Chapter 5
Alternatives Analysis

5.1 Introduction

The California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) require that an environmental impact report (EIR) "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6(a)). If mitigation measures or a feasible project alternative that would meet most of the basic project objectives would substantially lessen the significant environmental effects of a proposed project, then the lead agency should not approve the proposed project unless it determines that specific technological, economic, social, or other considerations make the mitigation measures and the project alternative infeasible (PRC Section 21002, State CEQA Guidelines Section 15091(a)(3)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency's determination (State CEQA Guidelines Section 15126.6(c)).

One of the alternatives that must be analyzed is the "No Project" Alternative. The No Project analysis must discuss the existing conditions at the time the notice of preparation (NOP) is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (State CEQA Guidelines Section 15126.6(e)(2)). Therefore, pursuant to the State CEQA Guidelines, this section discusses and analyzes a No Project Alternative.

In addition to the No Project Alternative, this section provides an additional alternative (Reduced Intensity Alternative) to the Project and analyzes the impacts of each. This section later provides a description of the alternatives and compares the significant impacts of the alternatives to the significant environmental impacts of the Project as proposed.

5.2 Description of Alternatives Considered

As discussed in Chapter 2, *Project Description*, the Project Sponsor has identified the following Project objectives that are relevant to the physical impacts considered in this document.

- Responsibly expand the Facebook Campus within Menlo Park to create a diverse and economically resilient workspace for Facebook and its affiliated companies, such as Instagram, Oculus, and Internet.org, and allow for a long-term presence in Menlo Park.
- Provide high-quality, highly sustainable office space at a permitted development density of 0.45 floor area ratio (FAR) that incorporates a robust Transportation Demand Management (TDM) program.
- Develop a highly connected Campus that provides flexible workspace.

- Minimize traffic and greenhouse gas (GHG) emissions by providing multiple transportation options for employees.
- Use highly sustainable design techniques to promote energy and water efficiency.
- Connect the Campus to the community by including a publicly accessible open space.
- Create a bicycle-/pedestrian-friendly environment that enhances connectivity between the Belle Haven neighborhood and Bayfront Park and the Bay Trail.
- Rehabilitate an existing industrial site, and remediate hazardous materials where appropriate.
- Provide new green spaces and additional habitat and landscaped areas with native drought-tolerant plant species.
- Create an accessible Campus that enhances connectivity, and promotes a sense of transition between the Belle Haven neighborhood and the Bay.
- Generate new revenue for the City and other public entities, including potential transient occupancy tax revenue from a potential new limited service hotel.

As stated above, the alternatives to a proposed project are meant to feasibly attain most of the basic project objectives while avoiding or substantially lessening its significant impacts. Significant and unavoidable Project-specific and cumulative impacts from the Project are listed below.

Project-Level Impacts

- **Peak Hour Motor Vehicle Traffic at Study Intersections.** Increases in traffic associated with the Project would result in increased delays during the a.m. and p.m. peak hours causing significant and unavoidable impacts at study intersections. (Impact TRA-1)
- **Peak Hour Motor Vehicle Traffic on Routes of Regional Significance.** Increases in peak hour traffic associated with the Project would result in significant and unavoidable impacts to regionally significant segments of State Route 84 / Bayfront Expressway and US 101. (Impact TRA-2)
- **Daily Motor Vehicle Traffic on Roadway Segments.** Increases in daily traffic associated with the Project increase daily traffic volumes on study segments, resulting in significant and unavoidable impacts on roadway segments. (Impact TRA-3)
- **Increased Delay to Transit Vehicles.** Increases in peak hour traffic associated with the Project would increase delay to AC Transit Dumbarton buses operating on Bayfront Expressway, resulting in a significant and unavoidable impact. (Impact TRA-8)
- **Conflicts with Applicable Plans and Policies.** The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, especially EO S-3-05. (Impact GHG-2)

Cumulative Impacts

- **Cumulative Peak Hour Traffic at Study Intersections.** Increases in traffic associated with the Project would contribute to increased delay during the a.m. and p.m. peak hours under Year 2040 conditions contributing to significant and unavoidable cumulative impacts at study intersections. (Impact TRA-10)

- **Cumulative Peak Hour Traffic on Routes of Regional Significance.** Increases in peak hour traffic associated with the Project under Year 2040 conditions would contribute to significant and unavoidable cumulative impacts to regionally significant segments of State Route 84/Bayfront Expressway, and US 101. (Impact TRA-11)
- **Cumulative Daily Traffic on Roadway Segments.** Increases in daily traffic associated with the Project would contribute to increased daily traffic volumes on study segments under Year 2040 conditions, contributing to significant and unavoidable cumulative impacts on roadway segments. (Impact TRA-12)

Based on the goal of reducing these significant and unavoidable impacts, two Project alternatives have been developed for evaluation in this Draft EIR: the No Project Alternative and Reduced Intensity Alternative. Table 5-1 provides a summary of key features of the Project and each alternative. Further details regarding potential impacts resulting from each alternative are provided below.

Table 5-1. Comparative Description of the Project Alternatives

	Project	No Project Alternative	Reduced Intensity Alternative
Total Square Footage Onsite[a]	1,137,200	511,700	848,480
Number of Buildings Onsite[a]	4	7	4
Number of Parking Spaces	3,533	1,690	2,475
Daily Vehicle Trip Cap[b]	26,457	10,128	22,127
Net New Employees	6,550	0	4,630

Notes:

a. Gross square feet (gsf); excludes existing Building 23.

b. The trip cap includes Building 20, Building 23, and the Project site. The trip cap for existing Buildings 10–19 is also being modified but is not shown in this table.

It has been determined that, in order to minimize significant and unavoidable impacts relative to transportation, air quality, and GHG emissions, an approximately 30 percent reduction in daily trips and employees would be necessary. In addition, to limit the number of employees, parking would also be reduced by approximately 30 percent. The 30 percent reduction was chosen because it allows for an increase in occupancy and development over existing conditions at the Project site, while decreasing the overall number of employees and vehicle trips associated with the Project. It also allows for the attainment of the majority of the Project objectives. For these reasons, the Reduced Intensity Alternative reducing employees by 30 percent was chosen as the most feasible alternative.

No Project Alternative

No additional construction would occur at the Project site with implementation of the No Project Alternative. Under a separate project, Buildings 307–309 would be demolished, but the No Project Alternative would retain Buildings 301–306. Not including Building 23, the Project site would encompass approximately 511,700 gsf of building area. In order to meet the definition of a “no project” alternative under CEQA, the No Project Alternative would not be permitted discretionary approvals, entitlements, or other environmental reviews. Therefore, Buildings 301–306 could not be occupied and would remain vacant. No additional employees would be added to the Project site. The same amount of

parking spaces would be provided at the Project site as under existing conditions (1,690 spaces), which could be used by the occupants of Building 23. The multi-use bicycle/pedestrian bridge over SR 84 would not be constructed, and the publicly accessible open space would not be installed. Access to the Project site would remain the same, and no new site access points would be constructed.

Reduced Intensity Alternative

The Reduced Intensity Alternative would include a 30 percent reduction in the amount of office floor area and number of office employees compared to the Project. This would equate to approximately 673,680 gsf of office building area. Including the hotel, the Reduced Intensity Alternative would result in approximately 848,480 gsf (not including Building 23). The Reduced Intensity Alternative would accommodate approximately 4,630 employees, with 4,480 Facebook employees and 150 hotel employees. As with the Project, the Reduced Intensity Alternative would include office uses and a hotel. The Reduced Intensity Alternative would result in an equivalent decrease in daily trips, which would equate to a trip cap of approximately 12,000 daily trips as a result of the Reduced Intensity Alternative. Including Buildings 20 and 23, the total site-wide trip cap would be approximately 22,127 daily trips.

This Draft EIR assumes that the site plan for the Reduced Intensity Alternative would be similar to that of the Project, with a reduced building footprint. Because the building footprints would be smaller, all footprint-based impacts would be the same as or less than those of the Project. The maximum building height would be the same as under the Project at 75 feet. Accordingly, the Reduced Intensity Alternative would still require rezoning of the Project site to a M-2(X) (Conditional Development Overlay) zoning district with a corresponding conditional development permit in order to increase the permitted building heights and define the development standards for the Project.

This EIR assumes that similar landscaping and circulation features would be installed, as proposed under the Project, including a publicly accessible open space and a terraced garden for employee use and a bicycle/pedestrian overcrossing and path that would connect the Belle Haven neighborhood with the Campus and the Bay Trail and Bayfront Park. Buildings 21 and 22 would include green roofs and terraces. The Reduced Intensity Alternative would also include a potential onsite wastewater system, which would process approximately 23 million gallons of water annually, and stormwater treatment areas. Furthermore, the TDM program, implemented to ensure that the daily vehicle trip cap would be met, would be similar but scaled for a smaller number of employees. As with the Project, the Reduced Intensity Alternative would be accessible from three access points: the current access point at Chilco Street and Constitution Drive, a new intersection at the northwest corner of the site, and a new signalized intersection at Bayfront Expressway (SR 84) at the approximate midpoint of the site. Vehicular, bicycle, and pedestrian routes throughout the site, as well as emergency vehicle access routes, would remain the same under the Reduced Intensity Alternative as under the Project. However, because the Reduced Intensity Alternative would result in less building area and fewer employees, the amount of parking would be reduced. This alternative would provide 2,475 parking stalls, compared to 3,533 stalls under the Project. It is assumed that the reduction in parking spaces would result in increased landscape areas.

5.3 Attainment of Project Objectives

An evaluation of how each alternative meets or does not meet the basic Project objectives is provided below. Pursuant to State CEQA Guidelines Section 15126.6(a), this analysis compares the alternatives to the objectives of the Project. As described in detail above, there are two alternatives for the Project: the

No Project Alternative and the Reduced Intensity Alternative. The following analysis describes the extent to which these alternatives meet or do not meet the Project Sponsor's objectives as described in Chapter 2, *Project Description*, and discussed above.

No Project Alternative

The No Project Alternative would not meet any of the primary objectives of expanding the Facebook Campus as a diverse and economically resilient workspace for Facebook and its affiliated companies and as a bicycle- and pedestrian-friendly, sustainable, flexible workspace that is highly interconnected and connected to the Belle Haven neighborhood and the Bay; that generates new revenue for the City and other public entities; and that rehabilitates an industrial site. Instead, the Project site would remain unoccupied and would not provide resources to the Facebook Campus (except for some parking for Building 23). The No Project Alternative would not demolish the existing buildings at the Project site and would not construct the proposed buildings, the publicly accessible open space, and bicycle and pedestrian paths. No connection between the Belle Haven neighborhood and the Bay Trail and Bayfront Park would be built. Additionally, the No Project Alternative would not create jobs; instead of approximately 6,550 jobs under the Project, the No Project Alternative would provide no new jobs at the Project site (not including Building 23). The tax revenues for the City would stay the same rather than increase with implementation of the Project. As such, the No Project Alternative would not meet the Project objectives.

Reduced Intensity Alternative

The Reduced Intensity Alternative would not fully achieve many of the Project Sponsor's objectives because the reductions in office space would not allow Facebook to operate at its desired level. However, the alternative would meet some of the objectives to a reduced degree. A reduction in net daily vehicle trips of 27 percent would still allow the Facebook Campus to be occupied at a level greater than existing conditions but less than what is proposed under the Project. In addition, the Reduced Intensity Alternative would develop the Facebook Campus with a building program similar to the building program under the Project. Under the Reduced Intensity Alternative, the allowable net increase in daily vehicle trips would be 27 percent less than that proposed under the Project. With the reduced trips, the Reduced Intensity Alternative would translate to approximately 4,630 employees instead of 6,550 in total, which would not meet the Project Sponsor's needs for growth.

The Facebook Campus would be developed at a lower development density than the Project's development density of 0.45 FAR. The Reduced Intensity Alternative would provide a less economically resilient workspace for Facebook and its affiliated companies, such as Instagram, Oculus, and Internet.org, compared with the Project. The Reduced Intensity Alternative would generate less new tax revenue for the City and other public entities. Because it is assumed that the building program would not be substantially different under the Reduced Intensity Alternative, the Facebook Campus would be highly connected and would provide flexible workspace, as under the Project. The Reduced Intensity Alternative would connect the Campus to the community by including publicly accessible open space. The Facebook Campus would also provide new green spaces and additional habitat and landscaped areas with native drought-tolerant plant species, similar to the Project. Similar to the Project, the Reduced Intensity Alternative would also create a bicycle-/pedestrian-friendly environment.

Because the Reduced Intensity Alternative would be in the same location as the Project, the Reduced Intensity Alternative would similarly develop a highly interconnected Campus. The Project site would also be connected to the community through a publicly accessible open space and a bicycle/pedestrian

bridge and path that would join the Facebook Campus to the Belle Haven neighborhood as well as Bayfront Park and the Bay Trail. The Reduced Intensity Alternative would also rehabilitate an existing industrial site and remediate hazardous materials where appropriate.

Similar to the Project, the Reduced Intensity Alternative would incorporate features that would promote sustainability. The Reduced Intensity Alternative would minimize traffic and GHG emissions by providing multiple transportation options for employees, as would the Project. This alternative would also implement a TDM program to minimize vehicle use. As with the Project, the Reduced Intensity Alternative would use highly sustainable design techniques to promote energy and water efficiency.

5.4 Alternatives Considered but Rejected

State CEQA Guidelines Section 15126.6(f)(2) states that a Draft EIR must consider offsite alternatives if such alternatives are deemed to be feasible by the lead agency. As stated in State CEQA Guidelines, Section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility of an alternative include:

> site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

Alternative Locations

Alternative locations for the Project were considered infeasible because the Project Sponsor owns this site; an alternate location for the office uses would require additional land acquisition, which is not included in the Project Sponsor plans or objectives. In addition, the Project site is adjacent to the current Facebook headquarters and the Project would be an expansion of that Campus. An offsite alternative would not meet the Project Sponsor's objectives and long-term growth needs. The Project Sponsor desires to remain in the same geographic area as the existing Campus to maintain its current employee base and to develop a highly connected Campus. This cannot be attained at an alternative site.

Although the Project could potentially be constructed on other similar-sized parcels near the San Francisco Bay (Bay) (for example, Redwood City, East Palo Alto, or Mountain View), there are currently no alternative sites in these areas that could accommodate the development intensity proposed given existing land use designations and zoning and scarcity of available land in the area. Further, building at an offsite location would not accomplish the objectives of developing a highly connected Campus, creating an environment that enhances connectivity between the Belle Haven neighborhood and Bayfront Park and the Bay Trail, and that provides a sense of transition between the Belle Haven neighborhood and the Bay. In addition, the significant and unavoidable impacts of the Project would most likely occur regardless of location, meaning that an offsite alternative would not further reduce these impacts and may increase impacts because it would require travel between disconnected campus locations.

Therefore, because of the aforementioned issues relative to site suitability, economic viability, and acquisition and control, an alternative site for the Project has been rejected as infeasible. This Draft EIR does not analyze an offsite location alternative.

Alternative Development Scenario

Alternatives that would consist of a permanent use other than office and hotel uses were not considered, except for onsite housing, discussed later, because they would not be consistent with applicable City zoning and General Plan land use designations and policies. In addition, uses other than office uses would not be consistent with the rest of the Facebook Campus or the Project Sponsor's objectives.

Development consistent with existing zoning ordinance requirements, which allow a maximum height of 35 feet, was considered. Under this alternative, the Project site could be developed with office buildings totaling approximately 1.396 million gsf under existing FAR limitations. This would accommodate a similar number of employees at the Project site. However, without an increase in height, the buildings would cover a larger portion of the Project site. Increasing the footprint would decrease the pedestrian-friendly campus atmosphere, reduce the landscaping, and result in a dramatic increase in impervious coverage, thereby increasing environmental impacts relative to hydrology. An increase in impervious coverage would most likely result in less groundwater recharge, with associated potential impacts on groundwater volume and water quality as a result of potentially increased stormwater runoff and associated pollutants. This would reduce the ability of the Project Sponsor to achieve its sustainability and building design goals. This alternative has been rejected because the impacts resulting from the increase in population would remain without the commensurate improvements in work-environmental connectivity, both in outdoor and indoor spaces, sustainability in design, site landscaping, and hydrology improvements.

Greater Reductions in Intensity Alternative

Reductions greater than 30 percent in the development intensity were evaluated as an alternative, but determined to be infeasible. Further reductions would not allow for redevelopment of the Project site to the maximum extent permitted under the zoning ordinance. The purpose of the Project is to expand the existing Campus in order to create an economically resilient workspace for Facebook and its affiliated companies. Reductions in office space would not allow Facebook to operate at the desired level and would most likely result in the need for additional space at a different location. A further reduction in development intensity would further reduce new revenue for the City and other public entities, including potential transient occupancy tax revenue from a potential new limited service hotel. Therefore, this alternative was considered but rejected from further analysis in this document.

Onsite Housing Alternative

An alternative has been considered that would include housing at the Project site. The inclusion of residential uses at the Project site could reduce traffic impacts associated with the Project by increasing the supply of local housing available to future employees if accompanied by a reduction in the daily and peak-period vehicle trip caps. The reduction in traffic would, in turn, reduce traffic, air quality, and GHG impacts. However, the Project site is not zoned for residential or mixed uses with residential units; a zoning ordinance amendment would be required in addition to the currently needed discretionary approvals. In addition, in 2007, Tyco Electronics and the Department of Toxic Substances Control (DTSC) entered into a Land Use Covenant (LUC) to protect present and future site users and the environment from hazardous materials that remain in soil and groundwater on the Raychem site (which includes the Project site). The LUC restricts use of the Raychem site to commercial and industrial land uses. Therefore, residential uses are not permitted at the Project site.

5.5 Impact Assessment

This section evaluates whether the alternatives would reduce the significant impacts of the Project to less-than-significant levels and/or would generate impacts other than those identified for the Project. Summarized lists of recommended mitigation measures for each alternative are provided in the analysis below; however, these mitigation measures are fully described in each resource section within Chapter 3, *Environmental Impact Analysis*, of this document. In addition, a summary comparative analysis of the Project and its alternatives is provided in Table 5-3, at the end of this section.

No Project Alternative

Land Use

In order to develop the Project to the desired height, the Project would require a rezoning to the M-2(X) zoning district with a corresponding conditional development permit. The No Project Alternative would not change the zoning or require a conditional development permit as no new buildings would be constructed. Similar to the Project, the No Project Alternative would result in no impact on an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plans; it would not conflict with the existing land use designation, nor would it divide a community. Similar to the Project, the No Project Alternative would be generally consistent with policies in the Regional Transportation Plan for the Bay Area and the City/County Association of Governments Congestion Management Program. Unlike the Project, because the No Project Alternative would not increase operational traffic, it would not result in the policy conflicts with respect to the General Plan Circulation and Transportation policies that could potentially occur with the Project. However, the No Project Alternative could result in other policy conflicts that would not occur with the Project. The General Plan and the Association of Bay Area Governments (ABAG) Bay Trail Plan and Design Guidelines promote the enhancement of bicycle and pedestrian linkages. The No Project Alternative would not construct the bicycle/pedestrian bridge over SR 84, and would not connect the Project site and the Belle Haven neighborhood to the Bay Trail. Nonetheless, as described in Section 3.2, *Land Use*, the ultimate findings of the General Plan consistency do not require that a project be entirely consistent with each individual General Plan policies. As such, because existing conditions would not change with the No Project Alternative, this alternative would result in a less-than-significant impact. (LTS)

Aesthetics

The Project site is not located adjacent to a state scenic highway. Therefore, as with the Project, the No Project Alternative would have no impacts on scenic resources along a state scenic highway. The No Project Alternative would not alter existing conditions and, therefore, would not change the existing visual character. Under the No Project Alternative, existing buildings and landscaping would remain as-is. Currently the Project site consists of outdated buildings and surface parking lots that do not complement the natural quality of the salt ponds and marshes to the north, Building 20 to the east, the Belle Haven neighborhood to the south, and the office parks to the west. In comparison, the Project would increase unity with its surroundings by constructing buildings that would reflect a similar architectural design and by including enhanced landscaping. These improvements on visual quality would not occur with the No Project Alternative.

Since no new structures would be built under the No Project Alternative, no new source of light and glare would be created, compared to the potentially significant, but mitigable, light and glare impacts that would result from the Project. Similarly, under the No Project Alternative, shadows would not

change from current conditions since no new buildings would be constructed. In comparison, under the Project, shadow impacts on the Project site would be restricted to the interior of the site and a small portion of Bayfront Expressway and the Bay Trail because of the multi-use bicycle/pedestrian bridge and would be less than significant. No impact on aesthetics would result with the No Project Alternative. (NI)

Transportation/Traffic

The No Project Alternative would retain approved conditions at the Project site. The only vehicle trips to and from the Project site would be associated with Building 23. Therefore, the No Project Alternative would be consistent with historic trip generation for the Project site. The No Project Alternative would result in no additional vehicle trips and no transportation-related impacts beyond those that were identified in the approvals for the prior projects. (NI)

Air Quality

The No Project Alternative would not construct new uses at the Project site and no uses would occupy the Project site. Therefore, the amount of emissions of criteria pollutants currently generated at the TE Connectivity Campus would not occur under the No Project Alternative. No new construction or operational emissions would be emitted; therefore the BAAQMD's significance thresholds would not be exceeded, and health risks associated with toxic air contaminants would not increase. Since no new development would be constructed or operate under the No Project Alternative, no growth would occur, and there would be no conflict with any applicable air quality plan. As a result, no impacts to air quality would result with the No Project Alternative. (NI)

Greenhouse Gas Emissions

The No Project Alternative would not involve construction activities and would not result in new direct GHG emissions from construction equipment. Additionally, no direct GHG emissions from area and mobile sources or indirect emissions from electricity generation, solid waste generation, or water consumption would be emitted, because there would be no new land uses operating at the Project site. Since this alternative would not construct new buildings, and no uses would operate at the Project site, there would be no increase in GHG emissions, resulting in no impact. (NI)

Noise

Since no construction would occur under the No Project Alternative, no construction noise would be generated. Operational noise at the Project site would remain the same because vehicle trips to the Project site as a whole (including Building 23) would not increase. In addition, the No Project Alternative would not include HVAC systems, emergency generators, or a recycled water system, all of which would generate noise under the Project. Therefore, the No Project Alternative would avoid the construction and operational noise and vibration impacts that would occur under the Project, resulting in no impacts. (NI)

Cultural Resources

The existing structures at the Project site are not historically significant. Although Buildings 307–309 would be demolished, this would occur as part of a separate project. The No Project Alternative would not demolish any of the existing buildings at the Project site. Because these existing structures are not

historically significant, neither the Project nor the No Project Alternative would result in impacts on historic buildings. Because no ground-disturbing construction would occur at the Project site, the No Project Alternative would not result in impacts on archeological and paleontological resources or human remains. (NI)

Biological Resources

The No Project Alternative would not include the demolition of any additional existing buildings, the construction of new buildings, or the removal of vegetation. As such, hoary bats would not be affected. Special-status bird and mammal species that inhabit nearby saltwater and brackish water marshes would not be affected because no new trees would be added to the landscape and the bicycle/pedestrian bridge would not be built. In comparison, under the Project, avian predators could use the new trees and mammalian predators could use the new bridge to access the species in the marsh. Migratory birds would not be affected under the No Project Alternative because no trees would be removed and there would be no disruption of nesting habitat. Under the No Project Alternative, no heritage trees would be removed. Therefore, no Project or cumulative impacts would occur under the No Project Alternative and there would be no conflicts with local policies adopted to protect biological resources. No impacts on biological resources would result from the No Project Alternative. (NI)

Geology and Soils

No known faults cross the Project site, and the site is not within a mapped Alquist-Priolo Earthquake Fault Zone. There would be no impact from the No Project Alternative related to fault rupture. The Project site is primarily flat and not adjacent to any hillsides where seismically induced landslides or other downslope movement of rock or soil material that could pose a hazard. The No Project Alternative would not include any septic tanks or leach field systems. As no construction would occur at the Project site under the No Project Alternative, there would be no topographic changes that could alter the erosion potential. In addition, construction activities, such as excavation, would not introduce instability and cause slopes to collapse.

The No Project Alternative would not construct new buildings or increase the amount of employees at the Project site over existing conditions. Therefore, the No Project Alternative would not expose additional people to ground shaking, liquefaction, or expansive soils. The No Project Alternative would result in no potential for fault rupture, landslide hazards, soil erosion or other soil hazards, nor would the No Project Alternative expose additional people to ground shaking, liquefaction, or expansive soils, whereas these impacts would be less than significant under the Project. Consequently, the No Project Alternative would result in no impact, unlike the less-than-significant impact of the Project. (NI)

Hydrology and Water Quality

As with the Project, the site is not subject to flooding from tsunami, seiche, or dam failure and is not within the 100-year floodplain; accordingly, there would be no impact. The No Project Alternative would not develop the Project site and would not add employees over existing conditions. Because no additional employees would be added with the No Project Alternative, additional people would not be exposed to potential sea level rise. The No Project Alternative would not modify the existing surface conditions at the Project site, which would remain primarily covered with impervious surfaces. The No Project Alternative would result in no impact with respect to groundwater recharge potential. The No Project Alternative would not include construction activities that could alter drainage patterns on the site or result in temporary erosion and siltation. However, the No Project Alternative would not include

the new drainage system that the Project would introduce to the site. Because drainage patterns at the Project site are an existing condition, there would be no impact. The No Project Alternative would not include stormwater quality features planned under the Project, such as bioretention areas, to temporarily store stormwater runoff and settle out pollutants. Therefore, the No Project Alternative would have a greater impact on stormwater runoff and potential pollutants than the Project. Nonetheless, because the wastewater discharge and impervious surface area constitute existing conditions, the No Project Alternative would result in no impact. (NI)

Hazards and Hazardous Materials

Unlike the Project, the No Project Alternative would not demolish any structures or disturb the soil. Therefore, it would result in no impact relative to the potential release of hazardous materials. Under the No Project Alternative, because there would be no construction, construction workers would not be exposed to potential risks from contaminated soil or groundwater. Unlike the Project, operation at the site would not include routine hazardous materials use and related maintenance activities because the existing buildings would remain vacant. As with the Project, the No Project Alternative would not expose employees or structures to wildland fires, airport hazards, or onsite hazardous materials, pursuant to Government Code Section 65062.5. Accordingly, there would be no impact. The No Project Alternative would not add traffic to the area and, therefore, would not impair emergency access and emergency plans. The potential for stormwater to infiltrate to groundwater where it could affect flow characteristics would remain. This could, in turn, interfere with the groundwater remediation system. Contaminated groundwater could flow into the BMPs, from which treated stormwater would flow to the storm drain system, resulting in possible inadvertent off-site contamination of stormwater. This is a greater impact than that of the Project. Nonetheless, because this is an existing condition, the No Project Alternative would result in no impact. (NI)

Population and Housing

The No Project Alternative would result in no increase in housing or employment levels at the Project site over existing conditions. Accordingly, the No Project Alternative would not result in a demand for new housing units within the City or proximate local jurisdictions. The No Project Alternative would avoid any population growth, resulting in no impact. (NI)

Public Services

Under the No Project Alternative, there would be no increase in the number of employees onsite compared with existing conditions that could result in increased demand for police, fire protection, emergency services, and recreational facilities. As discussed above, the No Project Alternative would not increase the population and housing demand within the City. Accordingly, the No Project Alternative would not increase the demand for schools or library services. The No Project Alternative would have no impact on public services. (NI)

Utilities and Service Systems

The No Project Alternative would not change the existing use at the Project site. Utilities at the Project site would continue to serve the existing buildings. As no additional employees would be added to the Project site, and the Project site is currently vacant, the No Project Alternative would not demand any additional utilities compared to existing conditions. Compared to the Project, the No Project Alternative would avoid the Project's less-than-significant impacts on water supply, water treatment, wastewater treatment, solid waste disposal, and stormwater drainage facilities. (NI)

Reduced Intensity Alternative

As described above, the Reduced Intensity Alternative would include a 30 percent reduction in the amount of office floor area and number of office employees. This would equate to approximately 673,680 gsf of office building area and approximately 4,630 employees (4,480 Facebook employees and 150 hotel employees). As with the Project, the Reduced Intensity Alternative would include offices and a hotel. Maximum building height would be 75 feet, the same as the Project. The site plan of the Reduced Intensity Alternative would be similar to the Project, with similar building footprints. Because the building footprints would be very similar, all footprint-based impacts would be the same as or less than the impacts of the Project, as explained below.

Land Use

As with the Project, the Reduced Intensity Alternative would not result in impacts related to division of an established community or impacts on an adopted habitat conservation plan or natural community conservation plan.

Conflicts with Adopted Land Use Plans and Policies. Similar to the Project, the Reduced Intensity Alternative would require a conditional development permit and rezoning to establish a new height limit. The maximum proposed building height under this alternative, 75 feet, would be the same as under the Project. The proposed new conditional development permit and rezoning to M-2(X) would allow the Reduced Intensity Alternative to be consistent with the Zoning Ordinance, resulting in less-than-significant impacts. This zoning, as currently defined, does not permit hotels. The proposed amendment to the Zoning Ordinance by the Project Sponsor to accommodate the proposed hotel would allow the Reduced Intensity Alternative, similar to the Project, to be consistent with the Zoning Ordinance, resulting in less-than-significant impacts. In addition, as with the Project, the Reduced Intensity Alternative would be generally consistent with the General Plan. The Reduced Intensity Alternative would enhance the Project site by installing extensive landscaping, a publicly accessible open space, and a terraced garden for employee use (consistent with General Plan policies that involve use of landscaping or designation of land for public use to achieve green urban spaces); a bicycle/pedestrian path (consistent with policies that involve designation of bicycle and/or pedestrian paths in areas of heavy non-vehicular use), and implementing a daily trip cap and a TDM program (consistent with policies designed to reduce traffic or GHG emissions or improve community amenities).

The Reduced Intensity Alternative would also be consistent with regional plans. Plan Bay Area calls for development to be placed near active transit corridors. Consistent with Plan Bay Area, in the absence of nearby transit corridors, the Reduced Intensity Alternative, similar to the Project, includes a TDM program to encourage use of alternate forms of transportation. The bicycle/pedestrian path would be compatible with ABAG Bay Trail Plan and Design Guidelines because it would enhance access from a neighborhood—the Belle Haven neighborhood—to the Bay Trail. Because the Reduced Intensity Alternative would result in fewer vehicle trips than the Project, this alternative would be generally consistent with the C/CAG Congestion Management Plan. (LTS)

Cumulative Impacts. Consistency with land use plans and policies is inherently a project-specific issue, and each jurisdiction would decide on Project consistency on the project level. As such, there would be a less-than-significant cumulative impact as a result of cumulative development in the ABAG region under the Reduced Intensity Alternative. (LTS)

Aesthetics

As with the Project, the Reduced Intensity Alternative would not damage scenic resources within a State Scenic Highway corridor.

Impacts on Scenic Vistas. As with the Project, the Reduced Intensity Alternative would result in additional height, bulk, and massing from the proposed buildings and the multi-use bicycle/pedestrian bridge, which would add a new visual element to the setting. However, as the Reduced Intensity Alternative would add approximately 30 percent less office building area than the Project, the bulk and massing of the alternative would be slightly less. The increased development of the Reduced Intensity Alternative would represent a small portion of the overall vista, as viewed from the BCDC Public Shoreline Trail, Bay Trail, and Bayfront Park. Furthermore, the increased development would not substantially obstruct views of the Santa Cruz Mountain Range. Therefore, the change in scenic views would not result in a significant impact because sensitive viewer locations primarily face away from the site and, therefore, would not be affected. Because the Reduced Intensity Alternative would have less building massing than the Project, and therefore less of an impact, the Reduced Intensity Alternative would also have a less-than-significant impact on scenic vistas. (LTS)

Degradation of Visual Character or Quality. The Reduced Intensity Alternative would slightly increase the total building area beyond existing conditions, resulting in a total building area of 848,480 gsf compared with 1,137,200 gsf under the Project. The maximum building height would be the same under this alternative as under the Project. Therefore, under the Reduced Intensity Alternative, the buildings would be more visible to surrounding uses than under existing conditions, similar to the Project. However, the proposed development would increase unity with its surroundings by constructing buildings that would reflect a similar architectural design. Further, similar to the Project, the Reduced Intensity Alternative would promote the transition of the area to office campuses by creating contiguous landscaped areas and providing bicycle and pedestrian connections. The Reduced Intensity Alternative would introduce a publicly accessible open space that would connect the adjacent Belle Haven neighborhood, the Campus, and the bicycle/pedestrian bridge, which would have connections to the Bay Trail and Bayfront Park. The alternative would also introduce buildings with a similar architectural design. Although the Reduced Intensity Alternative would increase onsite building height and massing compared with existing conditions, similar to the Project, this alternative would not significantly alter or degrade the visual character or quality of the site and its surroundings or the public view corridors in the area, resulting in a less-than-significant impact. (LTS)

New Sources of Light and Glare. As with the Project, the Reduced Intensity Alternative would add exterior lighting to an area that is not currently a significant source of nighttime lighting. Lighting used during construction would include occasional extended work hours with generator light towers. In addition, proposed development at the Project site would result in nighttime light from vehicles, interior circulation areas, parking lots, buildings, rooftop decks, and security features. Lighting could be a nuisance or distraction to motorists on Bayfront Expressway and Chilco Street and could affect residents in the Belle Haven neighborhood. Although lighting under the Reduced Intensity Alternative would be designed to standards, the increase in onsite activity and building heights would result in a potentially significant increase in lighting in the area. Implementation of Mitigation Measure AES-3.1, as required for the Project, specifies measures to ensure that lighting meets minimum safety and security standards, reducing the impacts to less than significant.

As with the Project, the Reduced Intensity Alternative would introduce new sources of glare to the Project site. With implementation of the Project, highly reflective surfaces at the Project site could pose the most significant impacts along major road corridors, such as Bayfront Expressway and Chilco Street.

Because building material specifics of the Reduced Intensity Alternative are currently unknown, it is conservatively assumed that the Project would result in potentially significant glare impacts. Mitigation Measure AES-3.2, which is required for the Project, would treat reflective surfaces, resulting in less-than-significant impacts. (LTS/M)

New Sources of Shadow. As with the Project, the Reduced Intensity Alternative would increase the maximum building height at the site to 75 feet. No offsite public parks, open space areas, or private residences would be affected by shadows that would be cast by the proposed office buildings. The only shadows that would be cast offsite by the Project would be toward a small portion of the Bayfront Expressway and the Bay Trail around the winter solstice. Impacts on Bayfront Expressway would be less than significant because the shadows would be noticeable by motorists for only a few seconds. During all other seasons, shadows from the proposed buildings would be restricted to the Project site. Like the Project, the impact from the Reduced Intensity Alternative is less than significant. (LTS)

Cumulative Impacts. The Reduced Intensity Alternative would not contribute to any cumulative impacts associated with visual resources. Although the Reduced Intensity Alternative and the nearby large-scale Menlo Gateway Project would add height, bulk, and massing in the Project vicinity, this change would not result in a significant impact on a scenic vista or the visual character of the vicinity. While there is potential for the Reduced Intensity Alternative and other planned and foreseeable projects to be large enough to contribute to a cumulative lighting impact, this alternative and the other projects would all involve redevelopment of urban sites that already generate light and glare, and the land uses proposed are not anticipated to be light intensive. Further, development of the projects is not anticipated to significantly increase nighttime lighting and glare conditions in the area. As discussed above, shadows from the Reduced Intensity Alternative would extend over a small geographic area. Although shadows from cumulative projects would not overlap with shadows from the Reduced Intensity Alternative, there would be a small overall increase in shadow as a result of the alternative. (LTS)

Transportation/Traffic

The Reduced Intensity Alternative would include a 27 percent reduction in the unmitigated Project daily vehicle trip cap, as proposed by the Project Sponsor and based on a commensurate reduction in the number of employees. During the a.m. and p.m. peak hours, net vehicle trip generation would vary.

If the Reduced Intensity Alternative were to include a peak period trip cap modeled after the Project (without Mitigation Measure TRA-1.2, which reduces the peak-hour share of allowable vehicle trips under the Project), then the Reduced Intensity Alternative would result in a net increase of 1,275 a.m. and 959 p.m. peak-hour vehicle trips. However, significant and unavoidable peak hour traffic impacts would still be anticipated without Mitigation Measure TRA-1.2.

If the Reduced Intensity Alternative were to include Mitigation Measure TRA-1.2, which reduces the allowable share of daily vehicle trips to Buildings 10-19 and the Project site (including Building 20) that may occur during a single peak hour, then the Reduced Intensity Alternative would generate substantially fewer vehicle trips. With Mitigation Measure TRA-1.2, the Reduced Intensity Alternative would result in a net increase of 20 vehicle trips during the a.m. peak hour, and a net reduction of 295 vehicle trips during the p.m. peak hour, compared to the No Project Alternative.

Because the analysis of Project impacts was based on inclusion of Mitigation Measure TRA-1.2, the comparison of the Project with the Reduced Intensity Alternative is based on inclusion of Mitigation Measure TRA-1.2. Therefore:

- During the a.m. and p.m. peak hours, the Reduced Intensity Alternative with Mitigation Measure TRA-1.2 would result in increased traffic peak-hour entrances at the site entrances from Chilco Street and Bayfront Expressway, but impacts would be less than significant with the mitigations identified for the Project at those locations. At off-site intersections, the alternative would result in traffic conditions consistent with the No Project Alternative. Peak hour traffic impacts to study intersections would, therefore, be reduced to less-than-significant levels with the Reduced Development Alternative, incorporating Mitigation Measure TRA-1.2 and the same site-specific access mitigations as identified for the Project. (LTS)
- During the a.m. and p.m. peak hours, the Reduced Intensity Alternative with Mitigation Measure TRA-1.2 would reduce peak hour impacts to regional routes of significance to less than significant. (LTS)
- During the a.m. and p.m. peak hours, the Reduced Intensity Alternative with Mitigation Measure TRA-1.2 would not result in significant cumulative impacts under Year 2040 conditions. (LTS)
- The Reduced Intensity Alternative with Mitigation Measure TRA-1.2 would not be anticipated to result in increased delay to AC Transit Dumbarton transit service, since the alternative would not result in an increase in net off-site traffic volumes on Bayfront Expressway compared to the No Project Alternative, therefore resulting in a less-than-significant impact on transit delay. (LTS)
- Daily traffic volumes under the Reduced Intensity Alternative would still result in significant and unavoidable impacts to roadway segments. However, the net increase in daily vehicle trips would be reduced by 27 percent in comparison with the Project. (SU)
- Daily traffic volumes under the Reduced Intensity Alternative would still result in significant and unavoidable cumulative impacts to roadway segments under Year 2040 conditions. However, the net increase in daily vehicle trips would be reduced by 27 percent in comparison with the Project. (SU)

Table 5-2 provides a comparison of vehicle trip generation under the Project and Reduced Intensity Alternative (both with and without Mitigation Measure TRA-1.2), and with the No Project Alternative.

Table 5-2. Vehicle Trip Comparison of the Project Alternatives

Alternatives	A.M. Peak Hour	P.M. Peak Hour	Daily
Total Vehicle Trips Generated by Each Alternative at Buildings 10–19, 20, 21, 22, 23, and Hotel			
Project	4,920	4,920	41,457
Project (with Mitigation TRA-1.2[a])	3,555	3,555	41,457
No Project Alternative	3,117	3,432	25,128
Reduced Development Alternative	4,391	4,391	37,127
Reduced Development Alternative (with Mitigation TRA-1.2[a])	3,137	3,137	37,127
Net Vehicle Trip Generation over No Project Alternative without Trip Cap Mitigation TRA-1.2[a]			
Project	**1,803**	**1,488**	**16,329**
Reduced Development Alternative	**1,274**	**959**	**11,999**
Net Vehicle Trip Generation over No Project Alternative with Trip Cap Mitigation TRA-1.2[a]			
Project + Mitigation TRA-1.2[a]	**438**	**123**	**16,329**
Reduced Development Alternative + Mitigation TRA-1.2[a]	**20**	**-295**	**11,999**

Source: TJKM, 2016.

[a.] Mitigation TRA-1.2 requires a reduction in peak-hour vehicle trips at Buildings 10–23.

Air Quality

Conflict with Air Quality Plan. The proposed development under both the Project and the Reduced Intensity Alternative would not conflict with the existing land use designation, would be consistent with the City's General Plan, and would not result in an increase in City population that exceeds ABAG projections. Similar to the Project, the Reduced Intensity Alternative would be consistent with the BAAQMD's 2010 Climate Action Plan (CAP) strategies. Therefore, impacts are considered less than significant. (LTS)

Construction Criteria Air Pollutant Emissions. The Reduced Intensity Alternative would result in a 30 percent reduction in office floor area and number of employees, which would likely result in a shorter construction period. However, in order to maintain a shorter construction period, it is likely that the daily construction activities under the Reduced Intensity Alternative would be similar to the Project. Therefore, daily construction emissions generated by the alternative would likely be similar to the Project. The daily construction emissions from operation of onsite construction equipment and on-road vehicles under the Project would be below the BAAQMD's significance thresholds for reactive organic gas (ROG), nitrogen oxides (NO_X), carbon monoxide (CO), and particulate matter (PM10 or PM2.5); therefore, the Reduced Intensity Alternative would not exceed any of the BAAQMD thresholds. Regardless, as required by the BAAQMD, Mitigation Measure AQ-2.1, as proposed for the Project, would be implemented to reduced PM10 and PM2.5 fugitive dust emissions. With the implementation of these mitigation measures, this impact would be less than significant. (LTS/M)

Operational Criteria Air Pollutant Emissions. Both Project and Reduced Intensity Alternative operation have the potential to create air quality impacts, primarily associated with direct emissions from mobile sources. Motor vehicle traffic would include daily employee trips, visitor trips, shuttle and vanpool trips, and contractor, vendor, and delivery trucks. Because the Reduced Intensity Alternative would result in fewer vehicle trips due to the reduction in office floor area and employees, the operational air quality impacts would be reduced. Given that the Reduced Intensity Alternative would

result in approximately 30 percent fewer employees than the Project, it is highly likely that such a reduction in the number of employees and corresponding vehicle miles traveled would result in NO_X emissions that would not exceed the BAAQMD threshold. This impact would be less-than-significant and Mitigation Measure AQ-2.2, as required for the Project, would not need to be implemented. (LTS)

Exposure of Existing Sensitive Receptors to Substantial Pollutant Concentrations During Construction. Diesel-fueled engines, which generate diesel particulate matter (DPM), would be used during construction of the Reduced Intensity Alternative, similar to the Project. Multiple sensitive receptors are located within 1,000 feet of the Project site, including single-family residences, a playground, and a school (see Table 3.4-4 in Section 3.4, *Air Quality*). Project construction would not result in any significant increases in the non-cancer hazard index, cancer risk, or annual PM2.5 concentrations at residential, recreational, or school receptors within 1,000 feet of the Project site. The Reduced Intensity Alternative would result in a reduction in office floor area compared with the Project; however, as discussed above, daily construction activity would very likely be comparable to that of the Project. Consequently, the Reduced Intensity Alternative's PM2.5 concentration, hazard index, and cancer risks would be similar to those of the Project but below the applicable thresholds with implementation of Mitigation Measure AQ-2.1, which would be required by the BAAQMD. This impact would be less than significant. (LTS)

Exposure of Existing Sensitive Receptors to Substantial Pollutant Concentrations from Project Operation. Traffic generated by the Project would have the potential to create CO hotspots at nearby roadways and intersections. However, since the Reduced Intensity Alternative would generate less traffic than the Project, the CO emissions would not be as significant. Regardless, for both the Project and the Reduced Intensity Alternative, CO concentrations are not expected to contribute to any new localized violations of the 1-hour or 8-hour ambient air quality standards, resulting in less-than-significant impacts. (LTS)

Create Objectionable Odors. Potential odor sources during construction include diesel exhaust from heavy-duty equipment. Construction-related operations near existing receptors would be temporary in nature, and construction activities would not be likely to result in nuisance odors that would violate BAAQMD Regulation 7 (Odorous Substances). Potential odor sources from operation of the Reduced Intensity Alternative would include diesel exhaust from landscaping equipment and emergency generators during routine maintenance. The odor impacts during operation would be limited and infrequent. The potential recycled water facility would not create odors. Because there would be no change in land use under the Reduced Intensity Alternative compared to the Project, the same less-than-significant impacts would occur. (LTS)

Cumulative Impacts. For the reasons described above, the Reduced Intensity Alternative, in combination with other development in the city, would not conflict with or obstruct implementation of the applicable air quality plan and would not result in a cumulatively significant impact. Additionally, the Reduced Intensity Alternative, in combination with other development within the city, would be consistent with the Ozone Attainment Plan and the Clean Air Plan. This would be a less-than-significant cumulative impact. (LTS)

As discussed above, the Reduced Intensity Alternative would not exceed the project- and cumulative-level BAAQMD thresholds for any pollutants during construction. Operational emissions of NO_X would exceed the BAAQMD threshold but would be offset, however, through mitigation; these emissions would not be cumulatively considerable. Further, cumulative PM2.5 concentrations, hazard index, and cancer risks associated with Project construction would not exceed the applicable BAAQMD cumulative

thresholds. As discussed above, the Reduced Intensity Alternative would result in construction emissions and impacts that would be comparable to those of the Project. Thus, PM2.5 concentrations, hazard index, and cancer risks would be comparable under this alternative and, thus, below the applicable thresholds. Consequently, the cumulative impact of health risks on sensitive receptors would be less than significant. (LTS)

Greenhouse Gas Emissions

GHG Emissions during Project Construction. Construction of the Reduced Intensity Alternative would generate emissions of carbon dioxide (CO_2), methane (CH_4), and nitrogen oxides (NOx) from mobile and stationary construction equipment exhaust, and employee and haul truck vehicle exhaust. Although the construction period could be shorter for this alternative due to less building area, the intensity of construction activities at a given time would be similar to the Project. BAAQMD's CEQA Guidelines do not recommend a GHG emission threshold for construction-related emissions; therefore, construction of the Reduced Intensity Alternative would not exceed thresholds. However, the Guidelines recommend implementation of BMPs to help control and reduce GHG emissions. Therefore, the construction of the Reduced Intensity Alternative is considered less than significant with implementation of Mitigation Measure GHG-1.1. (LTS/M)

GHG Emissions during Project Operation. Operation of the Reduced Intensity Alternative would generate fewer direct and indirect GHG emissions than the Project due to a decrease in building area and employees. Therefore, this alternative would result in fewer vehicle trips, and less electricity generation and consumption, waste and wastewater generation, and water use. However, the Reduced Intensity Alternative would still generate an increase in direct and indirect GHG emissions compared with existing conditions; however, there would be a 30 percent reduction in the number of employees, which would have an appreciable effect on GHG emissions. Regardless, the Reduced Intensity Alternative, similar to the Project, would be well below the BAAQMD efficiency threshold for GHGs. Thus, the Reduced Intensity Alternative would result in less-than-significant impacts. (LTS)

Conflicts with Applicable GHG Emission Plans, Policies, and Regulations. Because the Reduced Intensity Alternative would not exceed the BAAQMD efficiency threshold, this alternative would not pose any explicit conflict with the AB 32 Scoping Plan to reduce GHG emissions to 1990 levels by 2020 or the City's Climate Action Plan. The Reduced Intensity Alternative, similar to the Project, would also be below the 2030 "Substantial Progress" efficiency metric and would implement several GHG reduction measures. However, the Reduced Intensity Alternative could be inconsistent with the long-term goals specified in EO S-3-05 because the degree of future action at the state and federal level cannot be known at this time. Therefore, it is conservatively assumed that the Reduced Intensity Alternative's impact relative to conflicts with applicable plans and policies would be significant and unavoidable only with respect to the long-term goal specified in EO S-3-05. (SU)

Noise

As with the Project, the Reduced Intensity Alternative would have no impacts related to adjacency to airports.

Exposure to Excessive Noise Levels. The Reduced Intensity Alternative would expose persons to or generate noise levels in excess of standards established in the General Plan, noise ordinance, or applicable standards.

Construction. As with the Project, construction of the Reduced Intensity Alternative would require the use of heavy equipment that would temporarily increase noise levels at properties near the work sites. Although the Reduced Intensity Alternative would result in less building area and, therefore, potentially shorter construction periods, noise levels at a given time during construction would be similar to the levels expected under the Project. Construction work hours for the Reduced Intensity Alternative would likely be comparable to those of the Project, extending from 7:00 a.m. to 7:00 p.m. Monday through Friday. The Reduced Intensity Alternative, one hour of construction activity in the morning and one hour in the evening would not be covered by the exemption in the Noise Ordinance, and construction activities during these times would need to comply with the 60 dBA standard. As discussed for the Project construction impact assessment, construction noise is expected to exceed the 60 dBA L_{eq} limit (during the two hours per day that this standard applies) at residential properties within 1,200 feet. Further, during the exempted hours for construction activity, the loudest equipment piece (a pile driver) could generate noise levels of up to 94 dBA L_{eq} at a distance of 50 feet, which is in excess of the Menlo Park 85 dBA limit for powered equipment at 50 feet during the hours between 8:00 a.m. and 6:00 p.m. Therefore, as noise from the construction of the Reduced Intensity Alternative could exceed the 85 dBA limit at 50 feet between the hours of 8:00 a.m. and 6:00 p.m., and could be in excess of the 60 dBA L_{eq} threshold that would apply outside of these exempted hours, this impact would be potentially significant. Implementation of Mitigation Measure NOI-1.1, as required for the Project, would reduce construction noise impacts of the Reduced Intensity Alternative to less than significant. (LTS/M)

Impacts on Offsite Uses. The Reduced Intensity Alternative would have the potential to increase noise on roadway segments in the vicinity of the Project site, although to a lesser extent than the Project due to the reduction in vehicle trips. However, only the segment of Chilco Street between Hamilton Avenue and Terminal Avenue (and only one receptor along this segment) could result in potentially significant traffic noise impacts under the Reduced Intensity Alternative. Traffic noise impacts at the one street-adjacent to outdoor use areas along this segment would be less than significant when accounting for distance to the receptor from the centerline of the roadway and for an existing privacy fence that functions as a noise barrier. As with the Project, this alternative would result in less-than-significant noise impacts on offsite sensitive receptors. (LTS)

Impacts on Onsite Uses. The Reduced Intensity Alternative would have the potential to increase noise levels along the roadway segment adjacent to the proposed onsite hotel, specifically Chilco Street between Constitution Drive and Bayfront Expressway. With implementation, noise levels at the future hotel site (including potential noise from Bayfront Expressway) would be conditionally compatible with the proposed onsite hotel. Because the Reduced Intensity Alternative would involve fewer employees, it would involve a correspondingly lower level of noise increase. As with the Project, noise levels would be within the conditionally acceptable noise range for hotel use with implementation of the Reduced Intensity Alternative, and this impact would be less than significant.

The potential exists for onsite outdoor use areas that face Bayfront Expressway (to which the Reduced Intensity Alternative would add some daily traffic) to be exposed to noise levels that would be in excess of the noise compatibility standard. Because the Reduced Intensity Alternative would involve fewer employees than the Project, it would involve a correspondingly lower level of noise increase. Conservatively assuming that all of the additional Project traffic would be traveling on Bayfront Expressway was determined to result in a maximum noise increase attributable to the Project of approximately 1 dB at the onsite outdoor use areas; the Reduced Intensity Alternative would contribute even less than this amount. Therefore, noise levels would still be below the normally acceptable standards for commercial and office outdoor use areas with implementation of the Reduced Intensity Alternative. This impact would be less than significant. (LTS)

General Onsite Activity. The Reduced Intensity Alternative would result in an increase in noise levels associated with employee and hotel guest activity compared to existing conditions. However, this increase would be less than the noise levels associated with the Project due to the decrease in employees and vehicle trips. The shortest distance between the outdoor areas of the Project site and the nearest sensitive land use is more than 250 feet. Human activity on the site would not exceed 60 dBA at the nearest noise-sensitive land use and would not exceed the Noise Ordinance limit for residential land uses or the City General Plan compatibility standard. As with the Project, the Reduced Intensity Alternative would result in a less-than-significant impact related on human activity onsite. (LTS)

Heating, Ventilation, and Air-Conditioning Systems. As with the Project, the new buildings associated with the Reduced Intensity Alternative would require heating, ventilation, and air-conditioning (HVAC) systems. The new HVAC systems may expose persons to noise in excess of the applicable nighttime noise standard. Impacts related to the use of HVAC systems would be potentially significant. However, Mitigation Measure NOI-1.2 would incorporate design measures that would limit noise to the applicable standard at the property line of applicable noise-sensitive receptors. (LTS/M)

Parking. The Reduced Intensity Alternative would include new parking surfaces and podium parking. Because the Reduced Intensity Alternative would involve fewer employees than the Project, it would involve a correspondingly lower level of noise increase. The noise impact related to parking structures is less than significant under the Project and similarly less than significant under the Reduced Intensity Alternative. (LTS)

Truck Pick-Ups and Deliveries. As with the Project, the Reduced Intensity Alternative would include a total of four loading docks. Because the Reduced Intensity Alternative would involve fewer employees and, therefore, correspondingly fewer deliveries, it would involve a correspondingly lower level of noise increase. Trucks are exempted from the City's short-term noise level limit of 60 dBA at residential land uses, provided the trucks do not idle for more than 10 minutes. State law currently prohibits heavy-duty diesel delivery trucks from idling more than 5 minutes. Additionally, given the short duration and relative infrequency of truck trips to the Project site, truck deliveries would not be a source of excessive ambient noise. As with the Project, under the Reduced Intensity Alternative, impacts related to truck deliveries would be less than significant. (LTS)

Emergency Generators. With the Reduced Intensity Alternative, stand-by emergency power generators would be installed to serve the buildings associated with the Project. Emergency generators create temporary and periodic noise from testing. The Reduced Intensity Alternative would generate the same noise level as the Project. The generators are not anticipated to be in use frequently because they are intended to be a backup or emergency power source; however, because they would be tested monthly, noise levels from generator testing could exceed the City's Noise Ordinance if a noise attenuation enclosure were not installed to surround the emergency generators. Accordingly, this impact is considered significant for both the Project and the Reduced Intensity Alternative. Mitigation Measure NOI-3.1 would require installation of sound enclosures around emergency generators. (LTS/M)

Recycled Water System. The Reduced Intensity Alternative could include a recycled water system, similar to the Project. The system would include constructed wetlands, a mechanical equipment room, primary tanks, and a headworks building. All pumps, the lift station, and other noise-generating equipment associated with the recycled water facility would be housed inside buildings. However, it is conservatively assumed that like the Project, the primary tanks and headworks buildings under the Reduced Intensity Alternative would be located in relatively close proximity to residences located to the south of the Project site. Although it is possible that noise levels would be reduced to less-than-

significant levels, based on the design of the building enclosures, the designs have not been finalized at this time. As such, the potential exists for noise from operation of these facilities to exceed the City's daytime and nighttime noise standards, resulting in significant impacts. However, implementation of Mitigation Measure NOI-1.5, as required for the Project, would reduce this impact to less than significant levels by ensuring that building structures that house mechanical equipment are designed to limit noise. (LTS/M)

Expose Persons to or Generate Excessive Ground-borne Vibration or Ground-borne Noise Levels. The operation of heavy construction equipment can generate localized ground-borne vibration and noise at buildings adjacent to the construction site. The Reduced Intensity Alternative would use pile driving exclusively to construct building foundations. In the worst-case scenario, ground-borne vibration levels would be below the damage threshold for the most fragile buildings and below the perceptibility threshold. Therefore, vibration disturbance during construction of the Reduced Intensity Alternative is not expected to damage buildings or be perceptible to people. Similar to the Project, this impact is considered to be less than significant. (LTS)

Substantial Permanent Increase in Ambient Noise Levels. As with the Project, the Reduced Intensity Alternative could result in a permanent increase in ambient noise levels in the Project vicinity. Because the Reduced Intensity Alternative would involve fewer employees, it would involve a correspondingly lower level of noise increase. However, traffic would increase compared to existing conditions, and associated noise levels along some road segments would increase as well. Noise from Project HVAC systems and onsite emergency generators may also result in a permanent increase in noise levels. Implementation of Mitigation Measure NOI-1.2, as required for the Project, would reduce impacts related to HVAC noise levels to less than significant at nearby receptors. Additionally, Mitigation Measures NOI-1.3 and NOI-1.4 would reduce impacts related to emergency generator noise to less than significant. Project-related traffic would not result in significant increases in ambient noise levels, and traffic added by the Reduced Intensity Alternative would be less than traffic added by the Project; the corresponding noise increases would therefore also be less. Because implementation of Mitigation Measures NOI-1.2, NOI-1.3, NOI-1.4, and NOI-1.5 would reduce impacts related to stationary-source noise levels to less than significant, and the Reduced Intensity Alternative would not result in direct traffic noise impacts on nearby receptors, the Reduced Intensity Alternative would not result in a substantial permanent increase in ambient noise levels; this impact would be less than significant with mitigation. (LTS/M)

Substantial Temporary or Periodic Increase in Ambient Noise Levels. The Reduced Intensity Alternative could result in temporary or periodic increases in ambient noises. Construction for the Project and for the Reduced Intensity Alternative could also result in noise levels that would exceed the 60 dBA L_{eq} threshold that applies when construction noise is not exempted from the general noise limitations (specifically, 7:00 a.m. to 8:00 a.m. and from 6:00 p.m. to 7:00 p.m.). Mitigation Measure NOI-1.1, as required for the Project, would require noise control measures to be implemented during construction to reduce noise to less-than-significant levels. Emergency power generators that would be located in several buildings could result in noise that would exceed Menlo Park noise levels for sensitive receptors. Implementation of Mitigation Measures NOI-1.3 and NOI-1.4 would reduce impacts to less-than-significant levels for both the Project and for the Reduced Intensity Alternative. (LTS/M)

Cumulative Impacts. The Reduced Intensity Alternative would result in the same or slightly fewer cumulative noise impacts as the Project. Cumulative exposure to excessive noise would result in less than cumulatively considerable impacts with implementation of Mitigation Measure NOI-1.1. Impacts related to cumulative exposure to ground-borne vibration, cumulative permanent increase in noise

levels, and cumulative temporary increase in noise levels would be less than cumulatively considerable for the Project. Accordingly, the Reduced Intensity Alternative would also result in less than cumulatively considerable impacts. (LTS/M)

Cultural Resources

Impacts on Historic Resources. The Reduced Intensity Alternative would demolish the existing Buildings 301–306 at the Project site. However, as with the Project, the Reduced Intensity Alternative would not cause a substantial adverse change in the significance of a historic resource because none of the existing structures are considered historic resources. Therefore, like the Project, the Reduced Intensity Alternative would result in a less-than-significant impact on historic resources. (LTS)

Impacts on Archaeological Resources. Although no archaeological resources were identified in or adjacent to the Project site, three prehistoric sites have been recorded within 0.5 mile of the Project site. Accordingly, due to ground-disturbing activities during construction, the Reduced Intensity Alternative has the potential to encounter previously undiscovered archaeological resources during construction. However, as with the Project, implementation of Mitigation Measure CUL-2.1 would reduce the impact to less than significant. (LTS/M)

Impacts on Paleontological Resources. The Reduced Intensity Alternative has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts on paleontological resources would depend on the depth, extent, and type of soil-disturbing activities that may occur as a result of construction, as well as the paleontological sensitivity of the materials underlying the Project site. Construction activities under the Reduced Intensity Alternative would be similar to the Project. As such, this alternative could expose undisturbed deposits that may contain fossils, resulting in a potentially significant impact. However, Mitigation Measure CUL-3.1, as required for the Project, would reduce this impact to less than significant. (LTS/M)

Impacts on Human Remains. Although the Northwest Information Center background records search did not identify any human remains in or adjacent to the Project site, three prehistoric sites have been identified within 0.5 mile of the Project site. Therefore, the potential may exist for previously undiscovered human remains to be encountered during construction of the Reduced Intensity Alternative. However, Mitigation Measure CUL-4.1 would reduce the impact to less than significant. (LTS/M)

Cumulative Impacts. Because the existing buildings at the Project site are not considered historic resources, the Reduced Intensity Alternative would not contribute to any potential cumulative impact on historical resources. Given that known prehistoric resources have been identified within 0.5 mile of the Project site, there is the possibility that previously undiscovered archaeological resources, paleontological resources, and human remains could be encountered during construction. For this reason, the cumulative effects of all development on these resources are considered potentially significant. However, compliance with Mitigation Measures CUL-2.1, CUL-3.1, and CUL-4.1, as required for the Project, would reduce the Reduced Intensity Alternative's contribution to the cumulative impact to less than cumulatively considerable, similar to the impacts for the Project. (LTS)

Biological Resources

The Reduced Intensity Alternative would not result in a loss of riparian habitat, sensitive natural communities, or wetlands and would not conflict with any adopted habitat conservation plans.

Direct Impacts on Special-Status Species. Hoary bats are the only mammal species that could occur in the vicinity of the Project site. Because the Reduced Intensity Alternative would have a similar building footprint as the Project, the same number of trees would likely be removed. However, the Reduced Intensity Alternative would plant trees to offset the removal of heritage trees. In addition, the Reduced Intensity Alternative would demolish Buildings 301–306. Although the likelihood of occurrence is quite low, the removal of trees and the removal, or modification, of buildings containing active bat roosts, particularly during the nesting season (typically April through August), could result in a loss of individual bats, bat colonies, or their habitat. However, implementation of Mitigation Measure BIO-1.1, which would be implemented under the Project, would identify and protect roosting and breeding bats on the Project site, reducing the potentially significant impact to less than significant. The same impacts would occur with implementation of the Reduced Intensity Alternative as under the Project. (LTS/M)

Indirect Impacts on Special-Status Species. The three proposed buildings, new trees, the publicly accessible open space, and the bicycle/pedestrian bridge over Bayfront Expressway could serve as new or additional perching or nesting opportunities. These new features at the Project site could increase predation by raptors or other predatory birds on special-status species in the nearby salt marshes. However, implementation of Mitigation Measure BIO-2.1, as required for the Project, would install bird perching deterrents on all new buildings and other elevated structures, including the bicycle/pedestrian bridge, protecting special-status species from increased predation on the Project site. As with the Project, the Reduced Intensity Alternative would result in less-than-significant impacts on special-status species with implementation of this mitigation measure. (LTS/M)

Impacts on Native Wildlife Nursery Sites. Existing shrubs and trees on the Project site could provide nesting habitat for a variety of native migratory birds. With implementation of the Reduced Intensity Alternative, Buildings 301–306 would be demolished, existing landscaping removed, and the site would be developed with new buildings and landscaping. If nesting migratory birds are present (i.e., nests containing eggs or youths), tree and shrub removal associated with the redevelopment of the Project site could result in the loss of those birds caused by the direct mortality of adult or young birds, nest destruction, or disturbance of nesting native migratory bird species. However, implementation of Mitigation Measure BIO-3.1, which would be implemented for the Project, would require preconstruction surveys for nesting migratory birds. Implementation of Mitigation Measure BIO-3.2 would require that bird-safe design standards be incorporated into Project buildings and lighting design. As with the Project, the Reduced Intensity Alternative would result in less-than-significant impacts with implementation of this mitigation measure. (LTS/M)

Conflicts with any Local Policies or Ordinances that Protect Biological Resources. It is assumed that the Reduced Intensity Alternative would remove all of the existing trees at the Project site, several of which qualify as heritage trees under the City's Heritage Tree Ordinance. Removal of these trees would require adherence to the City's Municipal Code and the Heritage Tree Ordinance. Therefore, the Reduced Intensity Alternative would not conflict with any local policies protecting biological resources and would result in the same less-than-significant impacts as the Project. (LTS)

Cumulative Impacts. As discussed in Section 3.14, *Biological Resources*, cumulative impacts with respect to biological resources would be less than significant with the implementation of Mitigation Measures BIO-1.1, BIO-2.1, BIO-3.1, and BIO-3.2. Because this alternative would involve the same amount of tree removal, building demolition, and a similar building footprint impacts as the Project, the same less than cumulatively considerable impacts would occur. (LTS)

Geology and Soils

As with the Project, the Reduced Intensity Alternative would not result in impacts related to loss of topsoil, impacts on septic systems, fault rupture, landslide, or lateral spreading.

Strong Seismic Ground Shaking and Seismic-Related Ground Failure. The Reduced Intensity Alternative would construct two office buildings and a hotel totaling approximately 848,480 gsf. This new development would expose approximately 4,630 new workers to ground shaking. The risks to public safety from seismic hazards can be mitigated to the extent required by law with implementation of the proper design and construction methods, which would be within the responsibility of the City and the Project Sponsor to monitor and enforce through its building permit process. In addition, the City, along with other Bay Area jurisdictions, participates in a coordinated planning and emergency response program, and has its own Emergency Operation Plan to respond to natural disasters. Consequently, the Reduced Intensity Alternative, as with the Project, would not have a significant adverse impact with regard to exposure of people or structures to damage resulting from seismic ground shaking or liquefaction-related hazards. Therefore, impacts are considered less than significant. (LTS)

Soil Erosion. The Project site is nearly level and would not involve development on hillsides that would involve cut-and-fill. Thus, development of the Reduced Intensity Alternative would not result in topographic changes that could alter erosion potential. However, development of the Project site under the Reduced Intensity Alternative would involve grading to construct building foundations and trenching for utility installations. Some minor modifications to allow additional roadway access points would also be implemented. These construction activities could temporarily expose soils to erosive effects from stormwater runoff. Similar to the Project, compliance with City requirements and the California Building Code (CBC), which are within the authority of the City to enforce and monitor, would ensure that erosion impacts resulting from Project construction would be less than significant. (LTS)

Soil Hazards. Adherence to the soil and foundation support parameters of the City Building Code, as required by City and State law, would ensure the maximum practicable protection available from soil failures under static or dynamic conditions for structures and their associated trenches and foundations. With implementation of the Reduced Intensity Alternative, the Project Sponsor would be required to incorporate these recommendations into Project design. Therefore, as with the Project, hazards related to unstable geologic or soil units (subsidence and collapse) are considered less than significant. (LTS)

Expansive Soil. The preliminary geotechnical investigation for the Project site indicates that soils are expected to have a high shrink-swell potential. Structural damage, warping, and cracking of roads, driveways, parking areas, and sidewalks, and rupture of utility lines may occur if the potential for expansive soils and the nature of the imported fill are not considered during design and construction of the Reduced Intensity Alternative. Adherence to the soil and foundation support parameters of the City Building Code would ensure the maximum practicable protection available from soil failures under static or dynamic conditions for structures and their associated trenches and foundations. Therefore, similar to the Project, the Reduced Intensity Alternative would result in less-than-significant impacts related to expansive soils. (LTS)

Cumulative Impacts. Soil and geologic conditions are site-specific and there is little, if any, cumulative relationship between the Project site and other areas in the City. Accordingly, the potential for cumulative impacts to occur is geographically limited for many geology and soils impact analyses. The Reduced Intensity Alternative would have a less-than-significant potential to cause cumulatively

substantial erosion or siltation. Construction and operational activities embodied in the Reduced Intensity Alternative would be subject to the same regulations as the Project. Consequently, cumulative impacts would be less than significant. (LTS)

Hydrology and Water Quality

As with the Project, the Reduced Intensity Alternative would not substantially degrade water quality and would not have any impacts related to flooding by seiche, tsunami mudflow, or dam failure inundation.

Violation of Water Quality Standards or Waste Discharge Requirements. Implementation of the Reduced Intensity Alternative would include construction activities, which would disturb land and place stockpiles within proximity to storm drain inlets. This could result a temporary increase in sediment loads to the Lower San Francisco Bay. Sediment transport to local drainage facilities could also result in reduced storm flow capacity, resulting in localized ponding or flooding during storm events. All construction activities would be subject to existing regulatory requirements. All construction activities would comply with the General Construction Permit from the San Francisco Bay Regional Water Board, which contains standards to ensure that water quality is not degraded. Because the Reduced Intensity Alternative, similar to the Project, would be in compliance with the General Construction Permit, local stormwater ordinances, and other related requirements, potential water quality impacts during construction would be less than significant. Mitigation Measure WQ-1.1, as required for the Project, would be implemented during construction dewatering if necessary and would ensure that potential impacts related to water quality would be reduced to a less-than-significant level.

Stormwater treatment areas would be located throughout the Project site in order to limit stormwater runoff and provide for biotreatment of contaminants. In addition, the Reduced Intensity Alternative would result in increased pervious surfaces over existing conditions and the Project, as well as buildings with green roofs and terraces. Because less parking would be required with this alternative compared to the Project due to a decrease in building area and vehicle trips, these paved surfaces under the Project would instead consist of pervious landscaped areas. Accordingly, the Reduced Intensity Alternative would result in a net decrease in the amount of runoff leaving the Project site and thus, a reduced volume of potential contaminated runoff. The Reduced Intensity Alternative, as with the Project, would be in compliance with the San Francisco Bay Region MS4 Permit, San Mateo Countywide Stormwater Pollution Prevention Program, and local stormwater ordinances. Therefore, potential water quality impacts would be less than significant. (LTS/M)

Effects on Groundwater Supplies and Recharge. The majority of the water supplied to the Project site is from surface water sources, and this would not change during or following implementation of the Reduced Intensity Alternative. Although construction of this alternative may require dewatering, such activities would be conducted on a one-time or temporary basis during the construction phase and would not result in a loss of quantities of water that would deplete groundwater supplies. The Reduced Intensity Alternative would increase pervious service area; therefore, an increase in groundwater recharge would occur. However, the Reduced Intensity Alternative would include slightly more pervious surfaces than the Project because less parking would be required, furthering the groundwater recharge potential. Therefore, effects of the Reduced Intensity Alternative on groundwater supplies and recharge would result in a less-than-significant impact, like the Project. (LTS)

Changes to the Existing Drainage Patterns. Construction activities under the Reduced Intensity Alternative would temporarily alter existing drainage patterns and could result in local (onsite) and temporary erosion and siltation. However, the Reduced Intensity Alternative would include a

stormwater pollution prevention plan (SWPPP) to minimize the potential for erosion and sedimentation in nearby storm drains during construction. Although drainage patterns on the Project site would be altered, drainage would ultimately be improved because implementation of the Reduced Intensity Alternative would increase the pervious area in comparison to both existing conditions and Project conditions. The increased pervious area would correspondingly reduce runoff volumes and the potential for ponding and other drainage issues onsite. In addition to increased pervious area, surface runoff from the Project site would be collected into a combination of new and existing storm drain inlets and pipes, and a portion required for stormwater treatment would be directed to pumps, which would ultimately be pumped to the biotreatment areas located throughout the site. Further, in order to accommodate existing stormwater flows that overwhelm the system and the increased stormwater flows, the Project Sponsor would upsize the existing pipes in the area and ensure that the onsite system is adequate with respect to conveying stormwater in the event of a 100-year storm. The Reduced Intensity Alternative would have its own private stormwater drainage system. Also, because of the decrease in impervious surface area under the Reduced Intensity Alternative relative to existing conditions, there would be a reduced potential for erosion and siltation in the drainage systems at the Project site. Therefore, similar to the Project, the Reduced Intensity Alternative would not result in flooding onsite or offsite due to altered existing drainage patterns. Impacts would be less than significant. (LTS)

Changes to Stormwater Runoff. The Reduced Intensity Alternative would result in the reduction of the total stormwater runoff rate for a 10-year storm event compared to existing conditions. This alternative would have larger landscaped areas relative to existing conditions and the Project and biotreatment measures would be incorporated. Therefore, runoff water from the Project site would not exceed the capacity of existing or planned stormwater drainage systems. Further, the Reduced Intensity Alternative would adhere to all applicable federal, state, and local requirements associated with stormwater runoff. Impacts would be less than significant, similar to the Project. (LTS)

Impacts from Flooding. As with the Project, the Reduced Intensity Alternative would be built within a Special Flood-Hazard Area (SFHA), Flood Zone AE, which is a 100-year floodplain that is subject to tidal flooding. The Reduced Intensity Alternative would involve construction of two new office buildings and a hotel at a lower density than the Project. The Reduced Intensity Alternative would include the same drainage improvements, reductions in impervious areas, and new LID features to minimize the potential for overland floodflows as the Project. In addition, the Reduced Intensity Alternative would include the same placement of podiums to raise finished floor elevations in order to provide protection from the 100-year base-flood elevation (BFE), accommodating a planned application for Letter of Map Change for areas within the Project site with elevations above FEMA flood zone BFEs, which would qualify as being outside of FEMA Flood Zone AE. Although buildings would not be flooded with SLR of 16 inches or less, the site parking areas and roadways, including underground parking areas, would be inundated under certain flood conditions. Mitigation Measures WQ-5.1 and WQ-5.2, as required for the Project, would minimize the effects of flooding to less than significant. (LTS/M)

Cumulative Impacts. The Reduced Intensity Alternative would result in the same, or slightly fewer, cumulative hydrology impacts as the Project. Cumulative groundwater supplies and recharge impacts would result in less than cumulatively considerable impacts with implementation of Mitigation Measure WQ-1.1. Cumulative storm drain impacts and water quality impacts would result in less than cumulatively considerable impacts. As such, the Reduced Intensity Alternative would result in the same less than cumulatively considerable impacts as the Project. (LTS/M)

Hazards and Hazardous Materials

As with the Project, the Reduced Intensity Alternative would not result in impacts related to development on a hazardous materials release site included on the Cortese List, the navigable airspace of public use airports or private airstrips, or wildland fire hazards.

Routine Hazardous Materials Use. The Reduced Intensity Alternative would be required to comply with mandatory hazardous materials regulations and SWPPP requirements. Construction would involve routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Compliance with applicable regulations would ensure that potential releases from the transport and use or disposal of hazardous materials during Reduced Intensity Alternative construction activities would be reduced to a less-than-significant level. During operation, it is anticipated that the Reduced Intensity Alternative would involve use of hazardous materials typical of office uses (solvents, cleaning agents, paints, petroleum fuels, propane, batteries, etc.). Project operation may also involve the use of hazardous materials, including emergency generators, that are typical of office and hotel developments. Use, storage, and disposal of these materials would be regulated according to federal and state regulations and guidelines, the intent of which is to minimize the risk of upset. Therefore, the risk of accidental explosion or release of hazardous materials that could create a health hazard with the implementation of the Reduced Intensity Alternative is low, and impacts would be less than significant, as with the Project. (LTS)

Upset and Accident Conditions Involving Hazardous Materials. The Reduced Intensity Alternative would result in the same accidental release potential of hazardous materials as the Project. Implementation of the Reduced Intensity Alternative could expose people and the environment to hazardous materials during demolition of Buildings 301–306 and the Chemical Transfer Facility, including asbestos-containing materials, and lead-based materials. The Project site is located on fill materials that may contain naturally occurring asbestos and potential contaminants of concern in groundwater, soil, and soil gas. The Reduced Intensity Alternative would develop the Project site and would disturb soil during construction, which could generate dust containing residual soil contaminates. Any such release could cause adverse health or safety effects on construction workers, the public, and/or the environment if appropriate hazardous materials surveys and safety precautions are not taken. The current Soil Management Plan for the Project site includes protocols for managing both known and potentially undocumented residual soil and groundwater contamination that may be encountered during the construction of Building 21. Soil Management Plans have not yet been prepared for the remainder of the Project site. However, as with the Project, implementation of Mitigation Measures HAZ-2.1, HAZ-2.2, and HAZ-2.3 would reduce the impacts on human populations and ecological systems to a less-than-significant level. (LTS/M)

Exposure to Schools. The Reduced Intensity Alternative, could emit hazardous emissions or involve the handling of hazardous materials within 0.25 mile of existing schools. The closest schools are Belle Haven Elementary and Beechwood School, both located within 0.25 mile of the site. Construction of this alternative could disturb and release hazardous materials, resulting in a potentially significant impact on the sensitive receptors at the school. However, hazardous materials used during construction and operation would be managed in accordance with applicable laws and regulations. Implementation of the California Air Resources Board's (CARB's) Asbestos Airborne Toxic Control Measure (ATCM) would ensure that dust from asbestos-containing materials would not migrate offsite. As with the Project, the impact would be less than significant. (LTS)

Impairment of Emergency Response or Evacuation Plans. As discussed in Section 3.3, *Transportation/Traffic*, the Project would increase traffic in the vicinity of the Project site. The Reduced Intensity Alternative would also increase traffic, but to a lesser extent than the Project due to the associated 30 percent reduction in daily trips. Emergency access to the Project site would be provided from two access points on Chilco Street and from a new signalized intersection on State Route (SR) 84 at the midpoint of the site. Emergency vehicle access inside the site would be provided along the perimeter of the buildings. Implementation of the Reduced Intensity Alternative would not impede emergency access routes and would continue to maintain the existing City grid system. As such, implementation of the Reduced Intensity Alternative would not physically interfere with the City's adopted Emergency Operation Plan. Therefore, a less-than-significant impact would result, similar to the Project. (LTS)

Cumulative Impacts. Because the Reduced Intensity Alternative would develop the Project site similar to the Project and would disturb approximately the same amount of or slightly less soil, this alternative would have similar or slightly decreased cumulative impacts. Development of the site and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Reduced Intensity Alternative and other cumulative development could also expose people to asbestos, lead, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures proposed for the Project, and compliance with current regulatory standards, would reduce the cumulative impacts to less than significant. (LTS)

Population and Housing

As with the Project, the Reduced Intensity Alternative would not result in direct impacts on population growth or the displacement of housing or people.

Indirect Population Growth. The Reduced Intensity Alternative would not include development of new housing units. However, there would be a population increase associated with new employment during operation of this alternative. Approximately 4,630 new employees would be employed at the Project site as a result of the Reduced Intensity Alternative. In comparison, this would be less than the anticipated 6,550 new employees under the Project.

The increase in employment would result in a demand for new housing units and an indirect increase in the residential population. Assuming that 4.8 percent of employees would live in the city, and given an average of 1.8 workers per household, the Reduced Intensity Alternative would result in approximately 124 new households[1] within Menlo Park. With a persons per household (pph) ratio of 2.61,[2] this alternative could result in the increase of approximately 324 new residents in the city compared to the 457 new residents under the Project. Therefore, this alternative represents only a portion of the net population increase expected for the Project, resulting in a less-than-significant impact. The percentage of regional housing demand resulting from the Reduced Intensity Alternative would be relatively small in comparison with projected housing growth in the region. Accordingly, the impact of the Reduced Intensity Alternative would be less than significant. (LTS)

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[1] Assuming an average of 1.8 employees per household (Keyser Marston Associates 2015) in Menlo Park and 4.8 percent of employees who live and work in Menlo Park. 4,630 total employees * 4.8 percent = 222 employees who would also live in Menlo Park. 222 employees / 1.8 employees per household = 124 households.

[2] 124 households x 2.61 persons per household = 324.

Cumulative Impacts. This alternative, in combination with other projected growth in the City, would increase population, employment, and housing in the City. However, as with the Project, the contribution of the Reduced Intensity Alternative to any increase in population, employment, or housing demand is not cumulatively considerable. (LTS)

Public Services

Impacts on Fire Services. The Reduced Intensity Alternative would require an increased level of fire services due to increased employment and onsite activities over existing conditions. With more onsite activity, there could be more incidents requiring fire department response. Although the Project could require additional staff members to maintain the service ratios, the Project alone would not trigger the need for new or expanded facilities that could adversely affect the physical environment or affect human health and safety. Even if expanded facilities were needed, the existing stations are located on infill lots in the city and neighboring jurisdictions that are highly developed. The scale of expansion would be unlikely to result in environmental impacts. Therefore, this alternative's impacts on fire services would be less than those of the Project and would remain less than significant. (LTS)

Impacts on Police Services. The Reduced Intensity Alternative would require an increased level of police services due to increased employment and onsite activity. With more onsite activity, there could be more incidents requiring police response. However, the increased level of police services would not be large enough to trigger the need for construction of new or expanded facilities that could adversely affect the physical environment or affect human health and safety. This alternative's impacts regarding police services would be less than the Project, and would remain less than significant. (LTS)

Impacts on School Facilities. This alternative would not involve the construction of new residential units in the City and, therefore, would not directly generate students. Nonetheless, this alternative would generate student demand from the induced housing demand caused by increased employment at the Project site. Approximately 124 new households could live in the City as a result of the Reduced Intensity Alternative, which is less than the Project due to decreased employees. However, impacts from the indirectly generated students would be mitigated by the payment of the school impact fees established by Senate Bill (SB) 50 by the Project Sponsor and any subsequent residential projects as a result of this alternative. The Reduced Intensity Alternative's impacts regarding schools would be less than the Project, and would remain less than significant. (LTS)

Impacts on Parks and Recreational Facilities. The Reduced Intensity Alternative would provide onsite amenities to the employees such as a publicly accessible open space that would be owned and managed by Facebook and a terraced garden available to employees. These proposed features would reduce the likelihood of employees utilizing or overburdening City facilities. This alternative would add approximately 4,630 new employees to the area. Although the number of employees would increase over existing conditions, it is likely that these employees would mainly use the onsite facilities during work hours rather than the neighboring City parks. The proposed multi-use bicycle/pedestrian bridge would provide access to the Bay Trail and Bedwell Bayfront Park from the Project site and the Belle Haven neighborhood. Although the residential population in the City would increase as a result of the Reduced Intensity Alternative, there are no capacity issues, and the existing facilities would be able to accommodate the increase in residents. In addition, the Reduced Intensity Alternative would be subject to the City's supplemental property taxes to pay for bonds issued for park and recreation. The Reduced Intensity Alternative would not trigger the need for the construction or expansion of parks or other recreational facilities. This alternative's impacts on recreation would be less than those of the Project and would remain less than significant. (LTS)

Impacts on Library Facilities. The Reduced Intensity Alternative would add employees to the Project site who could use the City's libraries. However, it is expected that the existing libraries in the City would be able to accommodate an increase in employment at the Project site and the associated increase in residents. This alternative's impacts regarding libraries would be less than the Project, and would remain less than significant. (LTS)

Cumulative Impacts. As discussed in Section 3.13, *Public Services*, cumulative impacts with respect to fire, police, schools, recreational facilities, and libraries would be less than significant. Because this alternative would involve fewer employees compared to the Project, cumulative impacts would also be less than significant. (LTS)

Utilities and Service Systems

Water Supply. Implementation of the Reduced Intensity Alternative would result in approximately 1,920 fewer employees than the Project. As such, the water demand with implementation of the Reduced Intensity Alternative would be less than the approximately 30 million gallons per year of water demand at full buildout of the Project. Under the Project, the Menlo Park Municipal Water District (MPMWD) would have an adequate supply to meet its projected demands in normal years. In single and multiple dry years, there would be a shortfall in water supply, both with and without the Project. However, implementation of the Water Shortage Contingency Plan would adequately reduce demand such that the impact under the Project would be less than significant. Because the Reduced Intensity Alternative would demand less water than the Project, implementation of this alternative also would have a less-than-significant impact on existing water supplies in MPMWD's service area, and expansion of existing facilities or entitlements would not be necessary. (LTS)

Impacts on Water Treatment Facilities. As described above, there is sufficient water supply for implementation of the Reduced Intensity Alternative, which would not require expansion of the existing water treatment facilities serving MPMWD. Further, MPMWD has sufficient capacity to accommodate the water demands of the Project within its Individual Supply Guarantee (ISG). Because the Reduced Intensity Alternative would include fewer employees at the site than the Project, this alternative would also not require MPMWD to acquire additional water supplies with the associated requirement for water treatment. The San Francisco Public Utilities Commission (SFPUC) has sufficient capacity in its existing water treatment facilities to deliver treated water to its customers. Therefore, implementation of the Reduced Intensity Alternative would not require expansion of existing water treatment facilities or the construction of new facilities, similar to the Project. This alternative would have a less-than-significant impact related to water treatment facilities. (LTS)

Wastewater Generation. Although the Reduced Intensity Alternative would include fewer employees at the Project site compared to the Project, wastewater generation would still increase over existing conditions, just to a lesser extent than the Project. Wastewater discharge from the Project site would constitute less than approximately 7 percent of the West Bay Sanitary District's (WBSD's) current available capacity entitlement from SVCW. Therefore, WBSD's available capacity entitlements from SVCW would be sufficient to accommodate the projected wastewater flow that would result from implementation of the Project. The estimate of the Project's wastewater generation presents a conservative analysis because it assumes that 100 percent of indoor water demand at the Project site would become wastewater and would be conveyed to the Silicon Valley Clean Water (SVCW) (formerly known as the South Bayside System Authority) Regional Treatment Plant. Instead, the Reduced Intensity Alternative, similar to the Project, could include an onsite wastewater system that could process approximately 23 million gallons of water annually. The onsite wastewater system would be implemented by the Project Sponsor, if approved by the City and other required agencies. It is

anticipated that the potential onsite wastewater system would reduce the total nitrogen load to the SVCW Regional Treatment Plant as well as the hydraulic load in the sanitary sewage collection system leading to the SVCW Regional Treatment Plant. The processed water would be reused for toilets and urinals and potentially irrigation. Because the SVCW Regional Treatment Plant would have adequate capacity to process the wastewater generated from the Project, implementation of the Project would not exceed the wastewater treatment requirements of the San Francisco Bay RWQCB. The Reduced Intensity Alternative would not require the expansion or construction of new wastewater facilities. As such, similar to the Project, the Reduced Intensity Alternative would result in less-than-significant impacts. (LTS)

Solid Waste Generation. It is assumed that the Reduced Intensity Alternative would generate the same amount of solid waste during the construction phase as the Project because both would require the demolition of Buildings 301–306 and other asphalt features. During the operation phase, at full buildout and occupancy, the Project would generate approximately 4,087 tons of solid waste per year, or approximately 16 tons per day (31,440 pounds per day). Because the Reduced Intensity Alternative would include 30 percent or approximately 1,920 fewer employees than the Project, solid waste generation would be approximately 30 percent less under this alternative. The solid waste facilities that would serve the Project have sufficient remaining capacity to accommodate the Project. Therefore, the solid waste facilities that would serve the Project site would be sufficient to accommodate the Reduced Intensity Alternative. This alternative would not contribute to the need to expand existing or construct new solid waste disposal facilities. Because the Reduced Intensity Alternative would involve less development than the Project, this alternative would also result in less-than-significant impacts related to solid waste generation. (LTS)

Stormwater Generation. Implementation of the Reduced Intensity Alternative would include stormwater treatment areas, such as bio-retention areas. In addition, buildings on the Project site would contain low-impact development measures to allow for infiltration and minimize stormwater contamination, and proposed Buildings 21 and 22 would include green roofs and terraces. These features would result in a net decrease in the amount of runoff and associated pollution leaving the Project site. In addition, the Project Sponsor would upsize existing onsite pipes and ensure that the onsite system is adequate with respect to conveying stormwater in the event of a 100-year storm. The addition of the stormwater facilities would not require new or expanded stormwater drainage facilities. Further, implementation of this alternative would adhere to provisions included in the Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit and the City's grading and drainage policies, which regulate the quantity of stormwater runoff from new development, specifically prohibiting a net increase in the rate of runoff from new development. No new facilities would be required. Therefore, as with the Project, implementation of the Reduced Intensity Alternative would have a less-than-significant impact on the City's storm drain system. (LTS)

Energy Demand. The Reduced Intensity Alternative would use slightly less energy than the Project due to the decrease in the number of employees at the Project site. Implementation of the Project would result in less-than-significant impacts on existing electricity and natural gas supply and associated infrastructure because it would be served by PG&E and potentially Peninsula Clean Energy (once it becomes available), which is a joint powers agency formed by all the cities in San Mateo County to purchase clean energy in bulk, and would not require construction of new facilities, the energy demand is within the City's forecasts, and the Project incorporates energy-saving measures. Because the Reduced Intensity Alternative would demand fewer gas and electric services due to fewer employees and less building area, this alternative would result in a reduction in level of impact and therefore would also have a less-than-significant impact. (LTS)

Cumulative Impacts. As discussed in Section 3.14, *Utilities*, the City's water, stormwater drainage, solid waste, and energy have sufficient capacity to serve the cumulative development of the City. The City and its service providers would have adequate supplies to meet customer demand until 2040, including the demand of the Project combined with existing and planned future uses. Because the Reduced Intensity Alternative would use less water and energy and generate less wastewater, stormwater, and solid waste than the Project, impacts would not be cumulatively considerable. (LTS)

5.6 Comparison of Impacts

Table 5-3. Comparison of Impacts among Project Alternatives

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Land Use			
Conflicts with Adopted Land Use Plans and Policies	LTS	LTS	LTS
Cumulative Impacts	LTS	LTS	LTS
Aesthetics			
Impacts on Scenic Vistas	LTS	NI	LTS
Degradation of Visual Character or Quality	LTS	NI	LTS
New Sources of Light and Glare	LTS/M	NI	LTS/M
New Sources of Shadow	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Transportation/Traffic			
Impacts on Intersections	SU	NI	LTS/M
Impacts on Roadway Segments	SU	NI	SU
Impacts on Routes of Regional Significance	SU	NI	LTS
Impacts on Local Transit Systems	SU	NI	LTS
Impacts on Local Bicycle and Pedestrian Facilities	LTS/M	NI	LTS/M
Cumulative Impacts	SU	NI	LTS
Air Quality			
Conflict with Air Quality Plan	LTS	NI	LTS
Construction Criteria Air Pollutant Emissions	LTS/M	NI	LTS/M
Operational Criteria Air Pollutant Emissions	LTS/M	NI	LTS
Exposure of Existing Sensitive Receptors to Substantial Pollutant Concentrations During Construction	LTS	NI	LTS
Exposure of Existing Sensitive Receptors to Substantial Pollutant Concentrations from Project Operation	LTS	NI	LTS
Create Objectionable Odors	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Greenhouse Gas Emissions			
GHG Emissions during Project Construction	LTS/M	NI	LTS/M
GHG Emissions during Project Operation	LTS	NI	LTS
Conflicts with Applicable GHG Emission Plans, Policies, and Regulations	SU	NI	SU

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Noise			
Exposure of Onsite Users to Excessive Noise Levels	LTS/M	NI	LTS/M
Expose Persons to or Generate Excessive Ground-borne Vibration or Ground-borne Noise Levels	LTS	NI	LTS
Substantial Permanent Increase in Ambient Noise Levels	LTS/M	NI	LTS/M
Substantial Temporary or Periodic Increase in Ambient Noise	LTS/M	NI	LTS/M
Cumulative Impacts	LTS/M	NI	LTS/M
Cultural Resources			
Impacts on Historic Resources	LTS	NI	LTS
Impacts on Archaeological Resources	LTS/M	NI	LTS/M
Impacts on Paleontological Resources	LTS/M	NI	LTS/M
Impacts on Human Remains	LTS/M	NI	LTS/M
Cumulative Impacts	LTS	NI	LTS
Biological Resources			
Direct Impacts on Special-Status Species	LTS/M	NI	LTS/M
Indirect Impacts on Special-Status Species	LTS/M	NI	LTS/M
Impacts on Native Wildlife Nursery Sites	LTS/M	NI	LTS/M
Conflicts with Any Local Policies or Ordinances that Protect Biological Resources	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Geology and Soils			
Strong Seismic Ground Shaking and Seismic-Related Ground Failure	LTS	NI	LTS
Soil Erosion	LTS	NI	LTS
Soil Hazards	LTS	NI	LTS
Expansive Soil	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Hydrology and Water Quality			
Violation of Water Quality Standards or Waste Discharge Requirements	LTS/M	NI	LTS/M
Effects on Groundwater Supplies and Recharge	LTS	NI	LTS
Changes to the Existing Drainage Patterns	LTS	NI	LTS
Changes to Stormwater Runoff	LTS	NI	LTS
Impacts from Flooding	LTS/M	NI	LTS/M
Cumulative Impacts	LTS/M	NI	LTS/M
Hazards and Hazardous Materials			
Routine Hazardous Materials Use	LTS	NI	LTS
Upset and Accident Conditions Involving Hazardous Materials	LTS/M	NI	LTS/M
Exposure to Schools	LTS	NI	LTS
Impairment of Emergency Response or Evacuation Plans	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Population and Housing			
Indirect Population Growth	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Public Services			
Impacts on Fire Services	LTS	NI	LTS
Impacts on Police Services	LTS	NI	LTS
Impacts on School Facilities	LTS	NI	LTS
Impacts on Parks and Recreational Facilities	LTS	NI	LTS
Impacts on Library Facilities	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Utilities and Service Systems			
Water Supply	LTS	NI	LTS
Impacts on Water Treatment Facilities	LTS	NI	LTS
Wastewater Generation	LTS	NI	LTS
Solid Waste Generation	LTS	NI	LTS
Stormwater Generation	LTS	NI	LTS
Energy Demand	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS

NI = No Impact; LTS = Less-than-Significant; PS = Potentially Significant; SU = Significant Unavoidable

5.7 Environmentally Superior Alternative

Section 21002 of the State CEQA Guidelines requires lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the proposed project (State CEQA Guidelines Section 15126.6).

On the basis of comparing the extent to which the alternatives reduce or avoid the significant impacts of the Project, the No Project Alternative would be the environmentally superior alternative. Because no development would occur at the Project site, there would be no construction or operational impacts. However, per Section 15126.6(e)(2), the No Project Alternative cannot be selected as the environmentally superior alternative.

As previously discussed, the Reduced Intensity Alternative involving a 30 percent reduction in office building space and office employees is the only other alternative that has been deemed feasible. This alternative would result in a reduction of building area and an associated reduction of employees, vehicle trips, and parking areas. However, because a similar site plan is proposed under the Reduced Intensity Alternative as with the Project, similar construction and building footprint impacts discussed for the Project would occur for the Reduced Intensity Alternative. Only the impacts related to the number of employees, vehicle trips, and amount of impervious surfaces due to a change in parking area would be reduced with this alternative.

As explained above, with Mitigation TRA-1.2, the Reduced Intensity Alternative would result in a net increase of 20 vehicle trips during the a.m. peak hour, and a net reduction of 295 vehicle trips during the p.m. peak hour. Therefore, the Reduced Intensity Alternative would result in less-than-significant impacts on intersections after implementation of Mitigation Measure TRA-1.2, compared to the Project-induced significant and unavoidable impacts. In addition, the impacts on routes of regional significance and local transit systems would be reduced from significant and unavoidable under the Project to less than significant under the Reduced Intensity Alternative. Given that the Reduced Intensity Alternative would result in approximately 30 percent fewer employees than the Project, it is highly likely that such a reduction in the number of employees and corresponding vehicle miles traveled would result in NO_X emissions that would not exceed the BAAQMD threshold. Therefore, the Reduced Intensity Alternative would not require the implementation of Mitigation Measure AQ-2.2 in order to reduce impacts to less than significant. All other impacts from the Reduced Intensity Alternative would result in similar impacts as the Project. Because of the reduced transportation and air quality impacts, the Reduced Intensity Alternative is considered the Environmentally Superior Alternative.