



# Menlo Park Facebook Campus Project EIR Addendum



February 2013



# Menlo Park

## Facebook Campus Project

### EIR Addendum

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February 2013



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# Section 1

## Introduction

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### 1.1 BACKGROUND

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As part of the Menlo Park Facebook Campus Project (Project), Facebook (Project Sponsor) has moved its operations from the City of Palo Alto to the City of Menlo Park (City). The Project Sponsor proposed to move its operations to two sites located north of US 101 near the intersection of Bayfront Expressway and Willow Road. The Project site consists of a 56.9-acre East Campus and a 22-acre West Campus. The Project includes two phases of development: occupation of the East Campus during the first phase and the development of the West Campus during the second phase. The East Campus is currently occupied. The second phase includes demolishing the existing buildings at the West Campus and developing offices and associated amenities for use by Facebook.

The Environmental Impact Report (EIR) for the Project was certified by the City on May 29, 2012. Since EIR certification, the Project Sponsor has submitted an application for land use entitlements for the West Campus, which differs from the West Campus portion of the Project analyzed in the certified EIR. The Project at the East Campus remains unchanged from what was approved in May 2012. Consequently, this Addendum to the certified EIR only addresses the proposed changes to the West Campus, and has been prepared to satisfy requirements under the California Environmental Quality Act (CEQA). This document will be used by the decision-makers in their consideration of whether to approve the proposal for the West Campus. For the purposes of this Addendum, the West Campus proposal that was analyzed in the certified EIR is referred to as the “Previously Proposed Project,” and the revised proposal that is addressed in this Addendum is referred to as the “Revised Project.”

#### Previously Certified EIR

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In May 2012, City Council certified the Final EIR for the Previously Proposed Project, a summarized description of which is provided in Section 2, Project Description, of this document. The Final EIR included the Draft EIR that was published in December 2011 and Responses to Comments on the Draft EIR that was published in April 2012. Major conclusions for each environmental topic in the Final EIR are summarized in Section 3, Environmental Analysis, of this document. For ease of reference, this Addendum incorporates significant discussion from the certified EIR regarding the impacts evaluated for the Previously Proposed Project. This approach has contributed to the length of this Addendum, but is intended to allow the reader to more easily compare and better understand the differences between the Previously Proposed Project and the Revised Project and any differences in impacts, by minimizing the need to cross-reference between the certified EIR and this Addendum.

While revisions to the West Campus site plan are included in this EIR Addendum, no changes are proposed for the East Campus, which is currently developed with nine buildings (approximately 1,035,840 square feet [sf]) and occupied by Facebook. As part of the Project approvals in May and

June, the City Council took the following actions for the East Campus: (1) approved an amended and restated Conditional Development Permit (CDP); (2) approved Heritage Tree removal permits; (3) approved a Development Agreement; (4) certified the EIR; and (5) adopted a Statement of Overriding Considerations (SOC) and Mitigation Monitoring and Reporting Program (MMRP). Review and action on the East Campus entitlements is complete and this additional CEQA review focuses solely on the West Campus component of the Project.

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## **1.2 CEQA REVIEW OF THE UPDATED PROJECT**

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When revisions are proposed to a project after an EIR has been certified, an agency must determine whether an Addendum or a Supplemental EIR is the appropriate document to analyze the potential impacts of the revised project, pursuant to CEQA. Per CEQA Guidelines Section 15162(a), a Supplemental EIR is required if:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete.

If none of the above conditions apply, then an Addendum is the appropriate environmental document to analyze a revised project. Pursuant to CEQA Guidelines Section 15164(e), the Addendum must provide a brief explanation of the decision to not prepare a Supplemental EIR. The necessary explanation is set forth below.

As described in Section 2, Project Description, of this document, the Revised Project would maintain the proposed uses under the Previously Proposed Project, would include a slight reduction in building square footage (approximately 433,555 sf instead of approximately 439,850 sf), would employ the same number of people (approximately 2,800 employees), and would include a slight reduction in parking (approximately 1,499 stalls instead of 1,544 stalls), which would be provided at-grade instead of in a five-story parking structure. Based upon these considerations, no new significant impacts or increases in the severity of previously identified significant impacts are expected to result from the Revised Project, thereby rendering a Supplemental EIR unnecessary. Furthermore, the EIR was recently certified on May 29, 2012. Given the short period of time that has passed since certification of the EIR, there have been no changes to the background conditions and no new important information has arisen that would suggest the circumstances under which the Revised Project would be undertaken are substantially different than assumed or described in the EIR. Accordingly, as described further in this document, an Addendum is the appropriate mechanism for CEQA review of the Revised Project.

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### **1.3 ADDENDUM ORGANIZATION**

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This section provides an overview to this Addendum, the previous environmental review for the Project, and the organization of this Addendum. Section 2, Project Description, provides a description of the Revised Project and comparison to the Previously Proposed Project. Section 3, Environmental Analysis, summarizes conclusions in the certified EIR and presents the impacts of the Revised Project relative to the impacts of the Previously Proposed Project. Section 3 addresses the environmental topics that could potentially be altered by the Revised Project, such as aesthetics, wind, transportation, air quality, greenhouse gas emissions, noise, biological resources, hydrology and water quality, hazards and hazardous materials, and utilities. All other impact topics are not expected to be different from those outlined in the certified EIR. As such, these topics are discussed briefly in Section 3.2, Impacts Not to Be Evaluated.

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# Section 2

## Project Description

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### 2.1 PREVIOUSLY PROPOSED PROJECT SUMMARY

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A summary of the West Campus Project, as analyzed in the Final Environmental Impact Report (EIR) certified on May 29, 2012 (referred to here as the “Previously Proposed Project”), is provided below for comparison purposes. As explained in Section 1, Introduction, the East Campus component of the Project (Phase 1) has been approved and no changes are proposed. As such, the summary below only discusses the West Campus (Phase 2).

#### Previously Proposed Project Entitlements and Site Plan

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The West Campus currently includes two existing buildings that total approximately 127,246 square feet (sf), a guard house, minimal landscape features, and asphalt parking areas. The Previously Proposed Project includes the demolition of the existing buildings at the West Campus and the construction of five office buildings, ancillary buildings, a parking structure, landscaping, and on-site linkages, as explained in more detail below.

The West Campus is currently zoned M-2 (General Industrial District) and designated Limited Industry in the City’s General Plan. Under the current land use designation, the West Campus could be built out to a Floor Area Ratio (FAR)<sup>1</sup> of 0.45 FAR for office uses and 0.55 FAR for related office uses (such as amenities), as identified in the City’s zoning ordinance.<sup>2</sup> The Previously Proposed Project buildings range from two to four stories in height, with an overall height limit of 75 feet for the entire West Campus. This increase to the height limit from 35 feet to 75 feet would require rezoning the site to M-2-X (General Industrial, Conditional Development). In addition, a Conditional Development Permit (CDP) would be required to modify existing M-2 development regulations in order to establish a new height limit.

The Project Sponsor’s conceptual site plan for the Previously Proposed Project, as shown in Figure 2-1, proposes five separate buildings arranged with the long axis of each building along an east/west orientation. Each of the office buildings would have a footprint ranging from 30,000 sf to 36,650 sf. In addition, a transit shelter/public amenities building would be located in the southeast portion of the site with a footprint of approximately 9,000 sf and an amenities building with a footprint of 2,050 sf would be located in the central courtyard. In total, the five main buildings and the transit/amenities buildings would consist of approximately 440,000 sf with capacity for approximately

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<sup>1</sup> FAR is a measure of building intensity based on the ratio between the total floor area to be built on a site and the size of that site.

<sup>2</sup> City of Menlo Park, *Menlo Park Municipal Code*, Section 16.46.030(7), December 14, 2010.

NOTE: THE EXISTING LOT LINE WILL BE ELIMINATED THROUGH A LOT MERGER OR OTHER INSTRUMENT.



Figure 2-1  
Previously Proposed Project Site Plan

2,800 employees. The office buildings would be organized around a central courtyard consisting of open spaces, landscaped areas, ancillary buildings/meeting rooms, and pedestrian linkages. This central courtyard would provide the primary social space for the West Campus.

The Project Sponsor intends to pursue Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Gold certification for the buildings under the Previously Proposed Project. This LEED program would include strategies that would optimize the energy performance and environmental and health benefits for the buildings and their inhabitants. The sustainable goals and strategies are listed in the Draft EIR in Section 2, Project Description

## **Site Access, Circulation, and Parking**

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**Vehicular Access and Circulation.** Under the Previously Proposed Project, a Transportation Demand Management (TDM) program would be implemented to reduce the number of vehicle trips to the West Campus. The TDM program would be designed to provide alternatives to private automobile travel to, from, and between the East Campus and the West Campus in order to reduce vehicle trips and the resulting traffic and air quality impacts to the surrounding community. Access to the West Campus and circulation between the two campuses would be provided in several different ways and at many access points. Vehicular circulation would include entrances for private vehicles and commuter shuttles, as well as emergency access. Access for intra-campus people-movers would also be provided on campus.

*Emergency Vehicle Access.* Emergency vehicle access would be provided along the outside perimeter of the office buildings with access to the courtyard from the eastern end of the campus. Each building would be accessible to emergency vehicles via the perimeter roadway. Emergency vehicles would have access from the main and secondary access points at the West Campus. In addition, emergency vehicles would also access the West Campus via two fire lanes from the adjacent TE Connectivity property, to the west of the proposed parking structure.

*People-Mover.* Site improvements are planned as part of the Previously Proposed Project to provide connectivity between the East Campus and West Campus and to provide a permanent grade-separated undercrossing of Bayfront Expressway for public access. With construction of the West Campus, the undercrossing would be enhanced to provide lighting and security improvements, final grading of the approaches for Americans with Disabilities Act (ADA)-compliant access, removal of the narrow elevated walkway, and signing/stripping improvements. In addition, a pump would be installed to protect the undercrossing from seasonal flooding.

To create an option for Facebook employees to reduce the time needed to travel between campuses, the Project Sponsor has considered alternative circulation options to run through a portion of the undercrossing, with a focus on people-mover systems. Utilization of a people-mover system through the tunnel would allow for the efficient movement of people between campuses without adding traffic to Bayfront Expressway or Willow Road, and would operate within the height limitations of the existing undercrossing (10.5 feet). The people-mover system would be implemented upon the opening of the West Campus.

**Bicycle and Pedestrian Circulation.** Bicycle and pedestrian travel on site and between campuses would be encouraged through the central courtyard and the aforementioned Bayfront Expressway undercrossing, which would be designed to facilitate bicycle and pedestrian movement and would establish bicycle and pedestrian connections to the East Campus, the Belle Haven neighborhood, and the Bay Trail.

**Parking.** Parking on the West Campus would be provided in the undercroft of Buildings 4 and 5 and in the five-level parking structure. In total, approximately 1,544 parking stalls would be provided at the West Campus. Building 4 would contain 52 parking stalls and Building 5 would include 62 parking stalls, which would be reserved as priority parking for fuel efficient and low emission vehicles. In addition, a five-level parking structure with capacity for approximately 1,430 vehicles would be located in the western portion of the West Campus site.

## **Construction Schedule**

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Under the Previously Proposed Project, construction at the West Campus would start in late 2012 and would continue over approximately 18 months, with full build-out completed by mid-2014. Maximum occupancy would occur within two to three years thereafter. The West Campus construction would require the demolition of the existing buildings, surface parking lots, and removal of trees and other landscaping. The construction of the buildings would be phased so that each building would be constructed in sequence based on necessity, with each approximately six to eight weeks apart. The construction of all the buildings would conclude in July 2014 with Facebook phasing the occupancy of the buildings over a four-month period. The parking garage construction would be scheduled to ensure completion prior to occupancy of the first building.

Typical equipment that would be used during construction at the West Campus would include, but not be limited to, concrete crushers, cranes, tractors, excavators, pile drivers, forklifts, off-highway tractors and trucks, material handling equipment, pavers, pumpers, rollers, bulldozers, surfacing and grading equipment, backhoes, and trenchers. The number of truck deliveries would range from two to 210 trips per day, with the most trips occurring during the grading stage when soil would be imported to the site.

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## **2.2 REVISED PROJECT**

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The Revised Project would include the same uses as the Previously Proposed Project (office and amenity uses). In addition, the Revised Project would have the capacity for the same amount of employees (approximately 2,800) and would have roughly an equivalent amount of parking (1,499 stalls). As such, operational activity at the West Campus under the Revised Project would remain unchanged when compared with the Previously Proposed Project. However, the site plan has changed from five main office buildings with a parking garage to a single one-story office building over at-grade parking. As such, a description of the Revised Project site plans, landscaping, site access, and construction schedule are provided below.

## Revised Project Entitlements and Site Plan

As with the Previously Proposed Project, the Revised Project includes redevelopment of an approximately 22-acre site located at the intersection of Willow Road and Bayfront Expressway. The Revised Project would demolish the existing structures, totaling approximately 127,246 sf, and associated site features. The Project Sponsor now seeks to construct an approximately 433,555 sf building, which would include approximately 1,499 parking spaces located at-grade beneath the building structure. The proposed structure would span across the two existing parcels that compose the West Campus, which would require merged lot line adjustment as part of the Revised Project.

### Revised Project Entitlements

The Revised Project would be consistent with the M-2 zone requirements, except for the height of the structure, which would exceed the 35-foot maximum height limit in the M-2 zone, and for the building coverage, which would exceed the 50 percent maximum building coverage in the M-2 zone. The proposed structure, inclusive of all rooftop mechanical screening, the East Lobby roof, and the rooftop tent when erected, would measure approximately 73 feet in height. However, the majority of the roof would be at a height of approximately 45 feet. As such, a rezoning to M-2-X plus an approval of a CDP would be required to allow for the height limit and building coverage exceedances. Table 2-1 summarizes the existing development at the West Campus, the allowed development under current M-2 zoning, and the Revised Project development.

**Table 2-1  
Existing, Allowed, and Proposed West Campus Development**

	Existing Development	M-2 Zoning Ordinance	Revised Project
Floor Area Ratio (FAR)	0.23	0.45	0.45
Total Square Feet (sf)	127,246	433,656	433,555 <sup>a</sup>
Building Coverage	12%	50%	50.34% <sup>b</sup>
Building Height	35.4 feet	35 feet	73 feet <sup>c</sup>
Parking	242 stalls	1,446 stalls	1,499 stalls

*Sources:* City of Menlo Park, 2011; Facebook, 2013.

*Notes:*

- a. The current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted.
- b. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent.
- c. The majority of the roof would be at a height of approximately 45 feet; however, inclusive of rooftop mechanical screening and the east lobby roof, and the rooftop tent when erected, the building height would extend to 73 feet. The proposed height would exceed existing height permitted under M-2 Zoning.

## Revised West Campus Site Plan

As shown in Figure 2-2, the Project Sponsor proposes that the Revised Project include a single one-story building above an at-grade parking lot. The building would be of a linear design and would span approximately 1,565 feet along the Bayfront Expressway frontage and approximately 303 feet along the Willow Road frontage. The 433,555 sf building would include 14,743 sf at the ground floor for circulation elements (including 450 sf for security stations), 403,691 sf on the first floor for the main office spaces and associated amenities, 9,802 sf of staff amenities/support space at the mezzanine level, and 5,319 sf of usable space at the roof level. Table 2-2 includes a breakdown of square feet by floor.

**Table 2-2**  
**Revised Project Development (sf)**

	Ground Floor	First Floor	Mezzanine	Roof	Total
Enclosure Areas	15,793	405,284	399,098	18,320	<b>838,495</b>
Open to Below Areas <sup>a</sup>	0	(1,593)	(387,796)	(9,751)	<b>(399,140)</b>
Non-Occupiable/Inaccessible Areas	0	0	(1,500)	0	<b>(1,500)</b>
Enclosures for Trash and Recycling	(1,050)	0	0	0	<b>(1,050)</b>
Shafts (HVAC, Plumbing)				(85)	<b>(85)</b>
Ares for Building Systems	0	0	0	(3,165)	<b>(3,165)</b>
<b>Total</b>	<b>14,743</b>	<b>403,691</b>	<b>9,802</b>	<b>5,319</b>	<b>433,555<sup>b</sup></b>

Source: Facebook, 2013.

Note:

- a. Open to Below Areas, Non-Occupiable/Inaccessible Areas, Enclosures for Trash and Recycling, Shafts for HVAC and Plumbing, and Areas for Building Systems are excluded from the floor area and building coverage calculations.
- b. The current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted.

**Ground Floor.** The ground floor would consist mainly of parking, but would also include approximately 14,743 sf for the West Lobby (main public entrance), the East Lobby, an employee lobby entrance, site security control stations, and a shower/locker amenity. A loading dock and service entrance would be included in the eastern portion of the ground floor, with vehicular access from the secondary entry/exit along Willow Road.

The at-grade parking lot would be generally open around the perimeter and the majority of parking spaces would be covered by the proposed building structure. The height of the parking level would measure approximately 18 feet. The Zoning Ordinance requires one space per 300 sf, which equates to a requirement of 1,446 total parking spaces. The Revised Project would provide 1,499 parking stalls,



Source: Facebook, 2013.

Figure 2-2  
Revised Project Site Plan

which would include 26 ADA spaces and 122 parking stalls reserved for energy-efficient vehicles.<sup>3</sup> In addition, 90 bicycle spaces in designated bicycle parking areas would be provided on the parking level.

The perimeter of the West Campus, at the ground floor, would include landscaping, stormwater treatment/bioretention areas, an emergency vehicle access (EVA)/pedestrian path, lighting, a bicycle self-repair tool station, and three driveways. The southern perimeter would also include enclosures for two emergency generators and three trash collection areas. Figure 2-3 depicts the ground floor site plan.

**First Floor.** The 403,691 sf first floor of the building would include open office space and several amenity and support spaces. The interior of the first floor would be designed for approximately 2,800 employees. The distinct areas within the floor plan would include conference rooms, offices, staff amenities/support, storage space, restrooms, showers, closets, electrical, Information Technology (IT) spaces, lobbies, cafes, and a fitness center. The interior would be designed to provide natural daylighting from large window openings at the building's perimeter and skylight roof openings.

Three lobbies would be located along the north side of the building (proximate to Bayfront Expressway) and a fourth employee-only entry lobby would be provided near the center of the building. The West Lobby, East Lobby, and employee-only lobby would be accessible from the ground floor parking garage via elevators and stairs. The fourth lobby, the Northeast Lobby, would be accessible from the perimeter pedestrian path via outdoor stairs and a ramp. The lobby spaces would serve as a security check point at ground level and reception lounge spaces at the office level.

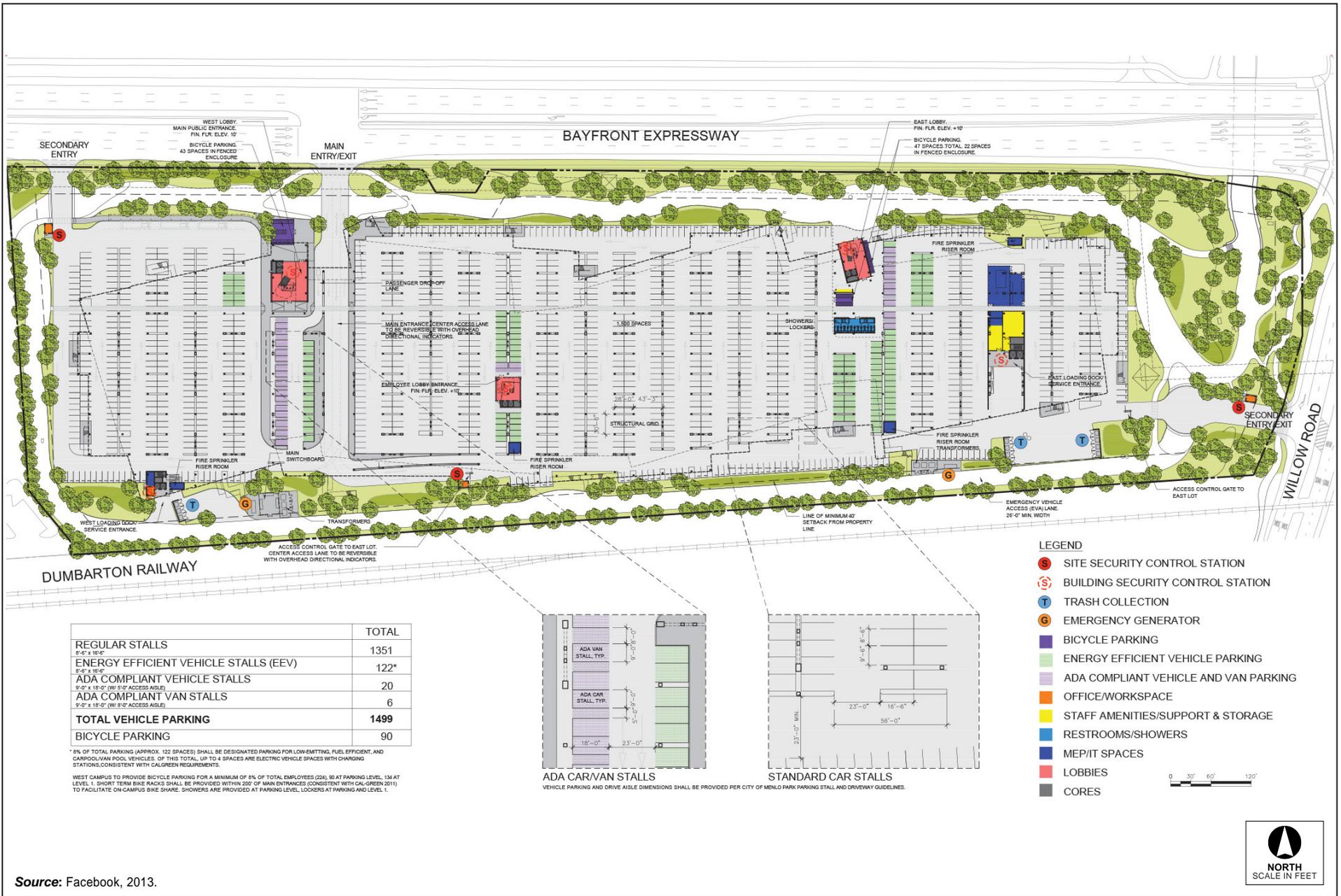
In addition, the Revised Project would include bicycle parking on the first floor. Approximately 64 bicycle spaces would be provided at the West Entry and an additional 70 would be available at the East and Northeast Entries. The proposed 134 bicycle spaces on the first floor would be accommodated by wall-mounted bicycle racks. In total, 224 bicycle spaces would be provided under the Revised Project.

Outdoor terraces would be located along the exterior of the building. The terraces would include a planter wall, planter benches, perimeter landscaping, and terraces for the cafes. As discussed in more detail below, the terrace planters would include a mix of water efficient native and adapted groundcovers, perennials, and shrubs. Figure 2-4 shows the layout of the first floor.

**Roof.** The roof level, at approximately 45 feet above grade, could either include a roof deck with useable area (Green Roof Scenario), or roof space inaccessible to employees that would include mechanical and other rooftop equipment (No Green Roof Scenario). This EIR Addendum analyzes the worst-case scenario, depending on the individual California Environmental Quality Act (CEQA) topic. Figure 2-5 depicts the Revised Project Green Roof Scenario and Figure 2-6 depicts the Revised Project No Green Roof Scenario.

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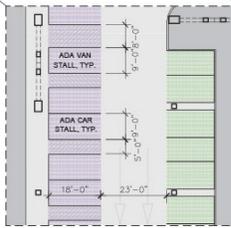
<sup>3</sup> This parking would be for low-emitting, fuel efficient, and carpool/vanpool vehicles. Up to four stalls would be for electric vehicle spaces with charging stations, consistent with CALGreen requirements.



	TOTAL
REGULAR STALLS 8'-6" x 19'-6"	1351
ENERGY EFFICIENT VEHICLE STALLS (EEV) 12'-0" x 18'-0"	122*
ADA COMPLIANT VEHICLE STALLS 9'-0" x 18'-0" (W/ 5'-0" ACCESS AISLE)	20
ADA COMPLIANT VAN STALLS 9'-0" x 19'-0" (W/ 9'-0" ACCESS AISLE)	6
<b>TOTAL VEHICLE PARKING</b>	<b>1499</b>
BICYCLE PARKING	90

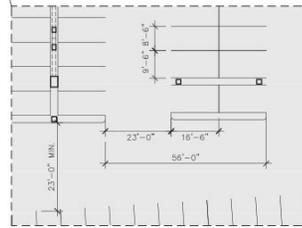
\*6% OF TOTAL PARKING (APPROX. 122 SPACES) SHALL BE DESIGNATED PARKING FOR LOW-EMISSION, FUEL EFFICIENT, AND CARPOOL/VAN POOL VEHICLES. OF THIS TOTAL, UP TO 4 SPACES ARE ELECTRIC VEHICLE SPACES WITH CHARGING STATIONS, CONSISTENT WITH CALGREEN REQUIREMENTS.

WEST CAMPUS TO PROVIDE BICYCLE PARKING FOR A MINIMUM OF 6% OF TOTAL EMPLOYEES (254), 90 AT PARKING LEVEL, 134 AT LEVEL 1. SHORT TERM BIKE RACKS SHALL BE PROVIDED WITHIN 200' OF MAIN ENTRANCES (CONSISTENT WITH CALGREEN 2011) TO FACILITATE ON-CAMPUS BIKE SHARE. SHOWERS ARE PROVIDED AT PARKING LEVEL, LOCKERS AT PARKING AND LEVEL 1.



ADA CAR/VAN STALLS

VEHICLE PARKING AND DRIVE AISLE DIMENSIONS SHALL BE PROVIDED PER CITY OF MENLO PARK PARKING STALL AND DRIVEWAY GUIDELINES.



STANDARD CAR STALLS

Source: Facebook, 2013.

Figure 2-3  
Revised Project Ground Floor



Source: Facebook, 2013.

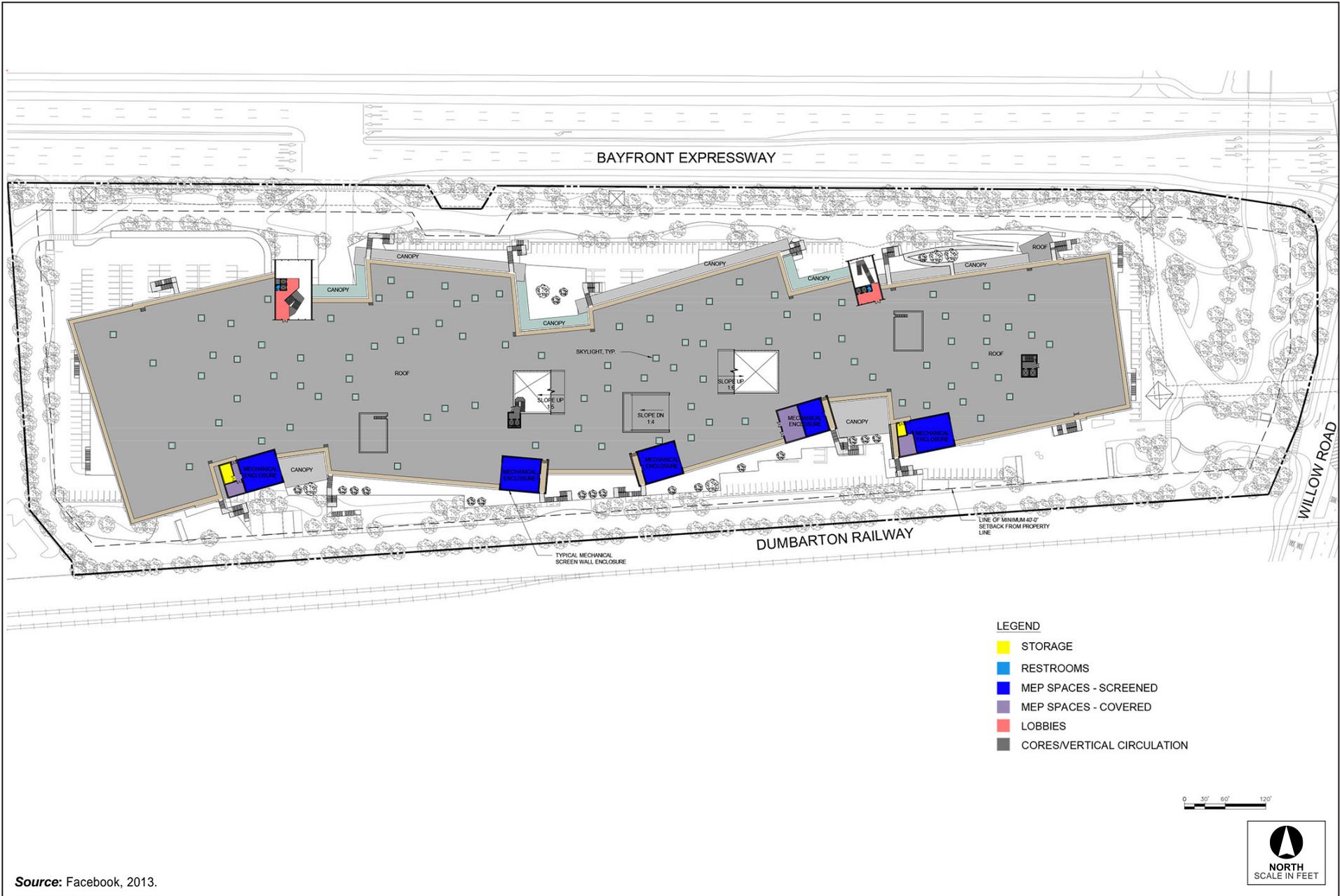
Figure 2-4  
Revised Project First Floor Plan



Source: Facebook, 2013.

Figure 2-5  
Revised Project Green Roof Scenario

10002015.4 | Menlo Park Facebook Campus Project



Source: Facebook, 2013.

Figure 2-6  
Revised Project No Green Roof Scenario

If the Revised Project would include an accessible green roof, then the roof area would be designed as an active space and would have extensive landscaped areas with trees, lawns, stairs leading to sunken gardens, a paved walking path, a meadow, and seating areas. The roof would be intended as an informal social space for walking and assembly functions with approximately 5,319 sf of useable space for lobbies, storage, and restrooms. The rooftop would also include mechanical enclosures to house the heating, ventilation, and air conditioning (HVAC) equipment. The roof would be accessible via stairs and elevators from the interior office level.

A temporary special event tent may be erected for single day events (limited to eight occurrences a year), including but not limited to, product launches, all-hands meetings, and company social gatherings, which may occur during both day and evening hours. The tent would have a maximum vertical peak at 28 feet above the roof with capacity for 960 people to 2,057 people. Walking paths, with adjacent areas of furniture for seating and dining, would be provided with the use of food service carts and portable gas barbecues. At the food service cart locations, either a fabric tent and/or a permanent canopy structure with a serving counter may be provided to protect the food service carts from inclement weather.

## **Landscaping**

Landscaping would be provided throughout the West Campus in a manner that supports sustainability goals, encourages active use of the outdoors, and reflects the various adjacent native environments. The new landscaping would be developed pursuant to the City's Water-Efficient Landscape Ordinance. Landscaping would be provided at ground-level (around the surface parking lot), within terraces at the first floor, and on the roof deck (assuming the Green Roof Scenario).

As of the certification of the EIR, there were 624 total trees at the West Campus. Of these trees, 233 were considered to be "Heritage Trees," per Section 13.24 of the City's Municipal Code.<sup>4</sup> Under previous entitlements and associated CEQA review, approximately 58 Heritage and 32 non-Heritage trees have already been removed at the West Campus. Under the Revised Project, the remaining 534 trees would also be removed. However, per the requirements of the City's Heritage Trees Ordinance and as evidenced on the project plans, approximately 562 trees could be planted at the West Campus, as summarized in Table 2-3.

**Ground Level Landscaping.** The Revised Project would remove all existing trees and vegetation at the West Campus. Replacement landscape features at ground-level would include hardscape paving, landscape groundcover, and landscape buffers along the perimeter of the West Campus. The perimeter landscaping would include a mix of water-efficient native and adapted groundcovers, perennials and shrubs planted on undulating topography, and bioretention areas. The mix of vegetation would be predominantly evergreen and natural in character. A naturalistic grove and garden setting would be

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<sup>4</sup> SBCA Tree Consulting, "Tree Survey—Facebook West Campus," May 18, 2011, Survey Addendum, July 19, 2011.

**Table 2-3**  
**Revised Project Tree Removal and Replacement Summary (with and without Green Roof)**

	Existing	Removed <sup>a</sup>	New
Ground Floor	624	(624)	332
First Floor	—	—	25
<b>Total (Green Roof Scenario)</b>	<b>624</b>	<b>(624)</b>	<b>357</b>
Green Roof	—	—	205
<b>Total (No Green Roof Scenario)</b>	<b>624</b>	<b>(624)</b>	<b>562</b>

Source: Facebook, 2013.

Note:

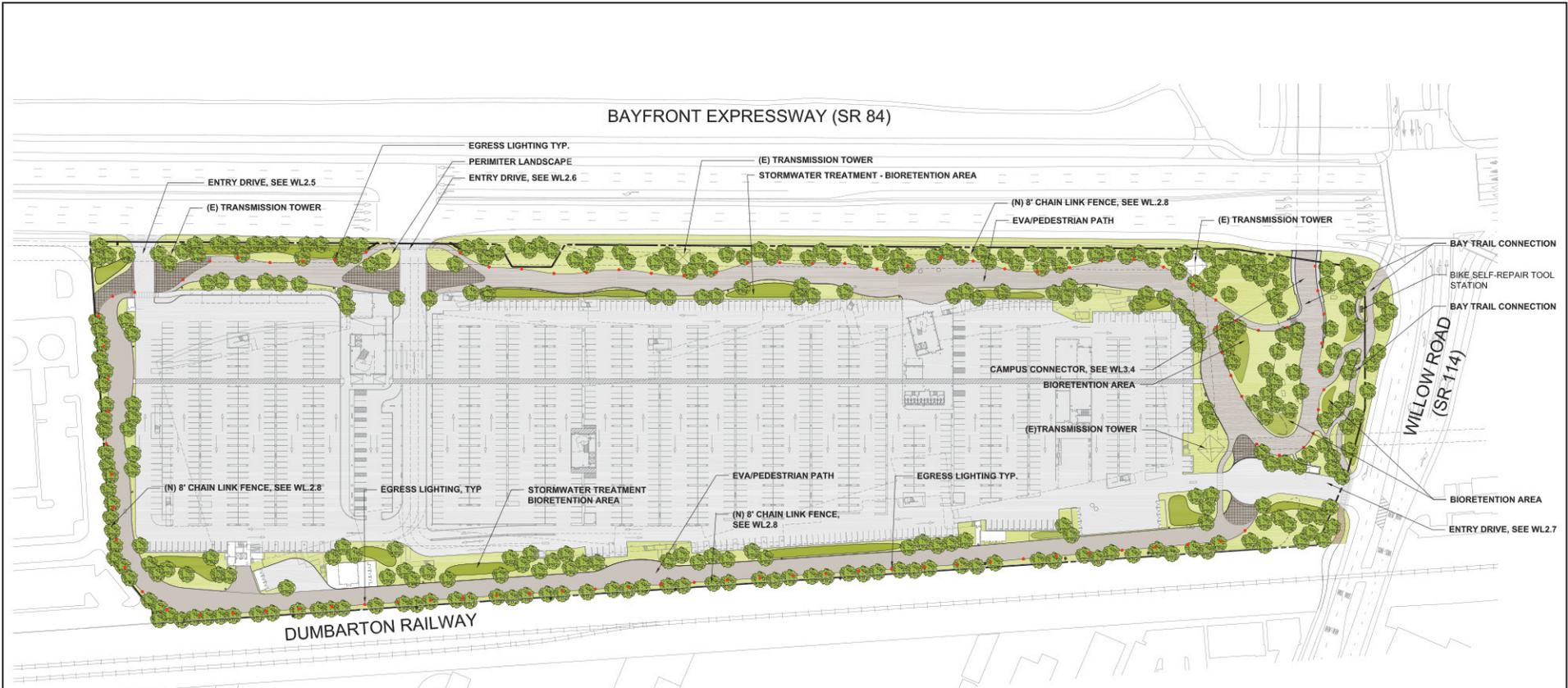
- a. The 624 trees proposed for removal include the 90 trees that have already been removed from the West Campus under separate entitlement processes and associated CEQA review and the 534 trees that would be removed as part of the Revised Project.

created at the east end of the West Campus. Approximately 332 new trees would be located at the ground level. The bioretention areas would feature a mix of native riparian and adapted species selected for biofiltration and soil moisture levels, including extended inundation and low irrigation use during the dry season.

The general design intent of the landscaping would be to provide a densely planted and attractive perimeter landscape surrounding and providing space for the building and a buffer along Bayfront Expressway. The preliminary landscape plan for the ground level is shown in Figure 2-7.

**First Floor Landscaping.** Terraces would be included on all sides of the building and would be accessible from the first floor. These terraces would consist mainly of concrete paving, but would provide some planters for vegetation. This landscaping would consist of a mix of water-efficient native and adapted groundcovers, perennials, and shrubs. The mix would be predominantly evergreen and diverse in character. Approximately 25 trees would be located throughout the terraces. Figure 2-8 shows the preliminary landscape plan for the first floor terraces.

**Roof Plan Landscaping.** Assuming the Green Roof Scenario, the roof plan would include lawns, gardens, meadows, and seating areas. A stabilized crushed stone walking path would loop around the roof. The green roof lawn area would consist of drought-resistant, low water use, and low-mow lawn. The green roof garden and meadow areas would consist of low-water-use native adapted grasses, perennials, and groundcovers suitable for intensive green roof applications. Approximately 205 trees would be included on the roof. Final selection (height and type) of roof level trees would be sensitive to potential wildlife impacts associated with adjacent wetland areas. The preliminary landscape plan for the roof deck is shown in Figure 2-9. If the Revised Project would include the No Green Roof Scenario, then no landscaping would be provided and the site plan as shown in Figure 2-6 would be implemented.



**LEGEND**

- PERIMETER LANDSCAPE: A mix of water efficient native and adapted groundcovers, perennials and shrubs planted upon undulating topography and bioretention areas. The mix will be predominantly evergreen and naturalistic in character.
- STORMWATER TREATMENT-BIORETENTION AREA: A mix of native riparian and adapted species selected for biofiltration and soil moisture levels including extended inundation and low irrigation use during the dry season.
- PROPOSED TREE: TOTAL QTY. 332  
TOTAL TREE REPLACEMENT REQUIREMENT = 315 TREES. REFER TO WL-1 FOR TREE DISPOSITION PLAN.  
MINIMUM SIZE: 24" BOX
- FIRELANE/PEDESTRIAN PATH: Pervious Concrete
- CAMPUS CONNECTOR AND PEDESTRIAN PATH PAVING: Pervious Concrete
- PARKING LOT & ENTRY DRIVES: Asphalt Concrete
- COBBLE PAVING
- EGRESS LIGHTING: PEDESTRIAN POLE LIGHT- PEDESTRIAN EGRESS LIGHTING SHALL BE PROVIDED FROM BLDG. EXITS TO THE PUBLIC WAY AT WILLOW RD AND THE TUNNEL UNDERCROSSING TO E. CAMPUS. EGRESS SHALL MEET CBC AND FIRE CODE REQUIREMENTS
- BIKE SELF-REPAIR TOOL STATION

**PRELIMINARY PLANT LIST**

TREES		SHRUBS		GROUNDCOVERS - GRASSES	
BOTANICAL NAME	COMMON NAME	BOTANICAL NAME	COMMON NAME	BOTANICAL NAME	COMMON NAME
AESCULUS CALIFORNICA	CALIFORNIA BUCKEYE	ARTEMESIA CALIFORNICA	CALIFORNIA SAGEBRUSH	ERIGERON GLAUCUS	SEASIDE DASY
CASUARINA CUNNINGHAMIANA	RIVER SHE-OAK	BACCHARIS PILULARIS 'EMERALD CARPET'	COYOTE BUSH	ESCHSCHOLZIA CALIFORNICA	CALIFORNIA POPPY
CEDRUS DEODARA	DEODAR CEDAR	CEANOETHUS GRISEUS	CALIFORNIA LILAC	HORDEUM BRACHYANTHERUM	MEADOW BARLEY
CERCIS CALIFORNICA	WESTERN REDBUD	CEANOETHUS THYRSIFLORUS	BLUE WILD RYE	FESTUCA RUBRA	CALIFORNIA RED FESCUE
FRAXINUS VELUTINA	FAN-TEX ASH	ELYMUS GLAUCUS	CALIFORNIA BUCKWHEAT	LEYMUS TRITICOIDES	CREeping WILD RYE
MELALEUCA QUINQUENERIVA	CAJUPUT TREE	ERIGONUM FASCICULATUM	SILVER BUSH LUPINE	MUHLBERGIA RIGENS	DEER GRASS
POPULUS FREMONTII	BEACH PINE	LUPINUS ALBIFRONS	STICKY MONKEY FLOWER	SIBYRRHULM BELLUM	BLUE-EYE GRASS
QUERCUS AGRIFOLIA	FREMONT POPLAR	MISULUS AURANTIACUS	COFFEEBERRY	STIPA PULCHRA	PURPLE NEEDLE GRASS
QUERCUS DOUGLASSII	COAST LIVE OAK	RHAMNUS CALIFORNICA	LEMONBERRY	ZALUSCHNERIA CALIFORNICA	CALIFORNIA FUSCHIA
QUERCUS VIRGINIANA	BLUE OAK	RHUS INTEGRIFOLIA	BLACK SAGE		
	VIRGINIA LIVE OAK	SALVIA MELLIFERA			

**ACCESSIBILITY**  
ALL PEDESTRIAN PATHS AND EGRESS ROUTES SHALL MEET CBC TITLE 24 & ADA ACCESSIBILITY REQUIREMENTS

**PLANT SELECTION NOTES**

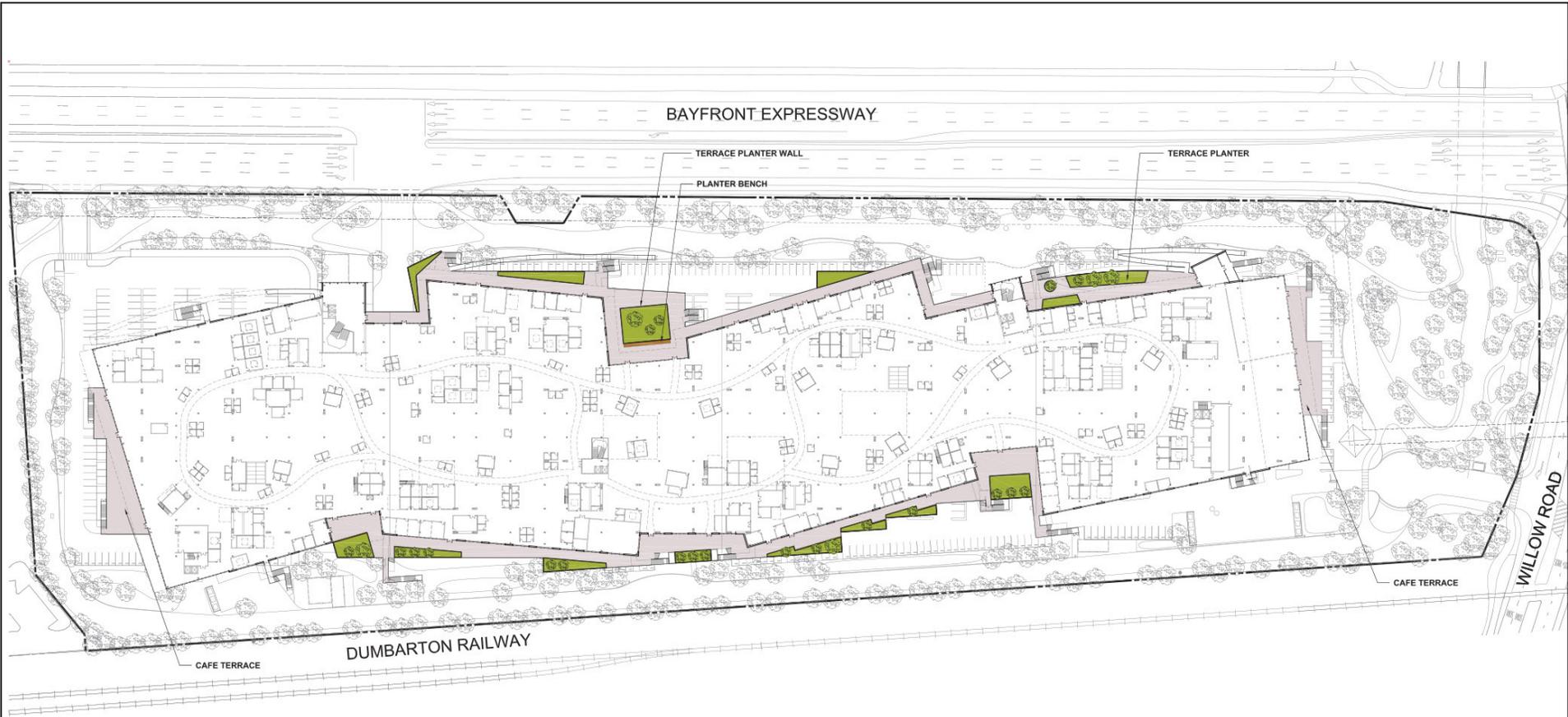
- General Design Intent: Provide a densely planted and attractive perimeter landscape surrounding and providing scale for the building. Provide visual, wind, and sound buffer along the Bayfront Expressway. Create a naturalistic grove and garden setting at the east end corner of the site.
- Final plant selection and layout shall be refined based on the following selection criteria.
  - Soils and Horticultural Suitability.
  - Salt and Wind Tolerance.
  - Water Efficient Landscape Ordinance requirements.
  - Aesthetic Quality
  - Ecological Value/Habitat and Environmental considerations.
  - Coordination with Caltrans and PG&E.

0 25' 75' 150'

Source: Facebook, 2013.



Figure 2-7  
Revised Project Ground Level Landscaping



**LEGEND**

- TERRACE PLANTER: A mix of water efficient native and adapted groundcovers, perennials and shrubs. The mix will be predominantly evergreen and diverse in character.
- PROPOSED TREE: TOTAL QTY. 25  
MINIMUM SIZE: 24" BOX
- TERRACE PAVING: Concrete Paving
- TERRACE CIP CONCRETE PLANTER WALL
- TERRACE BENCH

**PRELIMINARY PLANT LIST**

TREES		SHRUBS		GROUNDCOVERS	
BOTANICAL NAME	COMMON NAME	BOTANICAL NAME	COMMON NAME	BOTANICAL NAME	COMMON NAME
AESCULUS CALIFORNICA	CALIFORNIA BUCKEYE	CEANOTHUS GRISEUS	CALIFORNIA LILAC	ERIGERON GLAUCUS	SEASIDE DAISY
ARBUTUS UNEDO	STRAWBERRY TREE	CORREA	AUSTRALIAN BLUE BELL	ESCHSCHOLZIA CALIFORNICA	CALIFORNIA POPPY
BETULA JACKMONTI	JACKMONTI BIRCH	ELYMUS TRITICOIDES	CREEPING WILD RYE	SEDUM SP.	SEDUM VARIETIES
CERCIS CALIFORNICA	WESTERN REDBUD	ERIGONUM FASCICULATUM	CALIFORNIA BUCKWHEAT	SENECIO SP.	SENECIO VARIETIES
HETEROMELES ARBUTIFOLIA	TOYON	FESTUCA RUBRA	RED FESCUE		
PINUS CONTORTA	BEACH PINE	HORDEUM BRACHYANTHERUM	MEADOW BARLEY		
PISTACIA CHINENSIS	CHINESE PISTACHE	HEUCHERA	HEUCHERA		
QUERCUS VIRGINIANA	VIRGINIA LIVE OAK	IRIS	IRIS		
		LUPINUS ALBIFRONS	SILVER BUSH LUPINE		
		MIMULUS AURANTIACUS	STICKY MONKEY FLOWER		
		SALVIA MELLIFERA	BLACK SAGE		

**ACCESSIBILITY**

ALL PEDESTRIAN PATHS AND EGRESS ROUTES SHALL MEET CBC TITLE 24 & ADA ACCESSIBILITY REQUIREMENTS

**PLANT SELECTION NOTES**

1. Final plant selection and layout shall be refined based on the following selection criteria.
  - a. Soils Volume and Horticultural Suitability.
  - b. Wind Tolerance.
  - c. Water Efficient Landscape Ordinance requirements.
  - d. Aesthetic Quality and Size
  - e. Ecological Value/Habitat and Environmental considerations.



Source: Facebook, 2013.

Figure 2-8  
Revised Project First Floor Landscaping



**LEGEND**

- WALKING PATH: Stabilized Crushed Stone
- SEATING AREAS: Wood and Stone with Benches
- GREEN ROOF- LAWN AREA: Drought-resistant, low water use, and low-mow lawn.
- GREEN ROOF GARDEN AREA: Low water use native adapted shrubs, perennials and groundcovers suitable for intensive green roof applications.
- GREEN ROOF MEADOW AREA: Low water use native adapted grasses and perennials suitable for intensive green roof applications.
- TREES: Total Qty. on Roof 205  
MINIMUM SIZE: 24" BOX

**NOTES:**

1. TREE REPLACEMENT REQUIREMENT DOES NOT RELY ON TERRACE OR ROOF LEVEL TREES.
2. THE EXTENT OF POTENTIAL ROOF LEVEL GATHERING AND GREEN ROOF AREAS ARE SUBJECT TO MODIFICATION.
3. ROOF LEVEL SITE LIGHTING WILL BE DESIGNED TO ADDRESS DARK SKYS WITH LOW LEVEL LIGHTING WHERE APPLICABLE AND FULL CUT-OFF FOR PATH OF EGRESS AND EMERGENCY LIGHTING.

**PRELIMINARY PLANT LIST**

TREES		SHRUBS		GROUNDCOVERS - GRASSES	
BOTANICAL NAME	COMMON NAME	BOTANICAL NAME	COMMON NAME	BOTANICAL NAME	COMMON NAME
AESCHULUS CALIFORNICA	CALIFORNIA BUCKEYE	ARCTOSTAPHYLOS SP.	MANZANITA	ERIGERON GLAUCUS	SEASIDE DAISY
CERCIS CALIFORNICA	WESTERN REDBUD	ARTEMESIA CALIFORNICA	CALIFORNIA SAGE	ESCHSCHOLZIA CALIFORNICA	CALIFORNIA POPPY
FRAXINUS VELUTINA	FAN-TEX ASH	BACCHARIS PILLULARIS "EMERALD CARPET"	COYOTE BUSH	HORDEUM BRACHYANTHERUM	MEADOW BARLEY
JACARANDA MIMOSIFOLIA	JACARANDA	CELANOTHUS GRISEUS	CALIFORNIA LILAC	FESTUCA RUBRA	CALIFORNIA RED FESCUE
MELALEUCA QUINQUENERVIA	CAJUPUT TREE	CELANOTHUS THYRSIFLORUS	CALIFORNIA LILAC	LEYALUS TRITICOIDES	CREEPING WILD RYE
PIRUS CONTORTA	BEACH PINE	LUPINUS ALBIFRONS	SILVER BUSH LUPINE	MUHLENBERGIA RIGENS	DEER GRASS
PISTACHIO CHINENSIS	CHINESE PISTACHE	LUPINUS BICOLOR	LUPINE	SISTRINCHUM BELLUM	BLUE-EYE GRASS
POPULUS FREMONTI	FREMONT POPLAR	MINIULUS AURANTIACUS	STICKY MONKEY FLOWER	STIPA PULCHRA	PURPLE NEEDLE GRASS
QUERCUS AGRIFOLIA	COAST LIVE OAK	RHAMNUS CALIFORNICA	COFFEEBERRY	ZAUSCHNERIA CALIFORNICA	CALIFORNIA FUSCHIA
QUERCUS DOUGLASSII	BLUE OAK	RHUS INTEGRIFOLIA	LEMONBERRY		
QUERCUS VIRGINIANA	VIRGINIA LIVE OAK	SALVIA MELLIFERA	BLACK SAGE	DWARF TALL FESCUE SOO	LAWN
ZELKOVA SERRATA	ZELKOVA				

**ACCESSIBILITY**  
ALL PEDESTRIAN PATHS AND EGRESS ROUTES SHALL MEET CBC TITC 24 & ADA ACCESSIBILITY REQUIREMENTS

**PLANT SELECTION NOTES**

1. General Design Intent: Provide a densely planted and attractive greenroof landscape surrounding and providing scale for the building. Create a naturalistic and ecologically principaled landscape that links the ground level landscape to the roof.
2. Final plant selection and layout shall be refined based on the following selection criteria.
  - a. Soils and Horticultural Suitability.
  - b. Salt and Wind Tolerance.
  - c. Water Efficient Landscape Ordinance requirements.
  - d. Aesthetic Quality.
  - e. Ecological Value/Habitat and Environmental considerations, including adjacent salt flat habitat and raptor considerations.
  - f. Coordination with Caltrans and PG&E.

0 30' 60' 120'

100020154 | Menlo Park Facebook Campus Project

Source: Facebook, 2013.

Figure 2-9  
Revised Project Roof Plan Landscaping



## **Building Exteriors and Lighting**

The building design of the Revised Project intends to create opportunities for flexible indoor and outdoor working environments, while maintaining a visual connection to the surrounding landscape and the Don Edwards San Francisco Bay National Wildlife Refuge. The office level would be moderately screened by trees as viewed from surrounding areas. Partially covered terraces would be located around the perimeter of the first floor and would be directly accessible from inside the building and from exterior pedestrian ramps leading to and from the ground level.

Figure 2-10 and Figure 2-11 depict the building elevations for the Revised Project, assuming the Green Roof Scenario. As shown, inclusive of the mechanical enclosures and the lobby roof, and the rooftop tent when erected, the building would be at approximately 73 feet above average natural grade. The proposed building could include features such as canopies, handrails and stairs, skylights, glass curtainwalls, mechanical screenwalls, concrete columns, metal balustrade, and windows. Building materials that could be used include, but would not be limited to, stainless steel, glass, painted Portland cement plaster, painted metal, corrugated fiberglass, sealed concrete, and welded wire mesh.

The lighting standards for the West Campus would comply with LEED and CALGreen performance standards designed to minimize light trespass from the buildings and site. The standard set by LEED reflects the intent of the minimum lighting standard for the West Campus. The design would also comply with CALGreen Light Pollution Reduction Standards. In addition, the roof level would be designed to address dark skies with low-level lighting where applicable and full cut-off for path of egress and emergency lighting. Mitigation Measure BR-4.2 (as presented in the EIR) would remain in effect and would require the design of the building to comply with the San Francisco Planning Department Standards for Bird-Safe Buildings.

Conditions of approval would require compliance with applicable City requirements and mitigations measures; however, the final design, including lighting, would be determined as part of the building permit phase.

## **Activity and Employment**

The site would be developed with a new campus that would accommodate approximately 2,800 employees. The Project Sponsor proposes that the West Campus be operational by 2015 and would reach maximum occupancy within two to three years thereafter at the anticipated employee growth rate.

## **Sustainability Features**

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The Project Sponsor intends to design to LEED BD+C Gold for the building under the Revised Project. This LEED program, similar to that under the Previously Proposed Project, would include strategies that would optimize the energy performance and environmental and health benefits for the buildings and their inhabitants. The sustainability features for the Revised Project would include, but not be limited to:



Source: Facebook, 2012.

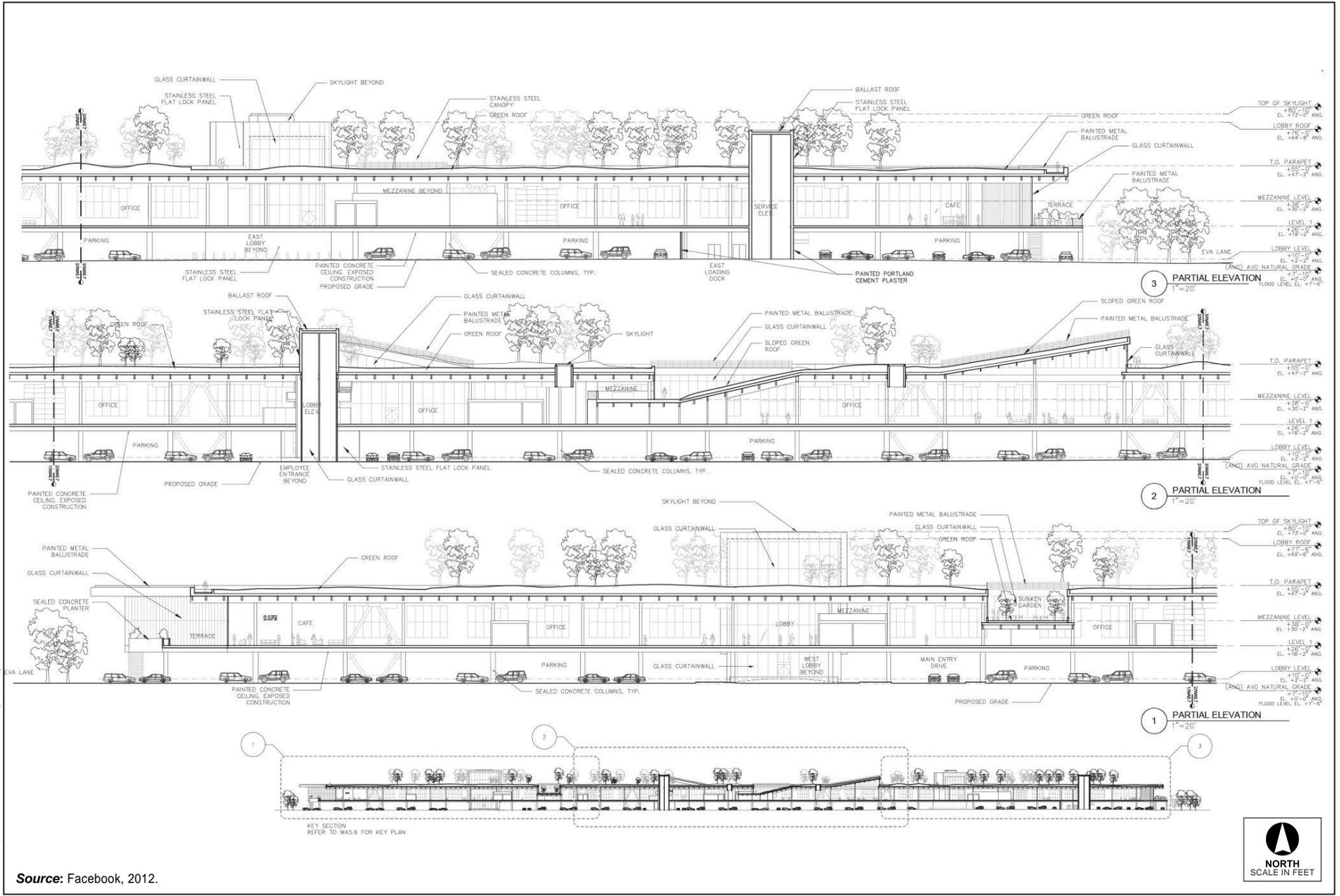


Figure 2-11 Revised Project Site Sections

- TDM program;
- Re-use existing industrial land;
- Bike parking and shower facilities;
- Use of best management practices for on-site stormwater management;
- On-site amenities (East Campus and West Campus) to reduce off-site transportation demand during the day, such as food service, coffee bar, fitness center, convenience services (including, but not limited to, an ATM, pharmacy/convenience supplies, post office, hair salon), physical therapy and chiropractic services, and bike repair;
- Energy-efficient site lighting and design to meet the Illuminating Engineering Society of North America (IESNA) lighting density and control standards for minimizing light pollution;
- Heat island effect mitigation by placing more than 50 percent of parking under the building and using shade trees and reflective materials to cool impervious site elements;
- Floor plate with skylights is conducive to daylighting strategies;
- Possible natural ventilation strategies;
- Building systems designed to avoid the use of heating, refrigeration, and fire suppression systems that include chlorofluorocarbons or halon compounds;
- Building energy modeling to improve energy performance beyond California Title-24-2008, Part 6 Energy Code Standards to a minimum of 15 percent better than code;
- Energy efficient building envelope design, including high performance glazing, cool roof and green roof, and optimized insulation levels;
- Energy efficient lighting and HVAC equipment;
- Extensive building commissioning practices to fine-tune energy using system performance;
- Building energy management controls system to optimize energy performance on an ongoing basis;
- Provision for electric vehicle charging;
- Water-efficient plumbing fixtures to reduce water consumption by at least 40 percent of California Green Building Standards Code baseline;
- Water-efficient landscape and irrigation design to reduce potable water consumption by at least 50 percent of standard design baseline;
- Construction waste management plan to recycle at least 75 percent;
- Crush a percentage of existing paving and concrete buildings to be re-used as base material;
- Building materials selection to prioritize resource conserving materials, such as materials that contain recycled content, are rapidly renewable, and are sourced from within a 500-mile radius;
- Indoor environmental quality measures, including selection of low-emitting interior finish materials, paints, and coatings; construction indoor air quality plan, during construction and prior to occupancy; and
- Non-utility energy metering by end-use to track energy use and system performance over time.

## **Site Access, Circulation, and Parking**

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**Vehicular Access and Circulation.** The main vehicular access point to the West Campus would be along Bayfront Expressway. This entrance would be signalized under the Revised Project and the

existing curb cut would be moved approximately 250 feet to the west. To accommodate the main entry, the Revised Project would signalize the intersection, restripe lanes, and extend the left turn lane to 200 feet. Secondary and emergency access points are proposed at the northwest corner of the West Campus along Bayfront Expressway and at the southeast corner of the West Campus along Willow Road. Both of the secondary access driveways would allow right-turns only for private vehicles, service vehicles, and shuttles. A TDM Program would be implemented to reduce traffic to/from the West Campus. Figure 2-12 shows West Campus vehicular, bicycle, and pedestrian circulation.

**Emergency Vehicle Access.** A 26-foot-wide EVA lane would circle around the perimeter of the West Campus and have a 60-foot minimum setback from the proposed building. Fire staging areas would be 30 feet by 60 feet and would be located along this EVA lane at each fire hydrant. This EVA lane would be accessible via the main entrance, the secondary access points, and one location from the TE Connectivity site to the west. The secondary access point on Willow Road would be designed to provide a left-turn-in option for emergency response vehicles traveling northbound on Willow Road.

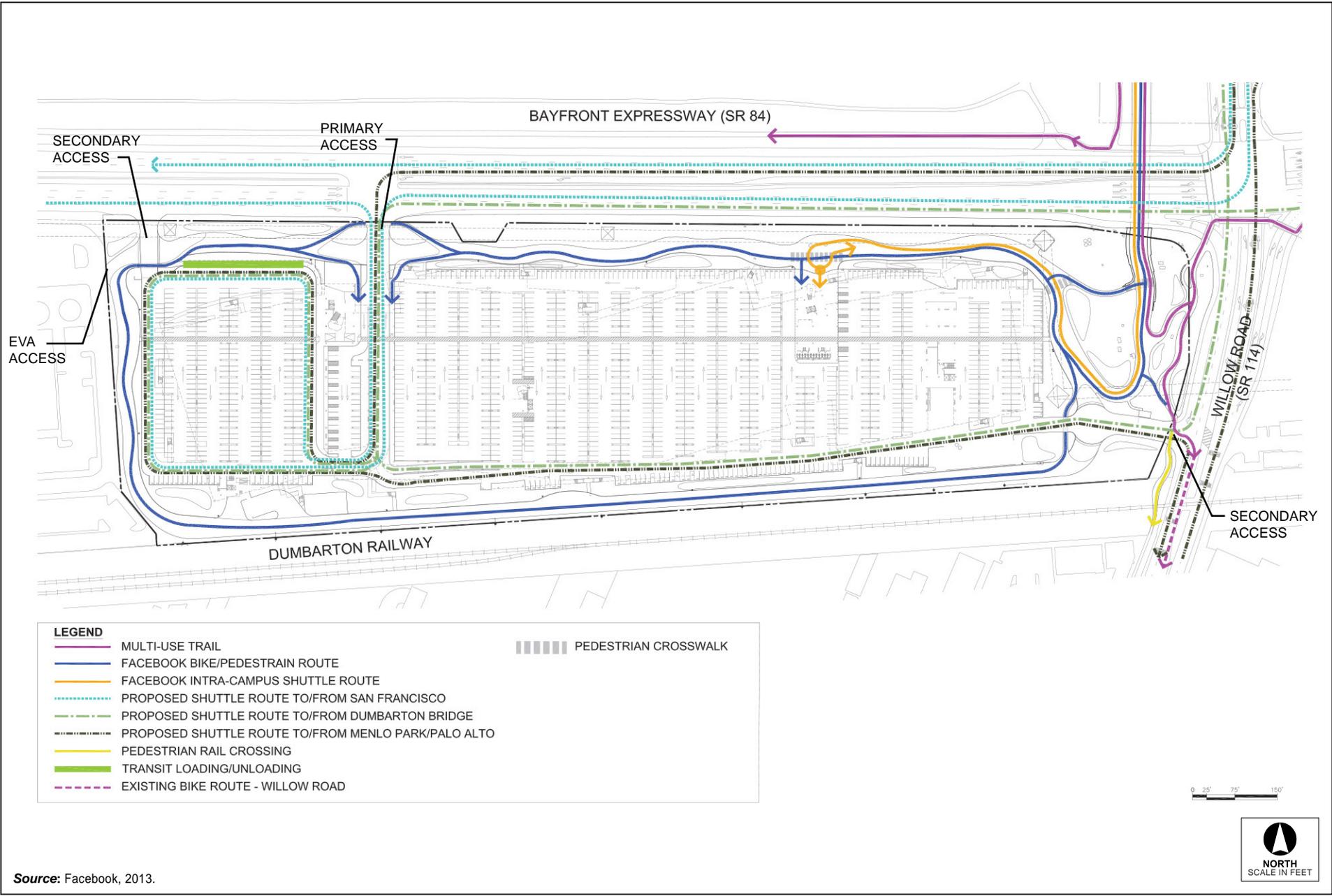
**Intra-Campus Shuttle System.** The connection between the East Campus and the West Campus would be further enhanced via additional improvements to an existing undercrossing of Bayfront Expressway that links the two campuses. As part of the East Campus component of the Project (as approved by City Council on May 29, 2012), Facebook is required to upgrade the existing undercrossing by making improvements to allow Facebook employees and members of the public to utilize the undercrossing via bicycle or foot to bypass the at-grade crossing of Bayfront Expressway. As part of the Revised Project at the West Campus, the undercrossing would be further improved to allow for use by the Facebook intra-campus shuttle system, in addition to bicycle and pedestrian use. To ensure bicyclists and pedestrian safety in the undercrossing, traffic control devices would be installed on both sides of the undercrossing for controlling ingress/egress of the intra-campus shuttle system into the undercrossing. From the East Campus, the shuttle would travel within the undercrossing and along the northern portion of the West Campus, on a segment of the EVA lane. However, the shuttle would turn into the parking area at the East Lobby and would drop-off/pick-up employees at this point, before returning to the East Campus.

## **Bicycle and Pedestrian Circulation**

Bicycles and pedestrians would utilize the Bayfront Expressway undercrossing to access the West Campus from the East Campus. Bicycles and pedestrians would be able to use the EVA lane and would enter/exit the building from the East Lobby and the West Lobby.

## **Parking**

As discussed above, the Revised Project would include a total of 1,499 parking stalls, which would include 1,351 regular parking stalls, 26 ADA spaces, and 122 parking stalls reserved for energy-efficient vehicles. The parking area would be separated by the main entry driveway with the West Lot dedicated for employee and visitor parking and the East Lot for employee parking only. In addition, bicycle parking with 224 stalls would be provided in the ground level parking garage and on the first



Source: Facebook, 2013.

Figure 2-12  
Revised Project Site Circulation and Connectivity

floor in wall-mounted racks. Table 2-4 provides a summary of parking under the Revised Project. The parking plan is shown in Figure 2-3, above.

	<b>Total</b>
Regular Stalls	1,351
Energy Efficient Vehicle (EEV) Stalls <sup>a</sup>	122
ADA Compliant Vehicle Stalls	20
ADA Compliant Van Stalls	6
<b>Total</b>	<b>1,499</b>
Bicycle Parking <sup>b</sup>	224

*Source:* Facebook, 2013.

*Notes:*

- a. EEV Stalls would be designated for low-emitting, fuel-efficient, and carpool/van pool vehicles. Up to four stalls would be electric vehicle spaces with charging stations consistent with CALGreen requirements.
- b. Bicycle parking includes 90 stalls at ground level and 134 stalls on the first floor. Short-term bicycle racks would be provided within 200 feet of main entrances (consistent with CALGreen standards) to facilitate on-campus bike sharing.

## **Construction Schedule**

Construction of the Revised Project would include the demolition of the existing facilities at the West Campus and the construction of the proposed building. It is anticipated that construction would start in the second quarter of 2013 with full build-out completed by mid-2015. The first phase of construction would include demolition of the existing buildings, surface parking lots, trees, and landscaping, and site clearing and grading. Piles and foundations would follow in mid-2013. Building construction would start in latter part of 2013 with site grading, earthwork, piles and foundations. The construction period would be phased into core/shell and fit-out. The core/shell would be complete in the fourth quarter of 2014, with the fit-out complete in mid-2015. Construction would occur over a period of 24 months.

**Demolition.** The Revised Project would require the demolition of the existing building structures, surface parking lots, and removal of trees and other landscaping. The Revised Project demolition would generate roughly 14,000 tons of concrete debris and 3,600 tons demolition debris. The concrete debris would be shredded on site prior to off-haul so that some of the material could be re-used as a base material for the new construction. The debris will be off-hauled to the SRDC Recycling Center in Redwood City with an average of 25 loads per day over a two to three week off-haul period, for a total of approximately 200 loads.

**Construction Equipment and Access.** Typical equipment that could be used during construction at the West Campus would include, but not be limited to, concrete crushers, cranes, tractors, excavators, pile

drivers, forklifts, off highway tractors, trucks, material handling equipment, paving machines, concrete pumps, concrete trucks, rollers, bulldozers, surfacing and grading equipment, backhoes, conveying equipment, water trucks, gradalls, JLG lift equipment, and trenchers. The number of truck deliveries would range from 2 to 155 with the most trips occurring during the grading stage where soil would be imported to the site. It is anticipated that the construction vehicles would access the site via Willow Road and Bayfront Expressway.

**Grading /Excavation.** The West Campus is located within a flood zone; therefore, the Revised Project would raise the elevation of the office floor. Soil import is required for the lobbies at the parking level. The soil import would involve approximately 35,000 cubic yards of soil for site grading. An additional 18,900 cubic yards of lightweight import would be required for the green roof, assuming the green roof scenario. The Revised Project would involve approximately 155 truckloads per day for four weeks. If a green roof is included in the Revised Project site plans, then an additional 73 loads per day for four weeks would be needed, for a total of 228 trucks per day.

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### **2.3 COMPARISON OF PREVIOUSLY PROPOSED PROJECT AND REVISED PROJECT**

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As stated above, the Revised Project would include the same uses as the Previously Proposed Project, including office uses and amenities. The same number of people would be employed at the West Campus (approximately 2,800) and a slight decrease in parking stalls would be provided (1,499 compared to 1,544); however, proposed parking continues to comply with Zoning Ordinance requirements pertaining to required parking. As such, activity at the West Campus would not increase as a result of the Revised Project.

However, as summarized in Table 2-5, below, the site plan has been altered to include one approximately 433,555 sf<sup>5</sup> building instead of five office buildings and amenities spaces totaling approximately 439,355 sf. As such, the Revised Project would result in significantly more building coverage (approximately 50.34 percent) than the Previously Proposed Project (28 percent). However, assuming implementation of the Green Roof Scenario, pervious surfaces at the West Campus could increase from 51 percent to 70 percent of the site, for an increase of 37.2 percent. In addition, although all existing trees would be removed under the Revised Project (compared to 375 trees under the Previously Proposed Project), the Revised Project would plant additional new trees, resulting in a greater number of trees at the West Campus (562 total trees compared to 396 total trees, for an increase of 166 trees). Under the No Green Roof Scenario, the Revised Project would result in a decrease of pervious surfaces and a decrease in the proposed number of new trees, as compared to the Previously Proposed Project.

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<sup>5</sup> The current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted.

**Table 2-5  
Site Usage Comparison**

<b>Site Overview</b>	<b>Previously Proposed Project</b>	<b>Revised Project</b>	<b>Comparison</b>
<b>SITE PLAN</b>			
Lot Area	963,682 sf	963,682 sf	Same —
Total Building Floor Area	439,850 sf	433,555 sf <sup>a</sup>	Reduced -6,295 sf
FAR	0.45	0.45	Same —
Total Building Coverage	269,831 sf	485,124 sf <sup>b</sup>	Increased 215,293 sf
Campus Building Coverage as Percent of Site	28 %	50.34 % <sup>b</sup>	Increased 79.8 %
Building Height	75 feet	73 feet	Reduced -2 feet
Number of Office Buildings	5 buildings <sup>c</sup>	1 building	Reduced -4 buildings
Number of Parking Stalls	1,544 stalls	1,499 stalls	Reduced -45 stalls
Number of Driveways	3 driveways	3 driveways	Same —
<b>TREES—GREEN ROOF SCENARIO</b>			
Tree Removal	375 trees	624 <sup>d</sup> trees	Increased 249 trees
New Trees	147 trees	562 trees	Increased 415 trees
Total Number of Site Trees	396 trees	562 trees	Increased 166 trees
<b>TREES—NO GREEN ROOF SCENARIO</b>			
Tree Removal	375 trees	624 <sup>d</sup> trees	Increased 249 trees
New Trees	147 trees	357 trees	Increased 210 trees
Total Number of Site Trees	396 trees	357 trees	Reduced -39 trees
<b>EMPLOYEES</b>			
Number of Employees	~2,800 employees	~2,800 employees	Same —
<b>CONSTRUCTION</b>			
Construction Period	18 months	24 months	Increased 6 months
Demolition Debris	17,600 tons	17,600 tons	Same —
Peak Truck Trips	210 Trips	228 <sup>e</sup> Trips	Increased 18 trips

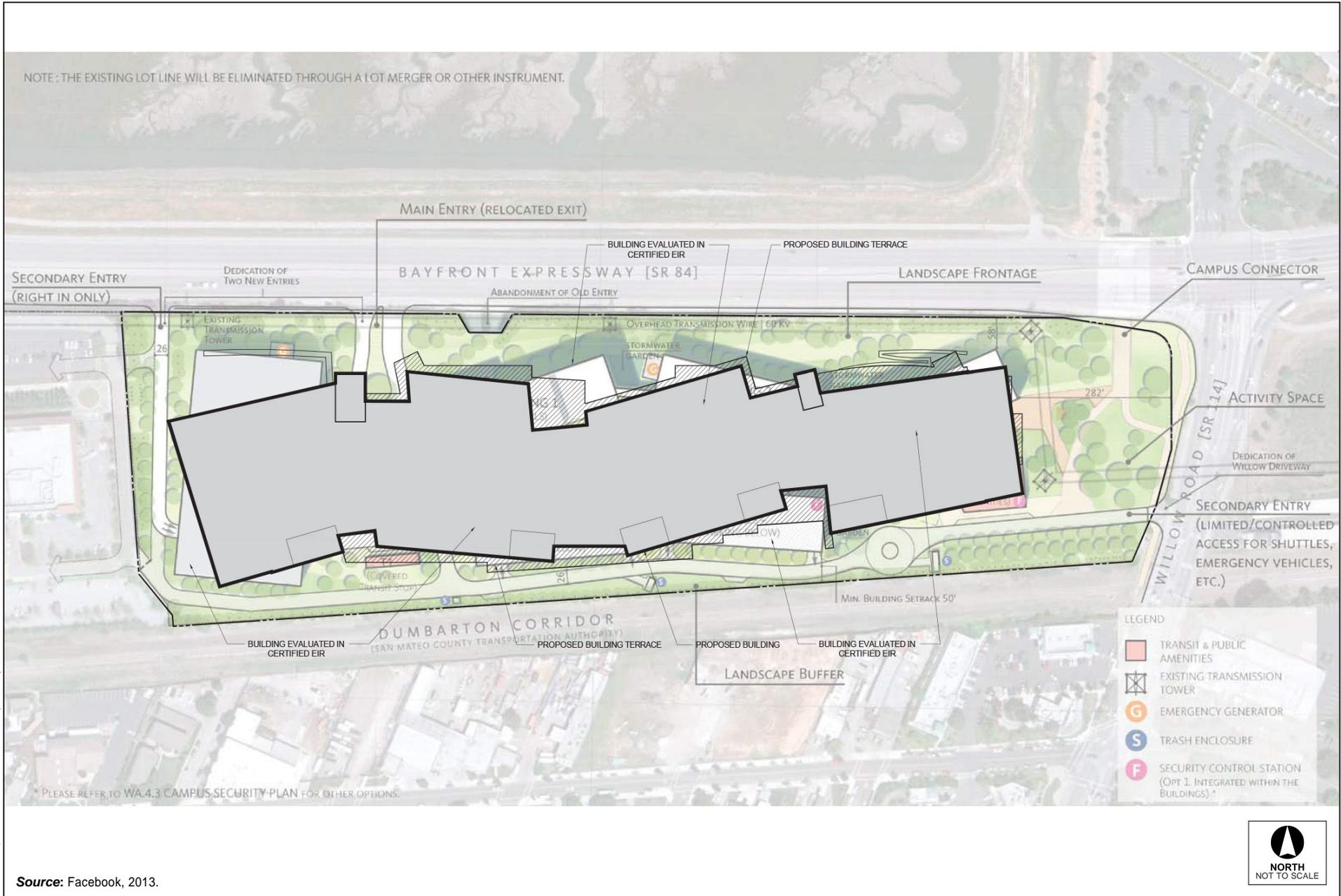
Source: Facebook, 2011 and 2013.

Notes:

- a. The current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted.
- b. Total building coverage up to 55 percent would be permitted under the CDP.
- c. Includes office buildings only. The Previously Proposed Project also included a parking structure, transit and public amenities structures, and a courtyard amenities structure.
- d. The 624 trees removed includes the 90 trees that have already been removed from the West Campus under separate entitlement processes and associated CEQA review and the 534 trees that will be removed as part of the Revised Project.
- e. Assumes the Green Roof Scenario, which would include additional truck trips for green roof soil.

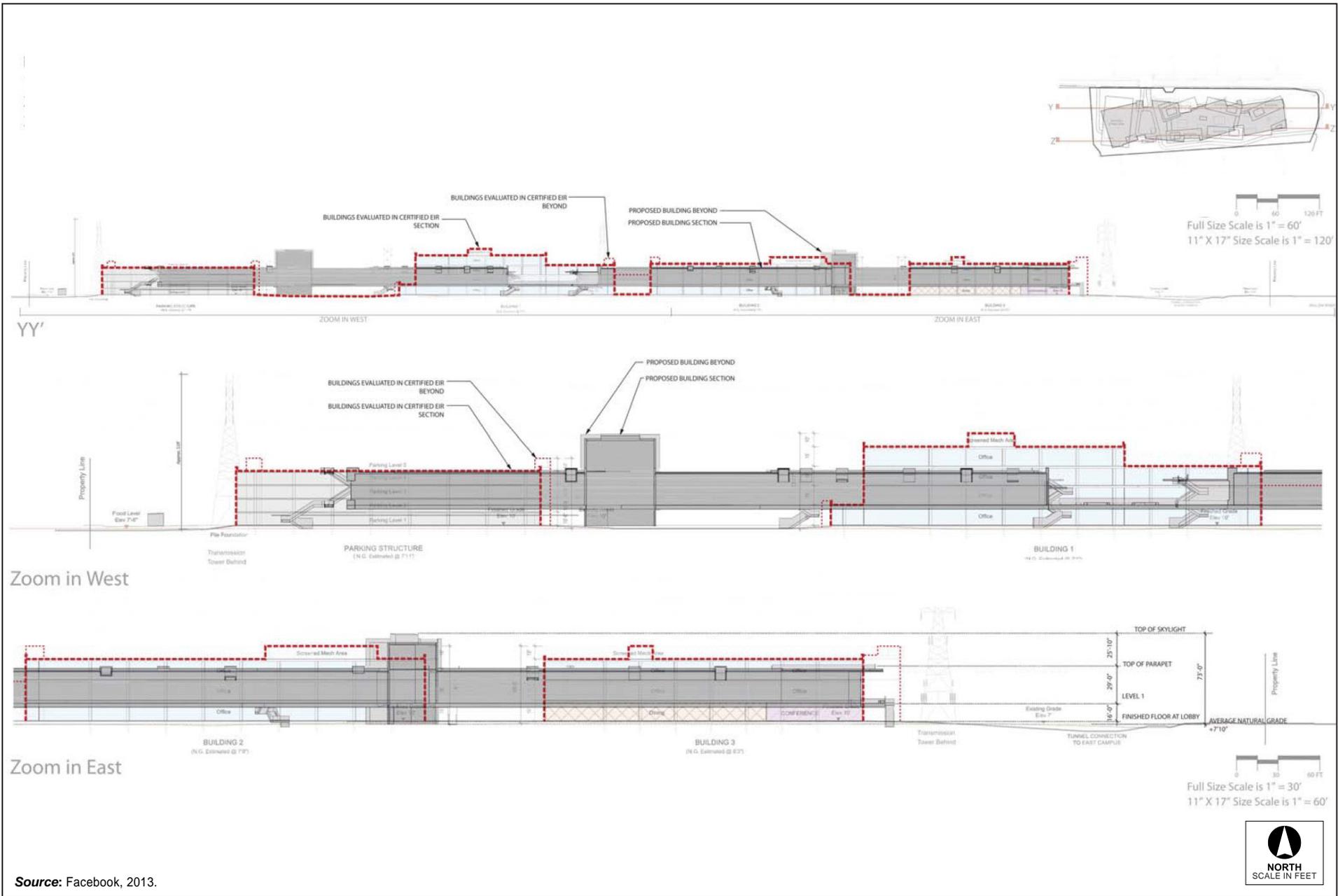
An M-2-X rezoning and approval of a CDP would be required for the Revised Project. Although the overall height of the building would decrease under the Revised Project from 75 feet to 45 feet, there would still be elements, such as the mechanical roof screening, the east lobby roof, and the rooftop tent when erected, that would extend to a maximum of 73 feet. Therefore, the proposed height would still require the same rezoning as the Previously Proposed Project. In addition, the rezoning and CDP would also provide the flexibility to increase the building coverage above the M-2 maximum of 50 percent to up to 55 percent. The anticipated construction period would occur over a 24-month period, compared to an 18-month period under the Previously Proposed Project.

For purposes of comparison, Figure 2-13 provides an overlay of the Previously Proposed Project site plan with the Revised Project building footprint. In addition, Figure 2-14 depicts an outline of the Previously Proposed Project building elevation as compared to the Revised Project.



Source: Facebook, 2013.

Figure 2-13  
Site Plan Comparison



Source: Facebook, 2013.

Figure 2-14  
Building Elevation Comparison

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# Section 3

## Environmental Analysis

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### 3.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

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#### Organization of this Section

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For each environmental topic, this environmental analysis section provides a summary of impacts from the Previously Proposed Project, as discussed in the EIR certified on May 29, 2012. This section also provides a discussion of the impacts under the Revised Project, an identification of mitigation measures that would still apply to the Revised Project, and the mitigation measures that would no longer apply to the Revised Project (if applicable). If mitigation measure language has been revised as a result of the Revised Project, then the changes are shown in strikethroughs (deletions) and underlines (additions). The purpose of the analysis is to compare the impacts of the Previously Proposed Project with the impacts of the Revised Project.

#### Rooftop Scenarios

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As discussed in Section 2, the Revised Project includes two rooftop scenarios: the Green Roof Scenario and the No Green Roof Scenario. The Green Roof Scenario would provide an accessible roof, which would include extensive landscaping, paved seating areas, outdoor dining spaces, and walking paths. The No Green Roof Scenario would not provide a roof that would be accessible to employees, with only mechanical and other rooftop equipment in this area. At this time, it is unknown which scenario would be implemented. As such, this analysis assumes the conservative scenario, depending on the environmental topic. Nevertheless, while this EIR Addendum analyzes the most conservative scenario, it is possible that the Project Sponsor may ultimately choose to implement an “in-between” scenario that includes a partial green roof rather than the complete Green Roof Scenario or the complete No Green Roof Scenario.

**Green Roof Scenario.** The Green Roof Scenario is considered conservative for the following topics:

- Lighting (Aesthetics)
- Construction equipment and hauling (Air Quality and Noise)
- Predatory birds (Biological Resources)
- Water demand (Greenhouse Gas Emissions and Utilities)

**No Green Roof Scenario.** The No Green Roof Scenario is considered conservative for the following topics:

- Degradation of existing visual character or quality (Aesthetics)
- Changes in stormwater runoff (Hydrology)

- Energy demand (Greenhouse Gas Emissions and Utilities)

The following topics would not be impacted by either the Green Roof Scenario or the No Green Roof Scenario: land use/planning, wind, transportation/traffic, cultural resources, geology/soils, hazards and hazardous materials, population/housing, and public services.

### Summary of Environmental Impacts

Table 3.1-1 summarizes the main conclusions for each environmental topic for both the Previously Proposed Project and the Revised Project. As indicated in the table, all conclusions in the certified EIR would remain the same for the Revised Project. Although some impacts would be slightly less or slightly greater than the Previously Proposed Project, these changes would be minor and would not affect the significance conclusions in the EIR.

However, two mitigation measures proposed in the certified EIR are no longer required as a result of the Revised Project, resulting in a lesser impact. The Revised Project would not include a parking structure, which would introduce a new source of light under the Previously Proposed Project. As such, Mitigation Measure AE-3.3, which would provide obstruction of light and glare from vehicles in the garage, is no longer applicable. In addition, since the certification of the EIR, the West Campus engineered cap is being remediated making Mitigation Measure HM-2.9 no longer applicable. Nonetheless, Impact AE-3 and Impact HM-2 cover several other topics; therefore, the overall significance conclusions would not change with implementation of the Revised Project.

**Table 3.1-1  
Comparison of Impacts**

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
<b>Land Use</b>			
Conflicts with Adopted Land Use Plans and Policies	LTS	LTS	0
Cumulative Impacts	LTS	LTS	0
<b>Aesthetics</b>			
Alteration of Scenic Views	LTS	LTS	0
Degradation of Existing Visual Character or Quality	LTS	LTS	0
New Sources of Light and Glare	PS/LTS	PS/LTS	-
New Sources of Shadows	LTS	LTS	0
Cumulative Impacts	LTS	LTS	0
<b>Wind</b>			
Wind Impacts	LTS	LTS	0
Cumulative Wind Impacts	LTS	LTS	0

**Table 3.1-1  
Comparison of Impacts**

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
<b>Transportation</b>			
Impacts to Intersections	SU	SU	0
Impacts on Roadway Segments	SU	SU	0
Impacts to Routes of Regional Significance	SU	SU	0
Impacts to Local Bicycle and Pedestrian Facilities	LTS	LTS	0
Transit Service, Pedestrian Facilities, and Bicycle Facilities	LTS	LTS	0
Cumulative Impacts	SU	SU	0
<b>Air Quality</b>			
Conflict with or Obstruct Implementation of an Applicable Air Quality Plan	LTS	LTS	0
Violation of Any Air Quality Standard	SU	SU	0
Construction Criteria Air Pollutant Emissions	LTS	LTS	0
Localized Carbon Monoxide Impacts from Motor Vehicle Traffic	LTS	LTS	0
Exposure to Toxic Air Contaminants	PS/LTS	PS/LTS	0
Exposure to Objectionable Odors	LTS	LTS	0
Cumulative Impacts	SU	SU	0
<b>Climate Change</b>			
Greenhouse Gas Emissions	LTS	LTS	0
Conflicts with Applicable Plans and Policies	LTS	LTS	0
<b>Noise</b>			
Exposure to Excessive Noise Level	SU	SU	0
Temporary Increases in Ambient Noise Level	SU	SU	0
Substantial Permanent Increase in Noise Level	SU	SU	0
Substantial Temporary Increase in Noise Level	PS/LTS	PS/LTS	0
Cumulative Impacts	SU	SU	0
<b>Cultural Resources</b>			
Impacts to Historic Resources	LTS	LTS	0
Impacts to Archaeological Resources	PS/LTS	PS/LTS	0
Impacts to Paleontological Resources	PS/LTS	PS/LTS	0
Disturbance of Human Remains	PS/LTS	PS/LTS	0
Cumulative Impacts	LTS	LTS	0

**Table 3.1-1  
Comparison of Impacts**

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
<b>Biological Resources</b>			
Impacts on Special-Status Species at the Project Site	PS/LTS	PS/LTS	0
Indirect Impacts on Special-Status Species Inhabiting the Adjacent Water Marshes	PS/LTS	PS/LTS	0
Loss of Riparian and Other Habitats	LTS	LTS	0
Impacts to Wildlife Corridors or Nursery Sites	PS/LTS	PS/LTS	0
Conflicts with Local Policies or Ordinances	LTS	LTS	0
Cumulative Impacts	PS/LTS	PS/LTS	0
<b>Geology and Soils</b>			
Strong Seismic Groundshaking and Seismic-Related Ground Failure	LTS	LTS	0
Soil Hazards	LTS	LTS	0
Soil Erosion	LTS	LTS	0
Cumulative Impacts	LTS	LTS	0
<b>Hydrology and Water Quality</b>			
Changes in Stormwater Runoff	LTS	LTS	0
100-Year Floodplain	PS/LTS	PS/LTS	0
Impeding or Redirecting Flood Flows	LTS	LTS	0
Sea Level Rise	PS/LTS	PS/LTS	0
Construction and Operational Stormwater Pollutants	LTS	LTS	0
Effects on Groundwater Supplies and Recharge	LTS	LTS	0
Cumulative Impacts	PS/LTS	PS/LTS	0
<b>Hazards and Hazardous Materials</b>			
Asbestos, Lead, or Other Hazardous Materials in Building Components	LTS	LTS	0
Soil and Groundwater Contamination	PS/LTS	PS/LTS	-
Effects on Ecological Systems	PS/LTS	PS/LTS	0
Inference with Groundwater Monitoring Systems	LTS	LTS	0
Maintenance Activities	PS/LTS	PS/LTS	0
Routine Hazardous Materials Use	LTS	LTS	0
Hazardous Materials Risks from Off-Site Uses	LTS	LTS	0
Impairment of Emergency Access and Emergency Plans	LTS	LTS	0
Cumulative Impacts	PS/LTS	PS/LTS	0

**Table 3.1-1  
Comparison of Impacts**

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
<b>Population and Housing</b>			
Population Increase	LTS	LTS	0
Cumulative Impacts	LTS	LTS	0
<b>Public Services</b>			
Police Impacts	LTS	LTS	0
Fire Impacts	LTS	LTS	0
School Impacts	LTS	LTS	0
Recreational Impacts	LTS	LTS	0
Library Impacts	LTS	LTS	0
Cumulative Impacts	LTS	LTS	0
<b>Utilities and Service Systems</b>			
Water Demand	LTS	LTS	0
Impacts to Water Treatment Facilities	LTS	LTS	0
Wastewater Generation	PS/LTS	PS/LTS	0
Solid Waste Generation	LTS	LTS	0
Stormwater Generation	LTS	LTS	0
Energy Demand	LTS	LTS	0
Cumulative Impacts	PS/LTS	PS/LTS	0

Source: Atkins, 2013.

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

0 = No Change; + = Greater Impact than Previously Proposed Project; - = Less Impact than Previously Proposed Project

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## 3.2 IMPACTS NOT TO BE EVALUATED

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### Introduction

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The proposed design modifications for the Revised Project would not change the analysis of the following topics, as analyzed in the certified EIR: land use, cultural resources, geology/soils, population/housing, and public services. All impact conclusions and/or mitigation measures would be the same for these topics. Although the building footprint and massing would change, no additional or different impacts beyond those identified in the EIR would result. This section includes a summary of the findings in the certified EIR and explains why these impacts have not changed due to the Revised Project.

### Land Use/Planning

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**Summary of Previously Proposed Project.** The Previously Proposed Project is required to be consistent with the land use designations and goals and policies outlined in the General Plan. The West Campus would include office uses with ancillary structures for uses such as cafes, a fitness center, meeting rooms, and parking. These uses are permitted under the Light Industry designation. In addition, the Previously Proposed Project would be consistent with the Zoning Ordinance with respect to gross floor area, building coverage, and parking. However, the Previously Proposed Project would require a CDP amendment to establish a new height limit at the West Campus. The proposed new CDP and zoning (M-2-X for increased heights at the West Campus) would allow the Previously Proposed Project to be consistent with the Zoning Ordinance, resulting in less-than-significant impacts.

The Previously Proposed Project would also be generally consistent with the General Plan and Bay Trail Plan, both of which promote the enhancement of bicycle and pedestrian linkages. The Previously Proposed Project would enhance the existing Bay Trail by providing an improved connection at the intersection of Bayfront Expressway and Willow Road. With implementation of the proposed mitigation measures presented throughout the certified EIR, the Previously Proposed Project would be generally consistent with the General Plan. In addition, the Previously Proposed Project would not divide an established community or conflict with an adopted Habitat Conservation Plan, resulting in less-than-significant land use impacts. (LTS)

**Impacts of Revised Project.** The Revised Project would result in the same uses as the Previously Proposed Project. As such, the conclusions for the Previously Proposed Project would apply to the Revised Project. An office building with ancillary uses would be constructed, which would be permitted under the Light Industry land use designation. The 433,555 sf building proposed under the Revised Project would have a FAR of 0.45, which is permitted under the M-2 zoning.

However, as with the Previously Proposed Project, a CDP amendment would be required to exceed the M-2 height restriction of 35 feet. The majority of the roof proposed for the Revised Project would be at approximately 45 feet; however, enclosed mechanical equipment, the east lobby roof, and the rooftop

tent when erected would extend to a height of approximately 73 feet. As such, like the Previously Proposed Project, the Revised Project would require a CDP and rezoning to M-2-X. In addition, the Revised Project would increase building coverage from 28 percent under the Previously Proposed Project to approximately 50.34 percent. This would exceed the 50 percent maximum building coverage in the M-2 zone. However, the CDP and rezoning for both height and building coverage would allow the Revised Project to be consistent with the Zoning Ordinance. In addition, the rezoning and CDP would also provide the flexibility to increase the building coverage above the M-2 maximum of 50 percent to up to 55 percent.

Table 3.2-1 summarizes the existing, allowed, Previously Proposed Project, and Revised Project development at the West Campus.

	<b>Existing Development</b>	<b>M-2 Zoning Ordinance</b>	<b>Previously Proposed Project</b>	<b>Revised Project</b>
Floor Area Ratio (FAR)	0.23	0.45	0.45	0.45
Total Square Feet	127,246 sf	449,346 sf	439,850 sf	433,555 sf <sup>a</sup>
Building Coverage	12%	50%	28%	50.34% <sup>b</sup>
Building Height	35.4 feet	35 feet	75 feet	73 feet <sup>c</sup>
Parking	242 stalls	1,446 stalls	1,544 stalls	1,499 stalls

*Sources:* City of Menlo Park, 2011; Facebook, 2013.

*Notes:*

- a. The current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted.
- b. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent.
- c. The majority of the roof would be at a height of approximately 45 feet; however, inclusive of rooftop mechanical screening and the east lobby roof, and the rooftop tent when erected, the building height would extend to 73 feet. The proposed height would exceed existing height permitted under M-2 Zoning.

In addition, as with the Previously Proposed Project, the Revised Project would be generally consistent with the General Plan and Bay Trail Plan. The Revised Project would provide the same bicycle and pedestrian linkages between the Bay Trail, the East Campus, and the West Campus as the Previously Proposed Project. The Revised Project would not divide an established community or conflict with an adopted Habitat Conservation Plan, resulting in less-than-significant land use impacts. (LTS)

## Cultural Resources

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**Summary of Previously Proposed Project.** There are currently two buildings at the West Campus, which were both constructed in the 1980s.<sup>6</sup> There is no scholarly or other information that establishes a historical significance of the structures or other built features at the West Campus. As such, although the Previously Proposed Project would require demolition of the existing buildings, impacts on historic resources would be less than significant.

However, since the Previously Proposed Project would require soil-disturbing activities during construction, impacts on archeological and paleontological resources and human remains could potentially occur. The cultural resources records search and Native American correspondence conducted for the Previously Proposed Project revealed no recorded Native American or historic-period archaeological sites within the Project area. In addition, the area has been subject to ground disturbance by previous development. However, given the environmental sensitivity of the Project area, there exists a moderate to high possibility of encountering Native American sites during construction at the West Campus. If encountered during construction, archaeological resources, paleontological resources, and human remains could be damaged or destroyed, resulting in potentially significant impacts.

MITIGATION MEASURES. Mitigation Measures CR-2.1, CR-3.1, and CR-4.1, as presented in the certified EIR, would reduce the impacts on archaeological resources, paleontological resources, and human remains, respectively, to less than significant. (PS/LTS)

**Impacts of Revised Project.** As with the Previously Proposed Project, the Revised Project would demolish the existing buildings at the West Campus. However, these buildings are not considered to be historically significant. The Revised Project would involve a greater amount of ground disturbance than the Previously Proposed Project. The Revised Project would cover approximately 50.34 percent of the West Campus while the Previously Proposed Project would cover approximately 28 percent of the site. As discussed above, building coverage could increase up to 55 percent with approval of the CDP. As such, there is a greater likelihood of unearthing archaeological resources, paleontological resources, and human remains under the Revised Project. Construction activities could damage these resources, resulting in potentially significant impacts.

MITIGATION MEASURES. Although the Revised Project would disturb more ground area, the mitigation measures as presented in the certified EIR (Mitigation Measures CR-2.1, CR-3.1, and CR-4.1) would reduce the impacts on archaeological resources, paleontological resources, and human remains to less than significant. As such, there would be no additional impacts beyond those identified in the certified EIR. (PS/LTS)

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<sup>6</sup> Cornerstone Earth Group, *Phase I Environmental Site Assessment, 312–314 Constitution Drive, Menlo Park, California*, November 19, 2010.

## Geology/Soils

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**Summary of Previously Proposed Project.** The new development at the West Campus would expose approximately 2,800 new workers to groundshaking. The risks to public safety from seismic hazards can be mitigated to the extent required by law with implementation of the proper design and construction methods, which would be within the responsibility of the City and the Project Sponsor to monitor and enforce through its building permit process. In addition, the City, along with other Bay Area jurisdictions, participates in a coordinated planning and emergency response program, and has its own Emergency Operations Plan to respond to natural disasters. Consequently, the Previously Proposed Project would not expose people or structures to damage resulting from seismic groundshaking or liquefaction-related hazards.

The Geotechnical Feasibility Evaluation for the West Campus indicates that site soils are expected to have a moderate to high shrink-swell potential. Structural damage, warping, and cracking of roads, driveways, parking areas and sidewalks, and rupture of utility lines may occur if the potential expansive soils and the nature of the imported fill are not considered during design and construction of improvements. Adherence to the soil and foundation support parameters of the California Building Code, as required by City and State law, would ensure the maximum practicable protection available from soil failures under static or dynamic conditions for structures and their associated trenches and foundations.

The West Campus is mostly flat and would not involve development on hillsides that would require cut-and-fill; thus, there would be no topographic changes that could alter erosion potential. However, development of the West Campus would involve grading to construct building foundations and trenching for utility installations. Some minor modifications to allow additional roadway access points would also be implemented. These construction activities could temporarily expose soils to erosive effects from stormwater runoff. Compliance with City requirements and the California Building Code, which are within the authority of the City to enforce and monitor, would ensure that erosion impacts resulting from Project construction would be less than significant. (LTS)

**Impacts of Revised Project.** The Revised Project would result in the same less-than-significant impacts as the Previously Proposed Project related to exposure of people to seismic groundshaking and seismic-related ground failure, soil hazards, and soil erosion. Although the site plan would change and would include one approximately 433,555 sf building instead of five buildings totaling approximately 439,850 sf, the same impacts would occur. In addition, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. Seismic hazards would be mitigated to the extent required by law with implementation of the proper design and construction methods, which would be within the responsibility of the City and the Project Sponsor to monitor and enforce through its building permit process. Adherence to the soil and foundation support parameters of the City Building Code, as required by City and State law, would ensure the maximum practicable protection available from soil failures. In addition, compliance with City requirements and the California Building Code would ensure that soil erosion impacts resulting from Revised Project

construction are minimized. As such, no additional impacts to geology and soils, beyond those identified in the certified EIR, would occur, resulting in less-than-significant impacts. (LTS)

## **Population/Housing**

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**Summary of Previously Proposed Project.** The Previously Proposed Project would not include development of new housing units and would thus not directly increase the residential population within the region. However, there would be an indirect population increase associated with new visitorship and employment during construction and operation. Approximately 2,800 net new workers would be employed at the West Campus. As such, the Previously Proposed Project would increase the daytime population at the Project site. The increase in employment would result in a demand for new housing units and an indirect increase in the residential population. However, the percentage of regional housing demand resulting from the Previously Proposed Project would be relatively small in comparison to projected housing growth in the region. Therefore, the population and housing impact of the Previously Proposed Project would be less than significant. (LTS)

**Impacts of Revised Project.** There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project and the population and housing conclusions in the certified EIR would still apply. The Revised Project would include roughly the same building area and the same number of anticipated employees as the Previously Proposed Project. The West Campus would generate a net increase of approximately 2,800 new jobs within the City. The net increase in employment at the site would account for approximately 69 percent of the City's employment growth of 4,050 jobs between 2010 and 2025, as projected by ABAG. The Revised Project, like the Previously Proposed Project, would result in approximately 1,572 new households within the region, with approximately 123 households in Menlo Park (at an estimated 7.8 percent of the total West Campus employees living in Menlo Park). This would represent approximately 7.5 percent of Menlo Park's projected housing demand growth from 2010 to 2025. As presented in the certified EIR, the person per household ratio used for the City was 2.62. Therefore, with a projected housing demand of 123 units, the Revised Project could result in an increase in Menlo Park population by 322 people, which is the same as the Previously Proposed Project. As such, the Revised Project would not induce substantial population growth indirectly through job growth and would not have direct impacts to the physical environment, resulting in a less-than-significant impact. (LTS)

## **Public Services**

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**Summary of Previously Proposed Project.** The Previously Proposed Project would require an increased level of police and fire services due to increased employment and on-site activity. With more on-site activity, there could be more incidents requiring police and fire response. However, the increased level of police and fire services would not be large enough to trigger the need for construction of new or expanded facilities that could adversely affect the physical environment or affect human health and safety.

The Previously Proposed Project would not involve the construction of new residential units in the City and, therefore, would not directly generate students. Nonetheless, the Previously Proposed Project would indirectly generate student demand from the induced housing caused by increased employment at the West Campus. However, impacts from the indirectly generated students would be mitigated by the payment of the school impact fees (established by SB 50) by the Project Sponsor and any subsequent residential projects that could be developed as a result of the Previously Proposed Project.

An increased demand and utilization of nearby parks and recreational services due to increased employment would also occur under the Previously Proposed Project. However, the Previously Proposed Project would include open spaces and fitness facilities at the West Campus, which could offset the potential deterioration of City parks due to the increase in employees. Although the residential population in the City would increase as a result of the Previously Proposed Project, there are no capacity issues and the existing facilities would be able to accommodate the increase in residents. In addition, the Previously Proposed Project would be subject to the City's property taxes that finance the maintenance of City parks.

The Previously Proposed Project would also add employees to the Project site who could use the City's libraries. However, it is expected that the existing libraries in the City would be able to accommodate an increase in employment at the West Campus and the associated increase in residents. As such, since the Previously Proposed Project would not trigger the need for the construction of new police, fire, school, parks, and library facilities, the impacts would be less than significant. (LTS)

**Impacts of Revised Project.** The Revised Project would employ the same number of people as the Previously Proposed Project (approximately 2,800). As such, the Revised Project would demand the same amount of public services as the Previously Proposed Project. In addition, since the Revised Project would include the same amount of employees and a slight reduction in the number of parking stalls, traffic conditions would not increase. As such, local roadways would not be further impacted and police and fire service response times would be the same as analyzed for the Previously Proposed Project. There would be no additional police, fire, school, parks, and library impacts beyond those identified in the certified EIR.

The Revised Project would change the site plan by constructing one large building instead of five smaller ones, which could alter how emergency vehicles access the West Campus. A 26-foot-wide emergency vehicle access (EVA) lane would circle around the perimeter of the West Campus and have a 60-foot minimum setback from the proposed building. Fire staging areas would be 30 feet by 60 feet and would be located along this EVA lane at each fire hydrant. This EVA lane would be accessible via the main entrance, the secondary access points, and one potential location from the TE Connectivity site to the west. The secondary access point on Willow Road would be designed to provide a left-turn-in option for emergency response vehicles traveling northbound on Willow Road. The Menlo Park Fire Department (MPFD) has reviewed the site plans and determined that the MPFD would be able to serve

the Revised Project building, as long as it complies with the current California Building Code, Fire Code, and local amendments, as required by law.<sup>7</sup>

Therefore, impacts to police services, fire services, schools, parks, and libraries would be less than significant under the Revised Project, similar to the Previously Proposed Project. (LTS)

### **Impacts Found to Be Less than Significant**

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Based on knowledge of the Project site and its surrounding areas, it was determined in the certified EIR that there would be no Project-related impacts on agriculture and forestry resources and mineral resources, because these resources are not present in the Project vicinity. The same conclusion of no impact applies to the Revised Project.

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<sup>7</sup> Menlo Park Fire Protection District Fire Prevention Bureau, “Planning Review—Facebook Campus West,” Reviewed by Bob Blach, October 2, 2012.

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### 3.3 AESTHETICS

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#### Summary of Previously Proposed Project

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**AE-1: Alteration of Scenic Views.** The Previously Proposed Project would significantly increase massing, height, and bulk over existing conditions. As such, the five office buildings at the West Campus and the multi-level parking structure would interrupt existing views of the Santa Cruz Mountain Range from scenic viewpoints. However, the increased development would represent a small portion of the overall vista. In addition, views from the scenic viewpoints generally tend to focus away from the West Campus and more toward the north, where views encompass panoramic and expansive scenery of the marsh, salt ponds, Bay, and the East Bay Hills. Although the development at the West Campus would considerably increase height, mass, and bulk over existing conditions, this change would not have a significant impact on scenic vistas. As such, the proposed development at the West Campus would have a less-than-significant impact on scenic vistas from the Bay Conservation Development Commission (BCDC) Public Shore Trail, the Bay Trail, and Bayfront Park. (LTS)

**AE-2: Degradation of Existing Visual Character or Quality.** While the Previously Proposed Project would substantially increase on-site building height, massing, and bulk, the development would not cause a significant impact to on-site visual character. Currently, the site consists of a partially vacant lot with two unused buildings, unmaintained vegetation, and broken pavement. The Previously Proposed Project would replace the abandoned site with new buildings, enhanced landscaping, and bicycle/pedestrian amenities that would complement the existing office development at the East Campus and the TE Connectivity site. The proposed site plan at the West Campus would provide increased unity with its surroundings by creating contiguous landscape areas and buildings that reflect a similar architectural design. In addition, the Project Sponsor would be required to comply with the City's architectural review requirements, as outlined in Section 16.68.020 of the Municipal Code. As such, although the upper levels of the proposed buildings would be visible from surrounding areas, overall views would not change to the extent that the visual character of the area would be substantially different. Therefore, the Previously Proposed Project would have a less-than-significant impact on the overall degradation of existing visual character and quality and may be considered an improvement over existing conditions. (LTS)

**AE-3: New Sources of Light and Glare.** Exterior lighting would be added to an area where there currently is little to no lighting. The Previously Proposed Project would include nighttime lighting from vehicles, the interior streets, the parking garage, buildings, and security. The increase in building heights would make building lights more visible to motorists along Bayfront Expressway and Willow Road and residents in the Belle Haven neighborhood, but some of the interior lights would be screened by the perimeter vegetation and potentially by window overhangs and awnings. In addition, the five-story parking structure could result in vehicle headlight spillage onto adjacent properties. The increase in buildings and on-site activity at the West Campus would result in a potentially significant increase in building lighting and vehicle headlights in the area.

In addition, implementation of the Previously Proposed Project could introduce highly reflective surfaces at the West Campus. These surfaces could pose the most significant impacts along major road corridors, such as Bayfront Expressway and Willow Road. The types of building materials and glass surfaces are unknown. As such, it is conservatively assumed that the Previously Proposed Project would result in potentially significant glare impacts.

MITIGATION MEASURES. Mitigation Measures AE-3.1, AE-3.2, and AE-3.3, as required by the certified EIR, would reduce potential light and glare impacts at the West Campus to a less-than-significant level. (PS/LTS)

**AE-4: New Sources of Shadows.** Shadows as a result of the Previously Proposed Project would be restricted to the West Campus during the summer solstice and the spring and fall equinoxes, resulting in no shadow spillage onto adjacent properties or public spaces. Shadows during the winter solstice would extend to just north of Bayfront Expressway, but this would not be considered significant, since it would not impact public open space. As such, the Previously Proposed Project would result in less-than-significant shadow impacts. (LTS)

**Cumulative Impacts.** The Previously Proposed Project, and other projects in the area, could be visible from scenic viewpoints. However, due to the flat topography, distance, intervening vegetation and development, and the relatively low-scale characteristics of the area, it is unlikely that the Previously Proposed Project and other cumulative projects could be viewed in the same context. In addition, the other nearby projects are speculative, and the height, bulk, and lighting characteristics of these projects are currently unknown. As such, cumulative visual quality impacts, including new sources of shadows, are considered less than significant. (LTS)

## **Impacts of Revised Project**

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### **Impacts Not to Be Evaluated**

Due to changes in the building design, the Revised Project would appear to be visually different than the Previously Proposed Project. As such, all aesthetic impacts, as included in the certified EIR, are evaluated in this section.

### **Impacts to Be Evaluated**

As with the Previously Proposed Project, photomontages at six different locations (as shown in Figure 3.3-1) have been prepared for the Revised Project to show how the proposed building would look inclusive of building and landscaping. The photomontages are used to provide a reasonable representation of the building's general massing, scale, and height upon completion. The building presented in the photomontages show the conservative No Green Roof Scenario, since a green roof would provide a more natural, aesthetically pleasing setting and roof vegetation would buffer some views of the proposed building. In addition, for informational purposes, one photomontage is included that shows the Green Roof Scenario with the erection of the temporary tent event. The photomontages for the Previously Proposed Project are also included for comparison with the Revised Project.



Source: Gensler, 2011 and Facebook, 2012.



Figure 3.3-1  
Aerial Map of Viewpoints

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The potential for this increase in 101 sf of building size would be minor in nature and would not substantially increase the bulk and mass of the building. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. Increasing building coverage from the proposed 50.34 percent to 55 percent would not result in substantial changes to the building that would affect visual quality or the conclusions reached in the analysis below.

**AE-1: Alteration of Scenic Views.** The City does not have any officially designated scenic views or vistas. However, in the areas surrounding the Project site, the locations that could be considered to have scenic vistas are the BCDC Public Shore Trail, the Bay Trail, and Bayfront Park. As such, photomontages have been prepared for the Revised Project at these locations, as discussed in further detail.

*BCDC Public Shore Trail (Viewpoint 1).* Similar to the Previously Proposed Project, the Revised Project would significantly increase massing and bulk over existing conditions. As shown in Viewpoint 1, Figure 3.3-2, the foreground views would remain the same with implementation of both the Previously Proposed Project and the Revised Project, but the background views would be altered due to development in the middleground. As with the Previously Proposed Project, the Revised Project would interrupt the existing panoramic and mostly unobstructed views of the Santa Cruz Mountain Range. Under the Previously Proposed Project (Figure 3.3-2a), the continuous ridgeline would still be visible over the roofs and mechanical screening areas of the buildings, which would range from 56 to 74 feet in height.

As shown in Figure 3.3-2b, the Revised Project would block a majority of the ridgeline. However, it is important to note that the viewpoint has shifted slightly to the north, away from the West Campus. As the viewer adjusts position, the Revised Project would block more or less of the ridgeline, depending on the viewer's location along the BCDC Trail. Although the photomontage shows that the Revised Project would block more of the ridgeline than the Previously Proposed Project, the Revised Project building would generally not be as tall as the buildings under the Previously Proposed Project. The proposed structure, inclusive of all rooftop mechanical screening and east lobby roof, would measure approximately 73 feet in height. However, the majority of the roof would be at approximately 45 feet, compared to 56 to 74 feet under the Previously Proposed Project. As such, the Revised Project would likely block fewer views from the BCDC Trail compared to the Previously Proposed Project. The impact would be less than significant, as with the Previously Proposed Project.

As discussed above, the No Green Roof Scenario is the more conservative option in terms of aesthetics because a green roof would provide a more natural, aesthetically pleasing setting and would buffer some views. However, Figure 3.3-3 is included for informational purposes to show the Revised Project from Viewpoint 1 with the green roof and the temporary tent event. As shown, the green roof would provide a visual transition that would link the ground-level landscaping to the roof. When erected, the

a. Previously Proposed Project



b. Revised Project



Source: Gensler, 2011; Facebook, 2013.

10020154 | Menlo Park Facebook Campus Project

Figure 3.3-2  
Viewpoint 1: BCDC Public Shoreline Trail Facing South



100020154 | Menlo Park Facebook Campus Project

Source: Facebook, 2013.

Figure 3.3-3  
Viewpoint 1: View of Revised Project with Temporary Tent Event

roof tent would be approximately 28 feet in height and would be at 73 feet above average natural grade, consistent with the height of rooftop mechanical equipment and the East Lobby. The tent would be set-back from the northern edge of the building and would mainly be blocked from view by proposed rooftop trees. In addition, the tent would be temporary and limited to eight occurrences per year. As such, aesthetic impacts to Viewpoint 1 would be less than significant.

*Bay Trail (Viewpoint 2).* Viewpoint 2 (Figure 3.3-4) shows the view of the West Campus as seen from the Bay Trail, looking southeast. Views from this direction encompass Bayfront Expressway, the utility towers and lines, and perimeter vegetation at the West Campus. With the Previously Proposed Project, as shown in Figure 3.3-4a, the five-story parking structure and the two- to four-story office buildings in the northern portion of the West Campus would be visible. As shown in Figure 3.3-4b, the western portion of the Revised Project would be visible. From this viewpoint, the massing of the buildings under the Previously Proposed Project and the Revised Project appear similar, but the building height of the Revised Project would actually be less than with the Previously Proposed Project. While both scenarios would represent a significant increase in building mass over existing conditions, the buildings would not block views of scenic features, such as the Santa Cruz Mountain Range to the south and the salt ponds to the north. Therefore, like the Previously Proposed Project, the Revised Project's impact would not be significant.

*Bayfront Park (Viewpoint 3).* Viewpoint 3 (Figure 3.3-5) depicts a lower-elevation view from Bayfront Park under existing and proposed conditions. As shown, the West Campus is at a significant distance from the park (approximately 1.15 miles). As such, views of the Revised Project (Figure 3.3-5b) would be mainly obstructed by foreground views of the marsh and salt ponds and middleground views of Bayfront Expressway and vegetation. This is a similar view of the West Campus as under the Previously Proposed Project (Figure 3.3-5a). The western portion of the Revised Project building would be visible from the lower elevations of Bayfront Park; however, due to distance, the proposed building blends with its surroundings and is hardly visible. Therefore, similar to the Previously Proposed Project, the visual impact to views from Bayfront Park would not be significant.

*Overall Impacts to Scenic Vistas.* The Revised Project would result in additional height, bulk, and massing compared to existing conditions that interrupt existing views of the Santa Cruz Mountain Range; however, the increased development would represent a small portion of the overall vista. Views from all of the scenic viewpoints generally tend to focus away from the West Campus and more towards the north, where views encompass panoramic and expansive scenery of the marsh, salt ponds, Bay, and the East Bay Hills. Although the development at the West Campus would considerably increase height, mass, and bulk at the site over existing conditions, this change would not have a significant impact on scenic vistas. As such, the Revised Project, as with the Previously Proposed Project, would have a less-than-significant impact on scenic vistas from the BCDC Public Shore Trail, the Bay Trail, and Bayfront Park. (LTS)

a. Previously Proposed Project



b. Revised Project



Source: Gensler, 2011; Facebook, 2013.

Figure 3.3-4  
Viewpoint 2: Bayfront Expressway/Bay Trail Facing Southeast

a. Previously Proposed Project



b. Revised Project



100020154 | Menlo Park Facebook Campus Project

Source: Gensler, 2011; Facebook, 2013.

Figure 3.3-5  
Viewpoint 3: Bayfront Expressway Facing Southeast

**AE-2: Degradation of Existing Visual Character or Quality.** Currently, the West Campus consists of a partially vacant lot with two unused buildings, unmaintained vegetation, and broken pavement. The Revised Project would replace the abandoned site with a new building, enhanced landscaping, and bicycle/pedestrian amenities that would complement the existing office development at the East Campus and the TE Connectivity site. The Revised Project would provide increased unity with its surroundings by creating contiguous landscape areas and an office setting.

The public view corridors identified in the certified EIR include Willow Road, Bayfront Expressway, and the residential areas of the Belle Haven neighborhood. Photomontages have been prepared from these corridors, depicting the Revised Project and the Previously Proposed Project.

*Bayfront Expressway/Willow Road Intersection (Viewpoint 4).* With development of the Previously Proposed Project (Figure 3.3-6a), the buildings would obstruct the majority of the Santa Cruz Mountain Range from Viewpoint 4. The Revised Project (Figure 3.3-6b) would also block views of the Santa Cruz Mountain Range, but some of the views would be preserved to the southwest. The proposed structure would add significant height and bulk at the West Campus over existing conditions; however, this viewpoint is not considered sensitive. These roadways are highly traveled and motorists only have fleeting views of the Santa Cruz Mountain Range due to the permitted speeds. Therefore, the views from the Bayfront Expressway/Willow Road intersection do not constitute sensitive views and motorists along these corridors are not considered sensitive viewers, resulting in a less-than-significant impact, as with the Previously Proposed Project.

*Belle Haven Neighborhood (Viewpoints 5 and 6).* Due to the flat topography, existing structures, and dense vegetation, background views of the areas surrounding the Belle Haven neighborhood are not visible. However, as shown in Figure 3.3-7 and Figure 3.3-8, streets that run perpendicular to Hamilton Avenue, such as Hollyburne Avenue and Madera Avenue, have channelized view corridors of the West Campus. From Viewpoint 5 at Hollyburne Avenue (Figure 3.3-7), the Revised Project building would be visible beyond the light-industrial uses that abut the Dumbarton Rail Corridor to the south. However, the majority of the building would be blocked by existing vegetation, which would remain under the Revised Project. In addition, one of the existing West Campus buildings is currently visible. A new building would be added to the West Campus under the Revised Project, with somewhat lower height and similar massing as the Previously Proposed Project. However, the increase in building mass from this view would not be substantial compared to existing conditions due to the demolition of the existing structure and the intervening vegetation and structures.

Viewpoint 6 from Madera Avenue (Figure 3.3-8) would include a view of the southern portion of the Revised Project building. As shown, the Revised Project building has slightly decreased height and similar scale and massing as the Previously Proposed Project. As with the Previously Proposed Project, the Revised Project building would be visually separated from the Belle Haven neighborhood by existing mature vegetation in the neighborhood and along the Dumbarton Rail Corridor and other dominant structures. As such, views of the Revised Project from the Belle Haven neighborhood would not be significantly altered, resulting in less-than-significant impacts as with the Previously Proposed Project.

a. Previously Proposed Project



b. Revised Project



10020154 | Menlo Park Facebook Campus Project

Source: Gensler, 2011; Facebook, 2013.

Figure 3.3-6  
Viewpoint 4: Bayfront Expressway/Willow Road

a. Previously Proposed Project



b. Revised Project



Source: Gensler, 2011; Facebook, 2013.

100020154 | Menlo Park Facebook Campus Project

Figure 3.3-7  
Viewpoint 5: Hollyburne Avenue Facing North

a. Previously Proposed Project



b. Revised Project



100020154 | Menlo Park Facebook Campus Project

Source: Gensler, 2011; Facebook, 2013.

Figure 3.3-8  
Viewpoint 6: Madera Avenue Facing North

*Overall Degradation of Existing Visual Character or Quality.* The Revised Project, as with the Previously Proposed Project, would replace the abandoned site with a new building, enhanced landscaping, and bicycle/pedestrian amenities that would complement the existing office development at the East Campus and the TE Connectivity site. The proposed site plan at the West Campus would provide increased unity by creating contiguous landscape areas and a building that would reflect a compatible architectural design. In addition, the Project Sponsor would be required to comply with the City's architectural review, as outlined in Section 16.68.020 of the Municipal Code.

The Revised Project would remove 534 existing trees at the West Campus, compared to 375 trees under the Previously Proposed Project. Assuming the No Green Roof Scenario, approximately 357 new trees would be planted, whereas the Previously Proposed Project would result in the planting of a total of 396 trees at the West Campus. As such, the Revised Project would result in 39 fewer trees than the Previously Proposed Project.<sup>8</sup> Nonetheless, the 357 new trees would be expected to adequately screen the majority of the Revised Project building from surrounding areas and the decrease in 39 trees from the Previously Proposed Project is not expected to make a perceivable difference.

Implementation of the Revised Project would substantially change the visual character of the site, similar to the Previously Proposed Project, but would not significantly alter the character of the surrounding areas due to the dense surrounding vegetation (particularly in the Belle Haven neighborhood) and flat topography. As such, although portions of the upper level of the Revised Project building and its mechanical roof equipment, would be visible from surrounding areas, this would not change the overall views to the extent that the visual character of the area would be substantially different or degraded. In addition, the Revised Project building, inclusive of all rooftop mechanical screening and east lobby roof, and the rooftop tent when erected (under the Green Roof Scenario), would measure approximately 73 feet in height; however, the majority of the roof would be at approximately 45 feet, compared to 56 to 74 feet under the Previously Proposed Project. Therefore, the overall height of the Revised Project would be less than the height of the Previously Proposed Project. Consequently, the Revised Project, similar to the Previously Proposed Project, would have a less-than-significant impact on the overall degradation of existing visual character and quality and may be considered an improvement over existing conditions. (LTS)

**AE-3: New Sources of Light and Glare.** As with the Previously Proposed Project, the Revised Project would add exterior lighting to an area where there is currently little to no lighting. The lighting standards under the Revised Project would comply with LEED and CALGreen performance standards designed to minimize light spillage from the building and site. The standard set by LEED reflects the intent of the minimum lighting standard for the West Campus. The design would also comply with CALGreen Light Pollution Reduction Standards. In addition, assuming the Green Roof Scenario (which would include additional rooftop lighting), the roof level would be designed to minimize the

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<sup>8</sup> Under the Green Roof Scenario, the Revised Project would include 562 total trees at the West Campus, compared to 396 trees under the Previously Proposed Project. This would be an increase of approximately 166 trees.

effects of lighting on dark skies with low-level lighting, where applicable, and full cut-off for path of egress and emergency lighting. Although these lighting density and control standards would attempt to minimize light pollution, the addition of a building and on-site activity under the Revised Project would result in similar potentially significant lighting impacts as the Previously Proposed Project.

The Revised Project could also create glare impacts, as with the Previously Proposed Project. Highly reflective surfaces at the West Campus could potentially cause impacts along major road corridors, such as Bayfront Expressway and Willow Road. The proposed building could include features such as canopies, handrails and stairs, skylights, glass curtainwalls, mechanical screenwalls, concrete columns, and windows. Building materials that could be used include, but would not be limited to, stainless steel, glass, painted Portland cement plaster, painted metal, corrugated fiberglass, sealed concrete, and welded wire mesh. However, at this time, the types of building materials and glass have not been finalized. As such, it is conservatively assumed that the Revised Project, similar to the Previously Proposed Project, would result in potentially significant glare impacts.

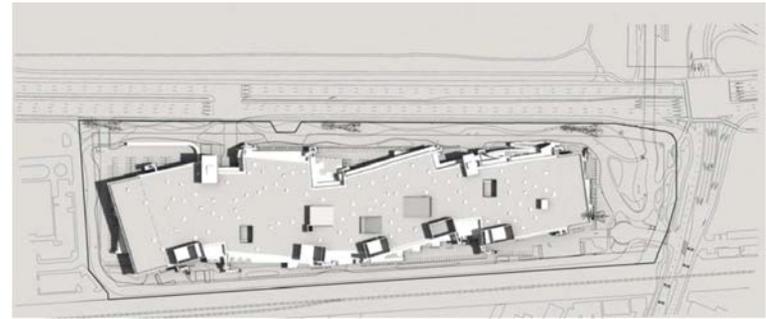
**MITIGATION MEASURES.** Mitigation Measures AE-3.1 and AE-3.2, as required by the certified EIR, would reduce potential light and glare impacts at the West Campus to a less-than-significant level. (PS/LTS)

Unlike the Previously Proposed Project, the Revised Project would not include a five-story parking garage that would be visible to surrounding areas. Under the Previously Proposed Project, light and glare from vehicle headlights on the levels of aboveground parking could be a nuisance to occupants of the surrounding light-industrial uses and the residential uses, and motorists on Bayfront Expressway. Vehicle headlights from the multi-level structure could potentially spill onto adjacent properties. The Revised Project would only include a ground-level parking garage, set back from Bayfront Expressway and the Belle Haven neighborhood. In addition, dense landscaping is proposed along the perimeter of the West Campus that would effectively block vehicle headlights from spilling outside of the parking garage. As such, the Revised Project would result in less-than-significant impacts from vehicle headlights and, unlike the Previously Proposed Project, would not require the implementation of Mitigation Measure AE-3.3. (LTS)

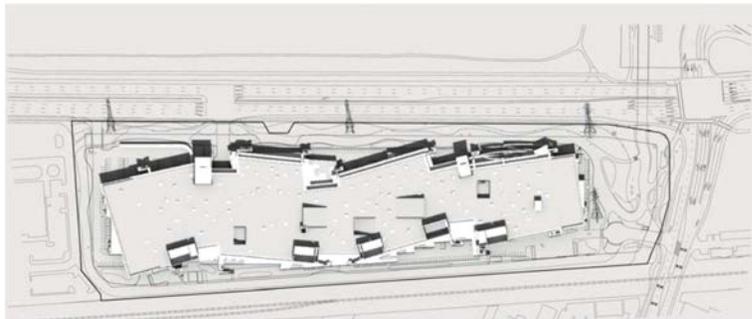
**AE-4: New Sources of Shadows.** The Revised Project would include one building, as opposed to five separate buildings and a parking structure under the Previously Proposed Project, with a somewhat smaller overall building height. As such, the shadow impacts from the Revised Project would be less than those from the Previously Proposed Project. Shadows from the Revised Project building would only extend outside the boundaries of the West Campus during the Winter solstice, as shown in Figure 3.3-9 and Figure 3.3-10. However, the shadows would not extend to public open spaces, such as the Bay Trail. As such, similar to the Previously Proposed Project, the Revised Project would result in less-than-significant shadow impacts. (LTS)



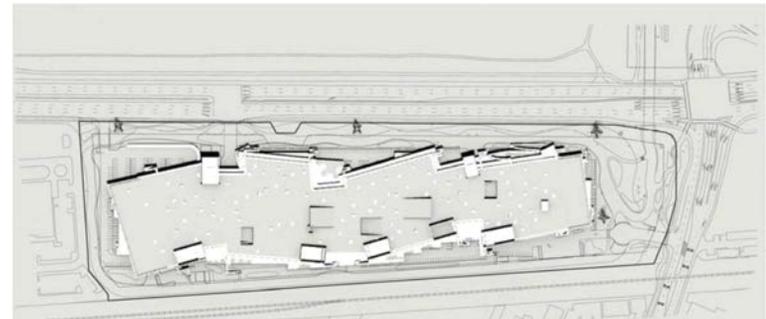
March 20, 9am



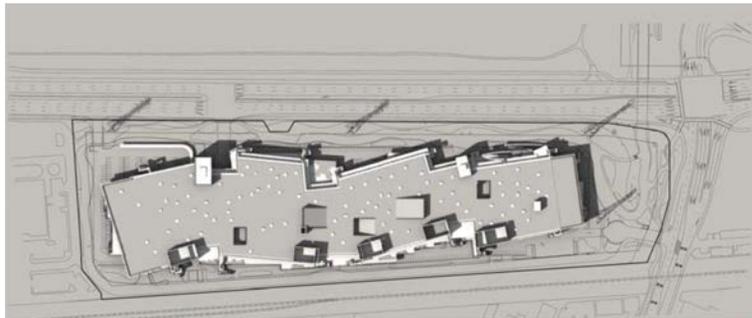
June 21, 9am



March 20, 12pm



June 21, 12pm



March 20, 3pm

### Spring Equinox (March 20) Shadows



June 21, 3pm

### Summer Solstice (June 21) Shadows

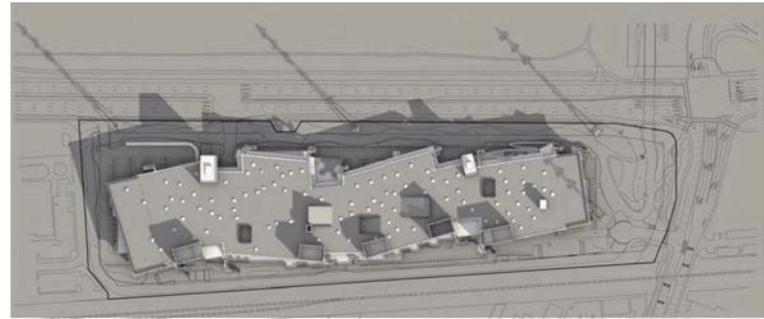
Source: Facebook, 2013.

1002015-4 | Menlo Park Facebook Campus Project

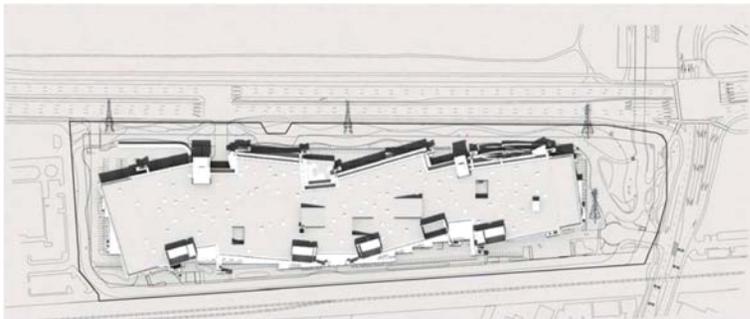
Figure 3.3-9  
Spring Equinox and Summer Solstice Shadows



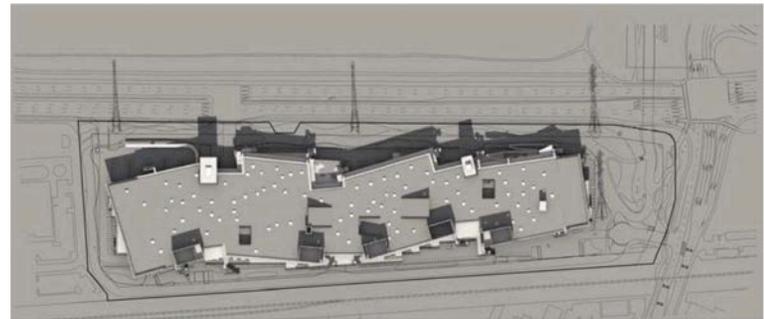
September 21, 9am



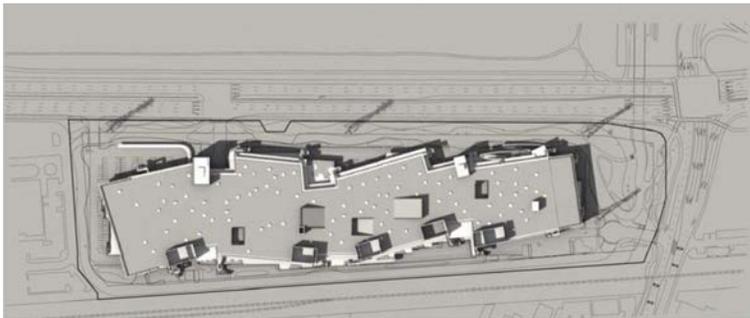
December 22, 9am



September 21, 12pm



December 22, 12pm



September 21, 3pm

### Fall Equinox (September 21) Shadows



December 22, 3pm

### Winter Solstice (December 22) Shadows

Source: Facebook, 2013.

Figure 3.3-10  
Fall Equinox and Winter Solstice Shadows

**Cumulative Impacts.** The Revised Project would result in similar bulk as the Previously Proposed Project, but a slightly reduced building height. As such, cumulative impacts would be similar. The generally 45-foot Revised Project building (73 feet including mechanical equipment and the rooftop tent when erected), and other projects in the area, could be visible from scenic viewpoints and sensitive receptors in the area. However, due to the flat topography, distance, intervening vegetation and development, and the relatively low-scale characteristics of the area, it is unlikely that the Revised Project and other cumulative projects would be viewed in the same context. In addition, the other nearby projects are speculative and the height, bulk, and lighting characteristics of these projects are currently unknown. As such, cumulative visual quality impacts are considered less than significant, similar to the Previously Proposed Project. (LTS)

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## 3.4 WIND

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### Summary of Previously Proposed Project

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**WD-1: Wind Impacts.** The Previously Proposed Project would have minimal wind shelter from northwest to north prevailing winds afforded by landscape trees. The Previously Proposed Project would result in the construction of five office buildings and one multi-level parking structure at the West Campus, ranging from two to five stories in height. Under the previous site plan, Building 1 would be exposed to prevailing winds. Building 1 was designed so that its long axis aligned across the prevailing wind direction, which suggests it would generate wind accelerations near the upwind corners. However, the expected accelerations would be elevated above pedestrian levels.

The gaps between Buildings 1 and 2 and Buildings 2 and 3 were found to have similar alignment as the gaps between buildings on the East Campus. Therefore, the spaces between West Campus buildings would experience wind effects similar to those at the East Campus, with winds extending to the pedestrian/outdoor corridor south of Buildings 1, 2, and 3 at the West Campus. Site plans for the Previously Proposed Project include five unenclosed elevated pedestrian bridges between buildings at the West Campus. The pedestrian bridges running east to west (between Buildings 1 and 2, Buildings 2 and 3, and Buildings 4 and 5) would be likely to experience accelerated wind due to the alignment of the gaps in the buildings with respect to prevailing winds and elevation above ground.

The previous analysis found that the exposure, massing, and alignment of the buildings on the West Campus would provide areas with accelerated winds, but the strongest winds would occur in areas not used by pedestrians, with the exception of the pedestrian bridges between Buildings 1 and 2, Buildings 2 and 3, and Buildings 4 and 5. The limited height of the structures would not result in hazardous winds, but uncomfortably windy conditions could be expected in parts of the central pedestrian/outdoor corridor and pedestrian bridges. The wind effects associated with the Previously Proposed Project would be limited to the West Campus and would not extend into surrounding neighborhoods. (LTS)

**Cumulative Impacts.** The analysis conducted for the Previously Proposed Project determined that, with the exception of the Menlo Gateway Project located approximately 1.5 miles from the West Campus, the cumulative projects were located far enough from the West Campus as to not affect cumulative wind conditions and/or building heights were not tall enough to result in significant wind-related impacts. Further, wind impacts from the Previously Proposed Project would not extend into surrounding neighborhoods to the south, or create an uncomfortable or hazardous environment along the Bay Trail to the north of Bayfront Expressway. Therefore, the Previously Proposed Project would not result in a cumulatively considerable contribution to cumulative wind impacts, resulting in a less-than-significant cumulative impact on wind conditions. (LTS)

## Impacts of Revised Project

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### Impacts Not to Be Evaluated

Due to changes in the building design, the Revised Project could result in different wind effects from those associated with the Previously Proposed Project. As such, wind impacts are evaluated in this section.

### Impacts to Be Evaluated

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The potential for this increase in 101 sf of building size would be minor in nature and would not affect the bulk and mass of the building to the extent that future wind conditions would change. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. Increasing building coverage from the proposed 50.34 percent to 55 percent would not result in a substantially larger building that would change wind impacts and the conclusions reached in the analysis below.

**WD-1: Wind Impacts.**<sup>9</sup> The Revised Project would result in construction of a single, large building at the West Campus primarily two stories in height with portions (lobbies, amenities and mechanical roofs) extending an additional floor in height. The proposed structure, inclusive of all rooftop mechanical screening and east lobby roof, and the rooftop tent when erected, would measure approximately 73 feet in height. However, the majority of the roof would be at approximately 45 feet. Since the Revised Project would include a single building rather than five buildings plus a parking structure, the massing of the Revised Project would be different from the Previously Proposed Project.

The exposure of the Revised Project to prevailing winds would be similar to the Previously Proposed Project, since the West Campus has little topographical shelter from prevailing winds. The overall west-to-east orientation of the West Campus would also be similar to the design evaluated for the Previously Proposed Project. However, because of building massing, the Revised Project would have wind impacts no greater than the design evaluated for the Previously Proposed Project, and would in some cases avoid wind/comfort impacts associated with the previous West Campus design. These findings are based on the following:

- The Revised Project would be of similar (slightly lower) height compared to the structures evaluated for the Previously Proposed Project. Similar to the Previously Proposed Project, the Revised Project would not result in hazardous wind conditions. Additionally, under the Revised Project, the building has a highly irregular shape with numerous cutouts and nonrectangular

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<sup>9</sup> Donald Ballanti, Certified Consulting Meteorologist, “Wind Impact Evaluation for the Revised West Campus of the Facebook Campus,” November 8, 2012. See Appendix 3.4.

corners, which means that there are no continuous, exposed building faces that could result in strong wind accelerations.

- The Revised Project would avoid the wind-exposed pedestrian bridges included in the Previously Proposed Project.
- The first-level parking garage would make the building “porous” such that strong wind-induced over-pressures and under-pressures, which cause wind accelerations, are not likely to occur at any building face, as pressure differences would be eased by air flowing through the garage.

Based on these findings, the Revised Project would result in a less-than-significant impact related to wind conditions at the West Campus, similar to, and less than, the Previously Proposed Project. (LTS)

**Cumulative Impacts.** As described above, the Revised Project would result in a less-than-significant impact to wind conditions at the West Campus and surrounding area. In some cases, the Revised Project would reduce the severity of wind-related impacts compared to the Previously Proposed Project. Similar to the Previously Proposed Project, the Revised Project would not result in wind impacts to surrounding public areas and, therefore, would not result in a cumulatively considerable contribution to cumulative wind impacts in the surrounding area, resulting in a less-than-significant cumulative impact. (LTS)

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## 3.5 TRANSPORTATION

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### Summary of Previously Proposed Project

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The certified EIR discusses transportation-related impacts associated with the Near Term 2015 East Campus Only Condition, Near Term 2018 East Campus and West Campus Condition, Cumulative 2025 East Campus Only Condition, and Cumulative 2025 East Campus and West Campus Condition. The Revised Project only focuses on the impacts arising from the West Campus and does not include changes to the East Campus. Consequently, this section addresses the proposed changes to the West Campus only and Impacts TR-1, TR-2, TR-3, TR-4, and TR-5 are not analyzed here, since they discuss the East Campus Only conditions. However, the traffic impacts for the West Campus alone were not analyzed because the EIR assumed that the West Campus would only be operational if the East Campus component of the Project were approved. As such, the below discussion includes the Near Term 2018 East Campus and West Campus Condition, and Cumulative 2025 East Campus and West Campus Condition, referred to as the “Project.”

**TR-6: Impacts on Intersections in the Near Term 2018 East Campus and West Campus Condition.** The following intersections would experience increases in average delay during the AM peak hour: Marsh Road/US 101 NB Ramps, Willow Road/Bayfront Expressway, Willow Road/Newbridge Street, and Willow Road/Middlefield Road. In addition, the PM peak hour would experience an increased average delay at the following intersections: Marsh Road/Bayfront Expressway, Willow Road/Bayfront Expressway, Willow Road/Newbridge Street, Willow Road/Middlefield Road, University Avenue/Bayfront Expressway, and Bayfront Expressway/Chrysler Avenue. These delays would result in potentially significant impacts on intersections.

MITIGATION MEASURES. Mitigation Measures TR-6.1 and TR-6.2, as required by the certified EIR, would implement a West Campus trip cap and intersection improvements to reduce impacts to intersections. However, intersection impacts would remain significant and unavoidable since many improvements would require obtaining additional right-of-way and several of these intersections are not under the City’s jurisdiction. (SU)

**TR-7: Impacts to Roadway Segments in the Near Term 2018 East Campus and West Campus Condition.** The net volume of daily trips added by the Project would be above the corresponding 100-vehicle threshold on the following Minor Arterial segments: Marsh Road (between Bay Road and the Dumbarton Rail Corridor), Willow Road (between Durham Street and Chester Street), and Willow Road (between Nash Avenue and Blackburn Avenue). This would result in a potentially significant impact to these roadway segments.

MITIGATION MEASURE. Mitigation Measure TR-7.1, as required by the certified EIR, would involve roadway improvements to mitigate or reduce the impacts on daily roadway segment operations. However, to improve daily roadway operations, the road would need to be widened

to add travel lanes. Since much of the City and surrounding areas are built out and right-of-way acquisitions would be required, the impact would be significant and unavoidable. (SU)

**TR-8: Impacts to Routes of Regional Significance in the Near Term 2018 East Campus and West Campus Condition.** Nine selected roadway segments within the Project vicinity are considered Routes of Regional Significance by the San Mateo County Congestion Management Plan. The overall Project-related trip generation would meet or exceed one percent of the existing roadway capacity for the following routes: NB SR-84 (between US 101 and Willow Road), SB SR-84 (between University Avenue and County Line), NB US 101 (north of Marsh Road), NB US 101 (between Willow Road and University Avenue), and SB US 101 (south of University Avenue). The Project would increase traffic that would exceed the current thresholds, resulting in a potentially significant impact.

MITIGATION MEASURE. Mitigation Measure TR-8.1, as required by the certified EIR, would involve roadway improvements to mitigate or reduce the impacts on Routes of Regional Significance. However, to improve conditions, these routes would need to be widened to add travel lanes. Since these roadways are not under the jurisdiction of the City and improvements would be costly to fund, the impact would be significant and unavoidable. (SU)

**TR-9: Impacts to Local Transit Systems in the Near Term 2018 East Campus and West Campus Condition.** Current public transportation in the Project vicinity is limited, with the Dumbarton Express the only route providing direct service to the Project site. With implementation of the proposed Transportation Demand Management (TDM) plan, additional shuttles would be provided by the Project Sponsor to meet the increase in rider demand. Therefore, the Project is not anticipated to add substantial demand for existing transit services and would result in less-than-significant impacts. (LTS)

**TR-10: Impacts to Local Bicycle or Pedestrian Facilities in the Near Term 2018 East Campus and West Campus Condition.** The Project would not result in any impacts to the adjacent bicycle or pedestrian facilities. However, implementation of the Previously Proposed Project at the West Campus would include improved bicycle, pedestrian, and people-mover connectivity between the two campuses. The Previously Proposed Project would provide a permanent grade-separated crossing of Bayfront Expressway for public access. As such, impacts to local bicycle and pedestrian facilities would be less than significant. (LTS)

**TR-11: Impacts on Intersections in the Cumulative 2025 East Campus and West Campus Condition.** The Cumulative 2025 East Campus and West Campus Condition would result in intersection delays during the AM and PM peak hours for the same intersections as listed above in Impact TR-6. These delays would result in potentially significant impacts on intersections.

MITIGATION MEASURES. Mitigation Measures TR-11.2 and TR-11.3,<sup>10</sup> as required by the certified EIR, would involve intersection improvements; however, impacts would be significant

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<sup>10</sup> Note that Mitigation Measure TR-11.1 applies to the Cumulative 2025 East Campus Only Condition and, therefore, is not applicable to the West Campus.

and unavoidable since many improvements would require obtaining additional right-of-way and several intersections are not under the City's jurisdiction. (SU)

**TR-12: Impacts to Roadway Segments in the Cumulative 2025 East Campus and West Campus Condition.** The net volume of daily trips added by the Project would be above the corresponding 100-vehicle threshold on the same Minor Arterial segments listed in Impact TR-7 above and also on Middlefield Road (between Linfield Drive and Survey Lane). This would result in a potentially significant impact to these roadway segments.

MITIGATION MEASURE. Mitigation Measure TR-12.1, as required by the certified EIR, would involve roadway improvements to mitigate or reduce the impacts on daily roadway segment operations. However, to improve daily roadway operations, the road would need to be widened to add travel lanes. Since much of the City and surrounding areas are built out, and right-of-way acquisitions would be required, the impact would be significant and unavoidable. (SU)

**TR-13: Impacts to Routes of Regional Significance in the Cumulative 2025 East Campus and West Campus Condition.** The overall Project-related trip generation would meet or exceed one percent of the existing roadway capacity for the routes listed above in Impact TR-8 and also on SR-84 (between Willow Road and University Avenue). The Project would increase traffic that would exceed the current thresholds, resulting in a potentially significant impact.

MITIGATION MEASURE. Mitigation Measure TR-13.1, as required by the certified EIR, would involve roadway improvements to mitigate or reduce the impacts on Routes of Regional Significance. However, to improve conditions, these routes would need to be widened to add travel lanes. Since these roadways are not under the jurisdiction of the City and improvements would be costly to fund, the impact would be significant and unavoidable. (SU)

**TR-14: Impacts to Local Transit Systems in the Cumulative 2025 East Campus and West Campus Condition.** With implementation of the proposed TDM plan, additional shuttles would be provided by the Project Sponsor to meet the increase in rider demand. Therefore, the Project is not anticipated to add substantial demand to the existing transit services and would result in less-than-significant impacts. (LTS)

**TR-15: Impacts to Local Bicycle or Pedestrian Facilities in the Cumulative 2025 East Campus and West Campus Condition.** Implementation of the Previously Proposed Project at the West Campus would include improved bicycle, pedestrian, and people-mover connectivity between the two campuses. The Previously Proposed Project would provide a permanent grade-separated crossing at Bayfront Expressway for public access. As such, impacts to local bicycle and pedestrian facilities would be less than significant. (LTS)

## Revised Project Impacts

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### Impacts Not to Be Evaluated

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project with regard to roadway segments, routes of regional significance, local transit systems, and local bicycle or pedestrian facilities in both the Near Term 2018 East Campus and West Campus Condition and the Cumulative 2025 East Campus and West Campus Condition because the Revised Project encompasses the same uses, square footage, and employee density as the Previously Proposed Project.

**TR-7 and TR-12: Impacts to Roadway Segments in the Near Term 2018 and Cumulative 2025 East Campus and West Campus Conditions.** The Revised Project would include the same number of employees (approximately 2,800) and the same TDM plan as the Previously Proposed Project. As such, traffic impacts at roadway segments are expected to be the same as associated with the Previously Proposed Project. In addition, the Revised Project would include 1,499 parking stalls compared to 1,544 stalls under the Previously Proposed Project. Therefore, it is possible that impacts to roadway segments could decrease slightly since less parking would be available, but not to an extent that would be noticeable.

Vehicle trips from construction traffic, including trucks hauling export materials, could temporarily increase traffic volumes at roadway segments. At the peak of construction activities, the Green Roof Scenario would result in a maximum of 228 truck trips per day, compared to approximately 210 truck trips per day under the Previously Proposed Project. Including construction worker trips,<sup>11</sup> the Revised Project would result in approximately 1,228 daily construction vehicle trips on Bayfront Expressway, compared to 1,210 daily construction vehicle trips with the Previously Proposed Project. Although daily construction vehicle trips would increase by 18 trips, this increase would not be significant enough to change the conclusions reached in the certified EIR. Like the Previously Proposed Project, the Revised Project during construction and operation would result in potentially significant impacts to roadway segments in the Near Term 2018 and Cumulative 2025 Conditions.

**MITIGATION MEASURES.** Mitigation Measure TR-7.1 and TR-12.1, as required by the certified EIR, would involve roadway improvements to mitigate or reduce the impacts on daily roadway segment operations. However, to improve daily roadway operations, the road would need to be widened to add travel lanes. Since much of the City and surrounding areas are built out, and right-of-way acquisitions would be required, the impact would be significant and unavoidable.  
(SU)

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<sup>11</sup> Construction worker trips assume a maximum of 250 workers per day and that every worker would generate four trips per day. The same assumptions used for the Previously Proposed Project applies to the Revised Project.

**TR-8 and TR-13: Impacts to Routes of Regional Significance in the Near Term 2018 and Cumulative 2025 East Campus and West Campus Conditions.** The Revised Project would include the same number of employees, the same TDM plan, and a slight decrease in parking as compared to the Previously Proposed Project. As such, traffic impacts to Routes of Regional Significance are expected to be the same as associated with the Previously Proposed Project. Like the Previously Proposed Project, the Revised Project would result in potentially significant impacts to Routes of Regional Significance in the Near Term 2018 and Cumulative 2025 Conditions.

MITIGATION MEASURES. Mitigation Measures TR-8.1 and TR-13.1, as required by the certified EIR, would involve roadway improvements to mitigate or reduce the impacts on Routes of Regional Significance. However, to improve conditions, these routes would need to be widened to add travel lanes. Since these roadways are not under the jurisdiction of the City and improvements would be costly to fund, the impact would be significant and unavoidable. (SU)

**TR-9 and TR-14: Impacts to Local Transit Systems in the Near Term 2018 and the Cumulative 2025 East Campus and West Campus Conditions.** Implementation of the proposed TDM plan would be the same under the Revised Project as under the Previously Proposed Project. As such, additional shuttles would be provided by the Project Sponsor to meet the increase in rider demand (which would be the same as the Previously Proposed Project, since the same number of employees is proposed). Therefore, the Revised Project is not anticipated to add substantial demand to the existing transit services and would result in less-than-significant impacts. (LTS)

**TR-10 and TR-15: Impacts to Local Bicycle or Pedestrian Facilities in the Near Term 2018 and the Cumulative 2025 East Campus and West Campus Conditions.** Implementation of the Revised Project would include the same improved bicycle, pedestrian, and people-mover connectivity between the two campuses. The Revised Project, like the Previously Proposed Project, would provide a permanent grade-separated crossing of Bayfront Expressway for public access. As such, impacts to local bicycle and pedestrian facilities would be less than significant. (LTS)

### **Impacts to Be Evaluated**

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. Transportation and traffic impacts are based on the proposed number of employees (approximately 2,800) rather than building area. As such, the potential increase of 101 sf would not change the below intersection analysis.

**TR-6 and TR-11: Impacts on Intersections in the Near Term 2018 and the Cumulative 2025 East Campus and West Campus Conditions.** The Revised Project would result in the same impacts on all intersections as analyzed for the Previously Proposed Project, except for potentially the intersections in the direct vicinity of the West Campus, such as the new intersection at the proposed driveway/Bayfront Expressway and Bayfront Expressway/Willow Road. This difference is due to changes in West Campus

access and vehicular circulation. The Previously Proposed Project included one signalized, full-access main driveway along Bayfront Expressway, approximately 800 feet west of the intersection with Willow Road. Two additional entry points were proposed, including a secondary right-in-only driveway on Bayfront Expressway west of the signalized driveway, and a right-in right-out (for all traffic), and left-in (for emergency vehicles only) driveway on Willow Road.

Under the Revised Project, the driveway locations and access/egress movements would remain consistent with the Previously Proposed Project, as shown in Figure 2-12 in Section 2, Project Description. However, the on-site circulation and layout have changed, which could affect queuing onto Bayfront Expressway and the intersection with Willow Road. The Revised Project would include surface-level parking under an elevated building spanning most of the site. The main drive aisle would span nearly the entire width of the site to maximize the driveway depth before drivers would need to turn. Instead of most traffic being directed to the entrance of a multi-level garage upon entry to the site (as under the Previously Proposed Project), vehicles would now be distributed across multiple parking aisles to access parking. Visitors would be directed to the western end of the site to park, while the east end of the site would be access-controlled for employees only. Gates would limit access into the employee parking area. Shuttle vehicles that enter into the western lot would access the shuttle drop-off area near the west lobby. The additional driveway length is also beneficial for outbound traffic storage in the PM peak hour, when southbound Bayfront Expressway (toward the Dumbarton Bridge) is more congested.

*Primary Bayfront Expressway Driveway.* The Revised Project would provide additional internal storage capacity for inbound and outbound traffic at the signalized driveway on Bayfront Expressway. This would allow additional time before drivers would encounter a potential conflict or delay, or need to make a decision to turn or park. The operating conditions of the West Campus signalized driveway were analyzed using traffic volume projections from the Near Term 2018 Plus Project Conditions from the certified EIR. Table 3.5-1 presents the level of service (LOS) results for the proposed intersection. As shown, the intersection is projected to operate at LOS B in the AM peak hour and a LOS D in the PM peak hour, both acceptable levels based on Caltrans and City thresholds. The critical movement for both AM and PM peak hour is the westbound left-turn from Bayfront Expressway into the West Campus.

	<b>AM Peak Hour</b>		<b>PM Peak Hour</b>	
	<b>Delay</b>	<b>LOS</b>	<b>Delay</b>	<b>LOS</b>
New Campus Signal/Bayfront Expressway	14.9	B	36.8	D

*Source:* Fehr and Peers, 2012.

*Secondary Bayfront Expressway Driveway.* Similar to the Previously Proposed Project, the secondary Bayfront Expressway driveway would provide right-in-only access from eastbound Bayfront

Expressway. Rather than entering the rear of the parking structure, the Revised Project would allow vehicles to enter the western surface-level parking area, to access approximately 350 stalls proposed in this area. A security control station would be located at this driveway, although no access-control or gates are proposed.

*Secondary Willow Road Driveway.* The secondary Willow Road driveway would provide inbound and outbound access. Shuttles traveling from the East Campus could enter this driveway and circulate into the parking lot. Traffic traveling to southbound US 101, East Palo Alto, Palo Alto, or Menlo Park are primarily expected to utilize this egress point. A security-control station is proposed upon entering this driveway, and an access-control gate is proposed to limit access to the employee parking lot.

*Queuing Analysis.* The access and egress locations and proposed intersection controls are consistent with the Previously Proposed Project. However, the site plan modifications do provide additional storage capacity for inbound and outbound traffic at the proposed signalized driveway. A reversible flow lane is proposed to improve traffic flow on site and accommodate the anticipated directionality of traffic, while minimizing the number of travel lanes needed. The Revised Project, including its placement of the security-control stations and access-control gates, is not anticipated to result in any queue spill back to Bayfront Expressway or Willow Road.

MITIGATION MEASURES. Mitigation Measures TR-6.1, TR-6.2, TR-11.2, and TR-11.3, as required by the certified EIR, would implement a West Campus trip cap and intersection improvements to reduce impacts to intersections. These mitigation measures (except for Mitigation Measure TR-6.2c, as discussed below) would still be applicable to the Revised Project. However, intersection impacts would remain significant and unavoidable since many improvements would require obtaining additional right-of-way and several of these intersections are not under the City's jurisdiction. (SU)

Mitigation Measure TR-6.2c has been revised since the certification of the EIR, but is unrelated to the impacts discussed above along Bayfront Expressway and Willow Road in the direct vicinity of the West Campus. Mitigation Measure TR-6.2c addresses intersection impacts in the Town of Atherton (Town). On July 2, 2012, the Town and the Project Sponsor executed the Memorandum of Agreement by and Between the Town of Atherton and Facebook, Inc. Regarding the Menlo Park Facebook Campus Project (Memorandum of Agreement). This Memorandum of Agreement replaces Mitigation Measure TR-6.2c from the certified EIR. As such, this mitigation measure has been revised as follows, with the underlines indicating new text and the strikethroughs denoting deleted text.

*TR-6.2 Intersection Improvements.* The operations at several of the intersections could be improved by modifying the intersection geometry to provide additional capacity. Some of these modifications may be made by restriping the existing roadway; however, others may require additional right-of-way to add travel lanes. These mitigation measures are not dependent on the West Campus vehicle trip cap. See Appendix 3.5-I for intersection conceptual layout plans for mitigation measures.

~~c. Marsh Road and Middlefield Road~~

~~The proposed mitigation measures for the intersection of Marsh Road and Middlefield Road include an additional southbound left turn lane on Middlefield Road and restriping an additional eastbound receiving lane, or similar traffic mitigations that reduce delay at the intersection to less than significant levels as defined by the Project EIR, or other improvements that substantially improve the level of service as determined by the City of Menlo Park.~~

~~The improvements would require potential additional right of way, widening the edge of pavement for the southbound direction of traffic into the existing landscape buffer, signing and striping improvements, and relocation of utility poles along Marsh Road, and modification to the existing traffic signal at the Marsh Road/Middlefield Road intersection.~~

~~Prior to the Development Agreement approval, the Project Sponsor shall prepare an updated construction cost estimate for the proposed mitigation measures at the intersection of Marsh Road and Middlefield Road for review and approval of the Public Works Director and the Town of Atherton. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall deposit its fair share contribution of the construction costs with the Town of Atherton, which is estimated to be 30.4 percent.~~

~~Funds will remain with the Town of Atherton for a seven year period from the effective date of the Development Agreement, after which funds will be returned to the Project Sponsor. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. Although the proposed mitigation would fully mitigate the impact, the impact remains **significant and unavoidable** because the intersection is under the jurisdiction of the Town of Atherton and the City cannot guarantee the mitigation measure would be implemented.~~

c. Memorandum of Agreement by and Between the Town of Atherton and Facebook, Inc. Regarding the Menlo Park Facebook Campus Project

Facebook shall comply with the Memorandum of Agreement by and Between the Town of Atherton and Facebook, Inc. Regarding the Menlo Park Facebook Campus Project dated July 2, 2012. The impact remains **significant and unavoidable** because the intersection is under the jurisdiction of the Town of Atherton.

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## 3.6 AIR QUALITY

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### Summary of Previously Proposed Project

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**AQ-1: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan.** The most current air quality plan for the region is the Bay Area Air Quality Management District's (BAAQMD) recently adopted 2010 Clean Air Plan. For consistency with the 2010 Clean Air Plan, a project must demonstrate that the population or Vehicle Miles Traveled (VMT) assumptions contained in the Clean Air Plan would not be exceeded and that the project implements Transportation Control Measures (TCMs) as applicable.

Full operation of the Previously Proposed Project would result in a vehicle trip generation of 15,956 trips per weekday. The addition of Project-related VMT represents approximately 0.13 percent of the total anticipated VMT growth in the nine county Bay Area. The Previously Proposed Project's contribution to VMT would not exceed the regional VMT projections and does not constitute a significant share of overall VMT for the Bay Area according to Metropolitan Transportation Commission's (MTC) VMT inventory. The Previously Proposed Project includes a Traffic Demand Management (TDM) program to reduce vehicular traffic and enhance non-automotive access to and within the Project site, thus reducing Project-related VMT. Development under the Previously Proposed Project is consistent with and supportive of the TCMs identified in the 2005 Ozone Strategy as critical to attaining the California Clean Air Act (CCAA) ozone standard. Therefore, impacts are considered less than significant. (LTS)

**AQ-2: Violation of Any Air Quality Standard.** The mass emissions associated with operation of the Previously Proposed Project are based on the estimates for area sources, natural gas energy use, and traffic associated with the Previously Proposed Project, as well as emergency generator testing. Emissions estimates for the Previously Proposed Project at the West Campus resulted in total emissions of 46 lbs/day reactive organic gases (ROG), 56 lbs/day nitrogen oxides (NO<sub>x</sub>), 47 lbs/day particulate matter (PM<sub>10</sub>), and 16 lbs/day fine particulate matter (PM<sub>2.5</sub>). Significance thresholds established by the BAAQMD are 54 lbs/day for ROG, NO<sub>x</sub> and PM<sub>2.5</sub> and 82 lbs/day for PM<sub>10</sub>. These average daily emissions resulted in annual emissions of 8.4 tons/year ROG, 11 tons/year NO<sub>x</sub>, 8.5 tons/year PM<sub>10</sub>, and 2.9 tons/year PM<sub>2.5</sub>. Significance thresholds are 10 tons/year for ROG, NO<sub>x</sub>, and PM<sub>2.5</sub> and 15 tons/year for PM<sub>10</sub>. As such, the development under the Previously Proposed Project would create new area and mobile sources of air pollutants that would generate emissions of NO<sub>x</sub> in exceedance of the significance thresholds. Therefore, this would be a potentially significant impact. At this time, there are no feasible mitigation measures that would reduce the NO<sub>x</sub> emissions to less than significant. This impact would be significant and unavoidable. (SU)

**AQ-3: Construction Criteria Air Pollutant Emissions.** Construction activities associated with the Previously Proposed Project would generate emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> that would not exceed significance thresholds. The criteria air pollutant emissions associated with the construction of

the West Campus are an estimate of average daily emissions over the construction period and would result in 22 pounds per day of ROG, 40 pounds per day of NO<sub>x</sub>, 2 pounds per day of PM<sub>10</sub> exhaust, and 2 pounds per day of PM<sub>2.5</sub> exhaust. Significance threshold for construction are the same as operational thresholds: 54 lbs/day for ROG, NO<sub>x</sub>, and PM<sub>2.5</sub> and 82 lbs/day for PM<sub>10</sub>.

MITIGATION MEASURE. Mitigation Measure AQ-3.1, as presented in the certified EIR, includes all appropriate dust control measures recommended by BAAQMD. Inclusion of these measures would ensure that construction-related impacts would remain at a less-than-significant level. (LTS)

**AQ-4: Localized Carbon Monoxide Impacts from Motor Vehicle Traffic.** The Previously Proposed Project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour, as maximum daily trips were estimated at 15,996. Because the Previously Proposed Project traffic would not increase traffic volumes at any one intersection above 24,000 vehicles per hour (total daily traffic is less than 24,000), the Previously Proposed Project would not generate carbon monoxide (CO) emissions that would exceed significance thresholds. Therefore, impacts are less than significant (LTS).

**AQ-5: Exposure to Toxic Air Contaminants (TACs).** A Health Risk Assessment (HRA) was conducted for the Previously Proposed Project that evaluated exposure of sensitive receptors to TACs and PM<sub>2.5</sub> concentrations from construction and operational sources. The maximally exposed individual sensitive receptor (MEISR) with respect to construction activities, emergency generator operation, and Previously Proposed Project traffic were identified.

BAAQMD requires that risks imposed by new sources be less than 10 in one million for cancer risks and that both chronic and acute impacts result in a health risk (HI) of less than 1.0. In addition, PM<sub>2.5</sub> concentrations must be less than 0.3 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). Unmitigated cancer risk, chronic HI, and PM<sub>2.5</sub> concentrations associated with the operation of onsite emergency generators are 1.33 per million, 0.013, and 0.069  $\mu\text{g}/\text{m}^3$ , respectively. Cancer Risk, chronic HI, and PM<sub>2.5</sub> concentrations associated with project specific traffic are 9.07 per million, 0.011, and 0.165  $\mu\text{g}/\text{m}^3$ , respectively. The unmitigated cancer risk, chronic HI, and PM<sub>2.5</sub> concentration at the MEISR for project construction are 14 in a million, 0.02, and 0.11  $\mu\text{g}/\text{m}^3$ , respectively, resulting in a potentially significant impact.

MITIGATION MEASURE. Implementation of Mitigation Measure AQ-5.1, as presented in the certified EIR, reduced the cancer risk, chronic HI, and PM<sub>2.5</sub> concentrations from construction emissions to 9.13 in a million, 0.014, and 0.16  $\mu\text{g}/\text{m}^3$ , respectively. As such, exposure to TACs was less than significant with implementation of mitigation. (PS/LTS)

**AQ-6: Exposure to Objectionable Odors.** The Previously Proposed Project would include on-site stationary source emissions related to periodic testing of emergency diesel generators. These emissions are not expected to have the potential for substantial odor impacts on local sensitive receptors. These generators would have advanced air emission control systems, would be well-maintained, and would

operate only briefly during periodic testing, or in the case of a power failure. None of the other activities associated with the Previously Proposed Project have the potential to expose nearby sensitive receptors, such as the Belle Haven neighborhood, to objectionable odors. Exposure to objectionable odors at the proposed development would be less than significant. (LTS)

**Cumulative Impacts.** Implementation of the Previously Proposed Project, in combination with other cumulative development in the City, would not conflict with or obstruct implementation of the applicable air quality plan. Additionally, the Previously Proposed Project, in combination with other development within the City, would be consistent with the Ozone Attainment Plan and the 2010 Clean Air Plan. This would be a less than significant cumulative impact.

The construction of the Previously Proposed Project was determined to be less than cumulatively considerable. All but one of the cumulative projects would have a less-than-significant impact when compared to the screening values. With the implementation of BAAQMD required mitigation, the Previously Proposed Project's related impacts were reduced to less than significant. This mitigation is required of all construction projects within the City. In addition, CO emissions would be less than significant on a project-level and other projects are not expected to violate this criterion.

However, the Previously Proposed Project, in combination with cumulative projects within the City, would result in an operationally cumulatively significant impact for ROG, NO<sub>x</sub>, and PM<sub>10</sub>. This would be considered cumulatively significant. The BAAQMD's significance thresholds state that when a project exceeds the BAAQMD's Project mass emission threshold for criteria air pollutants the project is automatically cumulatively considerable. Because no feasible mitigation has been identified for the Previously Proposed Project, the impact for ROG, NO<sub>x</sub>, and PM<sub>10</sub> emissions would be significant and unavoidable.

Cumulative risk with respect to TAC emissions in the Previously Proposed Project were determined to be significant and unavoidable. In combination with all existing and reasonably foreseeable future projects the MEISR's associated with the Previously Proposed Project would result in a maximum cancer risk of 176 per million, a maximum hazard index of 0.076 and a maximum PM<sub>2.5</sub> concentration of 1.3 μg/m<sup>3</sup>. These exceed the thresholds for cancer risk and PM<sub>2.5</sub> (100 per million and 0.8 μg/m<sup>3</sup>, respectively). The contribution from the Previously Proposed Project is less than 5 percent, and thresholds are exceeded at many of the receptors even without the project. As there are no feasible project related mitigation measures that will reduce the impacts to less than significant, cumulative health impacts remain significant and unavoidable. (SU)

## **Impacts of the Revised Project**

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### **Impacts Not to Be Evaluated**

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project with regards to conflicts with applicable air quality plans, localized CO impacts from traffic, and exposure to objectionable odors.

**AQ-1: Conflict with or Obstruct Implementation of an Applicable Air Quality Plan.** To demonstrate consistency with Applicable Air Quality Plans, a project must demonstrate that the population or VMT assumptions contained in the Clean Air Plan would not be exceeded and that the project implements TCMs as applicable. The Revised Project does not propose to increase employment or VMT beyond what was analyzed for the Previously Proposed Project; therefore, impacts from the Revised Project would be the same as the Previously Proposed Project with respect to plan consistency. (LTS)

**AQ-4: Localized Carbon Monoxide Impacts from Motor Vehicle Traffic.** The Revised Project is anticipated to result in the same number of trips as indicated for the Previously Proposed Project. The same number of employees are proposed to occupy the building (approximately 2,800) and a slight reduction in parking stalls would be included. As localized carbon monoxide impacts are determined by the number of vehicles queuing at any given intersection, and there are no changes in assumed trips or trip distribution, there would be no additional impacts with respect to carbon monoxide emissions. (LTS)

**AQ-6: Exposure to Objectionable Odors.** None of the activities associated with the Previously Proposed Project, including the implementation of the two emergency generators, would be likely to expose sensitive receptors to objectionable odors. As the Revised Project would not change the anticipated land use, the Revised Project also would not contain any of the listed land use types that could result in objectionable odor generation, nor does it include a new sensitive receptor that could be impacted by offsite odor generation. Further, the Revised Project would reduce the number of generators associated with the West Campus from three to two. Therefore, the impact of exposure to objectionable odors with respect to the Revised Project would be less than significant, identical to those of the Previously Proposed Project. (LTS)

### **Impacts to Be Evaluated**

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. This slight increase in building area and building coverage would not substantially change the construction assumptions. As a result, the analysis below would remain applicable.

**AQ-2: Violation of Any Air Quality Standard.** Criteria pollutant emissions result from traffic, area sources, and natural gas combustion associated with the operational activities of a project after build out. Emergency generator testing would also occur periodically and add to the emission of criteria pollutants. Project-specific information related to the generation of criteria pollutants has not changed between the Previously Proposed Project and the Revised Project except with respect to the emergency generators. Emissions from generator use are calculated based on generator specific emission rates. As non-generator related emissions do not change from the Previously Proposed Project these emissions

have not been remodeled. To determine the total criteria pollutants anticipated from the Revised Project, non-generator related emissions were taken directly from the certified EIR (model calculations are available in the certified EIR Appendix 3.6).

Because the number of generators has been reduced from three to two, and the capacity of the generators has increased, the emissions associated with the generators would change from that analyzed for the Previously Proposed Project. Table 3.6-1 compares the criteria pollutant emissions of the Revised Project to those of the Previously Proposed Project. As shown, although the number of generators would decrease, the size of the generators would increase. As such, the associated emissions would increase slightly on an average daily basis compared to the Previously Proposed Project. The exception to this is NO<sub>x</sub>, which shows a marked decrease between the previously anticipated generators and the new generators associated with the Revised Project. However, the overall emissions from the generators would be so minimal that, when included with the remaining criteria pollutants, the Revised Project would result in no change from the Previously Proposed Project in either total daily emissions or annual emissions. Assumptions associated with the modeling and calculations of generator emissions are included in Appendix 3.6-A and generator information is included as Appendix 3.6-B.

<b>Table 3.6-1</b>				
<b>Operational Criteria Air Pollutants</b>				
<b>Source Category</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b>DAILY EMISSIONS (AVERAGE LB/DAY)</b>				
<b>Previously Proposed Project</b>				
Non-Generator Emissions	46	55	47	16
Emergency Generators	0.02	1.4	0.001	0.007
<b>Total Average Daily Emissions</b>	<b>46</b>	<b>56</b>	<b>47</b>	<b>16</b>
<b>Revised Project</b>				
Non-Generator Emissions	46	55	47	16
Emergency Generators	0.04	0.37	0.01	0.01
<b>Total Average Daily Emissions</b>	<b>46</b>	<b>55</b>	<b>47</b>	<b>16</b>
<b>ANNUAL EMISSIONS (TONS/YEAR)</b>				
<b>Previously Proposed Project</b>				
Non-Generator Emissions	8.4	11	9	3
Emergency Generators	0.004	0.25	0.001	<0.007
<b>Total Average Daily Emissions</b>	<b>8</b>	<b>11</b>	<b>9</b>	<b>3</b>
<b>Revised Project</b>				
Non-Generator Emissions	8.36	11	8.5	2.9
Emergency Generators	0.007	0.07	0.002	0.002
<b>Total Average Daily Emissions</b>	<b>8</b>	<b>11</b>	<b>9</b>	<b>3</b>

Source: Atkins, 2013: Appendix 3.6-A generator emissions calculations.

The Previously Proposed Project reported potentially significant impacts for NO<sub>x</sub> due to the exceedance of 54 lbs per day. The Revised Project would result in a slight increase in generator emissions with the exception of NO<sub>x</sub>; however, even with the increased emissions in ROG, PM<sub>10</sub> and PM<sub>2.5</sub>, the new generators would not result in emissions that would exceed the regulatory thresholds. The Revised Project would reduce generator emissions and overall emissions with respect to NO<sub>x</sub> but not below the regulatory threshold, resulting in potentially significant impacts. At this time there are no feasible mitigation measures that would reduce the NO<sub>x</sub>, emissions from the generators or from other criteria pollutant sources such that emissions would reach a less-than-significant level. Therefore, impacts related to these emissions from the Revised Project remain significant and unavoidable. (SU)

**AQ-3: Construction Criteria Air Pollutant Emissions.** Criteria pollutant emissions from construction are primarily attributable to fuel use from construction equipment and worker commuting. The construction schedule and equipment list are based on information provided by the Project Sponsor<sup>12</sup> and included in Appendix 3.6-C. The construction schedule has changed from the Previously Proposed Project. Construction is anticipated to start later than in the Previously Proposed Project with altered construction phasing and phase scheduling. While it is unknown at this time if the Green Roof Scenario would be implemented, the construction of a green roof would require additional soil imports and additional equipment during the construction phases. Therefore, the Green Roof Scenario was analyzed as the conservative emissions scenario. CalEEMod™ was used to estimate the criteria pollutant emissions or construction activities. CalEEMod™ outputs are included as Appendix 3.6-D. The off-road equipment emissions were adjusted from the emissions estimate contained in the CalEEMod™ output to account for a 33 percent reduction attributable to overestimation of load factors, which ARB has indicated to be appropriate.<sup>13</sup>

Average daily emissions of criteria pollutants over the construction period from the Revised Project are approximately 12 pounds per day of ROG, 37 pounds per day of NO<sub>x</sub>, 2 pounds per day of PM<sub>10</sub> exhaust, and 2 pounds per day of PM<sub>2.5</sub> exhaust. Table 3.6-2 compares the average daily mass emissions from construction of the Revised Project to significance thresholds. As shown, construction emissions from the Revised Project are less than those estimated for the Previously Proposed Project. As with the Previously Proposed Project, the Revised Project construction activities would not exceed significance thresholds and, therefore, impacts would remain less than significant.

**MITIGATION MEASURE.** Mitigation Measure AQ-3.1, as presented in the certified EIR, includes all appropriate dust control measures recommended by BAAQMD. Inclusion of these measures would ensure that construction-related impacts as a result of the Revised Project, as

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<sup>12</sup> Fergus O'Shea, Facebook, electronic communication with Atkins, December 10, 2012.

<sup>13</sup> In September 2010, the ARB announced that its methods used to estimate the load factor for off-road equipment were incorrect and led to an overestimate of emissions by a factor of at least 33 percent. ARB is currently revising their emissions model, OFFROAD, which has not yet been released. In the meantime, we have received direction from ARB to reduce the load factors by a 33 percent to take into account this error and this will be accounted for into the analysis whether using OFFROAD directly or CalEEMod, which is based on OFFROAD. The slides from the ARB workshop discussing this change are available online at: [http://www.arb.ca.gov/msprog/ordiesel/documents/emissions\\_inventory\\_presentation\\_full\\_10\\_09\\_03.pdf](http://www.arb.ca.gov/msprog/ordiesel/documents/emissions_inventory_presentation_full_10_09_03.pdf).

with the Previously Proposed Project, would remain at a less-than-significant level for fugitive dust. (LTS)

<b>Table 3.6-2</b>				
<b>Revised Project Construction Criteria Air Pollutants</b>				
<b>Phase</b>	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b>REVISED PROJECT EMISSIONS</b>				
Demolition	268	2237.8	93.8	93.8
Site Prep I	241.2	2130.6	93.8	93.8
Grading II	53.6	348.4	40.2	26.8
Building Const I	67	643.2	26.8	26.8
Building Construction II	187.6	1219.4	93.8	93.8
Building Construction III	40.2	321.6	26.8	26.8
Building Construction IV	40.2	361.8	13.4	13.4
Building Construction V	348.4	1835.8	80.4	80.4
Building Construction VI	174.2	1433.8	40.2	40.2
Trenching	134	938	67	67
Site Preparation II	40.2	388.6	13.4	13.4
Site Preparation III	160.8	1072	80.4	80.4
Soil Import I	80.4	603	26.8	26.8
Soil Import II	13.4	147.4	13.4	13.4
Paving	160.8	964.8	80.4	80.4
Architectural Coating	3738.6	201	13.4	13.4
<i>Total # days</i>	<b>500.00</b>	<b>500.00</b>	<b>500.00</b>	<b>500.00</b>
<i>Total lbs</i>	<b>6177.40</b>	<b>18532.20</b>	<b>938.00</b>	<b>924.60</b>
<i>Average lbs/day</i>	<b>12.35</b>	<b>37.06</b>	<b>1.88</b>	<b>1.85</b>
<b>PREVIOUSLY PROPOSED PROJECT AVERAGE DAILY EMISSIONS (LBS/DAY)</b>				
	22	40	2	2

Source: Atkins 2013: CalEEMod emissions construction calculations.

**AQ-5: Exposure to Toxic Air Contaminants.** In order to evaluate the impacts of TACs and PM<sub>2.5</sub> on nearby existing sensitive receptors, an HRA was conducted consistent with BAAQMD CEQA Guidelines to determine local community risks and hazards. The HRA conducted for the Previously Proposed Project evaluated emissions associated with construction equipment at the West Campus, testing of emergency generators, and project traffic on nearby roadways. The traffic for the Revised Project would not change from the Previously Proposed Project and, therefore, modeled health risks associated with traffic would not change. However, construction activities would change between the

Previously Proposed Project and the Revised Project, but the emissions of PM<sub>10</sub> and PM<sub>2.5</sub> would be reduced from those of the Previously Proposed Project. Therefore, emissions and risk would be lower than reported in the certified EIR. Because the certified EIR reports a conservatively higher construction-related risk, remodeling of risk from construction activities was not warranted.

The Revised Project has changed the location, number, and type of emergency generators to be installed on the West Campus. Although there is one less generator with the Revised Project, the generators are located closer to sensitive receptors and, therefore, the risk was recalculated. Consistent with the methodology used for the Previously Proposed Project, the Revised Project analysis used the AERMOD model to determine risk from generator operations. While only the emissions from the generators were remodeled, because the sensitive receptors are existing receptors, the total project risk is the sum of the risk from the generators, project construction, and project generated traffic. Although construction and operational activities do not occur at the same time, the risk is cumulative over time. The health risks identified in this Addendum associated with construction and traffic have been incorporated from the certified EIR for the Previously Proposed Project. Because the location of the generators moved, the receptor that is most affected by the generators has also moved from what was reported in the Previously Proposed Project. As the receptor location has changed, the risk from Project construction and project related traffic would also change. Because traffic and construction were not remodeled, the risks from these sources associated with the new receptor location was calculated using the concentrations reported in the Previously Proposed Project analysis modeling output for the new location. The calculated construction-related risk for the Revised Project incorporates only the risks associated with the mitigated construction scenario for the Previously Proposed Project since the Revised Project must incorporate the construction mitigation measures specified in the certified EIR.

Table 3.6-3 shows the risk calculations from the Revised Project compared to the risk anticipated from the Previously Proposed Project. Assumptions, risk calculations, and the AERMOD output are included in Appendices 3.6-A, 3.6-B, and 3.6-E, respectively. Table 3.6-3 discusses the maximally exposed individual sensitive receptor (MEISR) with respect to each type of pollutant source (construction, generator operation, and project traffic). The receptor locations are numbered 1 for the MEISR affected by project construction, 2 for the MEISR affected by the operation of emergency generators, and 3 for MEISR affected by project traffic. For each MEISR, the estimated risk from the three sources is added together to determine the total risk for that specific MEISR.

As shown, risk to MEISR 1 from traffic and construction activities would not change; however, risk from the generators would increase by 0.01 in a million, resulting in a slight increase in risk over the Previously Proposed Project. Because the MEISR 2 location changed between the Previously Proposed Project and the Revised Project, the risk associated with each source has changed. Total risk to MEISR 2 is increased from that reported in the Previously Proposed Project. Risk to MEISR 3 from traffic and construction activities would not change; however, risk from the generators increases by 0.02 in a million, resulting in a slight increase in risk over the Previously Proposed Project analysis. However, even with the slight increase in risk resulting from operation of the generator, the total risk

for MEISR 3 would remain relatively unchanged between the two analyses. Therefore, despite the slight increase in risk, especially with respect to MEISR 1 and 2, no impacts would exceed the regulatory thresholds. Therefore, health impacts from the Revised Project would remain *less than significant* with the implementation of mitigation for construction identified for the Previously Proposed Project.

**Table 3.6-3  
Mitigated Project Health Impacts**

MEISR #	MEISR for Each Project Source	UTMx/ UTMy (M)	Source Contribution at MEISR	Lifetime Excess Cancer Risk (in a million)	Chronic HI	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )			
<b>Revised Project</b>									
1	Project Construction	574,724 / 4,148,425	Mitigated West Campus Construction <sup>a</sup>	9.10	0.0140	0.0900			
			West Campus Emergency Generators <sup>b</sup>	0.03	0.0003	0.0001			
			Project Traffic <sup>a</sup>	0.75	0.0005	0.0090			
			<b>Total Contributions</b>	<b>9.88</b>	<b>0.01</b>	<b>0.10</b>			
			<b>Previously Proposed Project<sup>a</sup></b>						
			Mitigated West Campus Construction	9.10	0.0140	0.0900			
West Campus Emergency Generators	0.022	0.000008	0.00004						
Project Traffic	0.75	0.0005	0.0090						
<b>Total Contributions</b>	<b>9.87</b>	<b>0.01</b>	<b>0.10</b>						
<b>Revised Project</b>									
2	Project Emergency Generator Testing	574,924 / 4,148,400	Mitigated West Campus Construction <sup>c</sup>	0.19	0.0731	0.0146			
			West Campus Emergency Generators <sup>b</sup>	0.06	0.0006	0.0001			
			Project Traffic <sup>c</sup>	1.01	0.0006	0.0126			
			<b>Total Contributions</b>	<b>1.26</b>	<b>0.0742</b>	<b>0.027</b>			
			<b>Previously Proposed Project<sup>a</sup></b>						
			Mitigated West Campus Construction	0.4	0.012	0.058			
West Campus Emergency Generators	0.034	0.000001	0.000063						
Project Traffic	0.90	0.0006	0.011						
<b>Total Contributions</b>	<b>1.33</b>	<b>0.013</b>	<b>0.069</b>						

**Table 3.6-3  
Mitigated Project Health Impacts**

MEISR #	MEISR for Each Project Source	UTMx/ UTMy (M)	Source Contribution at MEISR	Lifetime Excess Cancer Risk (in a million)	Chronic HI	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )			
<b>Revised Project</b>									
3	Project Traffic	574,734 / 4,147,461	Mitigated West Campus Construction <sup>a</sup>	0.06	0.0017	0.0090			
			West Campus Emergency Generators <sup>b</sup>	0.01	0.0001	0.0000			
			Project Traffic <sup>a</sup>	9.00	0.0090	0.1560			
			<b>Total Contributions</b>	<b>9.07</b>	<b>0.01</b>	<b>0.17</b>			
			<b>Previously Proposed Project<sup>a</sup></b>						
			Mitigated West Campus Construction	0.06	0.0017	0.0090			
West Campus Emergency Generators	0.012	0.000004	0.000019						
Project Traffic	9.00	0.0090	0.1560						
<b>Total Contributions</b>	<b>9.07</b>	<b>0.01</b>	<b>0.17</b>						
BAAQMD Significance Threshold				10	1	0.3			
Significant?				No	No	No			

- a. Values were taken directly from the Previously Proposed Project analysis.
- b. Values are the result of the remodeling conducted with respect to the changes in number and location of generators.
- c. Values were taken from the modeling output for the Previously Proposed Project with respect to the new MEISR location that resulted from the change in generator location and number.

MITIGATION MEASURE. Implementation of Mitigation Measure AQ-5.1, as presented in the certified EIR, would reduce the construction related cancer risk, chronic HI, and PM<sub>2.5</sub> concentrations to 9.13 in a million, 0.014, and 0.16 µg/m<sup>3</sup>, respectively. As such, exposure to TACs as a result of the Revised Project would be less than significant with implementation of mitigation. (PS/LTS)

**Cumulative Impacts.** The Revised Project, in combination with the cumulative projects identified in the certified EIR, would result in cumulatively significant impacts for NO<sub>x</sub>, as it is significant on a Project level. This is considered cumulatively significant since, according to significance thresholds, when a project exceeds the mass emission threshold for criteria air pollutants, these impacts are also considered cumulatively considerable.<sup>14</sup> As the Previously Proposed Project indicates significant and

<sup>14</sup> BAAQMD Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance, October 2009.

unavoidable cumulative impacts for violation of air quality standards, the Revised Project would not present any new impacts.

As with the Previously Proposed Project, the Revised Project has the potential to be cumulatively considerable when impacts are combined with other construction projects occurring at the same time within the project vicinity. Because the Revised Project would implement all of the required mitigations included in the certified EIR and because the project would be less than significant compared to the individual project thresholds, the Revised Projects contribution to cumulative impacts would be reduced to less than significant. The Revised Project does not result in any cumulative impacts beyond what was identified in the certified EIR.

The Previously Proposed Project identified all existing and foreseeable future TAC and PM<sub>2.5</sub> sources within 1,000 meters from the West Campus. These sources have not changed. The cumulative impacts from the Revised Project would add impacts to the existing stationary source and background traffic. Table 3.6-4 compares the cumulative Revised Project impacts with the Previously Proposed Project impacts and cumulative significance thresholds. As shown, both the Revised Project and Previously Proposed Project would exceed the cumulative thresholds for cancer risk and PM<sub>2.5</sub> concentrations with respect to the MEISR associated with project traffic. This would result in a cumulatively considerable impact for the Revised Project, but would not result in a change to the significance finding for the Previously Proposed Project. Consequently, no new impacts are identified. (SU)

**Table 3.6-4  
Cumulative Mitigated Project Health Impacts**

MEISR #	MEISR for each Project Source	UTMy (M) / UTMy (M)	Source Contribution at MEISR	Lifetime Excess Cancer Risk (in a million)	Chronic HI	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
<b>Revised Project</b>						
1	Project Construction	574,724 / 4,148,425	Mitigated West Campus Construction <sup>a</sup>	9.10	0.0140	0.0900
			West Campus Emergency Generators <sup>b</sup>	0.03	0.0003	0.0001
			Project Traffic <sup>a</sup>	0.75	0.0005	0.0090
			Other stationary Sources <sup>a</sup>	0.70	0.002	0.012
			Background Traffic <sup>a</sup>	29.00	0.011	0.18
			<b>Cumulative Total</b>	<b>40</b>	<b>0.023</b>	<b>0.29</b>
			<b>Previously Proposed Project<sup>a</sup></b>			
<b>Revised Project</b>						
2	Project Emergency Generator Testing	574,924 / 4,148,400	Mitigated West Campus Construction <sup>c</sup>	0.19	0.0731	0.0146
			West Campus Emergency Generators <sup>b</sup>	0.06	0.0006	0.0001
			Project Traffic <sup>c</sup>	1.01	0.0006	0.0126
			Other stationary Sources <sup>c</sup>	2.9	0.006	0.015
			Background Traffic <sup>c</sup>	30	0.0123	0.19
			<b>Cumulative Total</b>	<b>34.16</b>	<b>0.0925</b>	<b>0.23</b>

**Table 3.6-4  
Cumulative Mitigated Project Health Impacts**

MEISR #	MEISR for each Project Source	UTMy (M) / UTMy (M)	Source Contribution at MEISR	Lifetime Excess Cancer Risk (in a million)	Chronic HI	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
<b>Previously Proposed Project<sup>a</sup></b>						
			Mitigated West Campus Construction	0.40	0.012	0.058
			West Campus Emergency Generators	0.034	0.00001	6.3E-05
			Project Traffic	0.90	0.0006	0.011
			Other stationary Sources	2.9	0.006	0.015
			Background Traffic	30	0.011	0.19
			<b>Cumulative Total</b>	<b>35</b>	<b>0.039</b>	<b>0.32</b>
<b>Revised Project</b>						
			Mitigated West Campus Construction <sup>a</sup>	0.06	0.0017	0.0090
			West Campus Emergency Generators <sup>b</sup>	0.01	0.0001	0.0000
			Project Traffic <sup>a</sup>	9.00	0.0090	0.1560
			Other stationary Sources <sup>a</sup>	0.5	0.002	0.016
			Background Traffic <sup>a</sup>	167	0.062	1.07
			<b>Cumulative Total</b>	<b>176.57</b>	<b>0.074</b>	<b>1.256</b>
3	Project Traffic	574,734 / 4,147,461	<b>Previously Proposed Project<sup>a</sup></b>			
			Mitigated West Campus Construction	0.06	0.0017	0.0090
			West Campus Emergency Generators	0.012	0.000004	0.000019
			Project Traffic	9.00	0.0090	0.1560
			Other stationary Sources	0.5	0.002	0.016
			Background Traffic	167	0.062	1.07
			<b>Cumulative Total</b>	<b>176</b>	<b>0.076</b>	<b>1.3</b>
BAAQMD Significance Threshold				100	10	0.8
Significant?				Yes	No	Yes

- a. Values were taken directly from the Previously Proposed Project analysis.
- b. Values are the result of the remodeling conducted with respect to the changes in number and location of generators.
- c. Values were taken from the modeling output for the Previously Proposed Project with respect to the new MEISR location that resulted from the change in generator location and number.

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## 3.7 GREENHOUSE GAS EMISSIONS

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### Summary of Previously Proposed Project

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**CC-1: Greenhouse Gas Emissions.** Sources from the Previously Proposed Project would generate emissions of Greenhouse Gases (GHGs) that are below the Bay Area Air Quality Management District's (BAAQMD) significance thresholds. The emergency generator testing would result in emissions of 23 MT CO<sub>2</sub>e per year for the West Campus, which would be less than the stationary source threshold of 10,000 MT CO<sub>2</sub>e per year. The operational and amortized construction emissions would result in 4.4 MT CO<sub>2</sub>e per service population per year for the West Campus, which would be less than the 4.6 MT CO<sub>2</sub>e annual per service population threshold. Since the stationary source, amortized construction, and operational emissions for the Previously Proposed Project are all less than the applicable BAAQMD's thresholds, the impact of GHG emissions is less than significant. (LTS)

**CC-2: Conflicts with Applicable Plans and Policies.** The Previously Proposed Project would not conflict with any applicable plans or policies that do not require speculation as to future emission reductions that could occur based on technologies not yet developed. Therefore, the Previously Proposed Project's impact relative to conflicts with applicable Plans and Policies would be less than significant. (LTS)

### Impacts of Revised Project

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#### Impacts Not to Be Evaluated

Due to changes in the building design, the Revised Project would result in different GHG emissions than the Previously Proposed Project. As such, all GHG impacts, as included in the certified EIR, are evaluated in this section.

#### Impacts to Be Evaluated

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. This slight increase in building area and building coverage would not substantially change the construction assumptions. As a result, the analysis below would remain applicable.

**CC-1: Greenhouse Gas Emissions.** Consistent with the Previously Proposed Project analysis, San Mateo County CalEEMod™ defaults were used in the model runs unless otherwise noted in the Assumptions in Appendix 3.7-A. The CalEEMod™ output files are provided for reference in Appendix 3.7-B to this report.

*Construction Emissions.* GHG emissions from construction activities are primarily attributable to fuel use from construction equipment and worker commuting. The construction schedule and equipment list are based on information provided by the Project Sponsor<sup>15</sup> and included in Appendix 3.7-C. The construction schedule for the Revised Project has changed from the Previously Proposed Project. Construction is now anticipated to start later than anticipated for the Previously Proposed Project, with altered construction phasing, new equipment lists, and a longer construction period (24 months compared to 18 months). While it is unknown if the green roof contemplated under the Revised Project would be implemented, the construction of a green roof would require additional soil imports and additional equipment, making the Green Roof Scenario the more conservative emissions scenario. As such, in determining the Revised Project's emissions, the modeling assumes that a green roof would be constructed.

Consistent with the analysis for the Previously Proposed Project, the off-road equipment emissions were adjusted from the emissions estimate contained in the CalEEMod™ output to account for a 33 percent reduction attributable to overestimation of load factors, which Air Resources Board (ARB) has indicated to be appropriate.<sup>16</sup> The GHG emissions associated with construction of the Revised Project would total 1,349 MT CO<sub>2e</sub>, as shown in Table 3.7-1. In accordance with BAAQMD recommendations, the GHG emissions from construction and operational activities are combined to provide total annual emissions anticipated over the lifetime of the Project. Therefore, construction emissions are amortized over an anticipated 30-year lifetime and are added to operational emissions to determine project significance with respect to GHG emissions. Amortized Project-related construction emissions equal 45 MT CO<sub>2e</sub>. The Revised Project would emit fewer CO<sub>2e</sub> emissions when compared to the Previously Proposed Project, which was estimated to emit 1,711 MT CO<sub>2e</sub>.

*Operational Emissions.* Direct emissions from traffic and area sources and indirect emissions from energy, water use, wastewater, and waste management, would occur every year after build out of the Revised Project. Monthly emergency generator testing would also occur. There are certain sources of GHG emissions where project-specific information has not changed from the Previously Proposed Project analysis, including traffic, area sources and solid waste. The emissions from these sources, as documented in the Previously Proposed Project, have been included directly in the calculations for the Revised Project. For sources such as construction, energy use, and water use, where project specific data has changed, emissions have been remodeled. Modeling output is included in Appendix 3.7-B.

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<sup>15</sup> Fergus O'Shea, Facebook, electronic communication with Atkins, December 10, 2012. Attachments: Spreadsheet on Equipment 12.10.12.xlsx.

<sup>16</sup> In September 2010, the ARB announced that its methods used to estimate the load factor for off-road equipment were incorrect and led to an overestimate of emissions by a factor of at least 33 percent. ARB is currently revising their emissions model, OFFROAD, which has not yet been released. In the meantime, we have received direction from ARB to reduce the load factors by a 33 percent to take into account this error and this will be accounted for into the analysis whether using OFFROAD directly or CalEEMod™, which is based on OFFROAD. The slides from the ARB workshop discussing this change are available online at: [http://www.arb.ca.gov/msprog/ordiesel/documents/emissions\\_inventory\\_presentation\\_full\\_10\\_09\\_03.pdf](http://www.arb.ca.gov/msprog/ordiesel/documents/emissions_inventory_presentation_full_10_09_03.pdf).

**Table 3.7-1  
Summary of Construction GHG Emissions**

Construction Phase	CO <sub>2</sub> e Emissions		
	Equipment	Vehicles	Total
	MT <sup>a</sup>		
Demolition:	114	10	124
Site Prep I:	109	4	112
Grading I:	138	105	243
Grading II:	18	1	19
Building Const I:	47	4	51
Building Construction II:	60	15	75
Building Construction III:	17	7	24
Building Construction IV:	19	4	22
Building Construction V:	110	169	278
Building Construction VI:	80	32	112
Trenching:	51	5	56
Site Preparation II:	22	1	23
Site Preparation III:	62	13	75
Soil Import I:	12	46	58
Soil Import II:	9	1	10
Paving:	40	3	43
Architectural Coating:	9	14	23
<b><i>Total Revised Project</i></b>	<b><i>915</i></b>	<b><i>434<sup>c</sup></i></b>	<b><i>1,349</i></b>
Amortized Emissions <sup>b</sup>			45
<b><i>Total Previously Proposed Project</i></b>	<b><i>693</i></b>	<b><i>1,018<sup>c</sup></i></b>	<b><i>1,711</i></b>

Source: Atkins, 2013: CalEEMod™ modeling.

Notes:

- a. Emissions are rounded.
- b. Construction emissions are amortized over a 30-year project lifetime. Total construction emissions are divided by 30 years.
- c. The reduction in emissions is attributed to changes in the modeling assumptions including the fact that emissions decrease over time as vehicles become more efficient. Since the schedule changed from the Revised Project and the Previously Proposed Project, a more efficient fleet mix was assumed for the Revised Project.

Energy and water use estimates for the Revised Project were provided by the Project Sponsor.<sup>17,18</sup> As with the Previously Proposed Project analysis, the anticipated energy usage takes into account adjustments in energy consumption due to higher employee occupancy, improved building system energy use, and adjustments to account for California's current building codes and the Project Sponsor's commitment to sustainable efficiencies beyond current building code thresholds. Energy use included in the CalEEMod<sup>TM</sup> model was based on the Energy Demand Memorandum included as Appendix 3.7-D and water usage was based the assessment included as Appendix 3.7-E. Project specific energy and water use were included in the CalEEMod<sup>TM</sup> modeling to determine GHG emissions.

The Revised Project may include a green roof to reduce emissions. A green roof would reduce energy emissions for the Revised Project; however, it would increase water usage for irrigation purposes. Because it is unknown if the Green Roof Scenario would be implemented, a maximum worst-case was evaluated assuming a No Green Roof Scenario for energy usage and a Green Roof Scenario for water consumption in order to determine maximum operational emissions of GHGs for the Revised Project.

In addition, there would be two diesel-fired emergency generators installed at the West Campus. As provided by the Project Sponsor, the West Campus generators are anticipated to have a capacity of 500 KW and a testing duration of one hour each month. Each generator would result in 5.19 MT CO<sub>2</sub>e per year, for a total of approximately 10 MT CO<sub>2</sub>e per year from Revised Project associated stationary sources. Appendix 3.7-A contains the details of estimating the GHG emissions in CO<sub>2</sub>e associated with the emergency generator testing.

A summary of GHG emissions from the operation of the Revised Project, as compared to the Previously Proposed Project, are presented in Table 3.7-2, below. Based on the Previously Proposed Project analysis, the emissions for the West Campus were estimated to be 12,169 MT CO<sub>2</sub>e per year. Implementation of the Revised Project would result in emissions of 12,079 MT CO<sub>2</sub>e per year. With the amortized construction emissions included, total Revised Project emissions would be 12,124 MT CO<sub>2</sub>e per year, compared to 12,226 MT CO<sub>2</sub>e per year that were estimated for the Previously Proposed Project. As shown in Table 3.7-2 the Revised Project emissions are less than the Previously Proposed Project emissions. Therefore, as with the Previously Proposed Project, the Revised Project would not generate GHG emissions above the regulatory thresholds and, therefore, would remain less than significant for both project and cumulative impacts.<sup>19</sup> (LTS)

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<sup>17</sup> KEMA, Facebook Menlo Park West Campus Energy Demands, memorandum between Erik Dyrr, KEMA and City of Menlo Park, January 13, 2013.

<sup>18</sup> BKF, Facebook Menlo Park, West Campus Revised Project Water Demands, memorandum between BKF, Steve Tsuruoka, and Jennifer Renk, January 17, 2013.

<sup>19</sup> The Previously Proposed Project and the Revised Project would not generate enough GHG emissions to influence global climate change on their own. However, the Project would incrementally contribute to the global impact through its GHG emissions combined with the cumulative increase of all other anthropogenic sources of GHGs. Therefore, GHG emissions from a CEQA standpoint are evaluated on a cumulative basis with respect to project significance.

**Table 3.7-2  
Summary of Operational Emissions**

<b>Emission Category</b>	<b>Units</b>	<b>Previously Proposed Project<sup>a</sup></b>	<b>Revised Project<sup>b</sup></b>
Area		< 0.01	< 0.01
Energy Use		2,043	1,949
Water Use		30	34
Waste Disposed		357	357
Traffic	MT CO <sub>2</sub> e/yr	9,740	9,740
<b>Total Emissions</b>		<b>12,169</b>	<b>12,079</b>
Construction Amortized <sup>c</sup>		57	45
Total Plus Amortized Emissions		12,226	12,124
Service Population	Employees (SP)	2,800	2,800
<b>Emissions per Service Population</b>	MT	4.4	4.3
<b>Efficiency Metric Significance Threshold</b>	CO <sub>2</sub> e/yr/SP	4.6	
Emergency Generator Testing		23	10
Stationary Source Significance Threshold	MT CO <sub>2</sub> e/yr	10,000	

*Sources:*

- a. Final Menlo Park Facebook Campus Project EIR 2012 Section 3.7: Original analysis for area, waste, and traffic source emissions.
- b. Atkins, 2012: CalEEMod™ modeling for Construction, Energy, and Water use.

*Note:*

- c. Construction emissions are amortized over a 30-year project lifetime. Total construction emissions are divided by 30 years.

**CC-2: Conflicts with Applicable Plans and Policies.** The Revised Project is consistent with AB 32 goals because it is consistent with the BAAQMD’s AB 32 derived per-capita efficiency threshold<sup>20</sup> of 4.6 MT CO<sub>2</sub>e per service population per year as described under Impact CC-1. The BAAQMD threshold was based on the 1990 GHG emission level divided by the Revised Project’s estimated service population for 2020. Since the Revised Project’s GHG emissions fall below the threshold derived from AB 32 attainment goals, the Revised Project would not conflict with AB 32 and its associated planning efforts, similar to the Previously Proposed Project.

The Revised Project would implement the same sustainability strategies as were identified for the Previously Proposed Project and analyzed in the certified EIR. Therefore, as with the Previously Proposed Project, the Revised Project would be consistent with the City of Menlo Park’s 2011 Climate

<sup>20</sup> BAAQMD Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance. October 2009.

Action Plan Assessment Report, as it is consistent with all of the strategies that would reasonably be applied to a land use development project.

Beyond the goals of AB 32, Executive Order S-3-05, and SB 375 sets additional goals for the further reduction of GHG emissions. While AB 32 reaches the S-3-05 objective for reducing GHG emissions to 1990 levels by 2020, there currently are no sufficient technologies available to meet the additional S-3-05 goal of reducing emissions to 80 percent below 1990 emissions by 2050. Further, while SB 375 proposes compliance with a Sustainable Communities Strategy (SCS), the SCS has not yet been developed for the Bay Area. Therefore, there are no relevant metrics by which to compare the Revised Project to these additional reduction goals.

Based on the discussion above, the Revised Project would not conflict with any applicable plans or policies that do not require speculation as to future emission reductions based on technologies not yet developed. Therefore, the Revised Project, as with the Previously Proposed Project, would result in a less-than-significant impact relative to conflicts with applicable plans and policies. (LTS)

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## 3.8 NOISE

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### Summary of Previously Proposed Project

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**NO-1: Exposure to Excessive Noise Levels.** The addition of traffic with implementation of the Previously Proposed Project would further increase traffic noise levels above the City's standards for residential uses. Because the existing noise levels along the major arterials in the City already are above the City standards, these noise levels would continue to be above the City standards in the near-term and long-term with the addition of Project-related traffic. Operation of the Previously Proposed Project would implement a trip cap of 6,350 daily trips, which would result in a maximum noise level increase of 1 dBA. The Previously Proposed Project would include a Transportation Demand Management (TDM) program that sets forth a variety of measures designed to reduce the number of daily trips. However, the TDM program may not reduce trips enough to reduce the Previously Proposed Project's contribution to traffic noise to a less-than-significant level. As such, the traffic noise impacts would remain significant and unavoidable. (SU)

Operation of the Previously Proposed Project would consist of typical office operations. Noise sources associated with office uses include an increase in human activity; heating, ventilation, and air conditioning (HVAC) systems; parking lot and garage noise; truck pick-ups and deliveries; and emergency generator testing. The Previously Proposed Project's changes to the operational noise levels at the West Campus would be less than significant. However, operation of the West Campus would involve new emergency generator testing that would have the potential to exceed the Noise Ordinance noise level limit for residential land uses, resulting in a potentially significant impact.

MITIGATION MEASURES. Implementation of Mitigation Measures NO-1.1 and NO-1.2, as presented in the certified EIR, would require emergency generators to be shielded and would limit generator testing to daytime hours, resulting in a less-than-significant impact. (PS/LTS)

**NO-2: Temporary Increases in Ambient Noise Level.** Construction of the West Campus would not result in significant impacts related to sleep disturbance or damage during pile driving. However, groundborne vibration-related impacts to buildings within 225 feet of general construction activities and 900 feet of pile-driving activities could occur if such buildings include vibration-sensitive equipment. Due to the research and development nature of these uses, it is assumed that there is vibration-sensitive equipment within these distances, thus the Previously Proposed Project's impact to vibration-sensitive equipment would be potentially significant.

MITIGATION MEASURES. Implementation of Mitigation Measures NO-2.1 and NO-2.2, as included in the certified EIR, would require the notification of nearby businesses of potential impacts to vibration-sensitive equipment uses and best management practices. Even though implementation of these measures would reduce groundborne vibration impacts from construction, vibration-sensitive equipment at the TE Connectivity site, the Menlo Science and

Technology Park (AMB), and other commercial facilities (if identified), could still be exposed to excessive construction-generated vibration levels. Therefore, the Previously Proposed Project would result in significant and unavoidable impacts. (SU)

**NO-3: Substantial Permanent Increase in Noise Level.** Potential permanent increases in noise level associated with the Previously Proposed Project would include roadway noise, an increase in human activity, and HVAC systems. As discussed above, the Previously Proposed Project would result in a significant increase in local traffic noise levels on Marsh Road and Willow Road. Noise from the increase in human activity and use of new HVAC systems at the West Campus would not exceed the City's noise standards on-site or at the adjacent land uses. Therefore, this impact would be less than significant. However, implementation of the Previously Proposed Project would result in a significant increase in noise level on Marsh Road and Willow Road. No feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level, resulting in significant and unavoidable impacts. (SU)

**NO-4: Substantial Temporary Increase in Noise Level.** Vehicle trips during construction of the West Campus would not result in significant noise impacts. However, operation of heavy construction equipment would generate a substantial increase in ambient noise and would potentially exceed the City's Noise Ordinance standards. The impact is considered potentially significant.

MITIGATION MEASURE. Implementation of Mitigation Measure NO-4.1, as required in the certified EIR, would reduce construction noise to a less-than-significant level. (PS/LTS)

**Cumulative Impacts.** The Previously Proposed Project, in combination with other development in the City, could result in a substantial increase in exposure of persons to noise in excess of the standards established in the General Plan or Municipal Code due to traffic. The Previously Proposed Project's contribution to the exceedance of the noise thresholds from vehicular traffic would be cumulatively considerable. Since there is no mitigation measure to reduce this impact, it would be significant and unavoidable. (SU)

## **Impacts of Revised Project**

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### **Impacts Not to Be Evaluated**

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project relative to noise from operational traffic, HVAC equipment, and construction traffic.

**NO-1: Exposure to Excessive Noise Levels and NO-3: Substantial Permanent Increase in Noise Level (Traffic Noise).** Traffic trips generated as a result of the Revised Project would not increase since the same number of employees would work at the West Campus and a similar (less, in fact) amount of parking stalls would be provided. As such, traffic noise impacts and the significance conclusions presented in the certified EIR (Impacts NO-1 and NO-3) would remain the same. The Revised Project would still result in a maximum noise level increase of 1 dBA and would remain significant and unavoidable. (SU)

**NO-1: Exposure to Excessive Noise Levels and NO-3: Substantial Permanent Increase in Noise Level (HVAC Equipment).** HVAC noise impacts as a result of the Revised Project would not increase. As with the Previously Proposed Project, HVAC equipment would be located on the roof of the Revised Project and shielded by the roof itself and the surrounding enclosures. Therefore, it is expected that HVAC noise levels due to the Revised Project would be similar to what was analyzed for the Previously Proposed Project. As such, HVAC equipment impacts and the significance conclusions presented in the certified EIR (Impacts NO-1 and NO-3) would remain the same. This impact would remain less than significant. (LTS)

### **Impacts to Be Evaluated**

As with the Previously Proposed Project, the Revised Project would have the potential to cause noise impacts within the immediate area of the West Campus and has the potential to be impacted by existing noise sources. The Revised Project includes revisions to construction schedules and activities, a revised configuration and location for parking, revised and redesigned on-site outdoor activity areas, and relocation of emergency generators, which includes the use of enclosures. These revisions are discussed below.

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. This slight increase in building area and building coverage would not substantially change the construction assumptions. As a result, the analysis below would remain applicable.

**NO-1: Exposure to Excessive Noise Levels.** Revisions to the parking lot, garage area, and emergency generator locations under the Revised Project would likely result in fewer noise impacts than the Previously Proposed Project. Parking activities, truck pick-ups, and deliveries would be conducted in the parking area that would be located primarily under the new office building. The adjacent land uses would only be exposed to a minor amount of noise associated with parking activity that would be limited to the edges of the ground-level parking area. Under the Revised Project, all deliveries and pick-ups would be conducted under the office building. It should be noted that the adjacent land uses are not considered noise sensitive and the closest noise sensitive receptor is approximately 315 feet to the south of the West Campus perimeter. As such, the Revised Project would result in less-than-significant impacts related to noise from parking and on-site deliveries, similar to the Previously Proposed Project.

The Revised Project would include two new emergency generators, located on the ground level of the West Campus. These emergency generators would be located along the southern perimeter of the West Campus and would be housed in enclosures. The Previously Proposed Project included three new emergency generators located on the rooftops of the buildings. The westernmost of the new emergency generators would be located approximately 400 feet from the nearest residential property line and

500 feet from western project boundary line. As the emergency generators would be housed within enclosures and would be blocked from the nearest residential use line of site due to intervening structures, the noise levels from the emergency generator testing would be similar to, if not reduced from, what was analyzed for the Previously Proposed Project. Nonetheless, the Revised Project could still have the potential to exceed the Noise Ordinance noise level limit for residential land uses, resulting in a potentially significant impact.

MITIGATION MEASURES. Implementation of Mitigation Measures NO-1.1 and NO-1.2, as presented in the certified EIR, would require emergency generators to be shielded and would limit generator testing under the Revised Project, resulting in a less-than-significant impact. (PS/LTS)

**NO-2: Temporary Increases in Ambient Noise Level.** Construction of the Revised Project would not result in significant impacts related to sleep disturbance or damage during pile driving. Additionally, the Project Sponsor has indicated that all pile driving activity would be conducted by Augercast displacement, rather than impact pile-driving. However, groundborne vibration-related impacts to buildings within 225 feet of general construction activities and 900 feet of pile-driving activities could still occur if such buildings include vibration-sensitive equipment. The Revised Project would increase the number of piles required to be driven to support the proposed office building. The impact would remain potentially significant, similar to the Previously Proposed Project, but the duration of the impact would be longer due to the increased number of piles.

MITIGATION MEASURES. Implementation of Mitigation Measures NO-2.1 and NO-2.2, as included in the certified EIR, would require the notification of nearby businesses of potential impacts to vibration-sensitive equipment uses and best management practices. Even though implementation of these measures would reduce groundborne vibration impacts, sensitive receptors could still be exposed to excessive construction-generated vibration levels, and for a potentially longer duration than assumed under the Previously Proposed Project. Therefore, the Revised Project would result in significant and unavoidable impacts, as with the Previously Proposed Project. (SU)

**NO-4: Substantial Temporary Increase in Noise Level.** The Revised Project's vehicle trips during construction of the West Campus would not result in significant noise impacts. A similar amount of construction workers would be required for the Revised Project as for the Previously Proposed Project, resulting in generally the same amount of vehicle trips to the West Campus. Vehicle trips from construction traffic, including trucks hauling export materials, could temporarily increase noise levels along area roadways. Including construction worker trips,<sup>21</sup> the Revised Project would result in approximately 1,228 daily trips on Bayfront Expressway, compared to 1,210 daily trips with the Previously Proposed Project. Although daily trips would increase slightly, the addition of 18 vehicles

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<sup>21</sup> Construction worker trips assume a maximum of 250 workers per day and that every worker would generate four trips per day. The same assumptions used for the Previously Proposed Project applies to the Revised Project.

would not add perceptible traffic noise over the conditions analyzed in the certified EIR. Therefore, the 1,288 daily trips under the Revised Project would not significantly increase the noise level above existing conditions. Individual truck pass-bys could be audible to nearby land uses, but no changes in ambient noise levels during construction would occur. Similar to the Previously Proposed Project, the Revised Project would result in less-than-significant noise impacts from truck trips and construction worker trips.

However, the Revised Project would increase the construction schedule from 18 months to 24 months, extending construction noise over a longer period of time. In addition, the Revised Project increases the number of piles to be driven at the West Campus to support the revised office building. The noise levels associated with pile driving would be the same as what was analyzed in the Previously Proposed Project. The impact would remain potentially significant, but the duration of the impact would be longer due to the increased number of piles.

MITIGATION MEASURE. Implementation of Mitigation Measure NO-4.1, as required in the certified EIR, would reduce construction noise to a less-than-significant level. (PS/LTS)

**Cumulative Impacts.** Implementation of Mitigation Measures NO-1.1 would reduce cumulative noise levels to below the existing noise level along Willow Road. However, as discussed for the Previously Proposed Project, the Revised Project would cause a cumulative increase in existing traffic noise levels along other roadway network. The Revised Project's contribution to the exceedance of the noise thresholds from vehicular traffic would remain cumulatively considerable. Since there is no mitigation measure to reduce this impact, it would be significant and unavoidable, similar to the Previously Proposed Project. (SU)

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## 3.9 BIOLOGICAL RESOURCES

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### Summary of Previously Proposed Project

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**BR-1: Impacts on Special-Status Species at the Project Site.** Pallid bats and other potential crevice-roosting bat species are the only mammal species that have a moderate likelihood of occurrence in the vicinity of the West Campus. Pallid bats could roost in crevices on the exterior of the existing unoccupied buildings and in hollow trees. Hoary bats, which have a moderate likelihood of occurrence, could roost in the foliage of trees. With implementation of the Previously Proposed Project, the existing buildings on the West Campus would be demolished and approximately 375 trees would be removed. Removal of trees and removal of or modification to buildings containing active bat roosts, particularly during the nesting season (typically April through August), could result in the loss of individual bats, bat colonies, or their habitat.

In addition, a small area of marginally suitable habitat for burrowing owls is present in the eastern portion of the West Campus. Burrowing owls have been designated by the California Department of Fish and Game (CDFG) as a California Species of Concern. Although no burrowing owls have been observed at the West Campus, in the unlikely event that owls were to move onto the site and begin breeding, construction activities could impact these owls. Loss of individual owls, disruption to active burrowing owl nests, the abandonment of young, or the loss of young through vegetation removal and grading would be a potentially significant impact.

MITIGATION MEASURES. Mitigation Measures BR-1.1 and BR-1.2, as presented in the certified EIR, would ensure that the Previously Proposed Project's impacts with respect to bats and burrowing owls would be less than significant. (PS/LTS)

**BR-2: Indirect Impacts on Special-Status Species Inhabiting the Adjacent Water Marshes.** The Previously Proposed Project would result in a net increase in buildings, building height, and possibly tall trees on the West Campus that could serve as new or additional perching or nesting opportunities. The proposed buildings and trees would provide raptors or other predatory birds a vantage point from which to prey on special-status species in the adjacent salt marshes. Loss of individual western snowy plover, salt marsh harvest mouse, or other special-status bird or mammal species as a result of increased predation by raptors or other predatory birds would be potentially significant.

MITIGATION MEASURES. Mitigation Measure BR-2.1, as required by the certified EIR, would reduce the potentially significant impacts due to increased raptor predation at the West Campus to less than significant. (PS/LTS)

**BR-3: Loss of Riparian and Other Habitats, Including Wetlands as Defined by Section 404 of the Clean Water Act.** Based upon field surveys of the West Campus, no natural habitat, wetlands, or waters of the U.S. are present within its boundaries. While salt marshes, which are considered a sensitive habitat, occur near the West Campus to the north, the West Campus is separated from the

marshes by the Bayfront Expressway and a levee. Project activities on the West Campus would occur within the existing developed and formerly developed boundaries. Since there is no riparian habitat, salt marsh, state or federally protected wetlands, and/or other sensitive natural community present in any portion of the West Campus, impacts on any riparian habitat, or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG or U.S. Fish and Wildlife Service (USFWS), are considered less than significant. (LTS)

**BR-4: Impacts to Wildlife Corridors or Nursery Sites.** Existing shrubs and trees on the West Campus could provide nesting habitat for a variety of native migratory birds. However, most or all of the existing vegetation along the perimeter of the property, along with those associated with the landscaping around the existing buildings on the West Campus would be removed. If nesting migratory birds are present, then tree and shrub removal associated with the redevelopment of the West Campus could result in the loss of those birds. As such, disruption of nesting birds, resulting in the abandonment of active nests, or the loss of active nests through structure removal, would be a potentially significant impact.

MITIGATION MEASURE. Mitigation Measure BR-4.1, as required by the certified EIR, would reduce the potentially significant impacts to nesting migratory birds at the West Campus to less than significant. (PS/LTS)

**BR-5: Conflicts with any Local Policies or Ordinances Protecting Biological Resources.** The Previously Proposed Project would not result in conflicts with Chapter 13.24 of the City's Municipal Code (Heritage Tree Ordinance). There are 233 trees on the West Campus that qualify as heritage trees under the City's Heritage Tree Ordinance. Approximately 89 of these trees would be removed during construction of the Previously Proposed Project. Removal of heritage trees without first obtaining an appropriate permit from the Director of Public Works and payment of a fee is prohibited. As a part of obtaining a tree removal permit, the Project Sponsor must be in compliance with the Heritage Tree Ordinance. Since compliance with the tree ordinance is mandatory, this impact would be considered less than significant. (LTS)

**Cumulative Impacts.** Removal of buildings, trees, shrubs, or other wood vegetation associated with the construction of the Previously Proposed Project and other cumulative development could result in impacts to roosting bats, burrowing owls, and nursery sites. However, implementation of Mitigation Measures BR-1.1, BR-1.2, and BR-4.1 would reduce these impacts to less than cumulatively considerable. In addition, construction of new multi-story buildings associated with the Previously Proposed Project and other cumulative development would result in indirect effects on special-status bird and mammal species in the adjacent marshes due to increased raptor predation. Implementation of Mitigation Measure BR-2.1 would reduce this impact to less than cumulatively considerable. (PS/LTS)

## Impacts of Revised Project

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### Impacts Not to Be Evaluated

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project with regards to loss of riparian or other habitats.

**BR-3: Loss of Riparian and Other Habitats, Including Wetlands as Defined by Section 404 of the Clean Water Act.** No natural habitat, wetlands, or waters of the U.S. are present within the West Campus boundaries. Like the Previously Proposed Project, Revised Project activities on the West Campus would occur within the existing developed and formerly developed boundaries. Since there is no riparian habitat, salt marsh, state or federally protected wetlands, and/or other sensitive natural community present in any portion of the West Campus, impacts would be less than significant, same as the Previously Proposed Project. (LTS)

### Impacts to Be Evaluated

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. This slight increase in building area and building coverage would not substantially change the bulk, mass, or footprint of the building. As a result, the analysis below would remain applicable.

**BR-1: Impacts on Special-Status Species at the Project Site.** The Revised Project could impact pallid bats, other potential crevice-roosting bat species, and potentially burrowing owls. As with the Previously Proposed Project, the existing buildings on the West Campus would be demolished and trees would be removed, both of which could contain active bat roosts. However, the Revised Project (and previous entitlements) would result in the removal of all 624 trees at the West Campus, compared to 375 trees under the Previously Proposed Project. As such, 249 additional trees would be removed, which could result in an increased loss of individual bats, bat colonies, or their habitat. In addition, as with the Previously Proposed Project, construction activities could potentially harm burrowing owls, resulting in potentially significant impacts on special-status species.

MITIGATION MEASURES. Although an increased number of trees would be removed under the Revised Project, Mitigation Measures BR-1.1 and BR-1.2, as presented in the certified EIR, would still apply. These mitigation measures would ensure that the Revised Project impacts with respect to bats and burrowing owls would be less than significant. (PS/LTS)

**BR-2: Indirect Impacts on Special-Status Species Inhabiting the Adjacent Water Marshes.** As addressed for the Previously Proposed Project, the West Campus property is situated within disturbed land that has been previously developed, but occurs in the vicinity of undeveloped baylands associated with the southern portions of the San Francisco Bay. All of the undeveloped baylands occur off site,

and the West Campus property line is setback approximately 250 feet from sensitive habitat associated with the off-site baylands. As such, no direct impacts would occur to any sensitive habitat or special-status species associated with the off-site baylands.

Construction and operation activities proposed under the Revised Project, as with the Previously Proposed Project, would be entirely restricted to the existing disturbed and developed land at the West Campus. Therefore, with respect to potential direct impacts and habitat modifications affecting off-site baylands, there would be no impact and no change as a result of the Revised Project. However, similar to the Previously Proposed Project, the Revised Project would result in a net increase in building structures and possibly tall trees on the West Campus that could serve as perching or nesting opportunities for raptors and other predatory birds potentially ranging over the local area.

The amount of building structure and landscaping elements that are proposed within the West Campus, and that have the potential to affect predatory bird activities, have been modified in the Revised Project; therefore, there is a potential for a change in impact between the Previously Proposed Project and the Revised Project. The Revised Project, assuming the Green Roof Scenario, would include trees on the roof of the 45-foot building. The creation of suitable perching and nesting habitat on the rooftop could provide new vantage points from which predatory birds could prey upon special-status wildlife species that potentially occupy sensitive habitat within the off-site baylands. The potential indirect and incidental loss of off-site special-status wildlife species as a result of attracting predatory birds to the area, including Project-related enhancements to perching and nesting conditions on the West Campus property, would be a potentially significant impact. This potentially significant impact is addressed in more detail below, along with proposed measures to reduce the impact to a less-than-significant level.

The West Campus is abutted to the immediate north by Bayfront Expressway (SR-84), a heavily trafficked, signalized, six-lane highway. At the locations adjacent to the West Campus, Bayfront Expressway measures approximately 150 feet in width. Off-site, undeveloped baylands supporting sensitive salt flat and salt marsh habitat occurs further to the north of Bayfront Expressway. Approximately 100 feet of disturbed earthen fill for an existing levee structure separates the habitat from Bayfront Expressway. Better-quality salt flat and salt marsh habitat continues even further to the north, eventually connecting with the San Francisco Bay and preservation lands within the Don Edwards San Francisco Bay National Wildlife Refuge, which is managed by the USFWS. Existing developments and incompatible land uses serve as a sizeable separation between the West Campus property and adjacent off-site habitat.

As addressed for the Previously Proposed Project, the salt flat and salt marsh habitats located in the vicinity of the West Campus provide suitable conditions for a wide range of resident and migratory wildlife, including special-status species such as western snowy plover (*Charadrius alexandrinus nivosus*), salt marsh common yellowthroat (*Geothlypis trichas sinuosa*), California black rail (*Laterallus jamaicensis coturniculus*), California clapper rail (*Rallus longirostris obsoletus*), salt marsh harvest mouse (*Reithrodontomys raviventris*), and salt marsh wandering shrew (*Sorex vagrans halicoetes*). Western snowy plover are known to nest in nearby salt flats and the California Natural Diversity Database (CNDDDB) reports records for other special-status species within adjacent salt flat

and salt marsh habitats. Salt marsh habitats are known to provide foraging opportunities for terrestrial wildlife that often occur in adjacent upland areas.<sup>22,23</sup> Raptors, or birds of prey, such as red-tailed hawk (*Buteo jamaicensis*), osprey (*Pandion halieetus*), American kestrel (*Falco sparverius*), and northern harrier (*Circus cyaneus*), are apex predators that frequent salt marsh habitats for foraging requirements due to a number of factors, including an abundance of available prey items, open low-growing vegetation, and clear lines of sight from perch locations.<sup>24,25</sup> It has been suggested that, the presence of raptor species, particularly in urban areas with anthropogenic (man-made) perches, may negatively affect the recovery of special-status species populations in nearby salt marsh habitats.<sup>26</sup> Anthropogenic perches may include structures such as light poles, transmission towers, landscape trees, buildings, and artificial platform structures.

As discussed in detail within Section 2, Revised Project Description, of this Addendum, the Revised Project proposes plan modifications to several components addressed in the Previously Proposed Project, including those pertaining to building structures and landscaping on the West Campus. The Revised Project proposes a single one-story office building structure at the West Campus property, with landscaping on the top of the 45-foot roof level (assuming the Green Building Scenario). Figure 2-9, Revised Project Roof Plan Landscaping, provides detailed depictions of the proposed landscaping elements, including preliminary plant species lists, estimated numbers of trees, and informal approximations for the planned tree locations. The existing Bayfront Expressway and the levee, the West Campus property line and proposed ground-level landscaping are set back from adjacent undeveloped salt flat and salt marsh habitat by a distance of approximately 250 feet. The office building structure proposed under the Revised Project, including first-floor and rooftop landscape areas, are set back from the adjacent habitat by approximately 350 feet. Also noted on Figure 2-2, there are three lattice-style transmission towers, which extend to approximately 120 feet above natural grade of the site that will remain in place on the West Campus under the Revised Project, including two towers that occur along the northern frontage of the property adjacent to the Bayfront Expressway.

As addressed for the Previously Proposed Project, the introduction of a new building structure and landscape elements on the West Campus property could result in indirect impacts on special-status species potentially occupying the off-site salt flat and salt marsh habitat. Although no construction-related indirect impacts would be anticipated, operation of the Revised Project would result in the

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<sup>22</sup> California Department of Fish and Game (CDFG). 2012a. Wildlife Habitats—California Wildlife Habitat Relationships System based on A Guide to Wildlife Habitats of California (1988). Edited by Kenneth E. Mayer and William F. Laudenslayer, Jr. State of California, Resources Agency, Department of Fish and Game Sacramento, CA. 166 pp. Available at: [http://www.dfg.ca.gov/biogeodata/cwhr/wildlife\\_habitats.asp](http://www.dfg.ca.gov/biogeodata/cwhr/wildlife_habitats.asp).

<sup>23</sup> Macdonald, K. B. 1977. Plant and animal communities of Pacific North American salt marshes. Pages 167-191 In V. J. Chapman, ed. Wet coastal ecosystems. Elsevier Scientific Publ. Co., Amsterdam.

<sup>24</sup> California Department of Fish and Game (CDFG). 2012b. CWHR Life History Accounts and Range Maps. Available at: <http://www.dfg.ca.gov/biogeodata/cwhr/cawildlife.aspx>.

<sup>25</sup> Collopy, M.W., and K.L. Bildstein. 1987. Foraging behavior of Northern Harriers wintering in southeastern salt and freshwater marshes. *Auk* 104:11-16.

<sup>26</sup> Bosler, A.J. 2011. Perching preference of raptors in three urban Southern California salt marshes. Thesis Presented to the Department of Geography California State University, Long Beach. Available at: <http://gradworks.umi.com/1504433.pdf>.

permanent establishment of an office building and landscape. These permanent developments could promote temporary use by raptors and other predatory bird species by creating additional perching opportunities at the West Campus property. The single office building and landscape trees proposed under the Green Roof Scenario of the Revised Project could provide raptors and other predatory birds with new perches and vantage points from which to hunt prey potentially occupying the off-site habitat. As discussed above, the off-site habitat provides suitable conditions for several special-status wildlife species, including nesting western snowy plover and salt marsh harvest mouse, among others.

The Revised Project components (office building structure and landscape trees) are set back and separated from adjacent habitat by a State-controlled Highway, existing developments, and incompatible land uses. The setbacks from adjacent habitat areas measure up to approximately 350 feet. This is a considerable distance between potential new perch locations created under the Revised Project conditions and the adjacent foraging habitat. In addition to the distances, there is likely substantial noise and nighttime lighting associated with the Bayfront Expressway. Despite their keen hearing and eyesight, the considerable intervening distances and incompatible land uses would present challenges to raptors attempting to identify prey and successfully hunt from perches on the West Campus.

Additionally, the existing transmission towers on the property already provide suitable perching and nesting habitat for raptors. The towers will remain in place under the Revised Project, including the two towers that occur in the northern portions of the West Campus property and along the Bayfront Expressway frontage. The towers will remain at their existing heights, which exceed the height of the proposed office building structure. Consequently, the existing towers would likely serve as superior perching and nesting structures on the West Campus when compared to the building proposed under the Revised Project. The towers would be the tallest structures on the property and would be closer to the off-site foraging habitat. There would also be less obstruction and incompatible land use occupying the area in-between. As such, raptors and other birds of prey would likely show preference for the existing tower structures over any structures or landscape elements proposed under the Revised Project for perching and nesting. Nevertheless, the potential for raptors to perch or nest on structures proposed under the Revised Project cannot be completely ruled out and a potentially significant impact could occur.

MITIGATION MEASURE. Mitigation Measure BR-2.1 was presented in the certified EIR. While this mitigation measure would still be applicable, it has been revised to reflect the impact of landscaping on the roof under the Green Building Scenario. The underlines in Mitigation Measure BR-2.1, below, denote the new text while the strikethroughs denote the text that has been deleted. Revised Mitigation Measure BR-2.1 would reduce the potentially significant impacts due to increased raptor predation at the West Campus to less than significant. (PS/LTS)

*BR-2.1 Landscaping Restrictions and Installation of Bird Perching Deterrents on all New Buildings and Other Elevated Structures on the West Campus. The Project Sponsor shall implement the following measures to reduce impacts to special-status marsh species:*

1. For all new buildings to be constructed on the West Campus, the Project Sponsor shall install bird deterrents along suitable perching sites that would allow raptors or other predatory birds a vantage point from which to prey on western snowy plover, salt marsh harvest mouse, or other special-status species potentially inhabiting the adjacent salt marshes. Such deterrents may include one or more of the following deterrent devices as appropriate for the individual situation: bird spikes, bird netting, electric shock track, sound deterrents, or other devices approved by CDFG and/or USFWS.
2. Trees used for ~~replacement~~-landscaping on the West Campus shall consist of species that generally do not reach heights of greater than 30 feet ~~in order to or~~ shall be spaced at appropriate distances to reduce potential lines of sight and limit the distance perching birds could see into the adjacent salt marshes to the north. These landscaping trees may include native or non-invasive ornamental species. Species with broad canopies would be preferred, as tall narrow canopies (e.g., palms or conifers) generally provide better hunting perches for raptors.

**BR-4: Impacts to Wildlife Corridors or Nursery Sites.** If nesting migratory birds are present at the West Campus, then tree and shrub removal associated with the Revised Project would result in the loss of those birds. As described above, the Revised Project (and previous entitlements) would remove all 624 trees at the West Campus, compared to 375 trees that would be removed under the Previously Proposed Project. Therefore, there could be an increased potential for Revised Project construction to impact nursery sites. Disruption of nesting birds, resulting in the abandonment of active nests, or the loss of active nests through structure removal, would be a potentially significant impact.

MITIGATION MEASURE. Although the Revised Project would result in the removal of approximately 249 additional trees compared to the Previously Proposed Project, Mitigation Measure BR-4.1, as required by the certified EIR, would still be applicable. Mitigation Measure BR-4.1 would reduce the potentially significant impacts to nesting migratory birds at the West Campus to less than significant. (PS/LTS)

**BR-5: Conflicts with any Local Policies or Ordinances Protecting Biological Resources.** The Previously Proposed Project would not result in conflicts with Chapter 13.24 of the City's Municipal Code (Heritage Tree Ordinance). Not including the trees that have already been removed as a result of previous entitlements, there are 175 existing trees on the West Campus that qualify as heritage trees under the City's Heritage Tree Ordinance. All 175 heritage trees would be removed as a result of the Revised Project, compared to approximately 89 heritage trees that would be removed under the Previously Proposed Project. The 175 heritage trees that would be removed would be replaced by approximately 216 new trees. In addition, other trees would be planted. With the Green Roof Scenario, the Revised Project would result in 562 trees at the West Campus, an increase of approximately 166 trees. Under the No Green Roof Scenario, the Revised Project would result in 357 trees, a decrease in approximately 39 trees compared to the Previously Proposed Project.

Regardless of the scenario selected, removal of heritage trees without first obtaining an appropriate permit from the Director of Public Works and payment of a fee is prohibited. As a part of obtaining a tree removal permit, the Project Sponsor must be in compliance with the Heritage Tree Ordinance. Since compliance with the tree ordinance is mandatory, this impact would be considered less than significant. (LTS)

**Cumulative Impacts.** Removal of buildings, trees, shrubs, or other wood vegetation associated with the construction of the Revised Project and other cumulative development could result in impacts to roosting bats, burrowing owls, and nursery sites. However, implementation of Mitigation Measures BR-1.1, BR-1.2, and BR-4.1 would reduce these impacts to less than cumulatively considerable. In addition, construction of the new building and addition of rooftop landscaping, combined with other development in the area, would result in indirect effects on special-status bird and mammal species in the adjacent marshes due to increased raptor predation. Implementation of Mitigation Measure BR-2.1 would reduce this impact to less than cumulatively considerable. Cumulative impacts of the Revised Project are similar to those of the Previously Proposed Project. (PS/LTS)

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## 3.10 HYDROLOGY AND WATER QUALITY

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### Summary of Previously Proposed Project

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**HY-1: Changes in Stormwater Runoff.** Construction of the Previously Proposed Project would change the conditions at the West Campus. The net effect of the changes in impervious surfaces would result in a slight decrease in stormwater peak flow rates compared to existing conditions. However, because the on-site storm drain system has capacity limitations, ponding at the West Campus and at the adjacent TE Connectivity property would continue to occur. The drainage swale would continue to provide overflow storage because the Previously Proposed Project would result in no changes to the swale. The flow reversals currently experienced in the Hamilton Avenue system would also occur, but not to a greater extent than existing conditions. As such, the Previously Proposed Project would not cause or exacerbate City drainage system capacities to be exceeded or cause or exacerbate off-site flooding in local neighborhoods. The impact is considered less than significant. (LTS)

**HY-2: 100-Year Floodplain.** New structures at the West Campus would be placed in a Special Flood Hazard Area (SFHA), indicating development could be vulnerable to 100-year flood hazard risk. The Previously Proposed Project would involve placement of fill to elevate finished floor elevations above the 100-year flood hazard elevation. According to the Project Sponsor, the thickness of fill placed at the site would raise the site elevation such that finished floor elevations of habitable structures would provide protection for the 100-year tidally induced flooding, consistent with requirements for development in the SFHA, plus 16 inches of sea level rise by 2050.

MITIGATION MEASURE. Implementation of Mitigation Measure HY-2.1, as required by the certified EIR, would reduce the potentially significant flood risk impacts at the West Campus to less than significant. (PS/LTS)

**HY-3: Impeding or Redirecting Flood Flows.** The placement of fill and structures would not remove floodplain storage or increase flows to the drainage features that convey both stormwater and receding flood waters for the 100-year event for on-site and off-site properties. As a result, the Previously Proposed Project would not result in an increase in surface water elevations that could cause or exacerbate flood hazards on or off site. Therefore, impacts would be less than significant. (LTS)

**HY-4: Sea Level Rise.** Sea level rise could result in higher flood elevations, alterations in the frequency of flood events, higher shallow groundwater tables, reduced storm drain system water surface elevation gradients, and overtopping or failure of levees. Different scenarios and models used to predict sea level rise result in different estimates of the magnitude of sea level rise. The Previously Proposed Project would expose people at the West Campus to this hazard through the development of new buildings. This would be a potentially significant impact.

MITIGATION MEASURES. The sea level rise impact could be mitigated through Mitigation Measures HY-4.1 and HY-4.2, as presented in the certified EIR. (PS/LTS)

**HY-5: Construction and Operational Stormwater Pollutants.** Stormwater runoff from the Previously Proposed Project would contain urban pollutants. Compliance with applicable federal, State, and local regulations would ensure that the Previously Proposed Project would not violate water quality standards or permits, contribute additional sources of polluted runoff, or otherwise cause water quality degradation. With the use of Best Management Practices (BMPs) incorporated into the Project design and compliance with requirements of the San Mateo Countywide Stormwater Pollution Prevention Program (SMCWPPP), which would be the responsibility of the City to enforce and monitor, operation of the West Campus would be in compliance with applicable permits. The reductions in stormwater pollutants that would be achieved through decreased stormwater runoff and use of BMPs would ensure that the Previously Proposed Project would not contribute to additional sources of polluted runoff or otherwise degrade surface water quality. As a result, the Previously Proposed Project's operational water quality impacts would be less than significant. (LTS)

**HY-6: Effects on Groundwater Supplies and Recharge.** Existing groundwater recharge potential within the Project area is minimal because portions of the site contain impervious surfaces, fill has been placed in other locations in conjunction with site remediation, and compacted gravel overlies other areas. Development of the West Campus with implementation of the Previously Proposed Project would result in a decrease in the amount of impervious surface area compared to existing conditions. The net effect of these changes in surface conditions is that post-construction groundwater recharge potential would be similar to existing conditions, and indirect impacts on the local groundwater table would not be substantial. Therefore, impacts would be less than significant. (LTS)

**Cumulative Impacts.** Cumulative impacts under the Previously Proposed Project, including storm drain impacts, flooding and sea level rise, water quality, and groundwater supplies and recharge would result in less than cumulatively considerable impacts. (LTS)

## **Impacts from Revised Project**

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### **Impacts Not to Be Evaluated**

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project with regard to a 100-year flood plain or sea level rise.

**HY-2: 100-Year Floodplain.** As with the Previously Proposed Project, the Revised Project would place a structure within a Special Flood Hazard Area (SFHA). The Revised Project would include a parking garage at the lowest floor, but would still involve placement of fill to elevate the lobbies in the parking level above the 100-year flood hazard elevation. As such, this impact is considered potentially significant.

MITIGATION MEASURE. Implementation of Mitigation Measure HY-2.1, as required for the Previously Proposed Project in the certified EIR, would reduce the potentially significant flood risk impacts at the West Campus to less than significant. (PS/LTS)

**HY-4: Sea Level Rise.** The Revised Project would result in the same impacts with regard to sea level rise as identified for the Previously Proposed Project, as it would place a similarly sized structure on the same site and expose a similar number of persons to the risk of flooding from sea level rise. As such, this impact would be potentially significant.

MITIGATION MEASURES. The sea level rise impact could be mitigated through Mitigation Measures HY-4.1 and HY-4.2, as presented in the certified EIR. (PS/LTS)

## **Impacts to Be Evaluated**

As discussed in Section 2, Project Description, the Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. This slight increase in building coverage is not substantial enough to alter the stormwater runoff or drainage conditions at the site as described below. As a result, the analysis below would remain applicable.

**HY-1: Changes in Stormwater Runoff.**<sup>27</sup> The Revised Project proposes a single large office building with an area of approximately 433,555 sf<sup>28</sup> compared to the approximately 440,000 sf in five buildings under the Previously Proposed Project, plus a parking structure. Therefore, the Revised Project slightly reduces the total square footage of the development. The revised design includes permeable pavement, permeable landscaped areas, pervious bioretention areas, and a seasonal water feature. Assuming the No Green Roof Scenario, the “worst case” for stormwater runoff generation, total impervious cover at the West Campus would be 644,509 sf, or 67 percent of the total 22-acre site.<sup>29</sup> This represents an increase in impervious surfaces of 36.8 percent compared to the Previously Proposed Project. Impervious areas include the structure roof, terrace areas, and ground-level paved surfaces.

Currently, there are two sources at the West Campus that produce stormwater. One source is stormwater that is generated by rainfall that lands directly on the West Campus and then enters the on-site storm drain system. The second source of stormwater is runoff that is generated off site, but enters the West Campus before it enters the on-site storm drains. The two off-site sources of stormwater are a portion of the TE Connectivity property to the west and the swale located along the north side of the Dumbarton Rail Corridor to the south of the site.

The general layout of the storm drain system differs between the two sets of conditions. The Previously Proposed Project’s storm drain system would include a single east/west line to collect and convey all flow to the exit point under Willow Road. The Revised Project’s storm drain system includes two

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<sup>27</sup> Hydroconsult Engineers, Facebook West Campus Hydrology Report, January 15, 2013. See Appendix 3.10-A.

<sup>28</sup> The current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted.

<sup>29</sup> For informational purposes, the Green Roof Scenario would result in 319,173 sf of impervious surfaces, or 33 percent of the building coverage.

parallel east/west lines, one along the north side of the site and one along the south side. The two-line system under the Revised Project (compared to one with the Previously Proposed Project) would provide additional runoff storage. This storage would partially offset the increase in impervious area under the Revised Project conditions. Like the Previously Proposed Project, the Revised Project system would drain to the 78-inch pipe under Willow Road that is owned and maintained by Caltrans (Node MH-15).

Since the Previously Proposed Project and the Revised Project systems would both drain to the same outlet point, it is possible to compare the peak flow rates of stormwater that leaves the site under both sets of conditions. This comparison is summarized in Table 3.10-1. As shown, the Revised Project flow rates are lower than the Previously Proposed Project flow rates for both the 10- and 100-year events.

**Table 3.10-1  
Comparison of Peak Flow Rates That Leave Site**

Stormwater Drainage System Location <sup>a</sup>	10-Year Storm (cfs)		100-Year Storm (cfs)	
	Previously Proposed Project	Revised Project	Previously Proposed Project	Revised Project
MH-15	29.1	24.9	81.4	80.0

*Source:* Hydroconsult Engineers, 2013.

In order to produce off-site peak flow rates under the Revised Project that are lower than the off-site peak flow rates under the Previously Proposed Project, the design of the storm drain system was modified. These revisions were required primarily because the impervious cover at the site would be higher under the Revised Project than under the Previously Proposed Project. These revisions include the addition of a second storm drain line, the inclusion of oversize storm drain pipes along some of the system segments, and the addition of an underground weir/orifice combination at the downstream end of each line. These modifications would allow the larger pipes to temporarily store the water, as the weir/orifice combination meters the release of water into the off-site storm drain under Willow Road at a lower flow rate than would otherwise leave the system.

The Revised Project would result in a reduction of on-site ponding compared to the Previously Proposed Project. Model results indicate that the Revised Project storm drain has the capacity to eliminate on-site ponding during the 10- and 100-year events. Under the Previously Proposed Project, on-site ponding could occur during the 100-year event, but no ponding would occur during the 10-year event under either the Previously Proposed Project or the Revised Project.

The elimination of on-site ponding under the Revised Project would likely result in a positive benefit on the upstream off-site flooding; however, it is difficult to quantify this benefit. Ponding would likely continue on site and at the TE Connectivity site under the Previously Proposed Project, but the reduction of ponding under the Revised Project would mitigate this off-site ponding to some degree.

The magnitude of the ponding at the TE Connectivity site is expected to either improve or remain unchanged with implementation of the Revised Project.

The drainage swale parallel to the Dumbarton Rail Corridor that enters the West Campus would remain unchanged. The flooding in this swale is generated off site by a flow reversal in the Hamilton Avenue system. The reduction in on-site ponding under the Revised Project conditions would either lower or have no impact on the water surface elevations along the swale.

As mentioned, the Revised Project with the No Green Roof Scenario would result in an increase of impervious surfaces at the West Campus compared to the Previously Proposed Project. However, due to revisions in the proposed infrastructure, the peak flows leaving the site under the Revised Project would be less than the peak flows that would leave the West Campus under the Previously Proposed Project. In addition, the elimination of on-site ponding would either reduce or have no impact on the ponding on the TE Connectivity site and the flooding depths along the swale. As such, similar to the Previously Proposed Project, the Revised Project would result in less-than-significant impacts with regard to changes to stormwater flows. (LTS)

**HY-3: Impeding or Redirecting Flood Flows.** The Revised Project could alter the drainage of the West Campus in a somewhat different manner than the Previously Proposed Project, as it would construct one large building rather than five office buildings and a parking structure on the site. As noted under Impact HY-1, the Revised Project would provide additional stormwater capture features, including addition of a second storm drain line, the inclusion of oversize storm drain pipes along some of the system segments, and the addition of an underground weir/orifice combination at the downstream end of each line. In addition, the Revised Project would decrease on-site ponding compared to the Previously Proposed Project.

The peak flows leaving the site under the Revised Project would be less than the peak flows that would leave the West Campus under the Previously Proposed Project. The placement of fill and structures would remain substantially similar as under the Previously Proposed Project, and would not remove floodplain storage or increase flows to the drainage features that convey both stormwater and receding flood waters for the 100-year event for on-site and off-site properties. Because flooding in the Project vicinity is tidally influenced, earthwork to remove portions of the site from the SFHA would not displace flood water and would not increase the extent or depth of flooding in adjacent neighborhoods that could cause an adverse impact. Proposed grading at the West Campus would decrease the available storage volume in the flood area by approximately 0.4 percent and could have a proportionate decrease in the duration of flooding, but this would not adversely impact adjacent neighborhoods.<sup>30</sup> As a result, the Revised Project would not result in an increase in surface water elevations that could cause or exacerbate flood hazards on or off site, and would actually improve potential flood conditions compared to the Previously Proposed Project. Therefore, impacts of the Revised Project with respect to impeding or redirecting flood flows would continue to be less than significant. (LTS)

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<sup>30</sup> BKF, “West Campus Flood Zone Description,” January 17, 2013. See Appendix 3.10-B.

**HY-5: Construction and Operational Stormwater Pollutants.** The Revised Project would implement the same construction methods as the Previously Proposed Project, including the use of diesel equipment that could generate pollutants. Stormwater runoff from Revised Project would contain the same urban pollutants as identified for the Previously Proposed Project, as the structure would be of similar size and the operational activities would remain the same (i.e., use as an office building and associated amenities). In addition, the Revised Project would have the capacity for the same amount of employees (approximately 2,800) and would have roughly an equivalent amount of parking (1,499 stalls). Compliance with applicable federal, State, and local regulations would ensure that the Revised Project would not violate water quality standards or permits, contribute additional sources of polluted runoff, or otherwise cause water quality degradation. With the use of Best Management Practices (BMPs) incorporated into the Revised Project design and compliance with requirements of the SMCWPPP, which would be the responsibility of the City to enforce and monitor, operation of the West Campus would be in compliance with applicable permits. The reductions in stormwater pollutants that would be achieved through decreased stormwater runoff and use of BMPs would ensure that the Revised Project would not contribute to additional sources of polluted runoff or otherwise degrade surface water quality. As a result, the Revised Project's operational water quality impacts would be less than significant. (LTS)

**HY-6: Effects on Groundwater Supplies and Recharge.** Existing groundwater recharge potential within the Project area remains the same as described for the Previously Proposed Project. Development of the West Campus with implementation of the Revised Project would result in an increase in impervious surfaces compared to the Previously Approved Project. The Revised Project, however, contains additional stormwater features creating greater in-line storage and a seasonal water feature in the northeast area of the site. The net effect of these changes in surface conditions is that post-construction groundwater recharge potential would be similar to existing conditions, and indirect impacts on the local groundwater table would not be substantial, and would actually improve with implementation of the Revised Project. Therefore, impacts would remain less than significant. (LTS)

**Cumulative Impacts.** As described above, the Revised Project would result in less-than-significant impacts on water quality, flooding, groundwater recharge, and sea level rise. In some cases, the Revised Project would reduce the severity of hydrology impacts compared to the Previously Proposed Project because of on-site design improvements in stormwater retention. Project-level mitigation measures would be implemented under the Revised Project to reduce all potentially significant impacts to less than significant. Similar to the Previously Proposed Project, the Revised Project would not result in significant hydrology and water quality impacts and, therefore, would not result in a cumulatively considerable contribution to cumulative hydrology impacts in the surrounding area, resulting in a less-than-significant cumulative impact. (PS/LTS)

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## 3.11 HAZARDS AND HAZARDOUS MATERIALS

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### Summary of Previously Proposed Project

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**HM-1: Asbestos, Lead, or Other Hazardous Materials in Building Components.** The Previously Proposed Project would include demolition and excavation at the West Campus. Construction activities would disturb hazardous materials in existing building components, but compliance with existing regulations would prevent adverse health or safety effects. Proper handling and disposal of contaminated building materials in accordance with these regulations would reduce unforeseen risks to the environment and prevent potential future adverse health, safety, or environmental effects. As a result, impacts related to hazardous materials in building components would be less than significant. (LTS)

**HM-2: Soil and Groundwater Contamination.** Prior operations at the West Campus and the adjacent TE Connectivity site resulted in significant releases of hazardous substances, including polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs) and semi-VOCs at a number of locations in the West Campus. The Department of Toxic Substances Control (DTSC) has overseen a comprehensive “corrective action” program of investigation and remediation of these releases. These remediation activities have included: significant soil removal actions where concentrations of hazardous substances exceeded levels appropriate for commercial/industrial use; installation of a 5-foot-thick engineered cap over an 11,437 sf discrete area of deep PCB-contaminated soils on the eastern portion of West Campus (in the vicinity of former Building U, generally where the Transit Center and adjacent landscaping are proposed); and a comprehensive, long-term groundwater monitoring program consisting of 45 groundwater monitoring wells on the West Campus and the adjacent TE Connectivity property combined. DTSC has determined that the West Campus has been remediated to a level that is acceptable for commercial and industrial uses, but not residential use.

As explained for the Previously Proposed Project, because residual hazardous wastes remain in the soil and groundwater at the West Campus and the levels that remain are risk-based, DTSC determined that a Covenant and Agreement to restrict site uses was necessary for the protection of human health and the environment. A Land Use Covenant (LUC) restricting the use of property at the West Campus was made between Tyco Electronics and DTSC in January 2007 and is binding upon all owners of the land, their heirs, successors, and assigns. The LUC must be incorporated by reference into all deeds and leases for any portion of the West Campus. The LUC specifically prohibits any activity that may disturb or adversely affect the integrity of the engineered cap (paving and non-tree landscaping over the cap are permitted as long as such surfacing does not disturb or interfere with any remedy or operation and maintenance activities required for the site); and any activity that may interfere with the operation and maintenance of the groundwater monitoring wells that are required as part of the DTSC-approved remedy without the written approval of the DTSC and Environmental Protection Agency (EPA). The 2007 LUC was amended in 2012 to allow for activity that may disturb or adversely affect the integrity of the engineered cap, but only with the written approval of the DTSC and EPA.

To minimize the potential introduction of contaminated fill onto the West Campus, all possible sources of import fill would have adequate documentation so it could be verified that the fill source is appropriate for the West Campus. For locations where import fill is not used, on-site soil disturbance has the potential to result in impacts due to hazardous materials releases in a variety of ways: soil disturbance could generate dust containing residual soil contaminants, which could pose an inhalation hazard to workers if contaminants adhere to the dust; improperly stockpiled soils could introduce contaminants into stormwater; excavation and removal of contaminated soils, particularly if soils are used elsewhere on site or transported for off-site disposal or reuse, could spread contaminants. In addition, Naturally Occurring Asbestos may be present in fill materials. Besides the general soil movement associated with utility installations, utility trenches also have the potential to create a horizontal conduit for chemical contaminants contained in soil vapors or shallow groundwater to migrate along permeable soils that would be placed as trench backfill.

The Previously Proposed Project proposed various on-site drainage features to convey stormwater runoff to the City system. Although fill would be placed at the West Campus, which would increase the amount of separation between the best management practices (BMP) features and groundwater and residual contaminants in soil, there is still the potential for stormwater to infiltrate to groundwater, where it could affect flow characteristics. This could, in turn, interfere with the groundwater remediation system. In addition, although the West Campus has been comprehensively evaluated, there is a potential for construction activities associated with the Previously Proposed Project to encounter unidentified hazards, such as an abandoned underground storage tank located before permitting requirements were imposed, or other subsurface hazards, including soil.

**MITIGATION MEASURES.** All of these activities proposed under the Previously Proposed Project have the potential to result in a release of hazardous materials that could pose a human or environmental risk. However, implementation of Mitigation Measures HM-2.1 through HM-2.9 identified in the certified EIR would reduce the potentially significant soil and groundwater contamination impacts at the West Campus to less than significant. (PS/LTS)

**HM-3: Effects on Ecological Systems.** Studies have concluded that the conditions at the West Campus pose very little threat to biota from areas contaminated with hazardous substances due to lack of complete exposure pathways. The saltwater evaporation ponds and wetlands located north of the West Campus are separated from the site by Bayfront Expressway. However, because residual contaminants remain in soil, on-site soil movement during construction could provide a new potential pathway through which wildlife species could be exposed to contaminants in soil or fill material. Soil disturbance could be the result of general construction activities in which previously unidentified contaminants have been discovered, or it could be the result of implementation of Mitigation Measure HM-2.1. Compliance with the required procedures, as described for the Previously Proposed Project in Section 3.13, Hazards and Hazardous Materials, of the certified EIR would ensure that soil movement at the West Campus would not present a significant risk to the ecological environment. Therefore, with implementation of Mitigation Measure HM-2.1, potential construction-related ecosystem impacts

related to handling of soil with residual contaminants and groundwater would be reduced to less-than-significant levels. (PS/LTS)

**HM-4: Inference with Groundwater Monitoring Systems.** The earthwork that would be required to develop the West Campus under the Previously Proposed Project has the potential to damage or destroy groundwater monitoring wells. If a well were damaged (e.g., cracked) at the well head or below the surface as a result of site preparation, this could reduce or eliminate the well as a data point. In addition, if structures, landscaping, hardscaping, parking lots, or utility trenches are not properly designed and sited, these could preclude access to the monitoring wells for sampling. Site development plans would be coordinated with TE Connectivity and DTSC to allow continued monitoring, additional sampling, and/or remediation activities that may be required to obtain DTSC approvals for the West Campus. If there are groundwater wells that would obstruct construction activities, they will be decommissioned, relocated, and/or reinstalled. Such activities would require DTSC approval. This would ensure continued operation of the groundwater treatment and monitoring system in accordance with the LUC, and the impact would be less than significant. (LTS)

**HM-5: Maintenance Activities.** Following occupancy of the Previously Proposed Project, soil excavation may be required to maintain or replace utilities, repair foundations, or make other subsurface repairs. There is a potential for future maintenance or repair activities involving disturbance of subsurface soils on the West Campus to encounter previously unidentified hazards, such as contaminated soil or other subsurface features, that could pose a hazard. This would be a potentially significant impact because it could expose maintenance workers to previously unidentified contaminated soil or other hazards.

MITIGATION MEASURES. Mitigation Measure HM-5.1, as presented in the certified EIR, would reduce the potentially significant impact at the West Campus to less than significant. (PS/LTS)

**HM-6: Routine Hazardous Materials Use.** The Previously Proposed Project would be required to comply with mandatory hazardous materials regulations and Stormwater Pollution Prevention Program (SWPPP) requirements; compliance would ensure that potential releases from the transport and use or disposal of hazardous materials during construction activities would be reduced to a less-than-significant level. No mitigation is required. Operation of the Previously Proposed Project would involve the use of household and commercial hazardous materials, such as cleaning agents and paints. However, these materials would not be used, stored, or transported in large enough quantities to present a substantial risk from exposure to these materials. Furthermore, the use, storage, and transportation of hazardous materials are subject to applicable federal, State, and local regulations, the intent of which is to minimize the risk of upset. Therefore, the risk of accidental explosion or release of hazardous materials that could create a health hazard with the implementation of the Previously Proposed Project is low, and impacts would be less than significant. (LTS)

**HM-7: Hazardous Materials Risks from Off-Site Uses.** Compliance with existing federal, State, and local laws and regulations that are administered and enforced by the Certified Unified Program Agency (CUPA) (San Mateo County Environmental Health Division), and Menlo Park Fire Protection District

(MPFPD) standards (the local agency that implements applicable hazardous materials-related sections of the California Fire Code and California Building Code), along with the City permitting requirements, would reduce the potential for off-site uses to pose a substantial hazard to the Previously Proposed Project through routine or upset conditions to less than significant. (LTS)

**HM-8: Impairment of Emergency Access or Emergency Plans.** The Previously Proposed Project would increase traffic in the vicinity of the Project site over existing conditions. However, due to the close proximity of the existing Fire Station 77 (approximately 0.5 mile), the existing response times would remain relatively consistent. As such, implementation of the Previously Proposed Project would not impede emergency access and would continue to maintain the existing City grid system. Therefore, a less-than-significant impact would occur. (LTS)

**Cumulative Impacts.** All cumulative impacts of the Previously Proposed Project would be less than cumulatively considerable with implementation of the mitigation measures, as discussed above. Development of the West Campus and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Previously Proposed Project and other cumulative development could also expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that would be demolished if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures proposed for the Previously Proposed Project, and compliance with current regulatory standards, would reduce the cumulative impacts to less than significant. (PS/LTS)

## **Impacts of Revised Project**

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### **Impacts Not to Be Evaluated**

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project with regard to hazardous materials in building components, effects on ecological systems, interference with groundwater monitoring systems, maintenance activities, routine hazardous materials use, hazardous materials risks from off-site uses, and impairment of emergency access.

**HM-1: Asbestos, Lead, or Other Hazardous Materials in Building Components.** The Revised Project would include demolition or excavation at the West Campus, identical to the Previously Proposed Project. The existing buildings that would be demolished to accommodate the Revised Project would be the same buildings that would be demolished under the Previously Proposed Project. Construction activities would disturb hazardous materials in existing building components, but compliance with existing regulations would prevent adverse health or safety effects. Proper handling and disposal of contaminated building materials would reduce unforeseen risks to the environment and prevent potential future adverse health, safety, or environmental effects. As a result, impacts related to hazardous materials in building components that would be demolished would be the same as the Previously Proposed Project and would be less than significant. (LTS)

**HM-3: Effects on Ecological Systems.** Studies have concluded that the conditions at the West Campus pose very little threat to biota from areas contaminated with hazardous substances due to lack of complete exposure pathways. However, because residual contaminants remain in soil, on-site soil movement during construction of the Revised Project could provide a new potential pathway through which wildlife species could be exposed to contaminants in soil or fill material, resulting in potentially significant impacts.

MITIGATION MEASURE. Compliance with the required procedures, as described for the Previously Proposed Project, would ensure that soil movement at the West Campus under the Revised Project would not present a significant risk to the ecological environment. With implementation of Mitigation Measure HM-2.1, as identified in the certified EIR, potential construction-related ecosystem impacts related to handling of soil with residual contaminants and groundwater would be reduced to less-than-significant levels. (PS/LTS)

**HM-4: Interference with Groundwater Monitoring Systems.** The earthwork that would be required to develop the West Campus under the Revised Project has the potential to damage or destroy groundwater monitoring wells, as would occur with the Previously Proposed Project. If structures, landscaping, hardscaping, parking lots, or utility trenches are not properly designed and sited, these could preclude access to the monitoring wells for sampling. Site development plans would be coordinated with TE Connectivity and DTSC, and if groundwater wells are present that would obstruct construction activities, they will be decommissioned, relocated, and/or reinstalled. As with the Previously Proposed Project, this would ensure continued operation of groundwater treatment and monitoring system in accordance with the LUC, resulting in less-than-significant impacts. (LTS)

**HM-5: Maintenance Activities.** Following occupancy of the Revised Project, soil excavation may be required to maintain or replace utilities, repair foundations, or make other subsurface repairs. Although the layout of the West Campus would be different from the Previously Proposed Project, maintenance activities would still be required. There is a potential for future maintenance or repair activities involving disturbance of subsurface soils on the West Campus under the Revised Project to encounter previously unidentified hazards, such as contaminated soil or other subsurface features that could pose a hazard. This would be a potentially significant impact because it could expose maintenance workers to previously unidentified contaminated soil or other hazards.

MITIGATION MEASURE. Mitigation Measure HM-5.1, identified for the Previously Proposed Project in the certified EIR, would reduce the potentially significant impact at the West Campus under the Revised Project to less than significant, identical to the Previously Proposed Project. (PS/LTS)

**HM-6: Routine Hazardous Materials Use.** The Revised Project would involve similar earthwork, building construction, and site improvements as the Previously Proposed Project. Therefore, it would be required to comply with mandatory hazardous materials regulations and SWPPP requirements, identical to the Previously Proposed Project. No mitigation is required. Operation of the Revised Project would involve the use of household and commercial hazardous materials, such as cleaning

agents and paints. The modification to the building design and overall site layout would not affect how hazardous materials would be routinely used because the West Campus population and campus uses would stay the same; therefore, the types and amounts of hazardous materials would not be different than as previously analyzed. The use, storage, and transportation of hazardous materials are subject to applicable federal, State, and local regulations, the intent of which is to minimize the risk of upset. Therefore, the risk of accidental explosion or release of hazardous materials that could create a health hazard with the implementation of the Revised Project is low, and impacts would be less than significant, identical to the Previously Proposed Project. (LTS)

**HM-7: Hazardous Materials Risks from Off-Site Uses.** There are no aspects of the Revised Project that would alter off-site hazardous materials use because the campus uses would be identical to those of the Previously Proposed Project. Compliance with existing federal, State, and local laws and regulations would reduce the potential for off-site uses to pose a substantial hazard to the Revised Project through routine or upset conditions. (LTS)

**HM-8: Impairment of Emergency Access or Emergency Plans.** The traffic volumes and roadway network impacts generated by the Revised Project would be the same as the Previously Proposed Project because no changes in population are proposed. The MPFPD has reviewed the site plans and determined that the MPFPD would be able to serve the Revised Project building, as long as it complies with the current California Building Code, Fire Code, and local amendments, as required by law.<sup>31</sup> As such, implementation of the Revised Project would not impede emergency access and would continue to maintain the existing City grid system, and the impact would remain less than significant. (LTS)

### **Impacts to Be Evaluated**

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. The Revised Project would exceed building coverage allowances under M-2 Zoning. However, the CDP will allow for an additional exceedance of building coverage up to 55 percent. This slight increase in building area and building coverage would not substantially change the footprint of the building and would not add to soil and groundwater contamination. As a result, the analysis below would remain applicable.

**HM-2: Soil and Groundwater Contamination.** Development of the Revised Project would involve extensive earthwork across the entire site, as would occur with the Previously Proposed Project. In addition, Naturally Occurring Asbestos may be present in fill materials. Besides the general soil movement associated with utility installations, utility trenches also have the potential to create a horizontal conduit for chemical contaminants contained in soil vapors or shallow groundwater to migrate along permeable soils that would be placed as trench backfill. However, earthwork and fill

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<sup>31</sup> Menlo Park Fire Protection District Fire Prevention Bureau, “Planning Review—Facebook Campus West,” Reviewed by Bob Blach, October 2, 2012.

materials would be the same as the Previously Proposed Project and the Revised Project would result in the same impacts.

The Revised Project would include various on-site drainage features to convey stormwater runoff to the City system. Although fill would be placed at the West Campus, which would increase the amount of separation between the BMP and groundwater and residual contaminants in soil, there is still the potential for stormwater to infiltrate to groundwater, where it could affect flow characteristics. This could, in turn, interfere with the groundwater remediation system, identical to the Previously Proposed Project.

In addition, although the West Campus has been comprehensively evaluated, there is a potential for construction activities associated with the Revised Project to encounter unidentified hazards, such as an abandoned underground storage tank located before permitting requirements were imposed, or other subsurface hazards, including contaminated soil. All of these Revised Project construction activities have the potential to result in a release of hazardous materials that could pose a human or environmental risk, which is the same as for the Previously Proposed Project.

Excavation and off-site disposal have the potential to result in hazardous materials impacts, primarily from dust emissions, stormwater runoff, direct contact with contaminants, and off-site transport. As explained for the Previously Proposed Project, all of these potential pathways for hazardous materials releases would be controlled through implementation of DTSC-approved work plans and health and safety plans and must be evaluated by DTSC in a separate CEQA review before any such measures are approved.

As a distinct project under the purview of DTSC, the Project Sponsor is remediating the Project site to remove the engineered cap and underlying contaminated soils. While removal of the engineered cap differs from the site development assumptions for the Previously Proposed Project, it would not result in any new significant or more severe impacts than those disclosed and analyzed in Impact HM-2, for the reasons described above. Mitigation Measures HM-2.1 (update OMMP), HM-2.2 (health and safety plan), HM-2.3 (dust control plan), HM-2.4 (groundwater management plan), HM-2.7 (stormwater quality BMPs), and HM-2.8 (construction SWPPP) as identified in the certified EIR would sufficiently mitigate any potential impacts. In addition, the existing requirement for periodic groundwater monitoring and site inspections would continue. Implementation of the Remedial Action Plan (RAP) would substantially reduce risks to the public and would also reduce the potential for operational activities such as subsurface repairs and maintenance in the event of any future excavation at the site of the engineered cap. Impacts would be less than significant and would be beneficial in the long term.

**MITIGATION MEASURES.** Identical to the Previously Proposed Project, implementation of Mitigation Measures HM-2.1 through HM-2.8 identified in the certified EIR would reduce the potentially significant soil and groundwater contamination impacts at the West Campus for the Revised Project to less than significant. However, Mitigation Measure HM-2.9, which imposes landscape restrictions on the engineered cap, would not be applicable, since the proposed

building would be built over this area. As such, Mitigation Measure HM-2.9 has been deleted. (PS/LTS)

**Cumulative Impacts.** All cumulative impacts of the Revised Project would be less than cumulatively considerable with implementation of the mitigation measures, as discussed above. Development of the West Campus and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Revised Project and other cumulative development could also expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that would be demolished if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures proposed for the Previously Proposed Project, and compliance with current regulatory standards, would apply to the Revised Project and would reduce the cumulative impacts to less than significant. (PS/LTS)

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## 3.12 UTILITIES

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### Summary of Previously Proposed Project

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**UT-1: Water Demand.** Implementation of the Previously Proposed Project would result in a water demand of approximately 58,376 gallons per day (gpd) at full buildout. Under the Previously Proposed Project, the Menlo Park Municipal Water District (MPMWD) would have an adequate supply to meet its projected demands in normal and single dry years. The Previously Proposed Project would not require the MPMWD to acquire additional water supplies. As such, implementation of the Previously Proposed Project would have a less-than-significant impact on water supplies in the MPMWD's service area and expansion of existing entitlements would not be necessary. (LTS)

**UT-2: Impacts to Water Treatment Facilities.** Implementation of the Previously Proposed Project would not require expansion of the existing water treatment facilities serving the MPMWD. Further, the MPMWD has sufficient capacity under normal-year conditions to accommodate the water demands of the Project within its Individual Supply Guarantee (ISG). The San Francisco Public Utilities Commission (SFPUC) has sufficient capacity in its water treatment facilities to deliver treated water to its customers. Therefore, implementation of the Previously Proposed Project would not require the expansion of existing water treatment facilities or the construction of new facilities, resulting in a less-than-significant impact related to water treatment facilities. (LTS)

**UT-3: Wastewater Generation.** The technical study prepared by West Yost Associates<sup>32</sup> for the Previously Proposed Project determined that, under existing conditions, the 12-inch-diameter pipeline is operating at capacity and would not accommodate additional flows. Since the existing pipeline is already at capacity, implementation of the Previously Proposed Project would require installation of a new wastewater line to connect to the West Bay Sanitary District's (WBSD) main sewer system. Due to the limitations of the WBSD sanitary sewer pipeline and the Hamilton Henderson Pump Station (HHPS), the increase in employees at the Project site would result in a potentially significant impact with regard to wastewater conveyance infrastructure.

MITIGATION MEASURE. Mitigation Measure UT-3.1, as required in the certified EIR, would ensure that necessary capacity improvements are implemented so that the WBSD sanitary sewer system has sufficient capacity to accommodate additional wastewater generated by the Previously Proposed Project. This mitigation measure would reduce potentially significant impacts to a less-than-significant level. (PS/LTS)

**UT-4: Solid Waste Generation.** At full buildout and occupancy, the Previously Proposed Project would generate approximately 2,630 tons of solid waste per year, or approximately 7.2 tons per day.

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<sup>32</sup> West Yost Associates, Technical Memorandum: Evaluation of Proposed Flows From the New Facebook Campus as Compared to Existing District Sewer System Capacity, October 3, 2011.

The solid waste facilities that would serve the West Campus have sufficient remaining capacity to accommodate the Previously Proposed Project. Therefore, the Previously Proposed Project would not contribute to the need to expand existing or construct new solid waste disposal facilities, resulting in less-than-significant impacts related to solid waste generation. (LTS)

**UT-5: Stormwater Generation.** The Previously Proposed Project would not result in adverse impacts to the City's storm drain system. The Previously Proposed Project would comply with provisions of the Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit and the City's grading and drainage policies. These requirements would regulate the quantity of stormwater runoff from the new development, specifically prohibiting a net increase in the rate of runoff. No new stormwater facilities would be required. Therefore, implementation of the Previously Proposed Project would have a less-than-significant impact on the City's storm drain system. (LTS)

**UT-6: Energy Demand.** According to the Menlo Park Facebook Campus Energy Demand memorandum,<sup>33</sup> implementation of the Previously Proposed Project would result in an overall 67 percent reduction in per capita energy consumption over existing conditions. Because the Previously Proposed Project would be served by Pacific Gas and Electric (PG&E), and would result in substantial per capita energy reductions, impacts related to electricity and natural gas supply would be less than significant. (LTS)

**Cumulative Impacts.** The City's water, wastewater conveyance and treatment, stormwater drainage, energy, and solid waste facilities have sufficient capacity to serve the cumulative development of the City with identified mitigation. The City and its service providers would have adequate supplies to meet customer demand until 2035, including the demand of the Previously Proposed Project combined with existing and planned future uses. As such, impacts to utilities would not be cumulatively considerable and the cumulative impact would be less than significant. (PS/LTS)

## Impacts of Revised Project

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### Impacts Not to Be Evaluated

There would be no additional impacts beyond those identified in the certified EIR as a result of the Revised Project with regard to solid waste generation.

**UT-4: Solid Waste Generation.** As described above, the Previously Proposed Project would generate approximately 2.15 tons of solid waste per day at the West Campus, and would be accommodated by existing waste disposal facilities with sufficient available capacity. Solid waste generation is generally determined by accounting for the type of land use proposed and the number of individuals present. The Revised Project would result in the same land use and number of employees at the West Campus as evaluated in the certified EIR and, therefore, would generate the same amount of solid waste as

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<sup>33</sup> KEMA, "Facebook Menlo Park Campus Energy Demand," technical memorandum from Erik Dyrr, KEMA, to the City of Menlo Park, August 2, 2011.

determined for the Previously Proposed Project. Further, the Revised Project would retain the composting and recycling program identified for the Previously Proposed Project. The Revised Project would require the same demolition activities as evaluated in the certified EIR and would implement a construction waste management plan to recycle 75 percent of construction debris, similar to the Previously Proposed Project. Therefore, the Revised Project would comply with applicable solid waste plans and regulations, resulting in a less-than-significant impact with regard to solid waste disposal. (LTS)

### Impacts to Be Evaluated

As discussed in Section 2, Project Description, the current site plans show that the Revised Project building would be approximately 433,555 sf. However, in accordance with the M-2 Zoning Ordinance FAR requirements, a building of up to 433,656 sf would be permitted. This slight increase in building area would not substantially change the water demand, wastewater and stormwater generation, or energy demand. As a result, the analysis below would remain applicable.

**UT-1: Water Demand.** Implementation of the Revised Project would result in the same amount of water demand for the one building as for the five office buildings and the parking garage under the Previously Proposed Project. However, assuming the Green Roof Scenario, which is the conservative scenario for an analysis of water need, water demand for irrigation would be higher. As summarized in Table 3.12-1, the Revised Project would result in a water demand of approximately 62,711 gpd (70.25 acre feet per year [AFY]) at full buildout, which is 4,335 gpd (4.86 AFY) greater than the estimated water demand of the Previously Proposed Project.<sup>34</sup>

	Previously Proposed Project Demand (gpd)	Revised Project Demand (gpd)	Difference
Building Demand	38,976	38,976	0
Irrigation Demand	19,400	23,735	4,335
<b>Total</b>	<b>58,376</b>	<b>62,711</b>	<b>4,335</b>
<b>Total in AFY</b>	<b>65.39</b>	<b>70.25</b>	<b>4.86</b>

Source: BKF, 2013.

The MPMWD has sufficient capacity under normal-year conditions to accommodate the water demands of the Revised Project within its ISG with SFPUC. As described in the certified EIR, the MPMWD has capacity within its ISG of 4.465 million gallons per day (mgd) (4,993 AFY) to accommodate the water demand that would result from operation of the Revised Project. As of 2010, the MPMWD used

<sup>34</sup> BKF, “Facebook Menlo Park, West Campus Revised Project Water Demands,” Memorandum, January 17, 2013.

approximately 78 percent of its allocation from SFPUC, leaving approximately 1,083 AFY of unutilized water supply. Operation of the Revised Project would require approximately 70.25 AFY, which represents about 5 percent of MPMWD's available capacity. As such, the MPMWD would have an adequate supply to meet its projected demands in normal and single dry years. In years when SFPUC curtails deliveries, MPMWD can ask its customers for voluntary or mandatory water use reductions to help reduce demand in its service area. Therefore, implementation of the Revised Project, as with the Previously Proposed Project, would have a less-than-significant impact on water supplies in the MPMWD's service area and new water supplies or entitlements would not be necessary. (LTS)

**UT-2: Impacts to Water Treatment Facilities.** Implementation of the Revised Project would not require expansion of the existing water treatment facilities serving the MPMWD. Currently, the SFPUC has sufficient capacity in its water treatment facilities to deliver treated water to its wholesale and retail customers throughout its service area. Further, at the time the Revised Project is operational, SFPUC's water treatment facility improvement projects described in the certified EIR would be complete and the SFPUC would be capable of treating up to 655 mgd. Implementation of the Revised Project would not require the SFPUC to expand its water treatment facilities or to construct new facilities; therefore, a less-than-significant impact on water treatment facilities would result. (LTS)

**UT-3: Wastewater Generation.** The Revised Project would result in the generation of approximately 0.039 mgd of wastewater associated with indoor uses. The WBSD's average daily flow during dry weather is approximately 4.58 mgd, compared to WBSD's rated dry-weather capacity of approximately 7.975 mgd. Wastewater discharge from the Revised Project would constitute approximately one percent of WBSD's remaining, available capacity entitlements from the South Bayside System Authority (SBSA). Therefore, WBSD's available capacity entitlements from SBSA would be sufficient to accommodate the projected wastewater flow that would result from development of the West Campus. Because the SBSA Regional Treatment Plant would have adequate capacity to process the wastewater generated from the West Campus, implementation of the Revised Project at the West Campus would not exceed the wastewater treatment requirements of the RWQCB.

Implementation of the Revised Project would require a new wastewater line to connect to the WBSD's main sewer system along Willow Road, similar to the Previously Proposed Project. However, extension of the sanitary sewer system would comply with the WBSD Class 3 and Class 2 sewer permits.

The technical study prepared by West Yost Associates<sup>35</sup> for the Previously Proposed Project determined that, under existing conditions, the 12-inch-diameter pipeline is operating at capacity and could not accommodate additional flows. The Revised Project is also designed to accommodate approximately 2,800 employees (the same as the Previously Proposed Project); therefore, the existing 12-inch-diameter wastewater pipeline would also be insufficient to accommodate additional wastewater flows.

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<sup>35</sup> West Yost Associates, Technical Memorandum: Evaluation of Proposed Flows From the New Facebook Campus as Compared to Existing District Sewer System Capacity, October 3, 2011.

Since the existing pipeline is already at capacity, development of the West Campus would require a new wastewater line to connect to the WBSD's main sewer system. Due to the capacity limitations of the existing 12-inch-diameter wastewater conveyance pipeline, the increase in employees over existing condition at the Project site would result in a potentially significant impact with regard to wastewater conveyance infrastructure.

**MITIGATION MEASURE.** Mitigation Measure UT-3.1, as required in the certified EIR, would ensure that necessary capacity improvements are implemented so that the WBSD sanitary sewer system has sufficient capacity to accommodate additional wastewater generated by the Revised Project. This mitigation measure would reduce potentially significant impacts to a less-than-significant level. (PS/LTS)

**UT-5: Stormwater Generation.** Assuming the No Green Roof Scenario, the Revised Project would result in 67 percent impervious surfaces, compared to 49 percent under the Previously Proposed Project. As such, stormwater generation could increase. However, as discussed in Section 3.10, Hydrology and Water Quality, the Revised Project would include revisions to the proposed drainage infrastructure, which would result in fewer peak flows leaving the West Campus than with the Previously Proposed Project. In addition, the Revised Project would comply with provisions in the Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit and the City's grading and drainage policies. These requirements would regulate the quantity of stormwater runoff from the new development, specifically prohibiting a net increase in the rate of runoff. No new facilities would be required. Therefore, implementation of the Revised Project would have a less-than-significant impact on the City's storm drain system. (LTS)

**UT-6: Energy Demand.** The Revised Project would result in the same number of employees and anticipated land use at the West Campus as the Previously Proposed Project. However, because the building design for the Revised Project is substantially different from the Previously Proposed Project (one large building instead of five separate office buildings and a parking garage), an updated energy demand analysis was conducted. In order to estimate energy demand associated with the Revised Project, a building energy simulation modeling program developed by the Department of Energy was used.<sup>36</sup> The following energy-efficiency design features were taken into account during the modeling of energy demand:

- Building massing and orientation;
- Passive design features to reduce solar loads;
- High-performance glazing;
- Building insulation;
- Energy-efficient building lighting systems;
- Energy efficient HVAC systems and building controls;
- Commissioning and optimization;

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<sup>36</sup> KEMA, "Facebook Menlo Park West Campus Energy Demands Memorandum," January 13, 2013.

- Daylighting controls and occupancy sensors;
- Skylights;
- Variable speed drives and energy-efficient motors;
- Carbon monoxide sensors to reduce garage ventilation; and
- Energy Star rated computer equipment and appliances.

Results of the model indicate that the Revised Project would result in a four percent decrease in electricity demand and an eight percent decrease in natural gas demand compared to the Previously Proposed Project. This is summarized in Table 3.12-2.

**Table 3.12-2**  
**Estimated Energy Comparison—Revised Project and Previously Proposed Project**

West Campus Energy Demand	Electricity (kWh/yr)	Natural Gas (therms/yr)
Previously Proposed Project	6,473,213	68,703
Revised Project	6,196,028	63,009
Change	-277,185	-5,694
Percent Change (reduction)	-4%	-8%

*Source:* KEMA, 2013.

The reduction of energy usage is a result of the improved building envelope, chiller plant, and shading provided with the Revised Project. The EIR determined that the Previously Proposed Project would have a less-than-significant impact on energy demand. Therefore, because the Revised Project would result in a reduction in energy use compared to the Previously Proposed Project, energy-related impacts of the Revised Project would also be less than significant. (LTS)

**Cumulative Impacts.** The City’s water, wastewater conveyance and treatment, stormwater drainage, energy, and solid waste facilities have sufficient capacity to serve the cumulative development of the City (with identified mitigation). The City and its service providers would have adequate supplies to meet customer demand until 2035, including the demand of the Revised Project combined with existing and planned future uses. The Revised Project would not significantly increase water demand, wastewater generation, stormwater drainage, energy use, or solid waste generation as compared to the Previously Proposed Project. As such, impacts to utilities would not be cumulatively considerable, similar to the Previously Proposed Project, and the cumulative impact would be less than significant. (PS/LTS)

# Section 4 Conclusion

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## 4.1 CEQA CONCLUSION

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Based on the analysis and discussion presented in this document, no supplemental or subsequent environmental analysis is needed pursuant to CEQA Guidelines Sections 15162, 15163, and 15164. It is concluded that the analysis conducted, and the conclusions reached, in the EIR certified in May 2012 remain valid. The Revised Project would not cause any new significant impacts or any substantial increases in the severity of previously identified significant effects. No changes have occurred with respect to circumstances surrounding the Previously Proposed Project that would cause significant environmental impacts to which the Revised Project would contribute considerably. In addition, no new information has become available that shows that the Previously Proposed Project or the Revised Project would cause significant new environmental impacts. Therefore, no supplemental environmental review is required beyond this Addendum.

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Date of Determination

I do hereby certify that the above determination has been made pursuant to State and local requirements.

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Rachel Grossman  
Associate Planner, Community Development Department  
City of Menlo Park

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