terrestrial Wildlife

<https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/final-reports/ca23-3696-finalreport.pdf> and

<sup>7</sup> <https://darksky.org/resources/guides-and-how-tos/lighting-principles/>

<sup>8</sup> For example: More exposure to artificial, bright, outdoor night-time light linked to higher stroke risk. 2024  
<https://www.sciencedaily.com/releases/2024/03/240325172425.htm>, American Heart Association. More exposure to artificial, bright, outdoor night-time light is linked to higher stroke risk."

from observers using the spaces at night. That is because the eye is more sensitive to blue light at lower intensities, so an observer would otherwise perceive scenes to be brighter compared to, e.g., 2700K lighting even if the quantity of light were the same<sup>9</sup>. Furthermore, higher-CCT lighting yields more 'discomfort glare' than lower-CCT lighting<sup>10</sup>. That can be fatiguing to people exposed to it for long periods of time.

We believe that the City should use a CCT of no more than 3000 Kelvin, and limit the duration and intensity of artificial light at night. Lights should be off when no one is around (a switch, or motion sensors can do this effectively). The intensity of the lighting should be set appropriately (DarkSky Principle #3), taking into account that perception varies according to light color.

Thank you,

Matthew Dodder  
Executive Director  
Santa Clara Valley Audubon Society

James Eggers  
Chapter Director  
Sierra Club Loma Prieta Chapter

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<sup>9</sup> Schlesselman B, et al. 2015. Melanopically enhanced metamer white lightings make a simulated sports field appear brighter allowing a trade-off between photopic intensity and melanopic content. In *Proceedings of the Illuminating Engineering Society Annual Conference*.

<sup>10</sup> Huang W, Yang Y, Luo MR. Discomfort glare caused by white LEDs having different spectral power distributions. *Lighting Research & Technology*. 2018;50(6):921-936. doi:10.1177/1477153517704996; Zhu, X., et al. (2013). Perception study of discomfort glare from LED road lighting. *Light and Engineering*, 21(2), 61-68.)