

Project Overview

Hibiscus Properties, LLC (Project Sponsor), an affiliate of Facebook, Inc., is proposing to redevelop an existing approximately 58-acre industrial site, known as the TE Connectivity (TE) Campus, by demolishing existing onsite buildings and landscaping and constructing two new office buildings and a hotel (Project). The Project would expand the existing Facebook Campus, which currently consists of Buildings 10–19 (formerly known as the East Campus), located north of Bayfront Expressway/State Route (SR) 84; Building 20, located east of the Project site; and Building 23, located at the western end of the Project site and currently undergoing tenant improvements.

The two proposed office buildings (Buildings 21 and 22) would encompass approximately 962,400 gross square feet (gsf). In addition, the Project includes a 200-room limited-service¹ hotel with approximately 174,800 gsf. Development of the office buildings and hotel would result in a net increase of approximately 121,300 gsf at the Project site. The Project Sponsor is also proposing a trip cap as part of the Project to limit the number of daily and peak-period trips (AM and PM) and reduce traffic impacts. Although Building 20 is currently subject to a trip cap under a prior entitlement process, the Project would implement a trip cap that would apply to both the Project site (including Building 23) and Building 20. In addition, the Project would include a Transportation Demand Management (TDM) program to promote alternatives to private automotive travel and reduce the number of single-occupancy vehicle trips as well as the resulting traffic and greenhouse gas (GHG) emissions.

Building 21 would be constructed during the first phase of development. Building 21 would be connected to the existing Building 20 through an enclosed bridge. Building 22 would be constructed during the second phase of development. It is anticipated that Building 22 would be connected to Building 21 through an open-air bridge. The hotel would be located near the corner of Chilco Street and SR 84 and also constructed in the second phase. The Project would provide approximately 3,533 parking spaces for the office buildings, hotel, and Building 23.^{2,3} The office buildings and the hotel would be approximately 75 feet in height.

The Project would be organized around a publicly accessible open space that would provide a connection to the San Francisco Bay Trail (Bay Trail) and a gathering space for the community. A multi-use bicycle/pedestrian bridge over SR 84 would allow access to the Bay Trail and Bedwell Bayfront Park (Bayfront Park) from the Project site and the Belle Haven neighborhood. The Project would also include bicycle/pedestrian pathways that would be separated from the internal vehicle access roads where feasible. The onsite paths would connect the proposed office buildings to the existing Building 20 east of the Project site and Facebook Buildings 10–19 north of SR 84. In addition, a new 1-acre terraced garden space, for employee use, would be provided between Buildings 20 and 21. The perimeter of the Project site would have a landscaped buffer. As a separate project, Facebook (in partnership with the City) is

¹ A limited-service hotel generally offers fewer services (e.g., in-house drinking and dining options) than a full-service hotel.

² If the hotel is constructed, then the parking spaces associated with the hotel would be in a surface parking lot under the podium of the hotel. If the hotel is not constructed, then a surface parking lot with the same number of spaces would be provided in the northwestern portion of the Project site.

³ Building 23 is not part of the Project but is on the Project site. The parking spaces developed as part of the Project would be available to Building 23.

constructing bicycle and pedestrian improvements on Chilco Street, along the perimeter of the site, to improve bicycle and pedestrian safety in the area. The frontage improvements would also include landscaping along the frontage.

The Project site is zoned M-2 (General Industrial) and M-2(X) (General Industrial, Conditional Development). The current conditional development permit and “X” combining district apply only to specific buildings that exceed the 35-foot height limit of the M-2 zoning district, not the overall site. It is designated as Limited Industry under the City of Menlo Park (City) General Plan and can be built out to approximately 1.142 million gsf for office uses under the allowable 0.45 floor area ratio (FAR) and up to approximately 1.396 million gsf (0.55 FAR) for other general industrial uses, including, but not limited to, warehousing, manufacturing, printing, assembling, related office and laboratory uses, and shipping and receiving. The Project would require the entire site to be rezoned from M-2 and M-2(X) to an M-2(X) to exceed the maximum 35-foot height limit. In addition, a Conditional Development Permit (CDP) would be incorporated as part of the Project to define development standards and create mechanisms for the City to process any revisions to the Project that might arise over the buildout period. The Project Sponsor also proposes to amend the zoning ordinance text to accommodate the proposed hotel and enter into a development agreement with the City to create vested rights in Project approvals and specify benefits to the City.

Areas of Controversy

California Environmental Quality Act (CEQA) Guidelines Section 15123 specifies that the Draft Environmental Impact Report (EIR) summary identify “areas of controversy” known to the Lead Agency, including issues raised by agencies and the public.

A Notice of Preparation (NOP) was released for the Project on June 18, 2015, for a 30-day public review period. A public scoping meeting was held before the City’s Planning Commission on July 13, 2015. This summary list is based on written comments received (included in Appendix 1 of this Draft EIR) and comments stated during the public scoping meeting. The topics that would result in physical impacts under CEQA are addressed in the EIR analysis. Potential areas of controversy include those listed below.

Land Use

- Relationship with General Plan Update and M-2 Zoning Area Update
- Jobs/housing imbalance

Transportation

- Project-related trip generation, distribution, and assignment
- Preparation of a traffic impact study that includes a scenario for event traffic
- City's financial responsibility related to roadways, streets, intersections, and mitigation measures
- Signalization of right-turn in/out driveway at the 1 Facebook Way entrance
- Analysis of alternatives and impacts on SR 84
- Transportation Demand Management program

- Impacts on bicyclists and pedestrians from mitigation measures
- Lack of public transportation
- Bicycle and pedestrian traffic and circulation in North Fair Oaks
- Traffic in North Fair Oaks, in the Belle Haven neighborhood, on Willow Road, on Middlefield Road, and in other areas
- Encroachments onto and safety and security issues related to the Dumbarton Rail Corridor as a future transportation system
- Project impacts on the feasibility of building the Dumbarton Rail Trail

Air Quality

- Air pollution due to traffic

Cultural Resources

- Current archaeological record search if construction activities are proposed within the state right-of-way
- Cultural resource study and Native American consultation

Biological Resources

- Intrusion into the Don Edwards National Wildlife Refuge
- Access to the Don Edwards National Wildlife Refuge by predators
- Perching of avian predators on bicycle/pedestrian bridge
- Expected lifetime of bridge, considering SAFER Bay project plans
- Noise, light, and disturbance to wildlife and habitat

Hydrology/Flood Hazards

- Hydraulic report and drainage plans
- Maintenance responsibility for runoff and underground and surface drains
- Levees and flood-protection systems
- Sea-level rise

Hazardous Materials

- Toxic cleanup
- Emergency access response times due to increased traffic

Population and Housing

- Local affordable housing
- Higher office space densities for employees

- Growth-inducing impacts
- Potential displacement of East Palo Alto residents

Public Services

- Environmental setting, standard of significance, impacts on Fire Station 77, Project and cumulative impacts on the Fire District, impacts due to Project features, Standards of Cover Assessment, and Draft Nexus Impact Fee Report
- School capacity

Project Alternatives

Chapter 5 of this Draft EIR, *Alternatives*, analyzes the following reasonable alternatives to the Project.

- **No Project Alternative.** The No Project Alternative is provided in this Draft EIR to compare the impacts of the Project with 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 (CEQA Guidelines Section 15126.6(e)(2)).
- **Reduced Intensity Alternative.** The Reduced Intensity Alternative assumes a 30 percent reduction in building area and the number of employees. As discussed in Chapter 5, the Reduced Intensity Alternative is the Environmentally Superior Alternative.

As outlined above, Chapter 5, *Alternatives*, presents alternatives for the Project. The Reduced Intensity Alternative would not avoid all significant and unavoidable impacts of the Project. The City will need to resolve whether the Reduced Intensity Alternative, or another alternative that has not yet been considered, is preferable from an environmental and community perspective compared to the Project.

Impacts and Mitigation Measures

Table ES-1 presents a summary of the impacts of the Project, proposed mitigation and improvement measures, and each impact's level of significance after mitigation. The environmental impacts are identified and classified as "Significant," "Potentially Significant," "Less than Significant," or "No Impact." According to State CEQA Guidelines Section 15382, a significant impact is "... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project..." State CEQA Guidelines Section 15126.4(a)(1) also states that an EIR "... shall describe feasible mitigation measures which could minimize significant adverse impacts..." Mitigation measures are identified for all impacts labeled as "Potentially Significant."

Draft EIR Conclusions

In accordance with State CEQA Guidelines Section 15123(b)(3), this summary section must identify issues to be resolved, including whether or how to mitigate the significant effects and the choice among alternatives. Chapter 3 of the Draft EIR, *Environmental Impact Analysis*, presents mitigation measures to

reduce or avoid significant impacts identified for the Project. A Mitigation Monitoring and Reporting Program (MMRP) will be prepared to define the timing of implementation of the measures, the parties who will be responsible for implementation, and the parties who will be responsible for reporting and verifying implementation.

The Draft EIR identifies impacts that would remain significant and unavoidable even after implementation of the mitigation measures. Consequently, the City will need to determine whether to approve the Project as proposed and, if so, provide its rationale in a Statement of Overriding Considerations.

How to Comment on This Draft EIR

This Draft EIR is considered a draft under CEQA because it must be reviewed and commented upon by public agencies, organizations, and individuals before being finalized. This document is being distributed for a 45-day (minimum) public review and comment period. Readers are invited to submit written comments on the document. Comments are most helpful when they suggest specific alternatives or measures that would better mitigate significant environmental effects. Hard copies of the Draft EIR are available for review at the Menlo Park Library located at 800 Alma Street. Electronic copies of the Draft EIR are available for review online at <http://menlopark.org/1012/environmental-impact-report>. Written comments should be submitted to:

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Community Development Department, Planning Division
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Menlo Park, CA 94025
Email: ktperata@menlopark.org

To take oral comments on the Draft EIR, a public hearing will be held before the Planning Commission on June 20, 2016. Hearing notices will be mailed to responsible agencies and interested individuals.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.1 Land Use			
<p>Impact LU-1: Conflicts with Adopted Land Use Plans and Policies. The Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</p>	LTS	None required	N/A
<p>Impact C-LU-1: Cumulative Land Use Impacts. The Project, in combination with other foreseeable development in the nine-county ABAG region, would not be inconsistent with applicable land use plans, policies, and regulations.</p>	LTS	None required	N/A
3.2 Aesthetics			
<p>Impact AES-1: Impacts on Scenic Vistas. The Project would not substantially affect scenic vistas.</p>	LTS	None required	N/A
<p>Impact AES-2: Degradation of Visual Character or Quality. The Project would not substantially degrade the existing visual character or quality of the site and its surroundings.</p>	LTS	None required	N/A
<p>Impact AES-3: New Sources of Light and Glare. The Project could create a new source of substantial light or glare that could adversely affect daytime or nighttime views in the area.</p>	PS	<p><i>AES-3.1: Design Lighting to Meet Minimum Safety and Security Standards.</i> Concurrent with the building permit submittal, the Project Sponsor shall incorporate lighting design specifications to meet minimum safety and security standards. The comprehensive site lighting plans shall be subject to review and approval by the City’s Community Development Department, Planning Division, prior to building permit issuance for the first building on the site.</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>The following measures shall be included in all lighting plans.</p> <ul style="list-style-type: none"> Luminaries shall be designed with cutoff-type fixtures or features that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties. Fixtures that shine light upward or horizontally shall not spill any light onto adjacent private properties. Luminaries shall provide accurate color rendering and natural light qualities. Low-pressure sodium and high-pressure sodium fixtures that are not color-corrected shall not be used, except as part of an approved sign or landscape plan. Luminary mountings shall be downcast and pole heights minimized to reduce the potential for backscatter into the nighttime sky and incidental spillover onto adjacent properties and undeveloped open space. Light poles shall be no higher than 20 feet. Luminary mountings shall be treated with non-glare finishes. <p>AES-3.2: Treat Reflective Surfaces. The Project Sponsor shall ensure the application of a low-emissivity coating on exterior glass surfaces of proposed structures. The low-emissivity coating shall reduce the reflection of visible light that strikes the exterior glass and prevent interior light from being emitted brightly through the glass.</p>	
<p>Impact AES-4: New Sources of Shadow. Shadows cast by the proposed structures would not shade open spaces or public areas for an extended period.</p>	LTS	None required	N/A
<p>Impact C-AES-1: Cumulative Degradation of Aesthetics. The Project, in combination with other foreseeable development in the surrounding area, would not have a significant cumulative impact on visual character or the quality of scenic vistas or</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
public view corridors and would not cumulatively contribute to new sources of light, glare, or shadows. This cumulative impact is less than significant.			
3.3 Transportation			
Impact TRA-1: Impacts on Peak-Hour Traffic at Study Intersections under Background Plus-Project Conditions. Increases in traffic associated with the Project would result in increased delays during peak hour, causing significant and unavoidable impacts on the operation of study intersections.	S	TRA-1.1 Provide Increased Traffic Capacity on Peak-Hour LOS under Background-Plus Project Conditions. Mitigation Measure TRA-1.1 identifies potential measures to mitigate or reduce Project impacts where feasible.	SU
	PS	<p>a. Sand Hill Road & I-280 Northbound On-Ramp (#2)</p> <p>During the p.m. peak hour, the intersection of Sand Hill Road and the I-280 northbound on-ramp (study intersection #2) operates unacceptably at LOS E under existing and background conditions, reflecting the delay experienced by westbound vehicles when approaching I-280. Traffic associated with the Project would increase average delay to approximately 19 seconds, exceeding the impact threshold of 4 seconds for Caltrans intersections. The increased delay could be mitigated by modifying signal timing during the p.m. peak hour to increase the allocation of green time to the westbound approach (by up to 10 seconds during the p.m. peak hour). However, as described below, this mitigation would not be necessary under background plus-Project conditions because Mitigation Measure TRA-1.2 (discussed below) would modify the Project trip cap to limit the number of vehicle trips that could occur during a single peak hour (see Mitigation Measure TRA 1.2).</p> <p>With implementation of Mitigation Measure TRA-1.2, the net increase in the number of vehicle trips resulting from the Project during the p.m. peak hour would be reduced by</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>more than 90 percent. Therefore, with Mitigation Measure TRA-1.2, the change in delay would not be anticipated to exceed 4 seconds, and the impact would be reduced to a less-than-significant level.</p>	
	S	<p>b. Willow Road & Hamilton Avenue (#36) During the p.m. peak hour, the intersection would be anticipated to operate unacceptably at LOS F under both background and background plus-Project conditions. Project traffic would increase delay and exceed the City threshold of 0.8 second for critical movements. The increase in delay reflects a forecast increase in left-turn volumes related to vehicles from the Project site traveling through residential neighborhoods via Chilco Street and Hamilton Avenue to by-pass eastbound delay on the segment of Bayfront Expressway where it approaches Willow Road. Although the provision of an eastbound left-turn lane on Hamilton Avenue where it approaches Willow Road would reduce the delay, this potential mitigation is not recommend because it would encourage cut-through traffic via Chilco Street and Hamilton Avenue, potentially affecting the Belle Haven neighborhood. Therefore, to avoid facilitating the use of Chilco Street and Hamilton Avenue as cut-through routes in the adjacent residential neighborhood, mitigating this traffic impact is not recommended, consistent with City policies that discourage cut-through traffic in residential neighborhoods. Other mitigation measures are discussed below (TRA-3.1 and TRA-3.2) to discourage cut-through traffic in the Belle Haven neighborhood. Mitigation Measure TRA 1.2 (also described below) would reduce the impact, but the net change in delay would still be likely to exceed the 0.8-second threshold for critical movements. The peak-hour traffic impact would remain significant and unavoidable.</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	S	<p>c. Bayfront Expressway & Willow Road (#37)</p> <p>Given the applicable criteria for state-controlled intersections that operate at LOS E or F, a significant impact would occur if the combination of Project and future traffic would increase average delay by 4 seconds or more. The net change in average delay from existing conditions, under both background and background plus-Project conditions, would exceed the 4-second threshold. Furthermore, the addition of Project trips would result in a net change between background and background plus-Project conditions that would also exceed the 4-second threshold.</p> <p>During the a.m. and p.m. peak hours, approximately 70 percent of Dumbarton Bridge vehicle trips pass through this intersection (more than 4,500 vehicles during each peak hour under existing conditions). Similarly, the majority of allowable peak-hour vehicle trips to/from the Project site and Buildings 10–20 under the trip caps would also pass through this intersection because there are few viable alternative routes to/from most directions (particularly for trips to/from the south) and limited access points to both Campuses. As a result, the volume of conflicting movements at this intersection would increase significantly under background conditions because of the significant increase in conflicting movements. The addition of Project traffic would increase average delay by more than 80 seconds during the a.m. peak hour and more than 20 seconds during the p.m. peak hour, thereby exceeding the applicable impact threshold. Physical improvement options to expand approach capacity would be constrained given the proximity of the Dumbarton rail tracks and adjacent wetlands. Similarly, signal timing, which is necessary to accommodate the high volume of peak-direction traffic to/from the Dumbarton Bridge, would</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>limit the viability of some mitigation options.</p> <p>During the a.m. peak hour, the Project impact would be greatest in the northbound direction on Willow Road, affecting northbound through and northbound left-turn movements when approaching Bayfront Expressway from Willow Road. During the p.m. peak hour, the Project impact would be greatest in the eastbound direction on Bayfront Expressway when approaching the intersection with Willow Road because of the high volume of bridge approach traffic. In addition, during the p.m. peak hour, mitigation options at this intersection would ultimately be affected by downstream capacity limitations at the entrance to the Dumbarton Bridge.</p> <p>Localized queuing and delays in the p.m. peak hour may be minimized by extending the eastbound right-turn pocket from Bayfront Expressway to Willow Road. The turn pocket should be extended toward the Building 20 entrance to maximize queue storage for motorists who wish to turn right to access US 101 south. Delays for p.m. peak-hour traffic as it approaches the Dumbarton Bridge could be reduced if a dedicated receiving lane were to be provided on Bayfront Expressway for northbound right-turn movements from Willow Road. Such a mitigation, if feasible, would allow both northbound right-turn and eastbound through movements to occur concurrently. However, the mitigation would not reduce net travel time for motorists when approaching the Dumbarton Bridge, given downstream capacity at the Bayfront Expressway and University Avenue intersection. Similarly, grade separation to allow conflicting movements to occur simultaneously, if feasible, could reduce the impact on approach delay directly at the intersection but would not reduce net travel time unless accompanied by similar measures at downstream intersections.</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>Increasing capacity between US 101 and the Dumbarton Bridge via the Marsh Road/US 101 interchange, to provide a viable alternate route to Willow Road, could reduce the impact, if feasible and if designed to accommodate vehicles to/from the south on US 101 without increasing travel time (compared with the travel time to Willow Road). Such improvements could include one additional northbound exit lane on US 101 between Willow Road and Marsh Road and a similar measure to accommodate southbound traffic when entering US 101 via the Marsh Road intersection. The Project Sponsor shall be required to design and construct a lengthened eastbound right-turn pocket and a dedicated receiving lane on Bayfront Expressway for northbound right-turn traffic. Because the improvements would be under Caltrans jurisdiction, the Project Sponsor would be required to coordinate with Caltrans for review and approval of the improvements. The potential mitigation options described above are not under the control of the City, and thus, the City cannot guarantee their implementation. In addition, with implementation of Mitigation Measure TRA-1.2 (described below), the net increase in the number of peak-hour vehicle trips resulting from the Project during the a.m. and p.m. peak hours would be reduced. However, the increased delay at this intersection would still be anticipated to exceed the significance threshold. Therefore, this impact would remain significant and unavoidable.</p>	
	S	<p>d. Bayfront Expressway & University Avenue (#38) Given the applicable criteria for state-controlled intersections that operate at LOS E or F, a significant impact would occur if the combination of Project and future cumulative traffic would increase average delay by 4 seconds or more. This intersection would be anticipated to operate at LOS F under existing, background, and</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>background plus-Project conditions. The net change in average delay with the addition of Project traffic would not exceed the 4-second threshold. Therefore, Project trips would not significantly affect LOS, based strictly on the approach delay at the intersection. However, the Project would contribute to an increase in upstream delay, thereby affecting access to the Dumbarton Bridge, including increased eastbound delays where traffic would approach the Bayfront Expressway and Willow Road intersection under background plus-Project conditions. Given both the upstream and downstream capacity limitations on both sides of the Dumbarton Bridge corridor, including traffic congestion and capacity limitations on US 101 as well as I-880 on the east side of San Francisco Bay (Bay), peak-hour traffic volumes on the Dumbarton Bridge would not be anticipated to increase significantly. Instead, a greater portion of peak-hour traffic demand on the Dumbarton Bridge would be anticipated to occur outside of the peak hours, including some trips that would be delayed because of peak-hour congestion on connecting facilities. Grade separation that would allow conflicting movements to occur simultaneously, if feasible, would reduce delay where traffic would approach the intersection but could result in secondary impacts at downstream locations.</p> <p>The Project Sponsor shall be required to initiate design concepts through a Project Study Report (PSR), or other appropriate development document, for potential future grade separation at this intersection. Because the intersection would be under Caltrans jurisdiction, the Project Sponsor would be required to coordinate with Caltrans and the City. This potential mitigation is not under the control of the City, and the impact would remain significant and unavoidable.</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	PS	<p>e. Bayfront Expressway & Chilco Street (#40)</p> <p>During the p.m. peak hour, the potential impact reflects increased eastbound delay on Bayfront Expressway where traffic approaches the Dumbarton Bridge due to an increase in conflicting northbound movements at Chilco Street under background plus-Project conditions. The analysis assumes that two left-turn lanes and a separate right-turn lane would be provided as planned and funded improvements. However, the intersection would be anticipated to continue to operate at an unacceptable LOS of E.</p> <p>The provision of one additional eastbound lane (for a total of four through lanes) on Bayfront Expressway would mitigate the intersection impact but would not improve net vehicle delay at the approach to the Dumbarton Bridge unless accompanied by measures to reduce downstream delay. The mitigation is not be feasible given the downstream lane configurations and environmental constraints, including those related to the wetlands and marsh area north of Bayfront Expressway.</p> <p>With implementation of Mitigation Measure TRA-1.2 (described below), the net increase in the number of vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent. This intersection would be anticipated to operate acceptably at LOS D. Therefore, with Mitigation Measure TRA-1.2, the impact would be reduced to a less-than-significant level.</p>	LTS
	PS	<p>f. Chilco Street & Constitution Drive (#45)</p> <p>During the a.m. and p.m. peak hours, traffic volumes at this all-way stop-controlled intersection would increase significantly, because this intersection would serve as one of the two vehicle access points to the Project site. The intersection operates acceptably under existing conditions</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>during both the a.m. and p.m. peak hours. The intersection would continue operating acceptably under background conditions during the a.m. peak hour but would operate unacceptably at LOS F during the p.m. peak hour, reflecting increased traffic with full occupancy of Building 23 under background conditions in combination with the additional traffic that would be generated by approved projects in the Bayfront (formerly M-2) area.</p> <p>The Project would provide motor vehicle access to proposed Building 22, existing Building 23, and the proposed hotel via the Chilco Street and Constitution Drive intersection; direct motor vehicle access to proposed Building 21 would be provided from a proposed signalized intersection on Bayfront Expressway. Approximately 58 percent of the proposed parking supply would be accessed from the Chilco Street and Constitution Drive intersection. No changes to lane configurations or intersection control at the Chilco Street and Constitution Drive intersection are proposed as part of the Project. The Project would result in LOS F during the a.m. peak hour under background plus-Project conditions; southbound vehicle queues on Chilco Street, at the approach to the Project entrance, would extend onto Bayfront Expressway. During the p.m. peak hour, vehicles would experience significant delay when exiting the Project site; the delay would exceed the impact threshold. Although queuing at the intersection of Bayfront Expressway and Chilco Street in the a.m. peak hour is not considered an impact, based on the City’s LOS criteria, it is a safety concern for the site. The improvements identified below were designed to mitigate this impact.</p> <p>The proposed mitigation for peak-hour impacts at the intersection of Chilco Street and Constitution Drive would provide the following elements to accommodate inbound a.m. and outbound p.m. traffic movements:</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> • Installation of a traffic signal and signalized pedestrian crossings on all four legs of the intersection. • Provision of three southbound lanes on the one-block segment of Chilco Street, between Bayfront Expressway and Constitution Drive, to include two southbound left-turn lanes to accommodate the volume of left-turning vehicles entering the Project site. In addition, during the a.m. peak hour, provision of a “split-phase” signal operation on Chilco Street is recommended. • Provision of a northbound left-turn lane on Chilco Street approaching Constitution Drive. • Provision of two outbound lanes on Chilco Street exiting the Project site. 	
		<p>With implementation of this mitigation measure, the intersection would operate acceptably at LOS D during both peak hours. Bicycle lanes should be accommodated in the proposed improvements on Chilco Street, tying into the proposed improvements the Project Sponsor is constructing on Chilco Street as a separate project, and on Constitution Drive. These improvements are required to be operational prior to Building 22 occupancy. With these improvements, this impact would be reduced to a less-than-significant level.</p>	
	S	<p>g. University Avenue & Adams Drive (#47) Unacceptable LOS F occurs at this intersection under existing conditions, reflecting delay on the stop-controlled side street where it approaches University Avenue. Traffic volumes on Adams Drive where it approaches the stop sign are very low (i.e., 11 vehicle trips during the a.m. peak hour and 51 vehicles during the p.m. peak hour). Under background plus-Project conditions, the side-street</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	LTS	<p>approach volume is forecast to increase to 86 vehicles. However, traffic levels would remain below the threshold for warranting a traffic signal. Thus, a traffic signal is not recommended under background plus-Project conditions. The impact under background plus-Project conditions would therefore be significant and unavoidable. (SU)</p> <p>Installation of a traffic signal at this location would be recommended under 2040 cumulative conditions with the proposed General Plan. Therefore, if the proposed General Plan is adopted, this impact could be mitigated to less-than-significant levels (see Mitigation Measure TRA-13.1).</p> <p>h. Jefferson Drive & Constitution Drive (#50)</p> <p>During the p.m. peak hour, increased Project-related northbound traffic on Constitution Drive would result in an unacceptable LOS of D at one of the stop-controlled side-street approaches (i.e., the east leg of the intersection). This leg of the intersection is an existing driveway on the east side of the intersection that currently serves just 15 vehicle trips during the p.m. peak hour (primarily left turns by vehicles that exit the driveway toward Chilco Street), which is well below the level at which signalization would be considered. The volume on Jefferson Drive is similarly low, with a total of 69 vehicles turning right or left during the p.m. peak hour. The side-street approach volume from Jefferson Drive would operate at LOS C because the majority of approach vehicles would make a right turn toward Chilco Street and thus would not be delayed by northbound Project trips at this location. Therefore, because this impact would be limited to affecting a side-street driveway that serves just 15 vehicle trips during the p.m. peak hour, this impact would be less than significant, and no mitigation is required.</p>	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	PS	<p>i. University Avenue & US 101 Southbound Ramps (#56)</p> <p>During the a.m. peak hour, the intersection operates acceptably at LOS C under existing conditions and LOS D under background conditions. The addition of Project traffic would result in an unacceptable LOS of E during the a.m. peak hour at this Caltrans-controlled intersection in East Palo Alto. During the p.m. peak hour, the intersection currently operates unacceptably at LOS E under existing conditions; the net change under background plus-Project conditions would not exceed the 4-second threshold. Therefore this impact would be less than significant during the p.m. peak hour but potentially significant during the a.m. peak hour.</p> <p>Mitigation Measure TRA-1.2 (described below) would reduce allowable net Project vehicle trip generation by more than 75 percent during the a.m. peak hour. This intersection would be anticipated to operate acceptably at LOS D during the a.m. peak hour. Therefore, with Mitigation Measure TRA-1.2, the impact would be reduced to a less-than-significant level.</p>	LTS
	PS	<p>j. University Avenue & Woodland Avenue (#57)</p> <p>During the a.m. peak hour, this intersection operates at LOS F under existing and background conditions. Under background plus-Project conditions, the increase in a.m. peak-hour delay compared with background conditions would exceed the applicable impact threshold for East Palo Alto intersections that operate at LOS F (i.e., delay to critical movements increases by more than 4 seconds and the critical v/c ratio increases by 0.01).</p> <p>Provision of a dedicated right-turn lane on the westbound approach leg from Woodland Avenue would mitigate the impact. However, this potential mitigation is not recommend because it would encourage cut-through</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>traffic via Woodland Avenue, potentially affecting the Willows neighborhood in Menlo Park and Woodland neighborhood in East Palo Alto. To avoid facilitating use of Woodland Avenue as a cut-through route, this potential mitigation is not recommended, consistent with City policies that discourage cut-through traffic in residential neighborhoods. In addition, because the intersection is not within the city of Menlo Park, implementation of this potential mitigation cannot be guaranteed.</p> <p>Mitigation Measure TRA-1.2 (described below) would reduce the allowable net Project vehicle trip generation by more than 75 percent during the a.m. peak hour; the net change in delay to critical movements would not exceed the thresholds described above. Therefore, with Mitigation Measure TRA-1.2, the impact would be reduced to a less-than-significant level.</p>	
	S	<p>k. Chilco Street & Hamilton Avenue (#60)</p> <p>This all-way stop-controlled intersection, located within the Belle Haven neighborhood south of the Project site, would operate at an unacceptable LOS of F during the p.m. peak hour because a portion of Project vehicle trips would be anticipated to exit the site via Chilco Street southbound to Hamilton Avenue or other streets in the Belle Haven neighborhood to access Willow Road. Signalizing the intersection would improve LOS to an acceptable level. Mitigation Measure TRA-1.2 (described below) would reduce allowable net Project vehicle trip generation during the p.m. peak hour, but this intersection would still be anticipated to operate unacceptably given the proximity to the Project entrance and the LOS standard of C or better that applies to this intersection. However, any mitigation to improve traffic operations would encourage use of Chilco Street as a cut-through route, which conflicts with City of Menlo Park goals that aim to reduce cut-through</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>traffic in residential neighborhoods. Therefore, to avoid facilitating use of Chilco Street and Hamilton Avenue as cut-through routes, mitigating this traffic impact by increasing capacity is not recommended, consistent with City policies that discourage cut-through traffic in residential neighborhoods. Other mitigation measures are discussed below (Mitigation Measure TRA-3.1 and TRA-3.2) to discourage cut-through traffic in the Belle Haven neighborhood. The peak-hour impact on intersection LOS is therefore significant and unavoidable.</p>	
	S	<p>I. Bayfront Expressway & Facebook Building 20 Entrance (#65)</p> <p>The intersection, which opened following the completion of Building 20 in 2015, would operate at LOS C during the a.m. peak hour and LOS F during the p.m. peak hour under background conditions. However, LOS would degrade to LOS E during the a.m. peak hour and LOS F during the p.m. peak hour under background plus-Project conditions. During the a.m. peak hour, traffic in the single westbound left-turn lane from Bayfront Expressway (entering Building 20) would exceed storage capacity, resulting in delays for peak-direction traffic when traveling westbound on Bayfront Expressway. Provision of a two-lane left-turn pocket at the proposed adjacent entrance to the Project site at Building 21 would reduce the potential impact during the a.m. peak hour by allowing a portion of left-turn demand to use the adjacent intersection (see Mitigation Measure TRA-3.1).</p> <p>During the p.m. peak hour, delay would increase for exiting eastbound vehicles traveling toward Willow Road under background plus-Project conditions. This would be caused by the high volume of eastbound vehicles traveling between the Project site and Willow Road via a short segment of Bayfront Expressway. Building 20 currently has a driveway</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>to Willow Road that allows Project traffic to exit directly to Willow Road. Encouraging greater use of that driveway for outbound trips could help to reduce a portion of the eastbound traffic volume on Bayfront Expressway traveling toward Willow Road during the p.m. peak hour.</p> <p>The a.m. peak hour impact would be reduced to less-than-significant levels by providing a two-lane westbound left-turn pocket at the adjacent intersection of Bayfront Expressway and the Building 21 entrance. However, the right-of-way along Bayfront Expressway is constrained by the wetlands located adjacent to the roadway; therefore, this mitigation measure may not be feasible. Alternatively, the Project Sponsor shall be required to conduct a micro-simulation evaluation as part of the proposal to install a new traffic signal at the proposed entrance to Building 21 and ensure that queues do not extend onto the Bayfront Expressway at either intersection (see Mitigation Measure TRA-1.1m, below). During the p.m. peak hour, the provision of one additional eastbound through lane on Bayfront Expressway would mitigate the impact but would not improve net vehicle delay where traffic approaches the Dumbarton Bridge unless accompanied by measures to reduce downstream delay. The mitigation may not be feasible given downstream capacity constraints.</p> <p>Furthermore, the intersection is under the jurisdiction of Caltrans; therefore, the City cannot guarantee that this improvement would be implemented.</p> <p>Mitigation Measure TRA-1.2 (described below) would reduce net Project vehicle trip generation during both peak hours, but the increase in eastbound traffic on Bayfront Expressway between Chilco Street and Willow Road would still be anticipated to result in a significant impact on p.m. peak-hour LOS at this intersection. Therefore, the impact would remain significant and unavoidable.</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	S	<p>m. Bayfront Expressway & Proposed Building 21 Entrance (#66)</p> <p>As part of the Project, this would be a signalized intersection, providing two outbound travel lanes, one inbound right-turn lane, and one inbound left-turn for vehicles entering the Project site from Bayfront Expressway. During the p.m. peak hour, the intersection would operate unacceptably at LOS F. During the a.m. peak hour, the intersection would operate acceptably, based on LOS, but the anticipated queue length for vehicles entering the site via the single proposed westbound left-turn lane (from Bayfront Expressway to the Building 21 entrance) would exceed storage capacity, resulting in delays for westbound through traffic on Bayfront Expressway. The proposed mitigation to reduce a.m. peak-hour impacts on Bayfront Expressway and the Project impact at the entrance to Building 20 is the provision of a two-lane left-turn pocket for northbound vehicles that would enter Building 21 from Bayfront Expressway. However, the right-of-way along Bayfront Expressway is constrained by the wetlands located adjacent to the roadway; therefore, this mitigation measure may not be feasible. Alternatively, the Project Sponsor shall be required to conduct a micro-simulation evaluation as part of the proposal to install a new traffic signal at this location and ensure that queues do not extend onto Bayfront Expressway at either intersection (see Mitigation Measure TRA-1.11, above) while maintaining an acceptable intersection LOS of D or better. With the proposed mitigation, if feasible, the impact would be less than significant during the a.m. peak hour. During the p.m. peak hour, the provision of one additional eastbound through lane on Bayfront Expressway would mitigate the impact but would not improve net vehicle delay where traffic approaches the Dumbarton Bridge</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>unless accompanied by measures to reduce downstream delay. This potential mitigation is unlikely to be feasible given downstream capacity constraints.</p> <p>Mitigation Measure TRA-1.2 (described below) would reduce net Project trip generation by more than 75 percent during the a.m. peak hour and more than 90 percent during the p.m. peak hour; the volume of inbound and outbound vehicle trips via the proposed Building 21 driveway would be reduced by approximately 30 percent during both peak hours. With Mitigation Measure TRA-1.2, the impact would be less than significant during the p.m. peak hour. Because the feasibility of the a.m. peak-hour mitigation described above has not yet been confirmed, the impact would remain significant and unavoidable.</p>	
	S	<p><i>TRA-1.2: Reduce the Peak-Hour Share of Vehicle Trips Allowable under the Trip Cap, for both the Project Site and Buildings 10-19 to no more than 50 Percent of Allowable Vehicle Trips During each 2-Hour Peak Commute Period.</i> The Project trip cap, as proposed, would allow up to 69 percent of vehicle trips within each 2-hour peak commute period to enter or exit the site within a single peak hour. Similarly, the approved vehicle trip caps for Buildings 10-20 currently allow up to 70 percent of permitted vehicle trips within each 2-hour peak commute period to occur within a single hour.</p> <p>The proposed mitigation would reduce the maximum number of allowable peak-hour vehicle trips to no more than 50 percent of the 2-hour peak-period vehicle trip cap for both the Project site and Buildings 10-19. Table 3.3-7 provides a comparison of the potential peak 1-hour vehicle trips under the Project and with the proposed mitigation. As shown, the proposed mitigation would reduce the total volume of allowed peak-hour vehicle trips to the Project site and Buildings 10-19 by 28 percent.</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact TRA-2: Impacts on Routes of Regional Significance under Background Plus Project Conditions. Some Routes of Regional Significance would operate at or below their LOS threshold with the addition of Project trips, and Project traffic would exceed the allowable 1 percent threshold resulting in significant and unavoidable impacts.</p>	S	<p>Implement Mitigation Measure TRA-1.2, plus: TRA-2.1: Implement Improvements to Routes of Regional Significance to Address Background Plus-Project Effects. Providing additional travel lanes would increase segment capacity but would not be feasible on all segments given available right-of-way widths and both downstream and downstream capacity limitations on facilities such as US 101 and the Dumbarton Bridge. In addition, the routes are under the control of Caltrans and the City cannot guarantee mitigation.</p>	SU
<p>Impact TRA-3: Increase in Daily Traffic Volumes on Roadway Segments Under Background Plus-Project Conditions. Increases in daily traffic associated with the Project under near term plus-Project Conditions would result in increased ADT volumes on Project area roadway segments, resulting in significant and unavoidable impacts.</p>	S	<p>TRA-3.1: Provide Measures to Reduce Cut-Through Traffic in the Belle Haven Neighborhood via Chilco Street (South of the Dumbarton Rail Corridor), Newbridge Street, and Ivy Drive. The Project Sponsor shall provide measures to prevent cut-through traffic, which could include prohibiting left-turns exiting the Project site via Chilco Street during the p.m. peak period. The provision of physical traffic calming measures could also be included, where such measures would not affect emergency access and/or transit service, subject to community and City approval. Because community members and other potentially affected stakeholders may be affected by such improvements, the Project Sponsor shall fund a Neighborhood Traffic Plan to identify appropriate measures for reducing cut-through traffic. TRA-3.2: Provide Multi-Modal improvements on study segments that would be potentially impacted by increased ADT. The Project Sponsor shall provide measures to improve mobility options via walking, bicycling, and transit, consistent with the City’s complete streets goals, which would help to offset the effect of daily traffic generated by the Project. In particular, such measures could include pedestrian enhancements across Willow Road at Hamilton Drive, Ivy Drive, and Newbridge</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact TRA-4: Pedestrian Connections Under Background Plus-Project Conditions. The Project would result in a lack of adequate pedestrian connections to the area circulation system under background plus-Project conditions, resulting in a potentially significant impact.</p>	PS	<p>Street as well as at other affected study segment locations. These measures are discussed further under Impacts TRA-4 and TRA-5.</p> <p>TRA-4.1: Provide External Pedestrian Connections to the Area Circulation System and Adjacent Land Uses. The proposed mitigation would include providing and/or contributing to the cost of pedestrian improvements to eliminate gaps in the sidewalk network in key areas that provide access routes to and from the Project site. The improvements outlined below were selected to provide an immediate connection to the Project site.</p> <p>a. Constitution Drive The Project Sponsor shall construct sidewalks along one side of Constitution Drive between Chilco Street and Chrysler Drive and pedestrian crosswalks and curb ramps at Chilco Street & Constitution Drive and Jefferson Drive & Constitution Drive. Construction of a sidewalk and crossing improvements along this section of Constitution Drive, in conjunction with other planned and funded sidewalk construction in the area, will provide continuous pedestrian access from the Project site throughout the Bayfront Area (formerly M-2 area).</p>	LTS
<p>Impact TRA-5: Bicycle Connections Under Background Plus-Project Conditions. The Project would result in a lack of adequate bicycle connections to the area circulation system under background plus-Project conditions, resulting in potentially significant impacts.</p>	PS	<p>TRA-5.1: Provide bicycle connections to the area circulation system and adjacent land uses. The recommended mitigation would include providing and/or contributing to the cost of bicycle improvements to eliminate gaps in the bicycle network that are likely to be used as key access routes to the Project site, including bicycle connections to and from the Menlo Park Caltrain station.</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact TRA-6: Pedestrian and/or Bicycle/Vehicle Conflicts. The Project design would cause increased potential for pedestrian and/or bicycle/vehicle conflicts, resulting in potentially significant impacts.</p>	<p>PS</p>	<p>a. Hamilton Avenue The Project Sponsor shall install bicycle boulevard treatments on Hamilton Avenue between Chilco Street and the pedestrian/bicycle overcrossing of US 101. Bicycle boulevards generally include treatments to facilitate travel by bicyclists. Typical treatments generally include stop-sign modifications, lane markings, signage, and wayfinding elements. This designation is consistent with the street classification proposed in the ConnectMenlo draft Circulation Element.</p> <p>b. Northbound Access to the Project Site for Bicyclists The Project Sponsor shall provide facilities for northbound bicyclists to cross Willow Road and access the Project site, thereby minimizing vehicle/bicycle conflicts. Such facilities may include a two-stage left-turn queue box, or similar improvements, to accommodate northbound left-turn movements for bicyclists at the Willow Road/Hamilton Drive intersection from the curbside bicycle lane, in conjunction with a Class I pathway or similar improvements for northbound bicyclists to the travel on the west side of Willow Road between Hamilton Avenue and the Project site.</p> <p><i>TRA-6.1: Refine the Project Design to Minimize Conflicting Movements between Bicycles, Pedestrians, and Other Travel Modes within the Project Site.</i> The design for bicycle and pedestrian crossings, similar to the design at the Building 20 driveway, should direct bicycle and pedestrian traffic to the signalized intersection at Bayfront Expressway to avoid conflicts with motor vehicles and shuttle buses at uncontrolled crossings. The Project Sponsor shall work to minimize conflicts to the satisfaction of the transportation manager prior to approval of the site plan for construction.</p>	<p>LTS</p>

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact TRA-7: Increased Demand for Transit Services Under Background Plus-Project Conditions. The Project would result in a less than significant demand for transit services under Background Plus Project Conditions.</p>	LTS	None required	N/A
<p>Impact TRA-8: Delay to Public Transit Vehicles Under Background Plus Project Conditions. The Project would result in significant and unavoidable delays to public transit vehicles under Background Plus Project Conditions.</p>	S	None feasible	SU
<p>Impact TRA-9: Impacts to Vehicle Miles Travel. The VMT per Employee generated by the Project does not exceed 15 percent below the regional average VMT per Employee.</p>	LTS	None required	N/A
<p>Impact TRA-10: Peak-Hour Traffic Impacts at Intersections Under Cumulative 2040 Existing General Plan Plus-Project Conditions. Increases in peak-hour vehicle traffic associated with the Project would result in increased delays during AM and PM peak hours causing significant and unavoidable impacts on the operation of study intersections under Cumulative 2040 Conditions with the Existing General Plan.</p>	S	<p>Implement Mitigation Measure TRA-1.2, plus: <i>TRA-10.1: Provide Increased Traffic Capacity to Address Project Impacts on Peak-Hour LOS under Cumulative 2040 Existing General Plan plus-Project Conditions.</i> Mitigation Measure TRA 10.1 identifies potential measures to mitigate or reduce Project impacts where feasible.</p>	SU
	PS	<p>a. Sand Hill Road and I-280 Northbound Off-Ramp (#1) During the a.m. peak hour, the eastbound intersection of Sand Hill Road and the I-280 Northbound Off-Ramp (study intersection #1) operates at LOS D under Existing Conditions, would operate unacceptably at LOS E under Cumulative 2040 Existing General Plan Conditions without the Project, and would degrade further to LOS F with the addition of Project trips, reflecting traffic delay exiting the I-280 northbound freeway.</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>With implementation of Mitigation Measure TRA-1.2, the net increase in peak hour vehicle trips resulting from the Project during the a.m. peak hour is reduced by more than 75 percent. With Mitigation Measure TRA-1.2 the intersection would operate at LOS E and the net change in delay resulting from the Project would be reduced to less than 4 seconds. Therefore, with Mitigation Measure TRA-1.2 the Project contribution to the impact at this location under 2040 existing General Plan plus-Project conditions would be reduced to a less-than-significant level.</p>	
	S	<p>b. El Camino Real & Glenwood Avenue (#25) During the a.m. peak hour, traffic associated with the Project would result in an unacceptable LOS of E under cumulative 2040 existing General Plan plus-Project conditions. The provision of a dedicated right-turn lane on Glenwood Avenue, where it approaches El Camino Real, is identified in the City’s TIF program. The Project Sponsor’s payment of the TIF shall partially mitigate this impact. The provision of one additional through lane on Glenwood Avenue would be needed to improve LOS to an acceptable LOS of D and fully mitigate this impact. However, the provision of an additional through lane is not feasible given the right-of-way constraints. Therefore, this impact would be considered significant and unavoidable under cumulative 2040 existing General Plan plus-Project conditions.</p>	SU
	S	<p>c. El Camino Real & Ravenswood Avenue-Menlo Avenue (#28) During the a.m. peak hour, traffic associated with the Project would result in an unacceptable LOS under cumulative 2040 existing General Plan plus-Project</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>conditions. Potential mitigation would be to provide a right-turn pocket on Menlo Avenue, where it approaches El Camino Real, and a third through lane on El Camino Real in both the northbound and southbound directions. These measures are identified in the City's TIF program. The Project Sponsor's payment of the TIF shall mitigate this impact. With implementation of this mitigation measure, the intersection would operate acceptably, and the impact would be reduced to a less-than-significant level.</p>	
	S	<p>d. Willow Road & Hamilton Avenue (#36) The Project impact was identified under background plus-Project conditions (see TRA 1.1b). No additional feasible mitigation measures were identified to reduce this peak-hour traffic impact, which would remain significant and unavoidable.</p>	SU
	S	<p>e. Bayfront Expressway & Willow Road (#37) The Project impact was identified under background plus-Project conditions. Additional delay would occur during the a.m. peak hour under cumulative 2040 existing General Plan plus-Project conditions. As discussed in Mitigation Measure TRA-1.1c, no additional feasible mitigation measures were identified to reduce this impact, which would remain significant and unavoidable.</p>	SU
	S	<p>f. Bayfront Expressway & University Avenue (#38) The Project impact was identified under background plus-Project conditions. Additional delay would occur under cumulative 2040 existing General Plan plus-Project conditions, triggering an impact during both the a.m. and p.m. peak hours. As discussed in Mitigation Measure TRA-1.1d, no additional feasible mitigation measures were identified to reduce this impact, which would remain significant and unavoidable.</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	PS	<p>g. Chilco Street & Constitution Drive (#45) This impact, identified under background plus-Project conditions, pertains to the design of the Project entrance, as described above in Mitigation Measure TRA-1.1f. With implementation of this mitigation measure, the intersection would operate acceptably, and this impact would be reduced to a less-than-significant level.</p>	LTS
	PS	<p>h. Chrysler Drive & Constitution Drive (#46) During the p.m. peak hour, the intersection of Chrysler Drive and Constitution Drive (study intersection #46) operates acceptably at LOS C under cumulative 2040 existing General Plan conditions without the Project. Traffic associated with the Project would cause LOS to degrade to an unacceptable LOS of D during the p.m. peak hour under cumulative 2040 existing General Plan plus-Project conditions. With implementation of Mitigation Measure TRA-1.2, the net increase in the number of peak-hour vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent, and the intersection would operate acceptably at LOS C. Therefore, with Mitigation Measure TRA-1.2, the Project impact at this location under 2040 existing General Plan plus-Project conditions would be reduced to a less-than-significant level.</p>	LTS
	S	<p>i. University Avenue & Adams Drive (#47) The Project impact was identified under background plus-Project conditions. Additional delay would occur under cumulative 2040 existing General Plan plus-Project conditions, triggering an impact during both the a.m. and p.m. peak hours (see Mitigation Measure TRA-1.1g). This impact would remain significant and unavoidable under existing General Plan plus-Project conditions. (SU)</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>Installation of a traffic signal at this location would be recommended under 2040 cumulative conditions with the proposed General Plan. Therefore, if the proposed General Plan is adopted, this impact could be mitigated to a less-than-significant level (see Mitigation Measure TRA-13.1i).</p>	
	PS	<p>j. University Avenue & Bay Road (#51) The Project was identified to have a potential impact during the p.m. peak hour under cumulative 2040 existing General Plan plus-Project conditions. With implementation of Mitigation Measure TRA-1.2, the net increase in the number of peak-hour vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent. With Mitigation Measure TRA-1.2, the change in delay would not be anticipated to exceed 4 seconds, and the impact would be reduced to a less-than-significant level.</p>	LTS
	S	<p>k. University Avenue & Donohoe Street (#54) This state-controlled intersection located adjacent to the US 101 northbound ramps in East Palo Alto operates at LOS F under existing conditions during both the a.m. and p.m. peak hours. The addition of Project traffic under cumulative 2040 existing General Plan plus-Project conditions would result in additional delay that would exceed the 4-second significance threshold during both peak hours. With implementation of Mitigation Measure TRA-1.2, the net increase in the number of peak-hour vehicle trips resulting from the Project would be substantially reduced, but the increase in delay would still be anticipated to exceed the 4-second significance threshold. Potential mitigation options are limited given the proximity of adjacent freeway ramp intersections and recent development near the intersection. The provision of</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>additional westbound lane capacity on Donohoe Street, including an extended dual left-turn pocket, dedicated through lane, and dual right-turn lanes, would reduce delay but would not be feasible given the right-of-way limitations, including proximity to the adjacent property on the northeastern corner and the relatively short block length to the upstream US 101 northbound off-ramp. Similarly, providing a southbound right-turn lane on University Avenue and lengthening the northbound turn pockets, if feasible, would reduce delay but would most likely be constrained by adjacent land uses and proximity to the US 101 overpass and two northbound on-ramps. Furthermore, because the intersection is not under the control of the City of Menlo Park, implementation of potential mitigation to reduce peak-hour delay at this location, even if feasible options were available, cannot be guaranteed. This impact is therefore considered significant and unavoidable.</p>	
	PS	<p>l. University Avenue & US 101 Southbound Ramps (#56)</p> <p>Additional delay would occur under cumulative 2040 existing General Plan plus-Project conditions, triggering a potential impact during the p.m. peak hour. With implementation of Mitigation Measure TRA-1.2, the net increase in the number of peak-hour vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent. Therefore, with Mitigation Measure TRA-1.2, the change in delay would not be anticipated to exceed 4 seconds, and the impact would be reduced to a less-than-significant level.</p>	LTS
	PS	<p>m. University Avenue & Woodland Avenue (#57)</p> <p>The Project impact was identified under background plus-Project conditions. Additional delay would occur under</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>cumulative 2040 existing General Plan plus-Project conditions, triggering an impact during the p.m. peak hour. With implementation of Mitigation Measure TRA-1.2, the net increase in the number of peak-hour vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent. Therefore, with Mitigation Measure TRA-1.2, the change in delay would not be anticipated to exceed 4 seconds, and the impact would be reduced to a less-than-significant level.</p>	
	S	<p>n. Chilco Street & Hamilton Avenue (#60) The Project impact was identified under background plus-Project conditions. Additional delay would occur under cumulative 2040 existing General Plan plus-Project conditions, triggering an impact during the p.m. peak hour. As discussed in Mitigation TRA-1.1k, no additional feasible mitigation measures were identified to reduce this impact, which would remain significant and unavoidable.</p>	SU
	S	<p>o. Bayfront Expressway & Facebook Building 20 Entrance (#65) The Project impact was identified under background plus-Project conditions. Additional delay would occur under cumulative 2040 existing General Plan plus-Project conditions, triggering an impact during the p.m. peak hour. As discussed in Mitigation Measure TRA-1.1l, no additional feasible mitigation measures were identified to reduce this impact, which would remain significant and unavoidable during the p.m. peak hour.</p>	SU
	S	<p>p. Bayfront Expressway & Proposed Building 21 Entrance (#66) The Project impact was identified under background plus-Project conditions. Additional delay would occur under cumulative 2040 existing General Plan plus-Project conditions, triggering an impact during the a.m. and p.m.</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact TRA-11: Impacts on Routes of Regional Significance Under Cumulative 2040 Existing General Plan Plus Project Conditions. Some Routes of Regional Significance would operate at or below their LOS threshold with the addition of Project trips, and Project traffic would exceed the allowable 1 percent threshold, resulting in significant and unavoidable impacts.</p>	S	<p>peak hours. As discussed in Mitigation Measure TRA-1.1m, no additional feasible mitigation measures were identified to reduce this impact, which would remain significant and unavoidable during the a.m. peak hour.</p> <p>Implement Mitigation Measure TRA-2.1</p>	SU
<p>Impact TRA-12: Increase in Daily Traffic Volumes on Roadway Segments under Cumulative 2040 Existing General Plan Plus-Project Conditions. Increases in daily traffic under existing General Plan plus-Project conditions would result in increased ADT volumes on Project area roadway segments, resulting in significant and unavoidable impacts.</p>	S	Implement Mitigation Measures TRA-3.1 and TRA-3.2	SU
<p>Impact TRA-13: Peak-Hour Traffic Impacts at Intersections Under Cumulative 2040 Proposed General Plan Conditions. Increases in peak-hour vehicle traffic associated with the Project would contribute to increased delays during the a.m. and p.m. peak hours in 2040 under the proposed General Plan (ConnectMenlo), causing a significant and unavoidable impact on the operation of study intersections.</p>	S	<p>Implement Mitigation Measure TRA-1.2, plus: <i>TRA-13.1: Increase Traffic Capacity to Address Impacts on Peak-Hour LOS under Cumulative 2040 Proposed General Plan Conditions.</i> This measure describes the types of mitigation measures that would be necessary to mitigate impacts at each affected location to less than significant.</p>	SU
	PS	<p>a. Sand Hill Road & I-280 Northbound Off-ramp (#1) This a.m. peak-hour impact was identified under cumulative 2040 existing General Plan plus-Project conditions (see Impact TRA-10.1a) and mitigated to less-than-significant levels with the peak-hour trip reduction</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		described under Mitigation Measure TRA-1.2. Average delay would change by less than 1 second under the proposed General Plan, and impact findings would remain consistent with cumulative 2040 General Plan plus-Project conditions. The Project impact would, therefore, remain less than significant with Mitigation Measure TRA-1.2 under cumulative 2040 proposed General Plan conditions.	
	PS	<p>b. El Camino Real & Ravenswood Avenue-Menlo Avenue (#28)</p> <p>The intersection would operate unacceptably during both the a.m. and p.m. peak hours under cumulative 2040 proposed General Plan conditions. As described above under Mitigation Measure TRA 10.1c, the provision of a right-turn pocket on Menlo Avenue, where it approaches El Camino Real, and a third through lane on El Camino Real is identified in the City’s TIF program. The Project Sponsor’s payment of the TIF shall mitigate this impact to a less-than-significant level.</p>	LTS
	S	<p>c. Willow Road & Hamilton Avenue (#36)</p> <p>This potential impact on p.m. peak-hour traffic operations was identified as significant and unavoidable under background plus-Project conditions (see Mitigation Measure TRA-1.1b) and would remain significant and unavoidable under cumulative 2040 existing General Plan plus-Project conditions.</p> <p>Under cumulative 2040 proposed General Plan conditions, delay would further increase during the p.m. peak hour, thereby exceeding the significance threshold. Project impacts would remain significant and unavoidable, as described under Mitigation Measure TRA-1.1b.</p>	SU
	S	<p>d. Bayfront Expressway & Willow Road (#37)</p> <p>This potential impact on p.m. peak-hour traffic operations was identified as significant and unavoidable under</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>background plus-Project conditions (see Mitigation Measure TRA-1.1c) and would remain significant and unavoidable under cumulative 2040 existing General Plan plus-Project conditions.</p> <p>Under cumulative 2040 proposed General Plan conditions, additional delay would exceed the significance threshold (see Mitigation Measure TRA-1.1c for a discussion of potential mitigation and constraints to mitigation). Mitigation Measure TRA-1.2 would partially reduce the impact, but it would remain significant. This impact would remain significant and unavoidable, as described under Mitigation Measure 1.1c.</p>	
	S	<p>e. Bayfront Expressway & University Avenue (#38)</p> <p>This potential impact on peak-hour traffic operations was identified as significant and unavoidable under background plus-Project conditions (see Mitigation Measure TRA-1.1d) and would remain significant and unavoidable under cumulative 2040 existing General Plan plus-Project conditions. Increased delay is anticipated during the p.m. peak hour under the proposed General Plan. This impact would remain significant and unavoidable, as described under Mitigation Measure TRA-1.1d.</p>	SU
	PS	<p>f. Chilco Street & Constitution Drive (#45)</p> <p>This impact, also identified under background plus-Project conditions, pertains to the design of the Project entrance (see Mitigation Measure TRA-1.1). With implementation of this Project mitigation measure, the intersection would operate acceptably and this impact would be reduced to a less-than-significant level.</p>	LTS
	PS	<p>g. Chilco Street & Constitution Drive (#46)</p> <p>This impact was also identified under cumulative 2040 existing General Plan plus-Project conditions. With</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>implementation of Mitigation Measure TRA-1.2, the net increase in peak-hour vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent and the Project contribution to increased delay would be less than 4 seconds. Therefore, with Mitigation Measure TRA-1.2, the Project impact at this location under 2040 proposed General Plan conditions would be reduced to a less-than-significant level.</p>	
	PS	<p>h. University Avenue & Adams Drive (#47) LOS at this intersection reflects delay on the side-street stop-controlled approach from Adams Drive. Signalization of this intersection would be warranted under cumulative 2040 proposed General Plan conditions with buildout of ConnectMenlo, including the Project. Therefore, signalization of this intersection should be included in the City’s TIF program. The Project Sponsor’s payment of the TIF shall mitigate this impact, and the impact would be less than significant.</p>	LTS
	PS	<p>i. University Avenue & Bay Road (#51) The intersection operates at LOS F during the p.m. peak hour under existing conditions, reflecting primarily northbound traffic as it approaches the Dumbarton Bridge. Increased delay would exceed the significance threshold under cumulative 2040 proposed General Plan conditions, reflecting added traffic to/from the other development sites (west of University Avenue and east of Willow Road) identified under the proposed General Plan. Replacement of the east/west “split-phase” signal on Bay Street with standard protected signal phases would allow eastbound and westbound pedestrian crossings to occur simultaneously and reduce p.m. peak-</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>hour delay at this intersection. Because the intersection is not under the control of the City of Menlo Park, implementation of potential mitigation to reduce peak-hour delay at this location cannot be guaranteed. Project traffic would occur primarily in the reverse-peak direction (southbound) during the p.m. peak hour. In addition, Mitigation Measure TRA-1.2 would reduce the net increase in the number of p.m. peak-hour vehicle trips generated by the Project by approximately 90 percent. Therefore, the Project would not result in increased p.m. peak-hour delay that would exceed the impact threshold under background plus-Project or cumulative 2040 existing General Plan plus-Project conditions.</p> <p>Under cumulative 2040 proposed General Plan conditions with Mitigation Measure TRA 1.2, the Project would not be anticipated to result in additional delay to critical movements that would exceed 4 seconds, and Project trips would not result in the critical v/c ratio exceeding the impact threshold. The Project contribution to this cumulative impact would be less than significant with Mitigation Measure TRA-1.2.</p>	
	S	<p>j. University Avenue & Donohoe Street (#54)</p> <p>This state-controlled intersection located adjacent to the US 101 northbound ramps in East Palo Alto operates at LOS F under existing conditions during both the a.m. and p.m. peak hours. The addition of Project traffic under cumulate 2040 existing General Plan plus-Project conditions would result in additional delay that would exceed the 4-second significance threshold during both peak hours. Additional delay would occur under cumulative 2040 proposed General Plan conditions during the a.m. peak hour.</p> <p>This impact was identified under cumulative 2040 existing General Plan plus-Project conditions (see Mitigation</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		Measure TRA-10.1j) and would remain significant and unavoidable under cumulative 2040 proposed General Plan conditions.	
	PS	<p>k. University Avenue & US 101 Southbound Ramps (#56)</p> <p>During the p.m. peak hour, this intersection operates unacceptably at LOS E under existing conditions; it would remain at LOS E under background plus-Project and cumulative 2040 existing General Plan plus-Project conditions. With implementation of Mitigation Measure TRA-1.2, the net increase in the number of peak-hour vehicle trips resulting from the Project during the p.m. peak hour would be reduced by more than 90 percent. Therefore, with Mitigation Measure TRA-1.2, the intersection would be anticipated to operate at LOS E, consistent with existing conditions. The Project contribution to this cumulative impact would be less than significant with Mitigation Measure TRA-1.2.</p>	LTS
	S	<p>l. Chilco Street & Hamilton Avenue (#60)</p> <p>The Project impact was identified under background plus-Project conditions and cumulative 2040 existing General Plan plus-Project conditions (see Mitigation Measure TRA-1.1k). This impact would remain significant and unavoidable.</p>	SU
	S	<p>m. Bayfront Expressway & Facebook Building 20 Entrance (#65)</p> <p>The Project impact was identified under background plus-Project conditions and cumulative 2040 existing General Plan plus-Project conditions (see Mitigation Measure TRA-1.1l). This impact would remain significant and unavoidable during the p.m. peak hour. (SU)</p>	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
	S	<p>n. Bayfront Expressway & Proposed Building 21 Entrance (#66)</p> <p>The Project impact was identified under background plus-Project conditions and cumulative 2040 existing General Plan plus-Project conditions (see Mitigation Measure TRA-1.1m). With the proposed mitigation, the impact would remain significant and unavoidable during the a.m. peak hour.</p>	SU
<p>Impact TRA-14: Impacts on Routes of Regional Significance Under Cumulative 2040 Proposed General Plan Conditions. Some Routes of Regional Significance would operate at or below their LOS threshold with the addition of Project trips. However, Project traffic would exceed the allowable 1 percent threshold, resulting in significant and unavoidable impacts.</p>	S	Implement Mitigation Measure TRA-2.1	SU
<p>Impact TRA-15: Increase in Daily Traffic Volumes on Roadway Segments Under Cumulative 2040 Proposed General Plan Conditions. Increases in daily traffic associated with the Project under Cumulative 2040 Proposed General Plan Conditions would result in increased ADT volumes on Project area roadway segments resulting in significant and unavoidable impacts.</p>	S	Implement Mitigation Measure TRA-3.1 and TRA-3.2	SU
3.4 Air Quality			
<p>Impact AQ-1: Conflict with Air Quality Plan. The Project would not conflict with or obstruct implementation of the applicable air quality plan.</p>	LTS	None required	N/A
<p>Impact AQ-2a: Construction Criteria Air Pollutant Emissions. Construction activities at the Project site could result in the generation of regional criteria pollutant emissions during construction in excess of</p>	PS	<p>AQ-2.1: Implement BAAQMD Basic Construction Mitigation Measures to Reduce Construction-Related Dust. The Project Sponsor shall require all construction contractors to implement the basic construction mitigation</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
BAAQMD thresholds.		<p>measures recommended by BAAQMD to reduce fugitive dust emissions. Emission reduction measures shall include, at a minimum, the following measures. Additional measures may be identified by BAAQMD or contractor as appropriate.</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. Recycled water, to be purchased through advance arrangement with the City of Redwood City or the City of Palo Alto, shall be used to water all exposed surfaces. • All haul trucks transporting soil, sand, or other loose material offsite shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • A publicly visible sign shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations. 	
<p>Impact AQ-2b: Operational Criteria Air Pollutant Emissions. Operational activities at the Project site could result in the generation of regional criteria pollutant emissions during operation in excess of</p>	PS	<p><i>AQ-2.2: Offset NOX Emissions Generated during Project Operation that are above the BAAQMD NOX Average Daily Emission Threshold.</i> The Project Sponsor shall, prior to occupancy of the first building within the Project,</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
BAAQMD thresholds.		<p>enter into an agreement with the City to develop an alternative or complementary offsite mitigation program to offset operational NOX emissions to the level established by the BAAQMD thresholds for the years in which the Project's emissions exceed the BAAQMD threshold. The offsite mitigation program shall require Project Sponsor to provide a one-time payment to the City to establish a program to fund emission reduction projects through grants and similar mechanisms within the City of Menlo Park. The amount of such payment shall be calculated based on then-current BAAQMD Carl Moyer Program cost-effectiveness limit multiplied by the emissions that exceed BAAQMD's average daily threshold for each year that emissions exceed the threshold plus a five percent administrative fee to fund procurement of offsite emission reductions for the Project's projected operational emissions.</p> <p>Potential projects shall be limited to those which will reduce emissions for each year in which the project's emissions exceed the BAAQMD threshold through the end of 2025, which is when the Project's operational emissions are projected to be below the average daily thresholds, including, but not limited to, the following:</p> <ul style="list-style-type: none"> • Alternative fuel, low-emission school buses, transit buses, and other vehicles. • Diesel engine retrofits and repowers. • Bike Sharing Programs. • Electric vehicle charging stations and plug-ins. <p>All offsite reductions must be quantifiable, verifiable, and enforceable. The Project Sponsor shall engage a qualified air quality expert to coordinate with the City to identify a list of potential projects eligible for funding. Emission reduction projects shall be funded so that the Project's emissions are reduced each year until the end of 2025. The</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>air quality expert retained by the Project Sponsor shall provide a report within one year of occupancy of the first building within the Project identifying the projects that were funded and associated NOx emissions expected to be realized for each year out until the end of 2025. Annual reporting of the implementation of emissions reduction projects shall be required until the Project's emissions are less than the BAAQMD threshold without the offsets.</p> <p>If a sufficient number of emissions reduction projects are not identified to meet the required performance standards in the City of Menlo Park, Project Sponsor shall consult with a qualified air quality expert to ensure conformity is met through some other means of achieving the performance standard of achieving net zero operational emissions in excess of BAAQMD's average daily thresholds through 2025, including (but not limited to) payment of a one-time mitigation offset fee to BAAQMD's Strategic Incentives Division plus a five percent administrative fee to fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. Reporting for any emissions reduction projects outside the City shall be completed on the same schedule as indicated above for emission reduction projects in the City.</p> <p>If annual reports indicate that emission reductions do not adequately reduce project emissions to a level below the BAAQMD threshold for any year, then a penalty of 200 percent shall be imposed that will require the Project Sponsor to obtain an additional year of offsets based on the amount of emissions by which the Project's emissions exceed the BAAQMD threshold for the next following year (e.g., if the 2019 emissions exceed the threshold by five tons, then 10 tons of emissions must be provided by 2020).</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact AQ-3: Result in a Cumulatively Considerable Net Increase of any Criteria Pollutant for which the Project Region is Nonattainment. The Project could result in the generation of criteria pollutant emissions that would result in a cumulatively considerable net increase.</p>	PS	Implement Mitigation Measures AQ-2.1 and AQ-2.2	LTS
<p>Impact AQ-4a: Exposure of Existing Sensitive Receptors to Substantial Pollutant Concentrations During Construction. The Project would expose existing sensitive receptors to substantial pollutant concentrations during construction.</p>	PS	Implement Mitigation Measure AQ-2.1	LTS
<p>Impact AQ-4b: Exposure of Existing Sensitive Receptors to Substantial Pollutant Concentrations from Project Operation. The Project would not expose existing sensitive receptors to substantial pollutant concentrations during operation.</p>	LTS	None required	N/A
<p>Impact AQ-5: Create Objectionable Odors. The Project would not create objectionable odors that would affect a substantial number of people.</p>	LTS	None required	N/A
<p>Impact C-AQ-1: Conflict with Air Quality Plan. The Project, combined with other development within the City, would not conflict with or obstruct implementation of the applicable air quality plan.</p>	LTS	None required	N/A
<p>Impact C-AQ-2a: Cumulative Criteria Pollutants during Construction. Construction activities associated with the demolition of Buildings 307–309 could generate substantial NO_x emissions in excess of BAAQMD threshold.</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact C-AQ-2b: Cumulative Criteria Pollutants during Operation. Operational activities associated with the Project could generate substantial ROG, NO_x, and PM10 emissions in excess of BAAQMD thresholds.</p>	PS	Implement Mitigation Measure AQ-2.2	LTS
<p>Impact C-AQ-3a: Cumulative Health Risks during Construction. Cumulative development in the Project vicinity would expose existing sensitive receptors to substantial pollutant concentrations during construction.</p>	LTS	None required	N/A
<p>Impact C-AQ-3b: Cumulative Health Risks during Operation. Cumulative development in the Project vicinity would not expose existing sensitive receptors to substantial pollutant concentrations during operation.</p>	LTS	None required	N/A
3.5 Greenhouse Gas Emissions			
<p>Impact GHG-1: Greenhouse Gas Emissions. The Project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.</p>	PS	<p><i>GHG-1.1: Implement BAAQMD Best Management Practices for Construction.</i> The Project Sponsor shall require all construction contractors to implement the BMPs recommended by BAAQMD to reduce GHG emissions. Emissions reduction measures shall include, at a minimum, the use of local building materials (at least 10 percent), the recycling and reuse of at least 50 percent of construction waste or demolition material, and the use of alternative-fuel vehicles for construction vehicles/equipment (at least 15 percent of the fleet).</p>	LTS
<p>Impact GHG-2: 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.</p>	S	None feasible	SU

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.6 Noise			
<p>Impact NOI-1: Exposure to Excessive Noise Levels. The Project could expose persons to or generate noise levels in excess of standards established in the General Plan, noise ordinance or applicable standards of other agencies.</p>	PS	<p><i>NOI-1.1: Implement Noise Control Measures to Reduce Construction Noise during Project Construction.</i> The Project Sponsor shall submit a Construction Noise Plan for review and approval by the Planning and Building Divisions prior to the issuance of the demolition permit. The Project Sponsor shall comply with construction noise limits specified in Section 8.06 of the City of Menlo Park Municipal Code by implementing measures during demolition and construction of the Project. These measures may include, but are not limited to:</p> <ul style="list-style-type: none"> • To the extent feasible, schedule the noisiest construction activities, such as demolition and grading activities, during times that would have the least impact on nearby residential and other receptors. This could include restricting construction activities in the areas of potential impact to the early and late hours of the workday, such as from 8:00 a.m. to 10:00 a.m. or 4:00 p.m. to 6:00 p.m., Monday through Friday. • Use best available noise control techniques (e.g., improved mufflers, equipment redesign, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) on equipment and trucks used for Project construction wherever feasible. • Use hydraulically or electrically powered impact tools (e.g., pile drivers, jack hammers, pavement breakers, rock drills) used for Project construction wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, use an exhaust muffler on the compressed air exhaust; this muffler can lower noise levels from the exhaust by up to about 10 dBA. Use external jackets on the tools themselves where feasible. This could achieve a 	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>reduction of 5 dBA. Use quieter equipment, such as drills, rather than impact equipment whenever feasible.</p> <ul style="list-style-type: none"> • Use “quiet” gasoline-powered compressors or electric compressors, and use electric rather than gasoline- or diesel-powered forklifts for small lifting to the extent feasible. • Locate stationary noise sources, such as temporary generators, as far from nearby receptors as possible; such sources shall be muffled and enclosed within temporary enclosures and shielded by barriers or other measures to the extent feasible. • Install temporary noise barriers (generally approximately 8 feet in height) around construction areas adjacent to sensitive receptors to reduce construction noise from equipment to acceptable levels. Specifically, the noise barriers shall reduce noise levels during the hours of 8:00 a.m. to 6:00 p.m. on weekdays to 85 dBA at a distance of 50 feet from the construction equipment. In addition, the noise barriers shall reduce overall construction noise to less than 60 dBA Leq, as measured at the applicable property lines of adjacent uses, during the hours of 7:00 a.m. to 8:00 a.m. and 6:00 p.m. to 10:00 p.m. weekdays and 7:00 a.m. to 10:00 p.m. on Saturdays. The noise barriers shall be installed unless an acoustical engineer submits documentation that confirms that barriers are not necessary to achieve these attenuation levels or provides specific locations and heights to achieve the required attenuation. • Prohibit trucks from idling along streets serving the construction site. • Prior to any pile-driving activities, notify all surrounding property owners and occupants within 300 feet of the Project site, informing them of the estimated start date and duration. 	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> • Implement “quiet” pile-driving technology (e.g., vibratory pile driving or pre-drilled pile holes) where feasible, in consideration of geotechnical and structural requirements and conditions. • Monitor the effectiveness of noise attenuation measures by taking noise measurements during pile-driving activities to ensure compliance with the 85 dBA standard at 50 feet for construction equipment and during general construction occurring during non-exempted daytime hours to ensure compliance with the 60 dBA Leq daytime standard. <p><i>NOI-1.2: Implement Noise Control Measures to Reduce HVAC Noise during Project Operation.</i> The Project Sponsor shall design the Project HVAC system to limit noise to the applicable standard at the property line of nearby noise-sensitive receptors. Measures that can implemented to achieve this include, but are not limited to:</p> <ul style="list-style-type: none"> • Maximize the distance between HVAC systems and nearby sensitive receptors, • Provide enclosures around the HVAC units, • Incorporate local barriers around equipment, and • Utilize mufflers or silencers on HVAC systems. <p>Prior to the issuance of building permits, the Project Sponsor shall prepare a report, identifying measures that will be implemented to ensure that exterior HVAC noise levels will comply with the following noise limits:</p> <ul style="list-style-type: none"> • The 60 dBA Leq daytime and 50 dBA Leq nighttime noise standards for equipment located on the ground, • The zoning ordinance limit of 50 dBA at a distance of 50 feet for roof-mounted equipment. <p><i>NOI-1.3: Install Sound Enclosures around Emergency Generators.</i> The Project Sponsor shall reduce the sound level from the operating generators to a maximum sound</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>level of less than the 60 dBA noise standard at nearby noise-sensitive land uses. Measures that could accomplish this standard include, but are not limited to:</p> <ul style="list-style-type: none"> • Installing sound enclosures around all emergency generators, • Utilizing mufflers to reduce generator noise, and • Utilizing equipment that meets this standard. <p>Prior to the issuance of building permits, the Project Sponsor shall prepare a report, identifying measures that shall be implemented to ensure that exterior noise levels from emergency generators comply with the 60 dBA Leq daytime/nighttime noise standards.</p> <p>NOI-1.4: Limit Generator Testing to Daytime Hours. The Project Sponsor shall limit generator testing to between the hours of 8:00 a.m. and 6:00 p.m.</p> <p>NOI-1.5: Design Enclosures around Mechanical Equipment Associated with the Recycled Water System to Limit Exterior Noise. The Project Sponsor shall design the recycled water system such that noise generated by mechanical equipment complies with the City noise standards of 60 dBA Leq (daytime) and 50 dBA Leq (nighttime) at nearby residences. Measures that could accomplish this include, but are not limited to:</p> <ul style="list-style-type: none"> • Designing equipment room enclosures, access doors, and other equipment room openings to limit noise that could be transmitted to the exterior • Utilizing mufflers to limit blower noise <p>Prior to the issuance of building permits, the Project Sponsor shall prepare a report, identifying measures that shall be implemented to ensure that exterior noise levels from the recycled water system comply with the daytime and nighttime noise standards.</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Impact NOI-2: Expose Persons to or Generate Excessive Ground-borne Vibration or Ground-borne Noise Levels. The Project would not expose persons to or generate excessive vibration or ground-borne noise.	LTS	None required	N/A
Impact NOI-3: Substantial Permanent Increase in Ambient Noise Levels. The Project would result in a permanent increase in ambient noise levels in the Project vicinity, above levels existing without the Project.	PS	Implement Mitigation Measures NOI-1.2 through NOI-1.5	LTS
Impact NOI-4: Substantial Temporary or Periodic Increase in Ambient Noise Levels. The Project could result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity, above levels existing without the Project.	PS	Implement Mitigation Measures NOI-1.1	LTS
Impact C-NOI-1: Cumulative Exposure to Excessive Noise. The Project, in combination with other development within the city, could result in a substantial increase in exposure of persons to noise in excess of the standards established in the City General Plan or Municipal Code. The Project’s contribution would be cumulatively significant.	PS	Implement Mitigation Measure NOI-1.1	LTS
Impact C-NOI-2: Cumulative Exposure to Ground-borne Vibration. Construction activities associated with Project-related development and other future development in the city would not expose sensitive receptors to excessive ground-borne vibration. The Project’s cumulative impact would be less than significant.	LTS	None required	N/A
	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact C-NOI-3: Cumulative Permanent Increase in Noise Levels. Operation of the Project, in combination with other development in the city, would result in a substantial permanent ambient noise level increase in the Project vicinity. However, the Project’s contribution would not be cumulatively significant.</p>		None required	N/A
<p>Impact C-NO-4: Cumulative Temporary Increase in Noise Levels. Construction activities associated with Project-related development and other future development in the city would not expose sensitive receptors to a substantial temporary increase in the ambient noise level. The Project’s cumulative impact would be less than significant.</p>	LTS	None required	N/A
3.7 Cultural Resources			
<p>Impact CUL-1: Impacts on Historic Resources. The Project would not cause a substantial adverse change in the significance of a historical resource.</p>	LTS	None required	N/A
<p>Impact CUL-2: Impacts on Archaeological Resources. The Project has the potential to encounter and damage or destroy previously unknown subsurface archaeological resources during construction.</p>	PS	<p><i>CUL-2.1: Perform Construction Monitoring, Evaluate Uncovered Archaeological Features, and Mitigate Potential Disturbance of Identified Significant Resources at the Project Site.</i> Prior to demolition, excavation, grading, or other construction-related activities on the Project site, the Project Sponsor shall hire a qualified professional archaeologist (i.e., one who meets the Secretary of the Interior’s professional qualifications for archaeology or one under the supervision of such a professional) to monitor, to the extent determined necessary by the archaeologist, Project-related earth-disturbing activities (e.g., grading, excavation, trenching). In the event that any prehistoric or historic-period subsurface archaeological features or deposits, including locally darkened soil (midden), that could conceal cultural</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact CUL-3: Impacts on Paleontological Resources. The Project could destroy a unique paleontological resource or site or unique geologic feature.</p>	<p>PS</p>	<p>deposits, animal bone, obsidian, and/or mortar are discovered during demolition/construction-related earthmoving activities, all ground-disturbing activity within 100 feet of the discovery shall be halted immediately, and the Planning and Building Divisions shall be notified within 24 hours. The City shall consult with the Project archaeologist to assess the significance of the find. Impacts on any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by the City that are consistent with the Secretary of the Interior's Standards for Archaeological Documentation. If Native American archaeological, ethnographic, or spiritual resources are discovered, all identification and treatment of the resources shall be conducted by a qualified archaeologist and Native American representatives who are approved by the local Native American community as scholars of the cultural traditions. In the event that no such Native American is available, persons who represent tribal governments and/or organizations in the locale in which resources could be affected shall be consulted. When historic archaeological sites or historic architectural features are involved, all identification and treatment is to be carried out by historical archaeologists or architectural historians who meet the Secretary of the Interior's professional qualifications for archaeology and/or architectural history.</p> <p><i>CUL-3.1: Conduct Protocol and Procedures for Encountering Paleontological Resources.</i> Prior to the start of any subsurface excavations that would extend beyond previously disturbed soils, all construction forepersons and field supervisors shall receive training by a qualified professional paleontologist, as defined by the SVP, who is experienced in teaching non-specialists to</p>	<p>LTS</p>

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact CUL-4: Impacts on Human Remains. The Project has the potential to encounter or discover human remains during excavation or construction.</p>	<p>PS</p>	<p>ensure they recognize fossil materials and follow proper notification procedures in the event any such materials are uncovered during construction. Procedures to be conveyed to workers include halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who shall evaluate its significance. If a fossil is determined to be significant and avoidance is not feasible, the paleontologist shall develop and implement an excavation and salvage plan in accordance with SVP standards. Construction work in these areas shall be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and cataloged. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall then be deposited in a scientific institution with paleontological collections. A final Paleontological Mitigation Plan Report shall be prepared that outlines the results of the mitigation program. The City shall be responsible for ensuring that the monitor’s recommendations regarding treatment and reporting are implemented.</p> <p><i>CUL-4.1: Comply with State Regulations Regarding the Discovery of Human Remains at the Project Site.</i> If human remains are discovered during any construction activities, all ground-disturbing activity within 50 feet of the remains shall be halted immediately, and the county coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California’s Health and Safety Code. Additionally, the Planning and Building Divisions shall be notified. If the remains are determined by the county coroner to be Native American, the NAHC shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to</p>	<p>LTS</p>

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>in the treatment and disposition of the remains. The Project Sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Menlo Park Community Development Department, Planning Division, shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of state law, as set forth in State CEQA Guidelines Section 15064.5(e) and Public Resources Code Section 5097.98. The applicant shall implement approved mitigation, to be verified by the Planning Division, before the resumption of ground-disturbing activities within 50 feet of where the remains were discovered.</p>	
<p>Impact C-CUL-1: Cumulative Impacts on Historical Resources. Development in the Bay Area could have significant impacts on historical resources. However, construction of the Project would not contribute to a cumulative impact.</p>	LTS	None required	N/A
<p>Impact C-CUL-2: Cumulative Impacts on Archaeological, Paleontological Resources, and Human Remains. Construction activities on the Project site and other development could result in impacts on archaeological resources, paleontological resources, and human remains.</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.8 Biological Resources			
<p>Impact BIO-1: Direct Impacts on Special-Status Species. The Project could directly affect species that have been identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations.</p>	PS	<p><i>BIO-1.1: Identify and Protect Roosting and Breeding Bats on the Project Site and Provide Alternative Roosting Habitat.</i> The Project Sponsor shall implement the following measures to protect any roosting and/or breeding bats found in a tree that is to be removed during Project implementation.</p> <p>Prior to tree removal or demolition activities, the Project Sponsor shall retain a qualified wildlife biologist with demonstrated bat survey experience to conduct a focused survey for bats and potential roosting sites within trees that are to be removed during the period when bats are most active (May 1 through October 1). The surveys can be conducted by visual identification. If bats are observed on the Project site in areas where they could be affected by the Project, they will be identified to species level using a bat echolocation detector (e.g., “Anabat” unit). If no roosting sites or bats are found, the biologist shall submit a letter report confirming absence to CDFW, and no further mitigation will be required.</p> <p>If roosting bats are found during the above survey and roosting areas will be impacted, avoidance and minimization measures shall be implemented. Appropriate measures will be determined in coordination with CDFW and may include the following:</p> <ul style="list-style-type: none"> • Tree removal shall be avoided between April 15 and September 15 (the maternity period) to avoid impacts on pregnant females and active maternity roosts (whether colonial or solitary). • All tree removal will be conducted between September 15 and October 30, which corresponds to the time period when bats have not yet entered torpor or are not caring for non-flying young. 	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> • Trees will be removed in pieces rather than felling the entire tree. • If a maternity roost is located, whether solitary or colonial, that roost will remain undisturbed until September 15 or until a qualified biologist has determined the roost is no longer active. • If avoidance of non-maternity roost trees is not possible and tree removal or trimming must occur between September 15 and October 30, a qualified biologist will monitor tree trimming/removal. Prior to removal/trimming, each tree will be gently shaken; several minutes should pass before felling trees or trimming limbs to allow bats time to arouse and leave the tree. The biologists should search downed vegetation for dead and injured bats. The presence of dead or injured bats that are species of special concern will be reported to CDFW. • Compensatory mitigation for the loss of roosting habitat will also be determined through consultation with CDFW and may include the construction and installation of suitable replacement habitat (e.g., bat houses, cottonwood trees) onsite. • The performance standard for any replacement roosting habitat will be to demonstrate occupancy by roosting bats within five years of installation or construction. Occupancy shall be determined by whichever monitoring technique (e.g., roost emergence surveys, acoustic surveys) the qualified bat biologist deems most likely to determine bat presence. <p>The Project Sponsor will be responsible for ensuring that CDFW requirements are implemented. Multiple survey visits and survey methods may be required at a single site to determine presence or absence of roosting bats, depending on season and roost type.</p>	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact BIO-2: Indirect Impacts on Special-Status Species. The Project could result in increased predation of special-status bird and mammal species that inhabit nearby saltwater and brackish water marshes in the Don Edwards National Wildlife Refuge.</p>	PS	<p>BIO-2.1: Install Bird Perching Deterrents on All New Buildings and Other Elevated Structures, Including the Bicycle/Pedestrian Bridge. The Project Sponsor shall implement the following measures to protect special-status species from increased predation on the Project site:</p> <ul style="list-style-type: none"> • For all new buildings constructed on the Project site, as well as the bicycle/pedestrian bridge and northern bridge approaches, the Project Sponsor shall install bird deterrents along suitable perching sites to deter avian predators of special-status species that inhabit the adjacent salt marshes. Such deterrents may include one or more of the following: bird spikes, bird netting, an electric shock track, sound deterrents, or perching deterrents approved by CDFW and/or USFWS. • Trees that are used for replacement landscaping, especially those planted on rooftops, shall consist of species that generally do not exceed 30 feet in height to limit the visibility of adjacent salt marshes to the north. These trees may include native or non-invasive nonnative ornamental species. Species with broad canopies are preferred because trees with tall, narrow canopies (e.g., palms or conifers) generally provide better hunting perches for raptors. Additionally, trees that are planted on the rooftops of the new buildings shall be located away from the edge of the roof and planted with a reduced line of sight to the Bay. 	LTS
<p>Impact BIO-3: Impacts on Native Wildlife Nursery Sites. The removal of buildings, trees, shrubs, or woody vegetation and the installation of new buildings and lighting could affect native migratory birds.</p>	PS	<p>Implement Mitigation Measure BIO-2.1, plus:</p> <p>BIO-3.1: Conduct Pre-construction Surveys for Nesting Migratory Birds. The Project Sponsor shall implement the following measures to reduce impacts on nesting migratory birds:</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> To facilitate compliance with state and federal law (California Fish and Game Code and the MBTA) and prevent impacts on nesting birds, the Project Sponsor shall avoid construction during the nesting season (February 1 through September 14) or conduct pre-construction surveys, as described below. If it is not feasible to avoid the nesting season, the Project Sponsor shall hire a qualified wildlife biologist with demonstrated experience to conduct a survey for nesting birds, including raptors, no earlier than 3 days prior to the commencement of ground-disturbing activities and vegetation removal (including clearing, grubbing, and staging). The area surveyed shall include all construction areas within the Project site as well as areas within 250 feet outside the boundaries of the areas to be cleared or as otherwise determined by the biologist. If construction activities related to the multi-use bicycle/pedestrian bridge and occurring on the northern side of the Bayfront Expressway are initiated during the nesting bird season, within 3 days prior to the start of construction, a survey shall be conducted by a qualified biologist to determine whether western snowy plovers are nesting within 600 feet of the proposed construction area. Surveys shall be conducted on two week intervals, between February 1 and through May 30, or longer, if necessary, as determined by the biologist based on the behavior and habitat. If an active nest is identified, a buffer of 600 feet shall be established between the construction area and the nest, and the nest shall be periodically monitored by a qualified biologist to determine when it is no longer active (at which point the buffer will no longer be needed). If there is a visual barrier, such as a 	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>levee or dense vegetation, between the construction area and the nest, such that the plover will not be able to see construction activity from the nest, then the Project Sponsor may coordinate with the USFWS to determine whether a reduced buffer would be sufficient to allow work to occur without disturbing the nesting plovers.</p> <ul style="list-style-type: none"> • A nest survey shall be required prior to implementation of Phase 1 and Phase 2 of the Project and when construction work stops at a portion of the site where suitable nesting habitat remains for more than 15 days. Additionally, at least one nest survey shall be conducted at the beginning of each year of Project implementation between February and May. As discussed in Chapter 2, <i>Project Description</i>, Project implementation will occur between 2016 and 2022. The need for additional surveys shall be determined by the qualified wildlife biologist and based on the results of the initial survey. • If the biologist finds active nests during the survey, he or she shall establish species-specific no-disturbance buffer zones for each nest with use of high-visibility fencing, flagging, or pin flags. No construction activities shall be allowed within the buffer zones. The size of the buffer shall be based on the species sensitivity to disturbance and planned work activities in the vicinity. The buffer shall remain in effect until the nest is no longer active. • If structure demolition activities cannot occur outside of the nesting season, the Project Sponsor or its contractor shall remove inactive nests from the structure to be demolished and install nest exclusion measures (i.e., fine mesh netting, panels, or metal projectors) outside of the nesting season. All 	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>exclusionary devices shall be monitored and maintained throughout the breeding season to ensure that they are successful in preventing the birds from accessing cavities or nest sites. No more than 3 days prior to building demolition activities, a qualified biologist shall conduct a pre-construction survey of all potential nesting habitat on the structure to be demolished and the surrounding areas for the presence of active nests. If active nests are found on the building or in the affected area, then demolition activities shall not proceed until the biologist verifies that all nests on the building are inactive.</p> <ul style="list-style-type: none"> • After all surveys and/or nest deterrence activities are completed, the biologist shall complete a memorandum detailing the survey effort and results and submit the memorandum to the City within 7 days of survey completion. <p>BIO-3.2: Implement Bird-Safe Design Standards into Project Buildings and Lighting Design. The Project Sponsor or its contractor shall implement the following measures to minimize hazards to birds:</p> <ul style="list-style-type: none"> • Reduce large areas of transparent or reflective glass. • Locate water features, trees, and bird habitat away from building exteriors to reduce reflection. • Reduce or eliminate the visibility of landscaped areas behind glass. • Turn non-emergency lighting off at night, especially during bird migration season (February–May and August–November). • Include window coverings that adequately block light transmission from rooms where interior lighting is used at night and install motion sensors or controls to extinguish lights in unoccupied spaces. 	

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact BIO-4: Conflicts with Any Local Policies or Ordinances that Protect Biological Resources. The Project would not result in conflicts with Chapter 13.24 of the Municipal Code (Heritage Tree Ordinance).</p>	LTS	None required	N/A
<p>Impact C-BIO-1: Cumulative Impacts on Roosting Bats. Removal of buildings, trees, shrubs, or other woody vegetation associated with construction of the Project and other development would result in impacts on roosting bats.</p>	LTS	None required	N/A
<p>Impact C-BIO-2: Cumulative Indirect Impact on Special-Status Species. The Project and other development could result in increased predation of special-status birds and mammal species that inhabit nearby saltwater and brackish water marshes in the Don Edwards National Wildlife Refuge.</p>	LTS	None required	N/A
<p>Impact C-BIO-3: Cumulative Impact on Native Wildlife Nursery Sites. The removal of buildings, trees, shrubs, or other woody vegetation and the installation of new buildings and lighting could affect native migratory birds.</p>	LTS	None required	N/A

- Design and/or install lighting fixtures that minimize light pollution, including light trespass, over-illumination, glare, light clutter, and skyglow, while using bird-friendly colors for lighting when possible. *San Francisco's Standards for Bird-safe Buildings* document⁴ provides a good overview of building design and lighting guidelines to minimize bird/building collisions.

⁴ City and County of San Francisco. 2011. *Standards for Bird-Safe Buildings*. San Francisco Planning Department. July 14. Available: <http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%202011-30-11.pdf>.

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact C-BIO-4: Cumulative Conflicts with Any Local Policies or Ordinances that Protect Biological Resources. The Project, in combination with other reasonably foreseeable projects, would not conflict with local policies or ordinances that protect biological resources.</p>	LTS	None required	N/A
3.9 Geology and Soils			
<p>Impact GEO-1: Strong Seismic Ground Shaking and Seismically Related Ground Failure. The Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (1) strong seismic ground shaking and (2) seismically related ground failure, including liquefaction.</p>	LTS	None required	N/A
<p>Impact GEO-2: Soil Erosion. The Project would result in less-than-significant soil erosion impacts. (LTS)</p>	LTS	None required	N/A
<p>Impact GEO-3: Soil Hazards. The Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in subsidence or collapse.</p>	LTS	None required	N/A
<p>Impact GEO-4: Expansive Soil. Expansive Soil. The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating a less-than-significant risk to life or property.</p>	LTS	None required	N/A
<p>Impact C-GEO-1: Cumulative Seismic Hazards. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase the risk of exposure to seismic hazards.</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact C-GEO-2: Cumulative Soil Erosion. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase the soil erosion potential.</p>	LTS	None required	N/A
<p>Impact C-GEO-3: Cumulative Soil Hazards. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase soil hazards.</p>	LTS	None required	N/A
3.10 Hydrology and Water Quality			
<p>Impact WQ-1: Violation of Water Quality Standards or Waste Discharge Requirements. The Project could violate water quality standards or waste discharge requirements.</p>	PS	<p><i>WQ-1.1: Implement Construction Dewatering Treatment (if necessary).</i> Dewatering treatment would be necessary if groundwater is encountered during excavation activities, dewatering is necessary to complete the Project, or the dewatered water is discharged to any storm drain or surface water body. Because there is potential for groundwater to be contaminated with VOC's or fuel products at the Project site, the Project Sponsor would be required to comply with the San Francisco Bay RWQCB's VOC and Fuel General Permit (Order No. R2-2012-0012).</p> <p>If dewatering activities require discharges into the storm drain system or other water bodies, the water shall be pumped to a tank and tested for water quality using grab samples and sent to a certified laboratory for analysis. If it is found that the water does not meet water quality standards, it should either be treated as necessary prior to discharge so that all applicable water quality objectives (as noted in Tables 3.10-1 and 3.10-2) are met or hauled offsite instead for treatment and disposal at an appropriate waste treatment facility that is permitted to receive such water. Water treatment methods shall be selected that achieve maximum removal of contaminants found in the groundwater and represent the best available</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact WQ-2: Effects on Groundwater Supplies and Recharge. The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that a net deficit in aquifer volume or a lowering of the local groundwater table level would result.</p>	LTS	None required	N/A
<p>Impact WQ-3: Changes to the Existing Drainage Patterns. The Project would not substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion, siltation, or flooding onsite or offsite.</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact WQ-4: Changes to Stormwater Runoff. The Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p>	LTS	None required	N/A
<p>Impact WQ-5: Impacts from Flooding. The Project could expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, but would not place structures within a 100-year flood hazard area.</p>	PS	<p>WQ-5.1: Flood-Proofing of Project Underground Infrastructure. Prior to or, at a minimum, concurrent with the issuance of the first construction activity permit at the Project site, and in connection with applicable FEMA requirements, the Project Sponsor shall ensure that the Project incorporates design features, including storm drains, sewers, and equipment facilities, that would flood-proof underground infrastructure, thereby allowing it to withstand hydrostatic forces and buoyancy from SLR changes in groundwater levels. Onsite recycled-water wetland treatment areas shall be located at grade, with underground tanks placed in elevated areas to provide protection from the 100-year BFE plus 16 inches.</p> <p>WQ-5.2: Provide Adequate Stormflow Conveyance Capacity for Sea-Level Rise Conditions at the Project Site. Prior to or, at a minimum, concurrent with the issuance of the first construction activity permit at the Project site, the Project Sponsor shall provide current documentation in the form of a technical report to ensure that, as a result of Project design features, the storm drain system’s existing conveyance capacity is not constricted by SLR at the outlets, including the offsite Chrysler pump station, as a result of the Project design.</p>	N/A
<p>Impact C-WQ-1: Cumulative Hydrology and Water Quality Impacts. The Project, in combination with other foreseeable development in the vicinity, could contribute considerably to cumulative impacts on water quality, groundwater recharge and supplies, storm drain capacity, or current flooding.</p>	PS	Implement Mitigation Measure WQ-1.1	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.11 Hazards and Hazardous Materials			
<p>Impact HAZ-1: Routine Hazardous Materials Use. The Project would not create a significant hazard to human health and/or the environment through the routine transport, use, or disposal of hazardous materials.</p>	LTS	None required	N/A
<p>Impact HAZ-2: Upset and Accident Conditions Involving Hazardous Materials. The Project could create a potentially significant hazard to human health and/or the environment involving the release of hazardous materials.</p>	PS	<p>HAZ-2.1: Soil and Groundwater Management. Soil Management Plans that cover the entire Project site shall be prepared and implemented. These Soil Management Plans shall, as appropriate, incorporate the analytical results from the most recent groundwater monitoring event and soil investigations and include protocols for managing both known and potentially undocumented residual soil and groundwater contamination that may be encountered during Project construction, including naturally occurring asbestos. The Soil Management Plans shall include dust control measures that describe how construction and grading operations will minimize dust emissions and ensure that no equipment or operations will emit visible dust across the property line. Although naturally occurring asbestos has not been detected in the vicinity of Buildings 307-309, in accordance with CARB’s Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations, if naturally occurring asbestos is encountered during construction, then dust control measures must meet the requirements of an ADMP approved by the BAAQMD. These Soil Management Plans shall be approved by DTSC and implemented during Project construction.</p> <p>HAZ-2.2: Additional Site Investigation. If required by DTSC, additional site investigations shall be performed to delineate the source and extent of contamination on the Project site. At DTSC’s discretion, these investigations may be incorporated into the Soil Management Plans required</p>	LTS

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>by DTSC for the Project site. The analytical results shall be compared to risk-based human health screening levels approved by DTSC. The site investigation(s) shall be prepared and evaluated by a licensed professional, and a technical report summarizing the field activities, results, and conclusion shall be submitted to DTSC for review and approval prior to issuance of building permits.</p> <p>HAZ-2.3: Remedial Action. According to the results of additional site investigations (if any), the Project Sponsor shall coordinate with DTSC to select and implement remedial actions (as necessary) to protect future site users from conditions that could pose an unacceptable health risk. Remedial measures may include, but are not limited to, source removal of contaminated materials, in-situ treatment, engineering controls, and/or modification of institutional controls described in the existing LUC for the Project site. Remedial actions shall be implemented prior to building occupancy. At DTSC’s discretion, remedial actions may be completed during implementation of the Soil Management Plans required by DTSC for the Project site.</p>	
<p>Impact HAZ-3: Exposure to Schools. The Project would not create a potentially significant hazard for children at nearby schools from emissions or handling hazardous or acutely hazardous materials.</p>	LTS	None required	N/A
<p>Impact HAZ-4: Impairment of Emergency Response or Evacuation Plans. The Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.</p>	LTS	None required	N/A
<p>Impact C-HAZ-1: Cumulative Hazardous Materials Management and Accidental Releases. Construction and operation of the Project and other</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
development would not create a significant hazard to human health and/or the environment involving the management or release of hazardous materials.			
Impact C-HAZ-2: Cumulative Subsurface Hazardous Materials. Construction and operation of the Project and other development would not create a significant hazard to human health and/or the environment involving the disturbance of subsurface hazardous materials.	LTS	None required	N/A
Impact C-HAZ-3: Cumulative Impairment of Emergency Response or Evacuation Plans. Construction and operation of the Project and other development would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.	LTS	None required	N/A
3.12 Population and Housing			
Impact POP-1: Indirect Population Growth. The Project would not induce substantial population growth indirectly through job growth, nor would projected growth result in adverse direct impacts on the physical environment.	LTS	None required	N/A
Impact C-POP-1: Cumulative Increase in Population. Proposed development in the city would increase the resident population but would not exceed growth projections.	LTS	None required	N/A
Impact C-POP-2: Cumulative Increase in Housing Demand. Proposed development in the city would increase the demand for housing but would not exceed growth projections.	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.13 Public Services			
Impact PS-1: Impacts on Fire Services. The Project would not result in the need for new or physically altered fire service facilities.	LTS	None required	N/A
Impact PS-2: Impacts on Police Services. The Project would not result in the need for new or physically altered police service facilities.	LTS	None required	N/A
Impact PS-3: Impacts on School Facilities. The Project would not result in the need for new or physically altered school facilities.	LTS	None required	N/A
Impact PS-4: Impacts on Parks and Recreational Facilities. The Project would not result in the need for new or physically altered parks and recreational facilities.	LTS	None required	N/A
Impact PS-5: Impacts on Library Facilities. The Project would not result in the need for new or physically altered library facilities.	LTS	None required	N/A
Impact C-PS-1: Cumulative Fire Service Impacts. The Project, in combination with other foreseeable development in the city, would not result in the need for new or physically altered fire service facilities.	LTS	None required	N/A
Impact C-PS-2: Cumulative Police Service Impacts. The Project, in combination with other foreseeable development in the city, would not result in the need for new or physically altered police service facilities.	LTS	None required	N/A
Impact C-PS-3: Cumulative School Service Impacts. The Project, in combination with other foreseeable development in the city, would not result in the need for new or physically altered school facilities.	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact C-PS-4: Cumulative Park and Recreational Impacts. The Project, in combination with other foreseeable development in the city, would not result in the need for new or physically altered parks and recreational facilities.</p>	LTS	None required	N/A
<p>Impact C-PS-5: Cumulative Library Service Impacts. The Project, in combination with other foreseeable development in the city, would not result in the need for new or physically altered library facilities.</p>	LTS	None required	N/A
3.14 Utilities			
<p>Impact UT-1: Water Supply. The Project would have sufficient water supplies available to serve the Project from existing entitlements and resources, and no new or expanded entitlements would be needed. In addition, the Project’s contribution to cumulative impacts would be less than considerable.</p>	LTS	None required	N/A
<p>Impact UT-2: Water Treatment Facilities. The Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</p>	LTS	None required	N/A
<p>Impact UT-3: Wastewater Generation. The Project would not exceed wastewater treatment requirements of the San Francisco Bay RWQCB, require or result in the construction of new wastewater treatment facilities or the expansion of new facilities, or result in a determination by SVCW that it has inadequate capacity to serve the Project’s expected demand and existing entitlements.</p>	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
Impact UT-4: Solid Waste Generation. The Project would comply with federal, State, and local statutes and regulations related to solid waste and would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs.	LTS	None required	N/A
Impact UT-5: Stormwater Generation. The Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities.	LTS	None required	N/A
Impact UT-6: Energy Demand. The Project would not result in wasteful, inefficient, or unnecessary energy use and the Project would not exceed existing gas and electric supplies.	LTS	None required	N/A
Impact C-UT-1: Cumulative Water Treatment. The Project, in combination with other development within the city, would not require or result in the construction of new water treatment facilities or the expansion of existing facilities.	LTS	None required	N/A
Impact C-UT-2: Cumulative Wastewater Generation. The Project, in combination with other development within the WBSD service area, would not exceed wastewater treatment requirements, require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, or exceed expected demand and existing entitlements.	LTS	None required	N/A
Impact C-UT-3: Cumulative Solid Waste Generation. The Project, combined with other development within the RethinkWaste's service area, would not exceed service area solid waste disposal capacity and would be expected to comply with federal, State, and local statutes and regulations related to solid waste.	LTS	None required	N/A

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>Impact C-UT-4: Cumulative Stormwater Generation. The Project, in combination with other development in the city, would not require the construction or expansion of stormwater facilities.</p>	LTS	None required	N/A
<p>Impact C-UT-5: Cumulative Energy Demand. The Project, in combination with other development in the city, would not result in wasteful, inefficient, or unnecessary energy use, and the Project, in combination with other development served by PG&E, would not exceed existing gas and electric supply capacity.</p>	LTS	None required	N/A