3.1 Land Use and Planning

This section describes the existing and proposed land uses within and around the Facebook Campus Expansion Project (Project) site and evaluates the potential for land use incompatibilities to occur as a result of development of the Project. New development adjacent to existing land uses, particularly if it is much more intensive or involves operations or activities that have effects that extend beyond the property, may create land use incompatibilities. This section also addresses the consistency of the Project with applicable land use goals and policies from the City of Menlo Park (City) General Plan (General Plan) (adopted in 1994 and amended through 2013),[1] the Municipal Code, and Title 16 Zoning Ordinance (current through Ordinance No. 1005, effective June 13, 2014). In addition, because the Land Use Element and the Circulation Element of the City General Plan are presently being updated, this section considers the Project's consistency with the relevant proposed goals and policies of the pending update, known as ConnectMenlo. The City General Plan and Municipal Code consistency analysis is provided for environmental review purposes only. The City Council will ultimately determine the Project's consistency with the goals and policies contained in the City General Plan and other City requirements and planning documents.

Under the California Environmental Quality Act (CEQA), land use and planning analyses generally consider the compatibility of a project with neighboring areas, changes to or displacement of existing uses, and the consistency of a project with the relevant local land use policies that have been adopted to mitigate or avoid an environmental effect. With respect to land use conflicts or compatibility issues, the magnitude of the impacts depends on how a project affects the existing development pattern, development intensity, and air quality, noise, and the visual setting in the immediate area. Specific environmental issues (e.g., visual, transportation, air quality, noise) and their potential significance are discussed in detail in the associated topical resource sections of this Draft Environmental Impact Report (EIR) (e.g., Section 3.3, *Transportation/Traffic*, and Section 3.6, *Noise*).

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1) were considered in preparing this analysis. The City received one comment in response to the NOP related to land use. This comment indicated that Menlo Park has a high jobs/housing ratio and expressed concern over the Project's potential effect on the jobs/housing balance in adjacent jurisdictions, particularly East Palo Alto, by increasing employment in Menlo Park.

Existing Conditions

Regulatory Setting

City of Menlo Park General Plan

California planning law requires each city and county in the state to adopt a general plan for its future development. A general plan identifies the allowable land uses within its boundaries and establishes policies for both development and the protection of resources. It forms the foundation for a zoning ordinance, which establishes regulatory standards for development and resource protection. The City of

[1] City of Menlo Park. 2013. *City of Menlo Park General Plan.* Last revised and adopted on May 21, 2013. Available: <http://www.menlopark.org/departments/pln/gp/>. Accessed: February 4, 2016.

Menlo Park General Plan, adopted in 1994 and amended through 2013, is a long-term plan that guides the physical development and character of the city. The General Plan discusses the City's goals, policies, and implementation programs regarding future growth and development in the city. It also provides a framework for implementation of the City's zoning, subdivision, and building regulations, as codified in the Municipal Code. As such, the General Plan is used by the City Council and Planning Commission in considering planning and land use decisions. The central purpose of the General Plan, as stated in the document, "is to maintain Menlo Park's special character as a residential community that includes a broad range of residential, business, and employment opportunities and to provide for the change necessary to maintain a vital community."

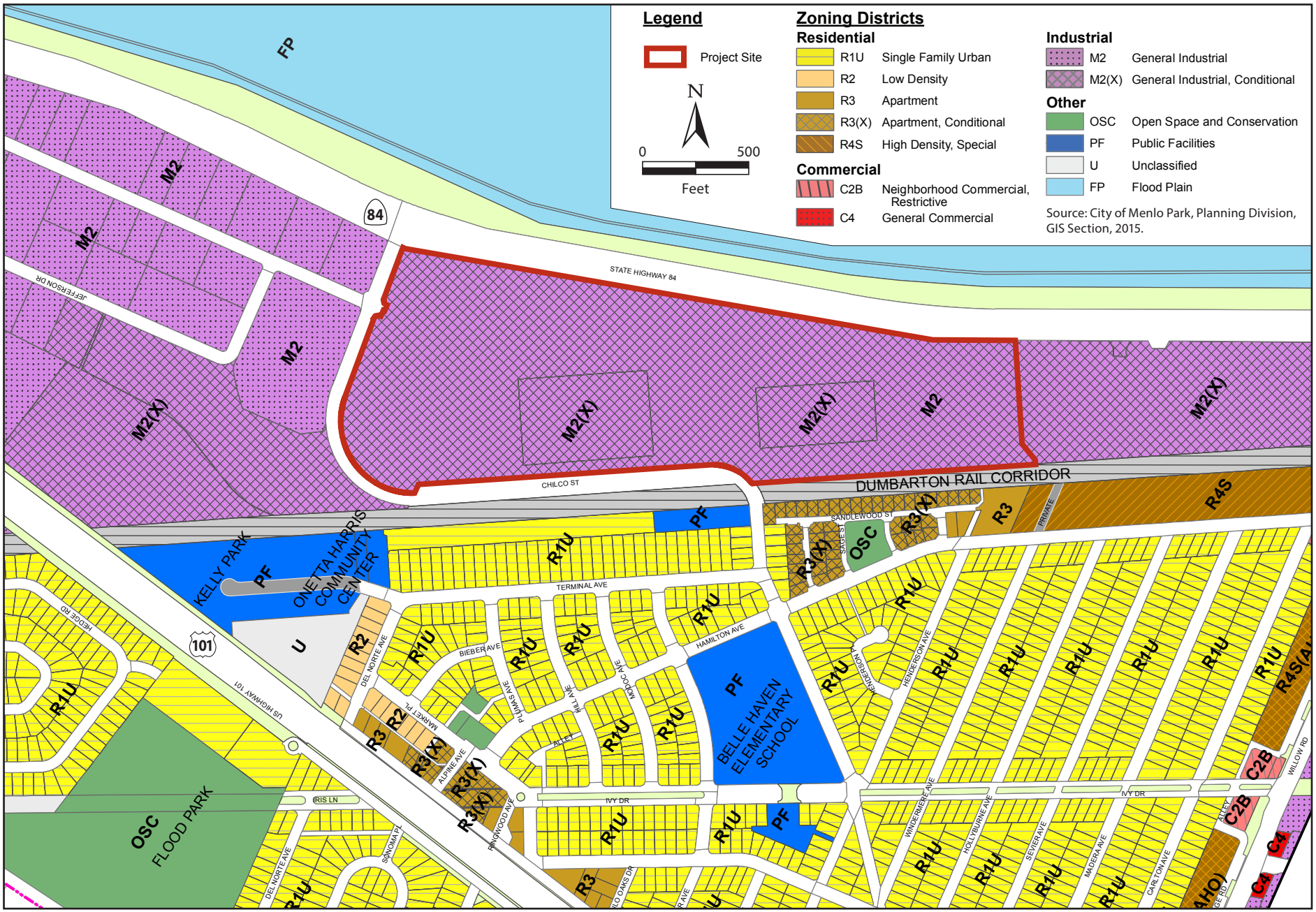
General Plan—Land Use Designations. The Land Use Diagram in the General Plan depicts the land use pattern for future development in the city. The boundaries of the land use designations in the Land Use Diagram are depicted generally. The land use designations are meant to outline building intensity and population density for various land uses.

The City of Menlo Park General Plan designates the Project site as Limited Industry. The Limited Industry land use designation allows for light manufacturing and assembly, the distribution of manufactured products, research and development facilities, industrial supply facilities, incidental warehousing, offices, limited retail sales (e.g., to serve businesses in the area), public and quasi-public uses, and similar compatible uses. The maximum floor area ratio (FAR) allowed is 0.45 for office uses to 0.55 for general industrial uses. Under the Limited Industry designation, hotel and other commercial uses are not allowed. However, Policy I-E-2 of the General Plan allows hotel uses to be considered at suitable locations within the commercial and industrial zoning districts of the city.

General Plan—Goals and Policies. The City adopted amendments to the General Plan in April 2014 when it updated the Housing Element. Other recent revisions to the General Plan took place in 2013, including amendments to the Land Use and Circulation Elements as well as updated Open Space and Conservation, Noise, and Safety Elements. Applicable goals and policies from the General Plan are discussed under Impact LU-1, below. In addition, applicable policies are outlined in the relevant sections of this Draft EIR.

ConnectMenlo General Plan Update—Goals and Policies. Just as it did with the Housing, Open Space and Conservation, Noise, and Safety Elements, the City is presently updating the General Plan's Land Use and Circulation Elements, a process known as ConnectMenlo. The General Plan update is expected to undergo council review in the fall of 2016.

The General Plan update effort considers the city's existing conditions and suggests a mix of land uses and potential circulation improvements to help create a live/work/play environment in the M-2 area. The updated Land Use Element will guide the type and scale of potential development that may occur, particularly in the M-2 area, the area where the Project site is located and where most land use change in Menlo Park is expected to occur over the next two decades. The M-2 area is one of the zoning districts in the city that allows for primarily industrial land uses (see Figure 3.1-1). The M-2 area is generally bounded by Bayfront Expressway/State Route 84 (Bayfront Expressway) to the north, the Dumbarton railroad right-of-way to the south, Marsh Road to the west, and East Palo Alto to the east. The updated Circulation Element will address citywide transportation and circulation issues and include goals, policies, and programs to improve bicycle/pedestrian facilities, transit service, parking programs, and roadway congestion. Applicable goals and policies proposed for inclusion in these updated elements are discussed under Impact LU-1, below.



Graphics ... 00296.15 (2-4-2016)

Figure 3.1-1
Existing Zoning
Facebook Campus Expansion Project Draft EIR

City of Menlo Park Municipal Code (Title 16, Zoning Ordinance)

The Zoning Ordinance implements the land uses designated in the General Plan. Title 16 of the Municipal Code was adopted as a precise zoning plan for the City. It is designed to

> …preserve and extend the charm and beauty inherent to the residential character of the city; to regulate and limit the density of population; encourage the most appropriate use of land; to conserve land and stabilize the value of property; to provide adequate open space for light, air and fire protection; to lessen traffic congestion; to facilitate the provision of community facilities; to encourage tree and shrub planting; to encourage building construction of pleasing design; to provide the economic and social advantages of a planned community.

The Zoning Ordinance defines the City's zoning districts and identifies the land uses permitted and conditionally permitted in each. The ordinance also establishes development regulations regarding building heights, setbacks, parking ratios, building land cover, and floor area.

The Project site is currently zoned M-2 (General Industrial) and M-2(X) Combining District (General Industrial, Conditional Development). The M-2 zoning district permits warehousing, manufacturing, printing, assembling, and office uses. Conditional uses allowed in the M-2 district include cafés, convenience stores, personal services (e.g., barber shops, beauty shops, launderettes, dry cleaners, shoe repair facilities), and daycare facilities, all of which are intended to serve employees in the immediate area. Development regulations for the M-2 district specify a maximum land cover of 50 percent for structures on the site, minimum building setbacks of 20 feet at the front, 10 feet at the sides, and 0 feet at the rear (20 feet when abutting residential districts), and a maximum FAR for office buildings of 0.45 and 0.55 for general industrial uses. In addition, the maximum building height should not exceed 35 feet. Buildings in the M-2 district are required to provide one parking space for every 300 square feet of gross floor area not in the front one-quarter of any required front yard. However, as described in Zoning Ordinance Chapter 16.56, all development standards, with the exception of density and intensity, may be modified with a conditional development permit (CDP). Within the M-2 district, the X Conditional Development Combining District allows construction of buildings to heights that exceed 35 feet, provided a conditional development permit is obtained. The current CDP requirements are specific to height for certain buildings rather than a broader set of requirements. In addition, the X Conditional Development Combining District requires a building site to be a minimum of 1 acre and off-street parking to be provided on or adjacent to the building site.

Plan Bay Area

Senate Bill (SB) 375, adopted in 2008, requires preparation of a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP) for the Bay Area. Plan Bay Area, the SCS for the region, and the 2040 RTP were jointly approved in July 2013 by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC).[2] The RTP/SCS represents a transportation and land use/housing strategy for addressing issues related to transportation mobility and accessibility needs, land development, and greenhouse gas (GHG) emissions reduction requirements in the Bay Area through 2040.[3] It integrates transportation and land use strategies to manage GHG

[2] The MTC is the government agency with responsibility for regional transportation planning and financing as well as coordinating transportation services in the nine-county San Francisco Bay Area.

[3] The RTP/SCS was also accepted by the California Air Resources Board in terms of meeting the SB 375 targets for per capita GHG emissions reductions from vehicles.

emissions and plan for future population growth. The RTP/SCS includes policies that call for shifting more travel demand to transit and accommodating growth along transit corridors in Priority Development Areas (PDAs).

Table 3.1-1 illustrates the anticipated jobs and housing for the city, as projected by ABAG and considered in Plan Bay Area as of 2013, the most recent projection available. As shown, the number of housing units is projected to increase by 380 between 2015 and 2020, while the number of jobs in the city is expected to grow by 2,210 (more than five times housing growth) during that same period. According to ABAG's projections, which do not include Facebook's expected growth, the jobs/housing ratio is anticipated to worsen in 2020.

Table 3.1-1. Comparison of Projected Number of Jobs to Housing in Menlo Park (Plan Bay Area)

	2015	2020
Jobs[a]	31,920	34,130
Housing[a]	14,490	14,870
Jobs/Housing Ratio	2.20	2.30

Source: Association of Bay Area Governments. 2013. *Projections 2013*. December.
Note:
[a.] Jobs and housing are based on the city's sphere of influence, which also includes unincorporated areas of San Mateo County.

Plan Bay Area calls for focused housing and job growth around high-quality transit corridors, particularly within areas that have been identified by local jurisdictions as PDAs, which are existing neighborhoods that are served by transit and supported by local plans (both existing and to be completed), to provide a wider range of housing options, along with amenities and services to meet the day-to-day needs of residents in a pedestrian-friendly environment. Many PDAs are also Transit Priority Project– (TPP-) eligible areas,[4] and most of the TPP-eligible land in the Bay Area is within PDAs. However, the Project site is not located within a TPP-eligible area.

ABAG Bay Trail Plan and Design Guidelines

The ABAG Bay Trail Plan proposes development of a regional hiking and bicycling trail around the perimeter of San Francisco and San Pablo Bays. The Bay Trail Plan mandates that the Bay Trail provide connections to existing park and recreational facilities, create links to existing and proposed transportation facilities, and be planned in a way that avoids adverse effects on environmentally sensitive areas. The Bay Trail Plan policies and design guidelines are intended to complement, rather than supplant, the adopted regulations and guidelines of local managing agencies. Implementation of the Bay Trail Plan relies on continued cooperation among shoreline property owners as well as federal, state, and local agencies with jurisdictions over the trail alignment.[5]

[4] Per Public Resources Code 21155 et seq., to quality as a Transit Priority Project, a project must meet the following criteria: be consistent with the general use designation, density, building intensity, and applicable policies of the adopted RTP/SCS; have at least 50 percent residential use; have a FAR of 0.75 or more if the project has between 6 and 50 percent nonresidential uses; have a minimum net density of at least 20 dwelling units per acre; and be located within 0.5 mile of a major transit stop or high-quality transit corridor included in the RTP/SCS.

[5] Association of Bay Area Governments. 2015. *Bay Trail Plan Summary*. Available: <http://baytrail.org/wp-content/uploads/2015/12/San-Francisco-Bay-Trail_-Bay-Trail-Plan-Summary.pdf>. Accessed: January 6, 2016.

The Bay Trail Plan and Design Guidelines would be applicable to the Project because the proposed multi-use bicycle/pedestrian bridge would connect the Project site and the Belle Haven neighborhood, to the south, to the Bay Trail. The bridge would be within the California Department of Transportation (Caltrans) right-of-way and would touch down along the north side of the Bay Trail.

City/County Association of Governments Congestion Management Program

The City/County Association of Governments (C/CAG) has prepared and adopted a Congestion Management Plan (CMP) to identify strategies that respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide solutions. C/CAG adopted the current CMP in 2015.[6]

Six roadway segments that were considered in the transportation analysis for this Project are CMP-designated Routes of Regional Significance:

- Bayfront Expressway from US 101 to Willow Road, from Willow Road to University Avenue, and from University Avenue to the Alameda county line
- State Route (SR) 109 (University Avenue) from Bayfront Expressway to Kavanaugh Drive
- SR 114 (Willow Road) from US 101 to SR 84
- US 101 from Whipple Avenue to the Santa Clara county line

In addition, three of the intersections included in the transportation analysis for this Project are CMP-designated intersections and monitored by C/CAG:

- Bayfront Expressway and University Avenue (SR 109)
- Bayfront Expressway and Willow Road (SR 114)
- Bayfront Expressway and Marsh Road

Project consistency with the CMP is discussed further in Section 3.3, *Transportation/Traffic*.

Environmental Setting

Adjacent Uses

The Project site is located in the city of Menlo Park. The city encompasses an area of about 19 square miles, including nearly 12 square miles of the San Francisco Bay (Bay) and wetlands. The approximately 7-square-mile urbanized portion of the city is virtually built out. The Project site is north of US 101, within an office park and industrial area, and bounded by Bayfront Expressway (SR 84) to the north, Chilco Street to the west and south, and Facebook Building 20 to the east. Figure 2-1 in Chapter 2, *Project Description*, depicts the Project site location and adjacent uses. Tidal mudflats and marshes in the Bay, the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge), the Bay Trail, Ravenswood Slough, and the former salt ponds are located north of the Project site, across SR 84.

[6] City/County Association of Governments of San Mateo County. 2015. *Final San Mateo County Congestion Management Program 2015*. November. Available: <http://ccag.ca.gov/wp-content/uploads/2016/02/2015-CMP_Final_rev.pdf>. Accessed: February 8, 2016.

The existing Facebook Campus is located east and northeast of the Project site. Buildings 10–19 include approximately 1 million gross square feet (gsf) of space, consisting primarily of office uses, except for Buildings 11, 18, and 19, which include cafés and a fitness center, respectively. The existing Facebook Campus buildings range in height from 31.5 feet to 47 feet to the top of the parapet. Building 20, immediately east of the Project site, is an approximately 433,555 gsf office building, with approximately 1,500 parking spaces located at grade beneath the building podium. Inclusive of all rooftop mechanical screening and the East Lobby roof, Building 20 is approximately 73 feet in height. Building 20 became operational in 2015 and accommodates approximately 2,800 employees.

The Dumbarton Rail Corridor, immediately south of Chilco Street and the Project site and north of the Belle Haven neighborhood, is a rail line that crosses the northernmost part of the city from east to west. The Dumbarton Rail Corridor separates the Belle Haven neighborhood from the Project site. This segment is part of a former Union Pacific line that once crossed the Bay. This railway currently consists of a single track; however, the rail bridge that served as the connection for this line is no longer functional. At this time, the railroad line is no longer in use, but a bicycle/pedestrian trail adjacent to the existing railroad line is currently being studied, along with other transportation alternatives, as part of the Dumbarton Corridor Study.

To the south of the Project site, across Chilco Street and the Dumbarton Rail Corridor, is the Belle Haven neighborhood, which includes a mix of uses, including churches, Menlo Park Fire Station No. 77, single-family residences, and multi-family residential units. The Belle Haven neighborhood also includes institutional and park uses, such as Beechwood School, Belle Haven Elementary School, the Belle Haven Pool, Belle Haven Youth Center, Onetta Harris Community Center, Menlo Park Senior Center, Boys and Girls Club, Hamilton Park, and Kelly Park. The majority of the Belle Haven neighborhood is zoned as R-1-U, (Single-Family Urban Residential District), with a General Plan land use designation of Low-Density Residential. However, along the north side of US 101, are areas that are zoned R-2 (Low-Density Apartment District) and R-3 (Apartment District). Along the southern border of the Dumbarton Rail Corridor and along US 101, zoning includes R-3, R-4-S, and C-2-S (Neighborhood Commercial District, Special). Similarly, along Willow Road, zoning includes C-2-S, R-3, R-4-S (High Density, Special), and C-2-B (Neighborhood Commercial District, Restrictive). Other zoning in the Belle Haven neighborhood includes P-F (Public Facilities) for Belle Haven Elementary School and Joseph B. Kelly Park (Kelly Park) and OSC (Open Space and Conservation) for Hamilton Park.

The area west of the Project site and north of the Dumbarton Rail Corridor includes a mix of warehouses and office buildings, including businesses that are involved in the science and technology sector (e.g., biotech, research and development [R&D], high-tech firms), law firms, business services, fitness centers, and wholesale retail. This area is in the process of transitioning from 1960s and 1970s industrial and warehousing uses to corporate campuses and office uses. Many of the older buildings in the area consist of large industrial warehouses, approximately one to two stories in height, with surface parking lots and street trees. Several newer office buildings, up to three stories in height, are located west of the Project site along Commonwealth Drive. This area is designated primarily as Limited Industry under the General Plan and zoned M-2 (General Industrial) District, and M-2(X), (General Industrial, Conditional Development) District. The M-2(X) District allows construction of buildings greater than 35 feet in height, subject to certain conditions, as described above.

Project Site

As described in Chapter 2, *Project Description*, the approximately 58-acre Project site consists of one parcel (assessor's parcel number 055-260-250) that encompasses the existing TE Connectivity (TE) Campus at 300–309 Constitution Drive in the city of Menlo Park. The Project site is zoned M-2 (General Industrial) and M-2(X) (General Industrial, Conditional Development). It is designated as Limited Industry under the General Plan and can be built out to approximately 1.142 million gsf for allowable office uses under the 0.45 FAR and up to approximately 1.396 million gsf (0.55 FAR) for other general industrial uses, including, but not limited to, warehousing, manufacturing, printing, assembling, related office and laboratory uses, and shipping and receiving.

Ten buildings are presently located on the Project site,[7] with former industrial, warehouse, office, and R&D uses totaling approximately 1.02 million gsf (including Building 23). The existing buildings, which cover approximately 46 percent of the Project site, range in height from a single story to three partial stories. The buildings were generally built in the late 1960s as part of an industrial and manufacturing campus. In addition, a privately owned substation is located along the west side of Building 23.

The Project site is currently accessible from one stop sign–controlled driveway on Chilco Street. There is also an emergency vehicle access point between the eastern end of the Project site and the adjacent Building 20. In addition, the Project site currently includes approximately 1,690 parking spaces.

Environmental Impacts

This section describes the impact analysis related to land use and planning for the Project. It describes the methods used to determine the impacts of the Project and lists the thresholds used to conclude whether an impact would be significant. Impacts are determined to be less than significant (LTS), less than significant with mitigation (LTS/M), or significant and unavoidable (SU); there can also be a no impact (NI) determination. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion, as needed.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a significant effect if it would result in any of the conditions listed below.

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

[7] Although 10 buildings were located on the Project site at the time of the NOP's release (the baseline), prior to the City's consideration of the Project, two buildings (307–309) were slated to be demolished. This will occur as a separate project; therefore, for purposes of this analysis, it is assumed that Buildings 307–309 are existing at the Project site.

Methods for Analysis

CEQA requires that an EIR consider whether a proposed project may conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental impact. This environmental determination differs from the larger policy determination of whether a proposed project is consistent with a jurisdiction's general plan. The former determination (intended for consideration in a CEQA document) is based on, and limited to, a review and analysis of environmental effects. The latter determination, by comparison, is made by the decision-making body of the jurisdiction and based on the jurisdiction's broad discretion to assess whether a proposed project would conform to the policies and objectives of its general plan/specific plan as a whole. In addition, the broader general plan consistency determination takes into account all evidence in the record concerning the project characteristics, its desirability, as well as its economic, social, and other non-environmental effects.

Conflicts of a project with land use policies do not, in and of themselves, constitute significant environmental impacts. Policy conflicts are considered environmental impacts only when they result in direct environmental effects. Decision-makers (in this case, the City Council) will need to consider the consistency of the proposed development with applicable plans and policies that do not directly relate to physical environmental issues when determining whether to approve or deny the Project.

Impacts Not Evaluated in Detail

Division of an Established Community. The Project would redevelop a site that is already developed and would not change the site boundaries. The Project site is located to the north of the Dumbarton Rail Corridor, in an area that is characterized by light industrial and office uses. The Project would include the construction of two new office buildings and a hotel with surface parking and landscaping. Although this would add new development to the area, the development would be located in an area of similar uses and would be physically separated from the Belle Haven neighborhood by the Dumbarton Rail Corridor. The Project would not divide the established Belle Haven community to the south, resulting in ***no impact***. Therefore, this impact is not evaluated further.

Impacts on an Adopted Habitat Conservation Plan or Natural Community Conservation Plan. The Project site is not a part of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. However, the salt marshes immediately north of SR 84 are part of the Refuge, which is actively pursuing expansion and protection of habitats and associated plant and wildlife species contained therein. The Refuge is also closely involved with the South Bay Salt Pond Restoration Project, which has active restoration sites near the Project site. Implementation of the Project would include construction of a new multi-use bicycle/pedestrian bridge over SR 84 to allow for public access to the Bay Trail and Bedwell Bayfront Park from the Project site. However, the foundation and vertical supports of the bridge touchdown north of SR 84 would be located entirely within the Caltrans right-of-way adjacent to the Bay Trail and would not extend into the Refuge. A portion of the aerial walkway could cantilever beyond the Caltrans easement. Regardless, none of the construction activities would interfere with management and/or expansion of the Refuge or restoration of the salt ponds. The Project would result in ***no impact*** on an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, this impact is not evaluated further.

Impacts and Mitigation Measures

Impact LU-1: Conflicts with Adopted Land Use Plans and Policies. The Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. (LTS)

Consistency with the General Plan

Land Use Designations. The Project is required to be consistent with the land use designations described in the General Plan. As described above, the Project site has a land use designation of Limited Industry, which allows for light manufacturing and assembly, the distribution of manufactured products, research and development facilities, industrial supply facilities, incidental warehousing, offices, limited retail sales (e.g., to serve businesses in the area), public and quasi-public uses, and similar compatible uses. Under the existing land use designation, the Project site can be built out to approximately 1.142 million gsf for office uses under the allowable 0.45 FAR or up to approximately 1.396 gsf (0.55 FAR) for other general industrial uses, including, but not limited to, warehousing, manufacturing, printing, assembling, related office and laboratory uses, and shipping and receiving.

The Project would include primarily office uses, with ancillary uses such as parking, a cafeteria, and private dining rooms. These uses are permitted under the Limited Industry designation. In addition, the Project would include a 200-room, limited-service hotel; the proposed hotel is not directly permitted within the Limited Industry designation. However, as indicated in Chapter 2, *Project Description*, the Project Sponsor proposes to amend the Zoning Ordinance text to accommodate the proposed hotel. Further, Policy I-E-2 of the General Plan, described below, allows consideration of hotel uses at suitable locations within the commercial and industrial zoning districts of the city. Construction of Buildings 21, 22, and the hotel would result in a net increase of approximately 121,300 gsf at the Project site. Including Building 23, the total gross floor area of office uses on the Project site would be approximately 1.143 million gsf, which is within the 0.45 FAR maximum for offices. The total gross floor area at the Project site would be approximately 1.317 million gsf, which is within the 0.55 overall FAR maximum in the M-2 zoning district for other general industrial uses.[8] As such, the Project, including the proposed amendment to the Zoning Ordinance, would not conflict with the existing land use designation, resulting in a ***less-than-significant*** impact.

Goals and Policies. The determination of whether or not the Project would conflict with applicable policies is based on either the Project description (Chapter 2) or, for policies adopted for the purpose of mitigating an environmental impact, on the environmental analysis provided in the applicable resource section of this Draft EIR. Table 3.1-2, at the end of this section, outlines the adopted General Plan goals and policies that have been identified as applicable to the Project, describes environmental effects and potential conflicts, and provides a determination of "consistent" or "inconsistent" for each policy.

Draft ConnectMenlo Goals and Policies. As with the current General Plan, the determination of whether or not the Project would conflict with applicable policies proposed as part of the draft ConnectMenlo General Plan update is based on either the Project description (Chapter 2) or the

[8] Although Building 23 is not part of the Project, because it is located on the Project site, it is included in the FAR calculations.

environmental analysis provided in the applicable resource sections of this Draft EIR. For informational purposes, Table 3.1-3, at the end of this section, outlines the draft goals and policies of the ConnectMenlo Land Use and Circulation Elements that have been identified as applicable to the Project, describes environmental effects and potential conflicts, and provides a determination of "consistent" or "inconsistent" for each draft policy. Note that buildout of ConnectMenlo is included in the cumulative analysis throughout this document. However, for purposes of general plan consistency analysis, this section considers the draft goals and policies of ConnectMenlo, even though they are not yet adopted.

General Consistency with General Plan Goals and Policies. Although the table shows some inconsistencies with the General Plan, the Project would be generally consistent with the goals and policies contained in the General Plan and the draft ConnectMenlo General Plan update. The ultimate determinations of general plan consistency can and will be made by the City Council. The ultimate finding of general plan consistency does not require that a project be entirely consistent with each individual general plan policy. A proposed project can be generally consistent with a general plan, even if it does not promote every applicable goal and policy. Assuming approval, the Project, including the proposed amendment to the Zoning Ordinance, would be generally consistent with applicable goals, policies, and actions, resulting in a ***less-than-significant*** impact.

Compliance with the Zoning Ordinance

As described in Chapter 2, *Project Description*, the Project would include demolition of existing onsite buildings, paving and landscaping, and the construction of two new office buildings (Buildings 21 and 22), encompassing approximately 962,400 gsf. In addition, the Project would include a 200-room limited-service hotel with approximately 174,800 gsf. Development of the office buildings and hotel would result in a net increase of approximately 121,300 gsf at the Project site. The Project would provide approximately 3,533 parking spaces for the office buildings, the hotel, and existing Building 23. The office buildings and the hotel would be approximately 75 feet in height.

The Project site is currently zoned M-2, which permits warehousing, manufacturing, printing, assembling, and office uses. The Project Sponsor is proposing to amend the Zoning Ordinance to accommodate the proposed hotel by conditionally permitting hotel uses in the M-2 zoning district. The Project Sponsor is also proposing to rezone the Project site to M-2(X), which would be necessary to allow a maximum building height in excess of 35 feet, and utilize a conditional development permit to establish the appropriate development standards, such as parking, setback, and building coverage standards, for the Project.

Table 3.1-4, below, summarizes allowed development under current M-2 zoning and the development proposed for the Project site.

Floor Area Ratio. Development regulations for the M-2 district include a maximum land cover by structures of 50 percent of the site and a maximum FAR of between 0.45 and 0.55, depending on the land use. For office buildings, the FAR must not exceed 0.45. The office buildings proposed for the Project site would be built in accordance with the allowable FAR. The combined office buildings and hotel would have a FAR of 0.52, which would comply with the maximum allowable FAR of 0.55 for the M-2 district. Therefore, the Project would not conflict with the existing FAR requirements outlined in the Zoning Ordinance or, as discussed above, the General Plan designation. The Project would have a ***less-than-significant*** impact related to FAR requirements.

Table 3.1-4. Allowed and Proposed Development at the Project Site

	Allowed Development (M-2 Zoning)	Proposed Development (M-2(X) Zoning)[a]
Floor Area Ratio (FAR)	0.45 office/0.55 general industrial uses	0.52
Gross Square Feet	1,142,000 office/1,389,564 non-office uses	1,317,300[b]
Site Coverage[c]	50%	49.5%
Max. Building Heights	35 feet	75 feet[d]

Sources: City of Menlo Park, 2014; Gehry Partners, 2015.

Notes:

a. The proposed development evaluates the Project site (TE Campus site). Under the Project, Building 20 would be merged and lot lines adjusted to include Buildings 20–23 on one site and the hotel on another. The overall developments calculations include both parcels.

b. Includes existing Building 23.

c. Site coverage represents land cover by structures. Building footprints, including Building 23, would occupy 50 percent of the site (approximately 1.26 million gsf).

d. According to Section 16.04.330 of the Municipal Code, the height of a structure is defined as "the vertical distance from the average level of the highest and lowest points of the natural grade to the topmost point of the structure, excluding elevator equipment rooms, ventilating and air-conditioning equipment, and chimneys." As such, the screened mechanical areas are excluded from the height calculations. Including the roof screen, elevator shaft, and stairwell, the buildings would be approximately 75 feet in height.

Gross Floor Area and Site Coverage. Per the Zoning Ordinance, and based on the size of the Project site, office buildings can occupy up to 1,142,000 gsf of gross floor area, and non-office buildings can occupy up to 1,389,564 gsf. The Project would include 962,400 gsf for office uses and associated amenities and, therefore, would be within the allowed floor area. The buildings would incorporate at-grade parking beneath the building podium, with office or hotel space above. Therefore, although the ground-floor lobby level of Buildings 21 and 22 and the hotel would cover 10,300 gsf, 9,000 gsf, and 13,700 gsf, respectively, the three buildings themselves, using the dimensions for the largest floors, would cover approximately 386,400 gsf, 419,900g gsf, and 39,400 gsf of the parcel, respectively. The proposed building coverage (Buildings 21 and 22 and the hotel) would be a combined 845,700 gsf. Together with the existing 180,100 gsf footprint of Building 23, total building coverage at the site would be 1,025,800 gsf, or 49.5 percent of the Project site. As such, the Project would be consistent with the requirements for gross floor area and site coverage. However, with the lot line adjustment, building coverage could exceed 50 percent. As described in Chapter 2, *Project Description*, and noted above, the Project would be subject to a conditional development permit that will establish the appropriate development standards, such as parking, setback, and building coverage standards, for the Project. Therefore, ***less-than-significant*** impacts would occur.

Building Heights. The M-2 zone has a height limit of 35 feet, which does not include the screened mechanical areas on rooftops. The existing Building 23, which would remain at the Project site, has a height of 52 feet. The Project Sponsor proposes to rezone the entire site to M-2(X) to exceed the maximum 35-foot height limit, thereby accommodating the proposed maximum building heights of 75 feet. The M-2(X) district allows an increased height, beyond that permitted in the M-2 district, provided a conditional development permit is obtained, the minimum building site is 1 acre, and off-street parking is provided on or adjacent to the building site. The proposed new zoning and conditional development permit would allow the Project to be consistent with the Zoning Ordinance, resulting in a ***less-than-significant*** impact.

Allowable Uses. As described above, the Project site is currently within the M-2 (General Industrial) and M-2(X) (General Industrial, Conditional Development) zoning districts. The M-2 (General Industrial) zone, which applies to the portion of the Project site where the hotel is proposed, allows general industrial uses and offices but not hotels. The Project Sponsor proposes to amend the Zoning Ordinance text to accommodate the proposed hotel by conditionally permitting hotel uses in the M-2 zoning district. The proposed amendment would allow the Project to be consistent with the uses allowed by the Zoning Ordinance, resulting in a ***less-than-significant*** impact.

ConnectMenlo Proposed Zoning. The ConnectMenlo General Plan update would include a rezoning of the Project site from M-2(X) (General Industrial, Conditional Development) to the proposed O (Office) zoning district. Office and hotel uses are permitted or conditionally permitted in the O (Office) zoning district. In addition, the proposed FAR for the Project would be within the limits established by the proposed rezoning. Therefore, the proposed uses and FAR would be consistent with the potential rezoning. The Project's CDP would continue to define all other development regulations and design standards. Accordingly, the Project would be consistent with the proposed rezoning.

Consistency with Plan Bay Area

There is no requirement under CEQA to analyze Project consistency with a non-enforceable plan, such as Plan Bay Area. In fact, Plan Bay Area expressly states that its "[a]doption…will not require any changes to local land use policies or environmental review processes."[9] As described above, instead of imposing requirements on local land use decisions, Plan Bay Area (consistent with SB 375) provides incentives for local governments by allowing streamlined CEQA review of GHG impacts for certain qualifying "transit priority projects" and other residential or mixed-used projects (i.e., where at least 75 percent of the total square footage of a project consists of residential use) that are consistent with Plan Bay Area, as the approved SCS.[10]

The Project site is not located within a TPP-eligible area. As such, the Project's degree of consistency with Plan Bay Area is discussed for informational purposes only in this EIR.

Plan Bay Area calls for new development to be placed near active transit corridors. Consistent with Plan Bay Area, the Project site is an already-developed urban site; however, there are no public transit stops adjacent to the Project site. AC Transit, SamTrans, and the City of Menlo Park Midday Shuttle serve areas near the Project site, connecting them to surrounding areas. The Project would include a Transportation Demand Management (TDM) program that would provide subsidized public transit passes and shuttle service that would connect the Project site to public transit stations, thereby encouraging employees to use alternate modes of transportation and reducing the number of vehicles traveling to/from the Project site. Section 3.3, *Transportation/Traffic*, of this Draft EIR describes the Project's relationship to transit in detail.

[9] Metropolitan Transportation Commission. 2013. *Plan Bay Area: Strategy for a Sustainable Region*. Metropolitan Transportation Agency and Association of Bay Area Governments. Adopted: July 18, 2013. Available: <http://files.mtc.ca.gov/pdf/Plan_Bay_Area_FINAL/Plan_Bay_Area.pdf>. Accessed: February 8, 2016.

[10] Public Resources Code Section 21155 (defining a "transit priority project" as a project that contains at least 50 percent residential use and a minimum net density of at least 20 dwelling units per acre that is within 0.5 mile of a major transit stop or high-quality transit corridor) and Section 21159.28 (providing certain exemptions from the need to evaluate project or cumulative impacts on global warming due to car and light-duty vehicle trips generated by the project).

As indicated above in Table 3.1-1 and in Section 3.12, *Population and Housing*, the City's jobs/housing ratio is projected to worsen over the next 5 years. The Project's development of office and hotel uses, rather than housing, in the context of the city's already-high jobs/housing ratio, does not further the balanced growth objectives of Plan Bay Area. However, as described in Section 3.12, the indirect housing demand from the Project would represent a small percentage of ABAG's projected housing growth for Menlo Park.

As noted above, because Plan Bay Area is not a legally enforceable plan relative to local land use planning, no significance finding is required under CEQA concerning consistency with this plan.

Consistency with the ABAG Bay Trail Plan and Design Guidelines

The Project would provide a new multi-use bicycle/pedestrian bridge that would extend over Bayfront Expressway, connecting the Project site and the Belle Haven neighborhood with the Bay Trail. This connection would touch down entirely within the Caltrans right-of-way, north of the Bay Trail. The facility would enhance access to the Bay Trail, and although it would not be located within the area that would be subject to the Bay Trail's design guidelines, it would be compatible with those guidelines. As such, the Project would have no inconsistencies with the ABAG Bay Trail and Design Guidelines and would result in a **less-than-significant** impact.

Consistency with the C/CAG Congestion Management Plan

According to the 2009 CMP,[11] for freeway segments that are currently in compliance with the adopted level-of-service (LOS) standard, a project is considered to have an impact if it will cause freeway segments to operate at an LOS that violates the adopted standard. Additionally, a project will have an impact if the cumulative analysis indicates that the combination of a proposed project and future cumulative traffic demand will result in a freeway segment operating at an LOS that violates the adopted standard. An impact could also occur if a proposed project increases traffic demand on a freeway segment by an amount equal to 1 percent or more of the segment's capacity or causes the freeway segment volume-to-capacity (v/c) ratio to increase by 1 percent.

As described in Impact TRA-2 of Section 3.3, *Transportation/Traffic*, the Project would affect five CMP Routes of Regional Significance. The Project would implement Mitigation Measure TR-2.1, which would make improvements to the Routes of Regional Significance. A typical mitigation measure would seek to widen the road to add travel lanes and capacity. However, impacts on Routes of Regional Significance would remain significant and unavoidable because these roadways are not under the jurisdiction of the City. In addition, freeway improvement projects, which add travel lanes are planned and funded on a regional scale, would be too costly for a single project to fund. Regardless, the Project would be generally consistent with the CMP, resulting in ***less-than-significant*** impacts. The Project's impacts on Routes of Regional Significance are considered transportation-related impacts and are fully evaluated in Section 3.3, *Transportation/Traffic*.

[11] City/County Association of Governments of San Mateo County. 2009. *Final San Mateo County Congestion Management Program 2009*. Adopted: September 2009. Available: <http://ccag.ca.gov/wp-content/uploads/2014/05/FINAL-SMC-2009-CMP.pdf>. Accessed: February 8, 2016.

Cumulative Impacts

Because land use policies are regional in scope, the geographic context for the cumulative impacts associated with land use issues is broader than the city and would include regional development under the jurisdiction of the ABAG. Past, present, and future cumulative development within this geographic context assumes full buildout of the general plans of the nine ABAG counties as well as development envisioned in the Land Use Element of the City General Plan, including the projects identified in Table 3.0-3, *Cumulative Projects*, in Section 3.0, *Introduction to the Environmental Analysis*. Cumulative impacts are addressed only for those thresholds that have a Project-related impact, whether it be less than significant, significant, or significant and unavoidable. If the Project would result in no impact under a particular threshold, the threshold is not considered one that would contribute to any cumulative impact, and no analysis is required.

This cumulative analysis examines the effects of the Project in the relevant geographic area, in combination with other current projects, probable future projects, and projected future growth.

Impact C-LU-1: Cumulative Land Use Impacts. The Project, in combination with other foreseeable development in the nine-county ABAG region, would not be inconsistent with applicable land use plans, policies, and regulations. (LTS)

As noted, CEQA requires that an EIR consider whether a proposed project may conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental impact. This environmental determination differs from the larger policy determination of whether a proposed project is consistent with a jurisdiction's general plan. Regional growth in general is reviewed for consistency with adopted land use plans and policies by the individual cities and counties in the geographic context in accordance with the requirements of CEQA, which require findings of plan and policy consistency prior to approval of entitlements for development. Analysis of project consistency with land use policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact is similarly evaluated for each individual project and addressed in the analysis for each specific resource area. For example, if an individual project were to result in the division of an established community, this would be addressed in the land use section of that project's EIR or other environmental document. The environmental evaluation for the project would also include an analysis of the division of an established community on a cumulative basis.

Because consistency with land use plans and policies is inherently a project-specific issue, and each jurisdiction would decide on project consistency at the project level, there would be no cumulative impact as a result of cumulative development in the ABAG region. As discussed above, implementation of the Project at the Project site would be generally consistent with the existing and proposed plans, including the adopted General Plan, proposed ConnectMenlo, Municipal Code, Plan Bay Area, ABAG Bay Trail Plan and Design Guidelines, and the C/CAG CMP. Therefore, the Project's cumulative impact would be ***less than significant***.

Table 3.1-2. Comparison of Project to General Plan Goals and Policies

General Plan Goal/Policy	Consistency Analysis
Land Use Element, adopted December 1, 1994, and amendments through May 21, 2013	
Policy I-E-2: Hotel uses may be considered at suitable locations within the commercial and industrial zoning districts of the city.	CONSISTENT. Although hotel uses are specifically not permitted in M-2 zoning districts (see the Compliance with the Zoning Ordinance discussion under Impact LU-1), the Project Sponsor proposes to amend the Zoning Ordinance text to accommodate the proposed hotel. Such an amendment would further ensure compatibility of the Project with this policy of the General Plan. A hotel use is suitable at the Project site because it would serve the demand from office and industrial uses in the area, particularly the demand from the Facebook Campus.
Policy I-E-4: Any new or expanded office must include provisions for adequate off-street parking, mitigating traffic impacts, and developing effective alternatives to auto commuting, must adhere to acceptable architectural standards, and must protect adjacent residential uses from adverse impacts.	CONSISTENT. The Project would provide approximately 3,533 parking spaces for the office buildings, the hotel, and Building 23. In addition, the Project Sponsor proposes a CDP to establish the appropriate development standards, including parking standards, for the Project. Further, the Project would include a TDM program that would encourage employees to use alternate modes of transportation, thereby reducing the number of vehicles traveling to/from the Project site.
Policy I-G-7: Public access to the Bay for the scenic enjoyment of the open water, sloughs, and marshes shall be protected.	CONSISTENT. The Project would include a publicly accessible open space area between proposed Buildings 21 and 22 and a safe bicycle and pedestrian route to the Bay and the Bay Trail. The Project's site and landscape improvements would include bicycle and pedestrian paths to improve biking and pedestrian circulation and provide public access and connectivity between the Belle Haven community and the Bay Trail.
Policy I-G-10: Extensive landscaping should be included in public and private development, including greater landscaping in large parking areas. Where appropriate, the City shall encourage placement of a portion of the required parking in landscape reserve until such time as the parking is needed. Plant material selection and landscape and irrigation design shall adhere to the City's Water Efficient Landscaping Ordinance.	CONSISTENT. The perimeter of the Project site would have a landscaped buffer; the interior of the site would include an approximately 2-acre, publicly accessible open space area. In addition, the Project would include a terraced garden, primarily for employee use, between Buildings 20 and 21 as well as useable private open spaces on the roofs of Buildings 21 and 22, which would include landscaped areas and walking paths. The sustainable landscaping, which would be developed pursuant to the City's Water-Efficient Landscape Ordinance, would be composed of native plant communities that are well adapted to the site and sensitive to adjacent bayland habitats.
Goal I-H: To promote the development and maintenance of adequate public and quasi-public facilities and services to meet the needs of the City's residents, businesses, workers, and visitors.	CONSISTENT. The Project would include new private and public open spaces as well as landscaped areas, provide public access and connectivity between the Belle Haven community and the Bay Trail, improve biking and pedestrian circulation, and create new social spaces for the city's residents as well as workers and visitors on the site.

General Plan Goal/Policy	Consistency Analysis
Policy I-H-1: The community design should help conserve resources and minimize waste.	CONSISTENT. Building 21 would pursue Leadership in Energy and Environmental Design (LEED) Gold certification. To conserve resources and reduce waste, sustainability features would be employed, including, but not limited to, a building form and space layout that would promote daylight use, energy-efficient lighting and heating, ventilating, and air-conditioning (HVAC) equipment, onsite renewable energy generation, and water-efficient plumbing fixtures and landscaping. In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority. The Project could also use a recycled water system for landscape irrigation and toilets/urinals.
Policy I-H-2: The use of water-conserving plumbing fixtures in all new public and private development shall be required.	CONSISTENT. The Project's sustainability features would include water-efficient plumbing fixtures to reduce water consumption by 40 percent compared with the LEED baseline. In addition, the Project would include water-efficient landscaping and an irrigation design that would reduce irrigation water consumption by 50 percent compared with the LEED baseline.
Policy I-H-3: Plant material selection and landscape and irrigation design for City parks and other public facilities and in private developments shall adhere to the City's Water Efficient Landscaping Ordinance.	CONSISTENT. The Project's landscaping, which would include a variety of landscape and open space areas, perimeter landscape buffers, and stormwater gardens, would be developed pursuant to the City's Water-Efficient Landscape Ordinance.
Policy I-H-7: The use of reclaimed water for landscaping and any other feasible uses shall be encouraged.	CONSISTENT. The Project's incorporation of water-efficient landscaping and an irrigation design that would reduce irrigation water consumption by 50 percent compared with the LEED baseline would minimize the use of potable water for irrigation. In addition, the Project could use a recycled water system for landscape irrigation and toilets/urinals.
Policy I-H-9: Urban development in areas with geological and earthquake hazards, flood hazards, and fire hazards shall be regulated in attempt to prevent loss of life, injury, and property damage.	CONSISTENT. Project development would involve construction and occupancy of new buildings on a site with seismic hazards, the majority of which is within the Federal Emergency Management Agency (FEMA) 100-year floodplain and subject to tidal flooding from the Bay. Adherence to federal, state, and local laws would reduce the effects of natural hazards. Compliance with the 2013 California Building Code (CBC) requires geotechnical investigations to provide design criteria that minimize impacts associated with strong ground shaking during an earthquake and all foundations and other improvements to be designed by a licensed professional engineer and based on site-specific soil investigations. The hydrology and hydraulics report indicates that the Project would ultimately reduce the risk of flooding through its incorporation of pervious landscaping, bio-retention areas, and stormwater infrastructure improvements.

General Plan Goal/Policy	Consistency Analysis
Policy I-H-11: Buildings, objects, and sites of historic and/or cultural significance should be preserved.	CONSISTENT. The Project would include demolition of Buildings 301–306; however, these buildings are not considered historic. Ground disturbance would occur during construction; however, implementation of Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 would reduce impacts on archeological and paleontological resources or human remains.
Policy I-H-12: Street orientation, placement of buildings, and the use of shading should contribute to the energy efficiency of the community.	CONSISTENT. The Project would incorporate features that would contribute to the community's energy efficiency, including shade trees. Buildings would be orientated to maximize the use of natural light and minimize energy use.
Circulation and Transportation Element, December 1, 1994, and amendments through May 21, 2013	
Goal II-A: To maintain a circulation system using the Roadway Classification system that will provide for the safe and efficient movement of people and goods throughout the City for residential and commercial purposes.	CONSISTENT. The Project would not alter the alignment of any roads. However, the increase in onsite employment could result in additional traffic in the area. The Project Sponsor is proposing a trip cap to limit the number of daily and peak hour (AM and PM) trips to and from the Project site and reduce traffic impacts. It would also implement a TDM program to promote alternatives to private automotive travel, thereby reducing the number of vehicle trips and the resulting traffic. Nonetheless, the Project would still add traffic to local roadways, as discussed in Section 3.3, *Transportation/Traffic*.
Policy II-A-1: Level of Service D (40 seconds average stopped delay per vehicle) or better shall be maintained at all City-controlled signalized intersections during peak hours, except at the intersection of Ravenswood Avenue and Middlefield Road and at intersections along Willow Road from Middlefield Road to US 101.	INCONSISTENT. The Project, under background plus-project conditions, would result in significant and unavoidable impacts on the following intersections during the a.m. peak hour: Willow Road/Bayfront Expressway and Bayfront Expressway/proposed Building 21 entrance. During the p.m. peak hour, the Project would result in significant and unavoidable impacts on the following intersections: Chilco Street/Hamilton Avenue, Bayfront Expressway/Building 20 entrance, Willow Road/Hamilton Avenue, Willow Road/Bayfront Expressway, Bayfront Expressway/University Avenue, and University Avenue/Adams Drive. As discussed in Section 3.3, *Transportation/Traffic*, all other intersections would operate at an acceptable level under background plus-project conditions (some with implementation of Mitigation Measures TRA-1.1 and TRA-1.2).

General Plan Goal/Policy	Consistency Analysis
Policy II-A-2: The City should attempt to achieve and maintain average travel speeds of 14 miles per hour (Level of Service D) or better on El Camino Real and other arterial roadways controlled by the State and at 46 miles per hour (Level of Service D) or better on US 101. The City shall work with Caltrans to achieve and maintain average travel speeds and intersection levels of service consistent with standards established by the San Mateo County Congestion Management Plan.	INCONSISTENT. The following Routes of Regional Significance would operate at or below their LOS threshold with the addition of Project trips, and Project traffic would exceed the allowable 1 percent threshold, resulting in significant impacts: Bayfront Expressway (SR 84) between US 101 and Marsh Road, Bayfront Expressway between Willow Road and University Avenue, SR 84 between University Avenue and the county line, US 101 north of Marsh Road, and US 101 south of Willow Avenue. To the extent feasible, the City will work with Caltrans to maintain acceptable levels of service at these locations. In addition, Mitigation Measure TRA-2.1 would implement improvements to address background plus-project effects. However, as discussed in Section 3.3, these impacts are considered significant and unavoidable.
Policy II-A-4: New development shall be restricted or required to implement mitigation measures in order to maintain the levels of service and travel speeds specified in Policies II-A-1 through II-A-3.	CONSISTENT. As discussed in Section 3.3, *Transportation/Traffic*, the Project would result in several significant and unavoidable impacts on levels of service and travel speeds within the city. Nonetheless, the Project would implement all feasible mitigation, as listed in Section 3.3 of this Draft EIR.
Policy II-A-8: New developments shall be reviewed for its potential to generate significant traffic volumes on local streets in residential areas and shall be required to mitigate potential significant traffic problems.	CONSISTENT. Section 3.3, *Transportation/Traffic*, evaluates the Project's traffic and circulation impacts and includes mitigation where necessary to address significant traffic impacts.
Goal II-B: To promote the use of public transit.	CONSISTENT. There are no public transit stops within the vicinity of the Project site. However, the TDM program would provide subsidized public transit passes and shuttle service, connecting the Project site to public transit stations.
Policy II-B-1: The City shall consider transit modes in the design of transportation improvements and the review and approval of development projects.	CONSISTENT. The Project would include a TDM program that would promote the use of alternative travel modes, such as transit, carpooling, bicycling, and walking.
Goal II-C: To promote the use of alternatives to the single occupant automobile.	CONSISTENT. The Project Sponsor is proposing a trip cap to limit the number of daily and peak hour (a.m. and p.m.) trips to and from the Project site and reduce traffic impacts. It would also implement a TDM program to promote alternatives to private automotive travel, thereby reducing vehicle trips and the resulting traffic. To reduce the number of single-occupancy vehicles, the TDM program would provide commuter shuttle buses, vanpool programs, rideshare programs, and car-share services. However, the Project would still add traffic to local roadways, as discussed in Section 3.3, *Transportation/Traffic*.

General Plan Goal/Policy	Consistency Analysis
Goal II-D: To promote the safe use of a bicycle as a commute alternative and for recreation.	CONSISTENT. The Project would include bicycle/pedestrian pathways, which would be separated from the vehicle access roads, around the perimeter of the site. In addition, a north–south bicycle/pedestrian corridor would run through the middle of the site, connecting the proposed office buildings to the existing Building 20 east of the Project site and Facebook Buildings 10–19 north of Bayfront Expressway. The Project TDM program would promote bicycling as a commute alternative as well as several amenities and incentives, such as bike shops, lockers, towel service, bicycle pumps, self-repair stations, and loaner bikes as part of the TDM program. In addition, the Project would also include construction of a new multi-use bicycle/pedestrian bridge over Bayfront Expressway to allow for public access to the Bay Trail and Bedwell Bayfront Park from the Project site. The bicycle/pedestrian facilities would provide residents of the Belle Haven neighborhood and the general public with access to the Project site's open space and the bicycle/pedestrian bridge over Bayfront Expressway.
Policy II-D-4: The City shall require new commercial and industrial development to provide secure bicycle storage facilities on-site.	CONSISTENT. The Project would include exterior and interior bicycle parking and storage facilities in each building.
Goal II-E: To promote walking as a commute alternative and for short trips.	CONSISTENT. The Project's proposed pedestrian linkages would promote walking for short trips. The Project would include a TDM program that would promote the use of alternative travel modes, including walking. In addition, the Project would provide a pedestrian linkage through the Project site from the Bay Trail and the Belle Haven neighborhood, connecting the Project site with other areas of the city.
Policy II-E-1: The City shall require all new development to incorporate safe and attractive pedestrian facilities.	CONSISTENT. The Project would incorporate landscaped pedestrian facilities within the site that would link to offsite areas. These facilities include a pedestrian bridge across Bayfront Expressway that would connect the Project site and Belle Haven neighborhood with the Bay Trail. Frontage improvements, including bicycle and pedestrian improvements, along Chilco Street are being implemented by the Project Sponsor as a separate project.
Policy II-E-2: The City shall endeavor to maintain safe sidewalks and walkways where existing within the public right of way.	CONSISTENT. A proposed multi-use bicycle/pedestrian bridge over Bayfront Expressway would allow safe public access to the Bay Trail and Bedwell Bayfront Park from the Project site and the Belle Haven neighborhood. Frontage improvements, including pedestrian improvements, along Chilco Street are being implemented by the Project Sponsor as a separate project. In addition, Mitigation Measure TRA-3.2 would provide multi-modal improvements, which would help to offset the effect of daily traffic generated by the Project. In particular, such measures could include pedestrian enhancements across Willow Road at Hamilton Drive, Ivy Drive, and Newbridge Street as well as at other affected study segment locations.

General Plan Goal/Policy	Consistency Analysis
Open Space/Conservation Element, adopted May 21, 2013	
Policy OSC1.3: Sensitive Habitats. Require new development on or near sensitive habitats to provide baseline assessments prepared by qualified biologists, and specify requirements relative to the baseline assessments.	CONSISTENT. As part of this EIR, a field survey was conducted by a qualified biologist on August 17, 2015. The field survey found that no riparian habitat, sensitive natural communities, or wetlands are present on the Project site. The Project site is located approximately 250 feet south of the Don Edwards Bay National Wildlife Refuge, but there is limited habitat connectivity between the Project site and the Refuge because of the presence of Bayfront Expressway. The foundation and vertical supports of the proposed multi-use bicycle/pedestrian bridge over Bayfront Expressway would touch down within the Caltrans easement on the north side of Bayfront Expressway and would not extend into the Refuge. However, a portion of the aerial walkway could cantilever beyond the Caltrans easement. Mitigation Measures BIO-2.1, BIO-3.1, and BIO-3.2 in Section 3.8, *Biological Resources*, would mitigate the impact to less than significant.
Policy OSC1.4: Habitat Enhancement. Require new development to minimize the disturbance of natural habitats and vegetation, and require revegetation of disturbed natural habitat areas with native or non-invasive naturalized species.	CONSISTENT. The Project site is currently developed with urban uses and, as such, does not contain natural habitat areas. Existing shrubs and trees on the Project site provide nesting habitat for a variety of native birds; however, this habitat is of low quality because of the developed nature of the site and surrounding area.
Policy OSC1.6: South Bay Salt Pond Restoration Project and Flood Management Project. Continue to support and participate in Federal and State efforts related to the South Bay Salt Pond Restoration Project and flood management project. Provide public access to the Bay for scenic enjoyment and recreation opportunities as well as conservation education opportunities related to the open Bay, the sloughs, and the marshes.	CONSISTENT. The South Bay Salt Pond Restoration Project has active restoration sites near the Project site. Implementation of the Project would not involve any construction outside the currently developed/disturbed areas, although a portion of the aerial walkway could cantilever beyond the Caltrans easement. Regardless, the Project would not affect the restoration project. The proposed multi-use bicycle/pedestrian bridge across Bayfront Expressway would enhance public access to the Bay via the Bay Trail.
Policy OSC1.11: Sustainable Landscape Practices. Encourage the enhancement of boulevards, plazas and other urban open spaces in high-density and mixed use residential developments, commercial and industrial areas with landscaping practices that minimize water usage.	CONSISTENT. The perimeter of the Project site would have a landscaped buffer, and the interior of the site would include several landscaped open space areas and walking paths. The sustainable landscaping would be developed pursuant to the City's Water-Efficient Landscape Ordinance and consist of native plant communities. In addition, the Project could use a recycled water system for landscape irrigation and toilets/urinals, minimizing water usage.
Policy OSC1.12: Landscaping and Plazas. Include landscaping and plazas on public and private lands, and well-designed pedestrian and bicycle facilities in areas of intensive non-vehicular activity. Require landscaping for shade, surface runoff, or to obscure parked cars in extensive parking areas.	CONSISTENT. The Project site would include landscaping on both the perimeter and the interior of the site, including plazas; a publicly accessible open space area; and bicycle and pedestrian paths throughout the site. The landscaping would include shade trees in parking areas and stormwater gardens to accommodate runoff.

General Plan Goal/Policy	Consistency Analysis
Policy OSC1.13: Yard and Open Space Requirements in New Development. Ensure that required yard and open spaces are provided for as part of new multi-family residential, mixed-use, commercial and industrial development.	CONSISTENT. The Project would provide an approximately 2-acre, publicly accessible open space area within the Project site. In addition, the Project would include a new 1-acre terraced garden, primarily for employee use, between Buildings 20 and 21, and useable private open spaces on the roofs of Buildings 21 and 22, which would include landscaped areas and walking paths.
Policy OSC1.15: Heritage Trees. Protect Heritage Trees, including during construction activities through enforcement of the Heritage Tree Ordinance (Chapter 13.24 of the Municipal Code).	CONSISTENT. There are currently 770 trees on the Project site, including 274 trees that qualify as heritage trees under the City's Heritage Tree Ordinance. The 770 trees consist almost entirely of nonnative ornamental species. Nearly all of the heritage trees would be removed. However, compliance with the Heritage Tree Ordinance, including the procurement of a tree removal permit, is mandatory for removal of heritage trees.
Goal OSC2: Provide parks and recreation facilities.	CONSISTENT. The Project would provide an approximately 2-acre privately owned, but publicly accessible, open space area within the Project site. The final design of the open space would be subject to review and approval by the City. In addition, the Project would include a new 1-acre terraced garden, primarily for employee use, between Buildings 20 and 21, and useable private open spaces on the roofs of Buildings 21 and 22, which would include landscaped areas and walking paths.
Policy OSC3.1: Prehistoric or Historic Cultural Resources Investigation and Preservation. Preserve historical and cultural resources to the maximum extent practical.	CONSISTENT. Although no identified prehistoric or historic cultural resources are present, ground disturbance would occur and could uncover unknown resources. Implementation of Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 would reduce impacts and ensure preservation of any cultural resources found during Project construction.
Policy OSC3.2: Prehistoric or Historic Resources Protection. Require significant historic or prehistoric artifacts to be examined by a qualified consulting archaeologist or historian for appropriate protection and preservation, and to ensure compliance with local, state, and federal regulations.	CONSISTENT. Although no identified prehistoric or historic cultural resources are present, ground disturbance would occur and could uncover unknown resources. Implementation of Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 would require monitoring, documentation, and potential recovery by a qualified professional archaeologist to reduce impacts and ensure preservation of any prehistoric or historic resources found during Project construction.
Policy OSC3.3: Archaeological or Paleontological Resources Protection. Protect prehistoric or historic cultural resources either on site or through appropriate documentation as a condition of removal. Require that when a development project had sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies superior mitigation. If resources are documented, undertake coordination with descendants and/or stakeholder groups, as warranted.	CONSISTENT. Although no identified prehistoric or historic cultural resources are present, ground disturbance would occur and could uncover unknown resources. Implementation of Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 would require monitoring, documentation, and potential recovery by a qualified professional archaeologist to reduce impacts and ensure preservation of any prehistoric or historic resources found during Project construction.

General Plan Goal/Policy	Consistency Analysis
Policy OSC3.4: Prehistoric or Historic Cultural Resources Found During Construction. Require that if cultural resources, including archaeological or paleontological resources, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is implemented.	CONSISTENT. Although no identified prehistoric or historic cultural resources are present, ground disturbance would occur and could uncover unknown resources. Implementation of Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 would reduce impacts on archeological and paleontological resources or human remains found during construction.
Policy OCS3.5: Consultation with Native American Tribes. Consult with those Native American tribes with ancestral ties to the Menlo Park city limits regarding General Plan Amendments and land use policy changes.	CONSISTENT. The Native American consultation process was initiated through the Native American Heritage Commission (NAHC) on August 20, 2015. On August 31, 2015, the NAHC indicated that a records search of its files failed to indicate the presence of Native American cultural resources in the immediate Project area. The NAHC provided a list of 10 Native American contacts who might have information pertinent to the Project or have concerns regarding the Project. A letter explaining the Project, along with a map depicting the Project area, was sent to the contacts listed by the NAHC on September 3, 2015. The letters solicited responses from each of the contacts, should they have any questions, comments, or concerns regarding the Project. To date, no responses have been received from any of the Native American contacts regarding the Project. However, Native American correspondence is ongoing and will be updated if responses are received. Appendix 3.7 contains copies of the Native American correspondence, if applicable.
Goal OSC4: Promote sustainability and climate action planning.	CONSISTENT. The Project would promote sustainability and climate action planning through a variety of features, including, but not limited to, a building design that promotes daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, and water-efficient plumbing fixtures and landscaping. In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority. Furthermore, a TDM program that encourages alternative transportation would be implemented.
Policy OSC4.2: Sustainable Building. Promote and/or establish environmentally sustainable building practices or standards in new development that would conserve water and energy, prevent stormwater pollution, reduce landfilled waste, and reduce fossil fuel consumption from transportation and energy activities.	CONSISTENT. Sustainability features to conserve resources and reduce waste would be employed, including, but not limited to, a building form and space layout that promotes daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, water-efficient plumbing fixtures and landscaping, and a recycled water system. In addition, seasonal wetland areas would be incorporated into the park landscape to provide both habitat and stormwater treatment functions. Construction waste would be diverted from landfills, and resource-conserving materials would be given priority. The proposed TDM program would be implemented to provide alternatives to single-occupancy automobile travel to and from the Project site, thereby reducing fossil fuel consumption.

General Plan Goal/Policy	Consistency Analysis
Policy OSC4.3: Renewable Energy. Promote the installation of renewable energy technology, such as, on residences and businesses through education, social marketing methods, establishing standards and/or providing incentives.	CONSISTENT. The Project proposes to include onsite renewable energy generation, such as photovoltaic panels.
Policy OSC4.4: Vehicles Using Alternative Fuel. Explore the potential for installing infrastructure for vehicles that use alternative fuel, such as electric plug in recharging stations.	CONSISTENT. As part of its sustainability measures, the Project would incorporate parking and charging access for electric vehicles.
Policy OSC4.5: Energy Standards in Residential and Commercial Construction. Encourage projects to achieve a high level of energy conservation exceeding standards set forth in the California Energy Code for Residential and Commercial development.	CONSISTENT. The Project would pursue LEED Gold certification, which requires modeling to prove that the Project exceeds California's Title 24 energy standards by at least 15 percent. The Project would use energy-efficient HVAC equipment, energy-efficient site lighting, building management systems to optimize energy performance, and advanced energy sub-metering.
Policy OSC4.6: Waste Reduction Target. Strive to meet the California State Integrated Waste Management Board per person target of waste generation per person per day through their source reduction, reuse, and recycling programs.	CONSISTENT. According to Assembly Bill 939, all cities and counties in California are required to divert 50 percent of all solid waste, or 6.3 pounds per person per day, from landfill or transformation facilities by January 1, 2000. Operation of the Project would generate approximately 4.8 pounds of solid waste per employee per day.
Policy OSC4.7: Waste Management Collaboration. Continue to support and participate in efforts such as the South Bayside Waste Management Authority, which provides waste reduction, recycling, and solid waste programs and solutions.	CONSISTENT. The Project site is within the South Bayside Waste Management Authority (RethinkWaste) service area. Project waste, similar to other residential and commercial solid waste and recyclable materials within the city, would be collected by Recology San Mateo County and taken to Shoreway Environmental Center, the regional solid waste and recycling facility for the receipt, handling, and transfer of solid waste and recyclables collected from the RethinkWaste service area.
Goal OSC5: Ensure Healthy Air Quality and Water Quality. Enhance and preserve air quality in accord with State and regional standards, and encourage the coordination of total water quality management including both supply and wastewater treatment.	CONSISTENT. The Project's compliance with air and water quality standards as well as policies established by the Bay Area Air Quality Management District (BAAQMD), San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), and City of Menlo Park Climate Action Plan are evaluated in this Draft EIR. Air quality impacts are discussed in Section 3.4, *Air Quality*, of this document, and water quality issues are discussed in Section 3.10, *Hydrology and Water Quality*. All Project construction activities and operations would be subject to existing regulatory requirements.

General Plan Goal/Policy	Consistency Analysis
Policy OSC5.1: Air and Water Quality Standards. Continue to apply standards and policies established by the Bay Area Air Quality Management District (BAAQMD), San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), and City of Menlo Park Climate Action Plan through the California Environmental Quality Act (CEQA) process and other means as applicable.	CONSISTENT. The Project's compliance with air and water quality standards as well as policies established by the BAAQMD, SMCWPPP, and City of Menlo Park Climate Action Plan are evaluated in this Draft EIR. Air quality impacts are discussed in Section 3.4, *Air Quality*, of this document, and water quality issues are discussed in Section 3.10, *Hydrology and Water Quality*. All Project construction activities and operations would be subject to existing regulatory requirements.
Policy OSC5.2: Development in Industrial Areas. Evaluate development projects in industrial areas for impacts to air and water resources in relation to truck traffic, hazardous materials use and production-level manufacturing per the California Environmental Quality Act (CEQA) and require measures to mitigate potential impacts to less than significant levels.	CONSISTENT. The Project's potential air quality and water quality impacts related to traffic and hazardous materials are evaluated in this Draft EIR. Air quality impacts are discussed in Section 3.4 of this document, and hazardous materials impacts are discussed in Section 3.11. Where applicable and feasible, Sections 3.4 (*Air Quality*) and 3.11 (*Hazards and Hazardous Materials*) include mitigation measures to reduce potential air quality and hazardous materials impacts.
Policy OSC5.3: Water Conservation. Encourage water-conserving practices in businesses, homes and institutions.	CONSISTENT. The Project would utilize water-efficient plumbing fixtures, and Project site landscaping would be developed in compliance with the City's Water-Efficient Landscape Ordinance. In addition, the Project proposes to use, subject to approval of the City Building Official, a recycled water system for landscape irrigation and toilets/urinals, thereby minimizing water usage.
Noise Element, adopted May 21, 2013	
Goal N1: Achieve acceptable noise levels.	CONSISTENT. Through implementation of Mitigation Measure NOI-1.1, which would implement construction noise control measures in compliance with local and regional noise and land use compatibility standards, the Project would achieve acceptable noise levels during the construction periods. Operation of the Project would consist of typical office operations and would not generate noise in excess of regulatory standards. However, traffic as a result of the Project could result in noise increases at certain roadway segments.
Policy N1.1: Compliance with Noise Standards. Consider the compatibility of proposed land uses with the noise environment when preparing or revising community and/or specific plans. Require new projects to comply with the noise standards of local, regional, and building code regulations, including but not limited to the City's Municipal Code, Title 24 of the California Code of Regulations, and subdivision and zoning codes.	CONSISTENT. The Project would temporarily generate noise associated with heavy equipment during the approximately 18-month Phase 1 and 23-month Phase 2 construction periods. However, Mitigation Measure NOI-1.1, which would implement noise control measures, would decrease construction noise impacts to less than significant. This mitigation measure would be in compliance with local and regional noise and land use compatibility standards. Operation of the Project would consist of typical office operations and would not generate ground-borne vibration or noise in excess of regulatory standards.

General Plan Goal/Policy	Consistency Analysis
Policy N1.2: Land Use Compatibility Noise Standards. Protect people in new development from excessive noise by applying the City's Land Use Compatibility Noise Standards for New Development to the siting and required mitigation for new uses in existing noise environments.	CONSISTENT. The Project would temporarily generate noise associated with heavy equipment during the construction periods. However, Mitigation Measure NOI-1.1, which would implement noise control measures, would decrease construction noise impacts, in compliance with local and regional noise and land use compatibility standards. Operation of the Project would consist of typical office operations and would not generate noise in excess of the City's land use compatibility noise standards.
Policy N1.4: Noise Sensitive Uses. Protect existing residential neighborhoods and noise sensitive uses from unacceptable noise levels and vibration impacts. Noise sensitive uses include, but are not limited to, hospitals, schools, religious facilities, convalescent homes and businesses with highly sensitive equipment. Discourage the siting of noise-sensitive uses in areas in excess of 65 dBA CNEL without appropriate mitigation and locate noise sensitive uses away from noise sources unless mitigation measures are included in development plans.	CONSISTENT. The Project would temporarily generate noise associated with heavy equipment during construction periods. However, Mitigation Measure NOI-1.1, which would implement noise control measures, would decrease construction noise impacts on nearby noise sensitive uses in compliance with local and regional noise and land use compatibility standards. Operation of the Project would consist of typical office operations and would not generate noise in excess of 60 A-weighted decibels, equivalent sound level (dBA L_{eq}), at nearby residences and 70 dBA L_{eq} at nearby churches or schools.
Policy N1.6: Noise Reduction Measures. Encourage the use of construction methods, state-of-the-art noise abating materials and technology and creative site design including, but not limited to, open space, earthen berms, parking, accessory buildings, and landscaping to buffer new and existing development from noise and to reduce potential conflicts between ambient noise levels and noise-sensitive land uses. Use sound walls only when other methods are not practical or when recommended by an acoustical expert.	CONSISTENT. The Project would temporarily generate noise associated with heavy equipment during construction periods. However, Mitigation Measure NOI-1.1, which would implement noise control measures, would decrease construction noise impacts on nearby noise sensitive uses. Although the Project would incorporate open space, landscaping, and parking areas between the proposed buildings and on the site perimeter, Project operation would consist of typical office operations and would not generate noise in excess of regulatory standards or at levels that would cause conflicts with nearby noise-sensitive land uses.
Policy N1.7: Noise and Vibration from New Non-Residential Development. Design non-residential development to minimize noise impacts on nearby uses. Where vibration impacts may occur, reduce impacts on residences and businesses through the use of setbacks and/or structural design features that reduce vibration to levels at or below the guidelines of the Federal Transit Administration near rail lines and industrial uses.	CONSISTENT. The Project would temporarily generate noise and vibration associated with heavy equipment during construction activities. However, Mitigation Measure NOI-1.1, which would implement noise control measures, would decrease construction noise impacts to less than significant. This mitigation measure would be in compliance with noise and land use compatibility standards. The Project would not generate ground-borne vibration levels in excess of the criteria established by the Federal Transit Administration at nearby sensitive land uses.

General Plan Goal/Policy	Consistency Analysis
Policy N1.8: Potential Annoying or Harmful Noise. Preclude the generation of annoying or harmful noise on stationary noise sources, such as construction and property maintenance activity and mechanical equipment.	CONSISTENT. The Project would temporarily generate noise associated with heavy equipment during construction activities. Mitigation Measure NOI-1.1, which would implement noise control measures, would decrease construction noise impacts to less than significant. This mitigation measure would be in compliance with noise and land use compatibility standards. Project operation would consist of typical office operations and would not generate potentially harmful or annoying noise.
Safety Element, adopted May 21, 2013	
Policy S1.1: Location of Future Development. Permit development only in those areas where potential danger to the health, safety and welfare of the residents of the community can be adequately mitigated.	CONSISTENT. The Project site is subject to land use, operational, and maintenance restrictions because of the presence of subsurface hazardous materials, including contaminated groundwater; residual soil contamination; and potential vapor intrusion from volatile organic compounds (VOCs) in soil gas, all of which could pose unacceptable hazards to future users of the Project site and/or the environment. Existing site restrictions included in the Land Use Covenant (LUC) with the Department of Toxic Substances Control (DTSC) would require DTSC approval of any soil-disturbing activities. In addition, Mitigation Measures HAZ-2.1, HAZ-2.2, and HAZ-2.3 would require soil and groundwater management, additional site investigations, and remedial actions, as necessary, to reduce risks associated with these conditions.
Policy S1.5: New Habitable Structures. Require that all new habitable structures incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused disasters.	CONSISTENT. The Project would comply with all hazard-reducing regulatory requirements, including those intended to reduce risks associated with site contamination, geologic and seismic hazards, and flooding. The Project would, as required, be designed and built in compliance with the CBC, Chapter 16 of which deals with structural design requirements governing seismically resistant construction, and local amendments adopted by the City of Menlo Park. In addition, Mitigation Measures HAZ-2.1, HAZ-2.2, and HAZ-2.3 would require soil and groundwater management, additional site investigations, and remedial actions, as necessary, all of which would be subject to DTSC approval, to reduce risks associated with these conditions.
Policy S1.7: Hazard Reduction. Continue to require new development to reduce the seismic vulnerability of buildings and susceptibility to other hazards through enforcement of the California Building Standards Code and other programs.	CONSISTENT. The Project would, as required, be designed and built in compliance with the CBC, Chapter 16, which deals with structural design requirements governing seismically resistant construction, and local amendments adopted by the City of Menlo Park.

General Plan Goal/Policy	Consistency Analysis
Policy S1.10: Safety Review of Development Projects. Continue to require hazard mitigation, crime prevention, fire prevention and adequate access for emergency vehicles in new development.	CONSISTENT. The Project would comply with all hazard-reducing regulatory requirements, including those intended to reduce risks associated with site contamination, geologic and seismic hazards, and flooding. The Project is not expected to increase demand for MPPD services; it would most likely be served by private security for basic monitoring of the site and buildings, thereby supplementing MPPD's police patrol services. As part of the City's review process, the MPPD would review Project plans and safety features to ensure that safety standards are met; however, MPPD could require additional safety and security measures. The Project would be required to comply with all applicable Menlo Park Fire Protection District (MPFPD) codes and regulations and meet MPFPD standards related to fire hydrants, the design of driveway turnaround and access points (to accommodate fire and emergency response equipment), and fire sprinkler protection as well as other fire code requirements.
Policy S1.13 Geotechnical Studies. Continue to require site-specific geologic and geotechnical studies for land development or construction in areas of potential land instability as shown on the State and/or local geologic hazard maps or identified through other means.	CONSISTENT. Site-specific geotechnical studies were conducted at the Project site as part of the Project design and environmental review processes. A geotechnical feasibility investigation was prepared for existing Building 23, and a geotechnical investigation was prepared for existing Buildings 307–309.
Policy S1.14 Potential Land Instability. Prohibit development in areas of potential land instability identified on State and/or local geologic hazard maps, or identified through other means, unless a geologic investigation demonstrates hazards can be mitigated to an acceptable level as defined by the State of California.	CONSISTENT. The Project would adhere to the soil and foundation support parameters of the City Building Code, as required by City and state law, ensuring that structures and their associated trenches and foundations would have the maximum practicable protection from soil failures available under static or dynamic conditions.
Policy S1.18 Potential Hazardous Materials Conditions Investigation. Continue to require developers to conduct an investigation of soils, groundwater and buildings affected by hazardous-material potentially released from prior land uses in areas historically used for commercial or industrial uses, and to identify and implement mitigation measures to avoid adversely affecting the environment or the health and safety of residents or new uses.	CONSISTENT. The Project site is subject to land use, operational, and maintenance restrictions because of the presence of subsurface hazardous materials from prior land uses; it carries existing restrictions associated with these materials. The Project would include implementation of Mitigation Measures HAZ-2.1, HAZ-2.2, and HAZ-2.3, which require soil and groundwater management, additional site investigations, and remedial actions, as necessary.
Policy S1.26 Erosion and Sediment Control. Continue to require the use of best management practices for erosion and sediment control measures with proposed development in compliance with applicable regional regulations.	CONSISTENT. Construction and operation of the Project would incorporate best management practices, including soil stabilization measures, in accordance with Construction General Permit post-construction requirements and municipal separate stormwater sewer system (MS4) design requirements to reduce erosion and sediment transport.

General Plan Goal/Policy	Consistency Analysis
Policy S1.27 Regional Water Quality Control Board (RWQCB) Requirements. Enforce stormwater pollution prevention practices and appropriate watershed management plans in the RWQCB general National Pollutant Discharge Elimination System requirements, the San Mateo County Water Pollution Prevention Program and the City's Stormwater Management Program. Revise, as necessary, City plans so they integrate water quality and watershed protection with water supply, flood control, habitat protection, groundwater recharge, and other sustainable development principles and policies.	CONSISTENT. The Project Sponsor would comply with the requirements of the National Pollutant Discharge Elimination System Construction General Permit and the City's stormwater requirements (e.g., the Santa Mateo County Grading Ordinance). In addition, Project operations would be subject to the requirements of the SMCWPPP and the associated San Francisco Bay MS4 Permit, SMCWPPP C.3 Stormwater Technical Guidance, and Construction General Permit post-construction requirements as well as other related stormwater requirements from the City or county.
Policy S1.28 Sea Level Rise. Consider sea level rise in siting new facilities or residences within potentially affected areas.	CONSISTENT. According to the National Oceanic and Atmospheric Administration, the Project site could be subject to sea-level rise (SLR) (full inundation) by 2100 (i.e., 1.38 to 5.48 feet by 2100). All newly constructed buildings would be elevated, which would help to prevent the potential flooding effects of SLR on the buildings themselves. The Project would involve the placement of podiums over proposed parking to elevate finished floor elevations and provide protection from the 100-year base flood elevation (BFE) plus a minimum of 16 inches of SLR by 2050. Mitigation Measures WQ-5.1 and WQ-5.2 would also minimize the effects of flooding at the Project site.
Policy S1.29 Fire Equipment and Personnel Access. Require adequate access and clearance, to the maximum extent practical, for fire equipment, fire suppression personnel and evacuation for high occupancy structures in coordination with the Menlo Park Fire Protection District.	CONSISTENT. The Project would comply with all applicable MPFPD codes and regulations and meet MPFPD standards, including those related to the design of driveway turnaround and access points (to accommodate fire equipment), fire apparatus access roads, traffic calming devices, photovoltaic system installation, automatic fire sprinkler systems, fire alarm systems and components, and building access in the event of an emergency.
Policy S1.38 Emergency Vehicle Access. Require that all private roads be designed to allow access for emergency vehicles as a prerequisite to the granting of permits and approvals for construction.	CONSISTENT. The Project would meet MPFPD standards related to emergency vehicle access. Emergency vehicle and fire truck access would be provided along the outside perimeter of the office buildings. Each proposed building would be accessible to emergency vehicles via the perimeter roadway. Along Chilco Street, emergency vehicles would access the site from the existing stop sign–controlled driveway. In addition, emergency vehicles would access the site from the new signalized intersection on SR 84. The emergency routes for the Project would connect with the existing emergency vehicle access routes that serve Building 20.

General Plan Goal/Policy	Consistency Analysis
Policy S1.30: Coordination with the Menlo Park Fire District. Encourage City-Fire District coordination in the planning process and require all development applications to be reviewed and approved by the Menlo Park Fire Protection District prior to project approval.	CONSISTENT. As part of the City's review process, the MPFPD would review Project plans. The Project would be required to comply with all applicable MPFPD codes and regulations and meet MPFPD standards related to fire hydrants, the design of driveway turnaround and access points (to accommodate fire and emergency response equipment), and fire sprinkler protection as well as other fire code requirements.
Housing Element, adopted May 21, 2013	
Policy H1.7: Local Funding for Affordable Housing. Seek ways to reduce housing costs for lower-income workers and people with special needs by developing ongoing local funding resources and continuing to utilize other local, state, and federal assistance to the fullest extent possible. The City will also maintain the Below Market Rate (BMR) housing program requirements for residential and nonresidential developments.	CONSISTENT. The Project would adhere to the BMR program requirements for nonresidential developments.
Policy H4.10: Inclusionary Housing Approach. Require residential developments involving five or more units to provide units or an in-lieu fee equivalent for very low-, low-, and moderate-income housing. The units provided through this policy are intended for permanent occupancy and must be deed restricted, including, but not limited to, single-family housing, multi-family housing, condominiums, townhouses, or land subdivisions. In addition, the City will require larger nonresidential developments, as job generators, to participate in addressing housing needs in the community through the City's commercial in-lieu fee requirements.	CONSISTENT. The Project Sponsor would address housing needs in the community through the City's commercial in-lieu fee requirements.

Table 3.1-3. Comparison of Project to Draft ConnectMenlo General Plan Goals and Policies

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Land Use Element	
Goal LU-1: Promote the orderly development of Menlo Park and its surrounding area.	CONSISTENT. The Project would involve construction and occupancy of new buildings on a previously developed site within Menlo Park.
Policy LU-2.6: Underground Utilities. Require all electric and communications lines serving new development to be placed underground.	CONSISTENT. Any new electric and communication lines proposed at the Project site would be placed underground.
Goal LU-4: Promote the development and retention of business uses that provide goods or services needed by the community that generate benefits to the City, and avoid or minimize potential environmental and traffic impacts.	CONSISTENT. The Project would provide goods or services to the City. As evaluated throughout this Draft EIR, the Project would minimize potential environmental and traffic impacts through Project components or mitigation measures.
Policy LU-4.1: Priority Commercial Development. Encourage emerging technology and entrepreneurship, and prioritize commercial development that provides fiscal benefit to the City, local job opportunities, and/or goods or services needed by the community.	CONSISTENT. The Project site would be occupied by commercial development that would provide local job opportunities.
Policy LU-4.2: Hotel Location. Allow hotel uses at suitable locations in mixed-use and nonresidential zoning districts.	CONSISTENT. The Project would include a 200-room, limited-service hotel with approximately 174,800 gsf of space in the northwestern portion of the Project site. Although hotel uses are specifically not permitted in M-2 zoning districts, the Project Sponsor proposes to amend the Zoning Ordinance text to accommodate the proposed hotel. Such an amendment would further ensure compatibility of the Project with this policy of the General Plan. In addition, the Project site has been identified in the ConnectMenlo General Plan Update as a proposed location for a hotel.
Policy LU-4.3: Mixed Use and Nonresidential Development. Limit parking, traffic, and other impacts of mixed-use and nonresidential development on adjacent uses, and promote high-quality architectural design and effective transportation options.	CONSISTENT. The Project would provide approximately 3,533 parking spaces for the office buildings, the hotel, and Building 23. Further, the Project would include a TDM program that would encourage employees to use alternate modes of transportation, thereby reducing the number of vehicles traveling to/from the Project site. Building façade articulations and architectural designs have not yet been developed, but each proposed building would offer a variety of design styles and articulations.

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Policy LU-4.4: Community Amenities. Require mixed-use and nonresidential development of a certain minimum scale to support and contribute to programs that benefit the community and the City, including education, transit, transportation infrastructure, sustainability, neighborhood-serving amenities, child care, housing, job training, and meaningful employment for Menlo Park youth and adults.	CONSISTENT. The Project would benefit the community through the provision of open space, connections between nearby amenities, increased transit use, and sustainability features. The Project would include a publicly accessible open space area. The Project would include onsite bicycle storage facilities and a TDM program that would encourage employees to use alternate modes of transportation, thereby reducing the number of vehicles traveling to/from the Project site. A wide range of sustainability features would be employed, including, but not limited to, a building form and space layout that would promote daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, and water-efficient plumbing fixtures and landscaping. In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority.
Policy LU-6.2: Open Space in New Development. Require new nonresidential, mixed use, and multiple dwelling development of a certain minimum scale to provide ample open space in the form of plazas, greens, community gardens, and parks whose frequent use is encouraged through thoughtful placement and design.	CONSISTENT. The Project would include a publicly accessible open space area. The area is expected to include a public plaza and event space with a mix of paving, seating, and shaded landscape areas; a bicycle/pedestrian path, which would be connected to the proposed multi-use bicycle/pedestrian bridge across SR 84; and a series of small paths and seating areas within a naturalistic setting that would also provide stormwater treatment.
Policy LU-6.3: Public Open Space Design. Promote public open space design that encourages active and passive uses, and use during daytime and appropriate nighttime hours to improve quality of life.	CONSISTENT. A publicly accessible open space area would be provided between Buildings 21 and 22. The area is expected to include a public plaza and event space with a mix of paving, seating, and shaded landscape areas; a bicycle/pedestrian path, which would be connected to the proposed multi-use bicycle/pedestrian bridge across SR 84; and a series of small paths and seating areas within a naturalistic setting that would also provide stormwater treatment.
Policy LU-6.6: Public Bay Access. Protect and support public access to the Bay for the scenic enjoyment of open water, sloughs, and marshes, including restoration efforts, and completion of the Bay Trail.	CONSISTENT. The Project would include a publicly accessible open space area between the proposed Buildings 21 and 22, which would provide a safe pedestrian route to the Bay and the Bay Trail. The Project's site and landscape improvements include bicycle and pedestrian paths that would improve biking and pedestrian circulation and provide public access and connectivity between the Belle Haven community and the Bay Trail.
Policy LU-6.8: Landscaping in Development. Encourage extensive and appropriate landscaping in public and private development to maintain the City's tree canopy and to promote sustainability and healthy living, particularly through increased trees and water-efficient landscaping in large parking areas and in the public right-of-way.	CONSISTENT. The Project site would include landscaping on both the perimeter and the interior, including plazas; an approximately 2-acre, publicly accessible open space area; and bicycle and pedestrian paths throughout the site. The landscaping would include shade trees in parking areas and stormwater gardens to accommodate runoff.

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Policy LU-6.11: Baylands Preservation. Allow development near the Bay only in already developed areas.	CONSISTENT. The Project site is near the Bay (approximately 500 feet south), across Bayfront Expressway. Currently, 10 buildings are located at the Project site, with industrial, warehouse, office, and R&D uses totaling approximately 1.02 million gsf (including Building 23). The existing buildings, which cover approximately 46 percent of the Project site, range in height from one level to three partial levels. The buildings were generally built in the late 1960s as part of an industrial and manufacturing facility. In addition, a substation is located on the west side of Building 23. Therefore, although the Project site is near the Bay, it is already developed.
Goal LU-7: Promote the implementation and maintenance of sustainable development, facilities and services to meet the needs of Menlo Park's residents, businesses, workers, and visitors.	CONSISTENT. Building 21 would pursue LEED Gold certification. To conserve resources and reduce waste, sustainability features would be employed, including, but not limited to, a building form and space layout that would promote daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, and water-efficient plumbing fixtures and landscaping. In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority. The Project's sustainability features would include water-efficient plumbing fixtures to reduce water consumption by 40 percent compared with the LEED baseline. In addition, the Project would include a water-efficient landscape and irrigation design to reduce irrigation water consumption by 50 percent compared with the LEED baseline and minimize the use of potable water. The Project could use a recycled water system for landscape irrigation and toilets/urinals, thereby further minimizing water usage.
Policy LU-7.1: Sustainability. Promote sustainable site planning, development, landscaping, and operational practices that conserve resources and minimize waste.	CONSISTENT. The Project would incorporate sustainability features to conserve resources and reduce waste (e.g., a building form and space layout that would promote daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, water-efficient plumbing fixtures and landscaping). In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority.
Policy LU-7.5: Reclaimed Water Use. Implement use of adequately treated "reclaimed" water (recycled/nonpotable water sources such as, graywater, blackwater, rainwater, stormwater, foundation drainage, etc.) through dual plumbing systems for outdoor and indoor uses, as feasible.	CONSISTENT. The Project could use a recycled water system for landscape irrigation and toilets/urinals. All plumbing fixtures would feed into the wastewater system from Buildings 21 and 22, including toilets/urinals, kitchen sinks, drinking fountains, and other water fixtures. Wastewater from kitchens or other wastewater that may be high in fats, oils, and greases would be routed through a grease trap prior to reaching the wastewater treatment system.

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Policy LU-7.7: Hazards. Avoid development in areas with seismic, flood, fire and other hazards to life or property when potential impacts cannot be mitigated.	CONSISTENT. Project development would involve construction and occupancy of new buildings on a site with seismic hazards, the majority of which is within the FEMA 100-year floodplain and subject to tidal flooding from the Bay. Adherence to federal, state, and local laws would reduce the effects of natural hazards. The Project would comply with all hazard-reducing regulatory requirements, including those intended to reduce risks associated with site contamination, geologic and seismic hazards, and flooding.
Policy LU-7.8: Cultural Resource Preservation. Promote preservation of buildings, objects, and sites with historic and/or cultural significance.	CONSISTENT. The Project would include demolition of Buildings 301–306; however, these buildings are not considered historic. Ground disturbance would occur; however, implementation of Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 would reduce impacts on archeological and paleontological resources or human remains.
Policy LU-7.9: Green Building. Support sustainability and green building best practices through the orientation, design, and placement of buildings and facilities to optimize their energy efficiency in preparation of State zero-net energy requirements for residential construction in 2020 and commercial construction in 2030.	CONSISTENT. Project sustainability features to conserve resources and reduce waste would be employed, including, but not limited to, a building form and space layout that would promote daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, and water-efficient plumbing fixtures and landscaping. In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority.
Program LU-7.A.: Green Building Operation and Maintenance. Employ green building and operation and maintenance best practices, including increased energy efficiency, use of renewable energy and reclaimed water, and install drought-tolerant landscaping for all projects.	CONSISTENT. Building 21 would pursue LEED Gold certification. Sustainability features to conserve resources and reduce waste would be employed, including, but not limited to, a building form and space layout that would promote daylight use, energy-efficient lighting and HVAC equipment, onsite renewable energy generation, and water-efficient plumbing fixtures and landscaping. In addition, construction waste would be diverted from landfills, and resource-conserving materials would be given priority. The Project's sustainability features would include water-efficient plumbing fixtures to reduce water consumption by 40 percent compared with the LEED baseline. In addition, the Project would include a water-efficient landscape and irrigation design to reduce irrigation water consumption by 50 percent compared with the LEED baseline and minimize the use of potable water. The Project could use a recycled water system for landscape irrigation and toilets/urinals, thereby further minimizing water usage.
Circulation and Transportation Element	

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Policy CIRC-1.8: Pedestrian Safety. Maintain and create a connected network of safe sidewalks and walkways within the public right of way ensure that appropriate facilities, traffic control, and street lighting are provided for pedestrian safety and convenience, including for sensitive populations.	CONSISTENT. A proposed multi-use bicycle/pedestrian bridge over Bayfront Expressway would allow public access to the Bay Trail and Bedwell Bayfront Park from the Project site and the Belle Haven neighborhood. Frontage improvements, including bicycle and pedestrian improvements, along Chilco Street are being implemented by the Project Sponsor as a separate project. In addition, Mitigation Measure TRA-3.2 would provide multi-modal improvements to improve mobility options (e.g., walking, bicycling, transit), consistent with the City's "complete streets" goals, which would help to offset the effect of daily traffic generated by the Project. In particular, such measures could include pedestrian enhancements across Willow Road at Hamilton Drive, Ivy Drive, and Newbridge Street as well as at other affected study segment locations.
Goal CIRC-2: Increase accessibility for and use of streets by pedestrians, bicyclists, and transit riders.	CONSISTENT. The Project would provide pedestrian connections to immediately adjacent sidewalks and a proposed multi-use bicycle/pedestrian bridge over Bayfront Expressway. Within the Project site, the Project Sponsor has identified bicycle, pedestrian, and transit routes within the Project site. Furthermore, the Project TDM program would promote increased bicycle, pedestrian, and transit use.
Policy CIRC-2.11: Design of New Development. Require new development to incorporate design that prioritizes safe pedestrian and bicycle travel and accommodates senior citizens, people with mobility challenges, and children.	CONSISTENT. The Project design features bicycle and pedestrian accessibility and connectivity, both within the Project site and between nearby areas, including the Belle Haven neighborhood and the Bay Trail. Frontage improvements, including bicycle and pedestrian improvements, along Chilco Street are being implemented by the Project Sponsor as a separate project.
Policy CIRC-2.14: Impacts of New Development. Require new development to mitigate its impacts on the safety (e.g., collision rates) and efficiency (e.g., vehicle miles traveled (VMT) per capita) of the circulation system. New development should minimize cut-through and high-speed vehicle traffic on residential streets; minimize the number of vehicle trips; provide appropriate bicycle, pedestrian, and transit connections, amenities and improvements in proportion with the scale of proposed projects; and facilitate appropriate or adequate response times and access for emergency vehicles.	CONSISTENT. The Project would include multi-use bicycle/pedestrian pathways and a bicycle/pedestrian corridor that would run north–south through the middle of the site, which would connect the proposed office buildings to the existing Building 20 east of the Project site and Facebook Buildings 10–19 north of Bayfront Expressway. The Project TDM program would promote bicycle, pedestrian, and transit use as commute alternatives; several amenities and incentives, such as bike shops, lockers, towel service, bicycle pumps, self-repair stations, and loaner bikes, would be part of the TDM program. The TDM program and trip cap would minimize the number of vehicle trips associated with the Project. In addition, the Project would include construction of a new bicycle/pedestrian bridge over Bayfront Expressway to allow public access to the Bay Trail and Bedwell Bayfront Park from the Project site and the Belle Haven neighborhood.
Goal CIRC-3: Increase mobility options to reduce traffic congestion, greenhouse gas emissions, and commute travel time.	CONSISTENT. The Project TDM program would promote bicycle, pedestrian, and transit use as commute alternatives to reduce traffic congestion, GHG emissions, and commute travel time.

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Policy CIRC-3.1: Vehicle-Miles Traveled. Support development and transportation improvements that help reduce per capita vehicle miles traveled.	CONSISTENT. The Project Sponsor is proposing a trip cap to limit the number of daily and peak-hour (a.m. and p.m.) trips to and from the Project site and reduce traffic impacts. It would also implement a TDM program to promote alternatives to private automotive travel, thereby reducing vehicle miles traveled. However, the Project would still add traffic to local roadways, as discussed in Section 3.3, *Transportation/Traffic.*
Policy CIRC-4.1: Global Greenhouse Gas Emissions. Encourage the safer and more widespread use of nearly zero-emission modes, such as walking and biking, and lower emission modes like transit, to reduce greenhouse gas emissions.	CONSISTENT. The Project TDM program would promote the use of alternative modes of transportation, including bicycles, walking, and public transit. In addition, as part of its sustainability measures, the Project would incorporate parking and charging access for electric vehicles.
Policy CIRC-4.2: Local Air Pollution. Promote non-motorized transportation to reduce exposure to local air pollution, thereby reducing risks of respiratory diseases, other chronic illnesses, and premature death.	CONSISTENT. The Project TDM program would promote the use of non-motorized transportation, including bicycles and walking. In addition, as part of its sustainability measures, the Project would incorporate parking and charging access for electric vehicles.
Policy CIRC-5.1: Transit Service and Ridership. Promote improved public transit service and increased transit ridership, especially to employment centers, commercial destinations, schools, and public facilities.	CONSISTENT. There are no public transit stops adjacent to the Project site. However, AC Transit, SamTrans, and the City of Menlo Park Midday Shuttle serve areas near the Project site and connect them to surrounding areas. Furthermore, the Project TDM program would provide subsidized public transit passes and a shuttle service that would connect the Project site to public transit stations.
Policy CIRC-5.7: New Development. Ensure that new nonresidential, mixed-use, and multiple-dwelling residential development provides associated needed transit service, improvements and amenities in proportion with demand attributable to the type and scale of the proposed development.	CONSISTENT. There are no public transit stops adjacent to the Project site. However, AC Transit's DB and DB1 Dumbarton Express routes cross the Dumbarton Bridge, with stops near the Project site on Willow Road. SamTrans provides bus service to the area south of the Project site from Routes 270 and 276 and several shuttle routes, and the City of Menlo Park Midday Shuttle serves the Menlo Park Senior Center, located south of the Dumbarton Rail Corridor, and travels to several retail areas in downtown Menlo Park. Furthermore, the Project TDM program would provide subsidized public transit passes and a shuttle service that would connect the Project site to public transit stations.
Policy CIRC-6.3: Shuttle Service. Encourage increased shuttle service between employment centers and the Downtown Menlo Park Caltrain station.	CONSISTENT. The Project TDM program would provide subsidized public transit passes and shuttle service between the Project site and public transit stations.
Policy CIRC-6.4: Employers and Schools. Encourage employers and schools to promote walking, bicycling, carpooling, shuttles, and transit use.	CONSISTENT. The Project TDM program would encourage employees to use alternate modes of transportation, including walking, bicycling, carpooling, shuttles, and public transit.

Draft ConnectMenlo Goal/Policy	Consistency Analysis
Goal CIRC-7: Utilize innovative strategies to provide efficient and adequate vehicle parking.	CONSISTENT. In addition to onsite vehicle parking, the Project would include a TDM program that would encourage employees to use alternate modes of transportation, thereby reducing the number of vehicles traveling to/from and parking at the Project site.
Policy CIRC-7.1: Parking and New Development. Ensure new development provides appropriate parking ratios, including application of appropriate minimum and/or maximum ratios, unbundling, shared parking, electric car charging, car sharing, and Green Trip Certified strategies to accommodate employees, customers and visitors.	CONSISTENT. The Project would provide approximately 3,533 parking spaces for the office buildings, the hotel, and Building 23. In addition, a conditional development permit would be used to establish the appropriate development standards, including parking standards, for the Project. Further, the Project would include a TDM program that would encourage employees to use alternate modes of transportation, thereby reducing the number of vehicles traveling to/from the Project site.
Policy CIRC-7.2: Off-Street Parking. Ensure both new and existing off-street parking is properly designed and used efficiently through shared parking agreements and, if appropriate, parking in-lieu fees.	CONSISTENT. The Project would provide adequate off-street parking and encourage the use of alternative transportation modes.