

## Chapter 3

# Environmental Impact Analysis

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Chapter 3 of this Draft Infill Environmental Impact Report (Infill EIR) presents an analysis of the potential impacts that the 1300 El Camino Real Greenheart Project (Project) could have on existing environmental conditions. The environmental analysis has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Section 21000, *et seq.*), and the CEQA Guidelines.

## Organization of This Chapter

Each CEQA topic or environmental issue in Chapter 3 is given its own section, each containing the following subsections.

- **Regulatory Setting**—describes the federal, state, and local regulations regarding the impact topic that would be applicable to the construction and operation of the Project.
- **Environmental Setting**—describes existing baseline conditions, including the environmental context and background. The environmental baseline for purposes of the analysis is discussed in detail in this chapter under *Environmental Baseline*. As discussed in Chapter 2, *Project Description*, the existing Project site includes the former Derry Lane Site (3.5 acres), the former 1300 El Camino Real Site (3.4 acres), and 1258 El Camino Real Site (0.3 acre), which together total approximately 7.2 acres. These parcels generally consist of vacant, previously developed land in the northern portion of the site and commercial buildings along Derry Lane and Oak Grove Avenue in the southern portion.
- **Environmental Impacts**—identifies standards of significance and evaluates how the Project would affect the baseline conditions. If the change to the baseline conditions would exceed the significance thresholds, this would constitute a significant impact, and mitigation measures to reduce, eliminate, or avoid the significant impacts are suggested. This section also analyzes cumulative impacts, as described in this section under *Approach to Cumulative Impacts*.

## CEQA Methodology

CEQA Guidelines Section 15151 provides guidance for the preparation of an adequate EIR.

- An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.
- An evaluation of the environmental impacts of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

In practice, this guidance suggests that EIR preparers adopt a reasonable methodology to estimate impacts and make reasonable assumptions using the best information reasonably available.

It has been determined that (1) the Project would have effects that either were not analyzed in the prior El Camino Real/Downtown Specific Plan (Specific Plan) EIR (certified June 2012) or would be more significant than described in the prior EIR, and (2) that no uniformly applicable development policies would substantially mitigate such effects. Therefore, since these impacts could be significant, this Infill EIR is required to analyze those effects.

The Project site is within the Specific Plan area. Since the Project's site plan and development parameters are consistent with the Specific Plan, the programmatic Specific Plan EIR is applicable to this Project. Therefore, an Infill Environmental Checklist for the Project has been prepared by the City of Menlo Park (City), in conformance with Section 15183.3 of the CEQA Guidelines and Section 21094.5 of the Public Resources Code (PRC), and is included as Appendix 1-1. These guidelines were developed to eliminate repetitive analysis of the effects of a project that were previously analyzed in a programmatic EIR for a planning-level decision or are substantially mitigated by uniformly applied development policies. The Infill Environmental Checklist (Appendix 1-1) was used to limit the scope of the Infill EIR to the effects determined to be significant, identical to the function of an initial study as defined in Section 15063 of the CEQA Guidelines.

Section 15183.3 of the CEQA Guidelines and Section 21094.5 of the PRC, adopted per Senate Bill (SB) 226, outline the steps to streamline the CEQA process for projects that qualify as infill development. In order to qualify, a project site must be in an urban area that has been previously developed or that has urban uses on 75 percent of the site perimeter and must meet the following specified performance thresholds.

1. Inclusion of onsite renewable generation for the non-residential portion of the project.
2. Documentation of prior or planned remediation if the site has contamination issues.
3. Address local air quality issues if located near a high-volume roadway or other significant air pollution source.
4. If residential, must have one of the following: lower vehicle miles traveled (VMT) than regional average; be within 0.5 mile of a major transit stop or high-quality transit corridor; or include 300 or fewer units with 100 percent affordable or lower income housing.
5. If commercial, must have one of the following: lower VMT than regional average; or be within 0.5 mile of 1,800 dwelling units.
6. If office, must have one of the following: lower VMT than regional average; within 0.5 mile of a major transit stop or within 0.25 mile of a high-quality transit corridor.

The Office of Planning and Research's (OPR's) Appendix N, *Infill Environmental Checklist*, was used to evaluate the Project and document the Project's eligibility through the completion of the environmental checklist. The Project satisfied the Appendix N performance standards, listed below.

1. The Project would include the installation of an estimated 110-kilowatt (kW) photovoltaic system, which satisfies the inclusion of onsite renewable generation for the non-residential portion of the Project. Therefore, the renewable generation requirement is satisfied.
2. A discussion of the presence of hazardous substances at the Project site is described in detail in Chapter 2, *Project Description*. As described therein, where necessary, remediation is underway. Therefore, the documentation of prior or planned remediation is satisfied.

3. The Project would place residential uses within 500 feet of the Caltrain right-of-way and El Camino Real. The Project would install Minimum Efficiency Reporting Value (MERV) ventilation systems for residential uses to reduce the interior health risks to less than 10 in one million. This requirement was established by the health risk assessment prepared for the Specific Plan EIR.
4. The Project site is located in a low vehicle travel area, as defined in Appendix M.<sup>1</sup> The 2010 regional average VMT is 15.1 per capita, and the Project site is in a traffic analysis zone (TAZ) with approximately 14.9 VMT per capita.
5. The Project is within 0.5 mile of 1,800 dwelling units. With regard to office building projects, the Project is located within a low vehicle travel area, as defined in Appendix M.
6. The Project is located within 0.5 mile of an existing major transit stop (the Menlo Park Caltrain station).

In addition to meeting the above requirements, the Project site is within the Priority Development Area (PDA) in the adopted Plan Bay Area, which is the Sustainable Communities Strategy (SCS) for the Bay Area as required by SB 375. PDAs are areas where new development will support the needs of residents and workers in a pedestrian-friendly environment served by transit. Local jurisdictions, including Menlo Park, defined the character of their PDAs according to existing conditions and future expectations as regional centers, city centers, suburban centers, and/or transit town centers. Therefore, the Specific Plan serves as the PDA that includes the Project site. Since the Project is consistent with the Specific Plan (as discussed throughout this document), it is also consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCS.

SB 743 provides some streamlining options, similar to those presented in SB 226, as described above. The SB 743 streamlining options were not employed in the Infill Environmental Checklist, but other provisions of SB 743 were deemed to be applicable. Specifically, SB 743 provides that “aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Aesthetics and parking will no longer be considered in determining if a project has the potential to result in significant environmental effects provided, a project meets all of the following three criteria:

1. The project is in a transit priority area,<sup>2</sup>
2. The project is on an infill site,<sup>3</sup> and
3. The project is residential, mixed-use residential, or an employment center.<sup>4</sup>

The Project meets these criteria. Criterion 1 is met because of the Project’s location. As discussed in Chapter 2, *Project Description*, the Menlo Park Caltrain station is less than 300 feet south of the Project

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<sup>1</sup> Appendix M of the State CEQA Guidelines: Performance Standards for Infill Projects Eligible for Streamlined Review.

<sup>2</sup> *Transit priority area* is defined as an area that is within 0.5 mile of a major transit stop that is existing or planned, if the project is scheduled to be completed within the planning horizon included in an adopted federal Transportation Improvement Program (PRC Section 21099 (a)(7)).

<sup>3</sup> *Infill site* is defined as a lot located within an urban area that has been previously developed or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses (PRC Section 21099 (a)(4)).

<sup>4</sup> *Employment center* is defined as a project located on property zoned for commercial use with a floor-area ratio of no less than 0.75 within a transit priority area (PRC Section 21099 (a)(1)).

site, between Alma Street and El Camino Real, providing daily service between San Francisco and Gilroy. Criterion 2 is met because of the adjacent land uses, as discussed in Chapter 2, *Project Description*, and illustrated in Figure 2-1. As discussed therein, neighboring land uses include a hotel to the north, single- and multi-family residential units east of the Caltrain right-of-way, the Menlo Park Caltrain station and mixed-use development (including residential units) south of Oak Grove Avenue, and the El Camino Real commercial corridor to the west. The northeast corner of El Camino Real/Oak Grove Avenue, immediately adjacent to the Project site, includes a Chevron gas station and a restaurant/café. Downtown Menlo Park is approximately 0.1 mile southwest of the Project site, separated from the site by El Camino Real. Finally, Criterion 3 is met because of the proposed land uses at the Project site, which consist of mixed-use residential, as well as the proposed FAR of 1.5, which is greater than the 0.75 required by SB 743.

## California Building Industry Association vs. Bay Area Air Quality Management District

The California Supreme Court concluded in the *California Building Industry Association vs. Bay Area Air Quality Management District* (CBIA vs. BAAQMD) case that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project’s future users or residents.” The CBIA vs. BAAQMD ruling provided for several exceptions to the general rule where an analysis of the project on the environment is warranted: 1) if the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried); 2) if the project qualifies for certain specific specified exemptions (certain housing projects and transportation priority projects per PRC 21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6)); 3) if the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (per PRC 21096); and 4) school projects require specific assessment of certain environmental hazards (per PRC 21151.8).

## Classification of Impacts

In accordance with Section 15022(a) of the CEQA Guidelines, the City used the impact significance criteria designated by CEQA and CEQA Guidelines Appendix N, *Infill Environmental Checklist*, for this Infill EIR. These criteria, as well as City-adopted significance criteria for traffic impacts, are used to evaluate project impacts throughout this document. These criteria are listed at the beginning of the subsection *Environmental Impacts* under *Thresholds of Significance* throughout the resource sections in Chapter 3.

For each impact identified, a level of significance is determined using the following classifications.

- **Significant (S)** denotes effects that may have a significant impact. The analysis in these instances conservatively assesses the credible worst-case conditions, but the discussion acknowledges that there is some uncertainty regarding the credible extent of the impact.
- **Less-than-significant (LTS)** denotes effects that have a noticeable impact, but do not exceed established or defined thresholds or are mitigated below such thresholds.
- **No impact (NI)** denotes situations in which there is no adverse effect on the environment.

For each impact identified as being **significant**, this Infill EIR provides mitigation measures to reduce, eliminate, or avoid the adverse effect. If the mitigation measures would successfully reduce the impact to a **less-than-significant** level, this is stated in this Infill EIR. However, if the mitigation measures

would not diminish these effects to ***less-than-significant*** levels, then this Infill EIR classifies the impacts as ***significant and unavoidable (SU)***.

In Chapter 3, impacts are defined using an alphanumeric system that identifies the environmental topic of the impact. For example, NOI-1 denotes the presentation of the first impact in the Noise section. The abbreviated codes used to identify the environmental issues discussed in Chapter 3 are listed below.

- AQ—Air Quality (construction)
- NOI—Noise
- TRA—Transportation and Traffic
- HAZ—Hazards and Hazardous Materials

## Mitigation Measures

Mitigation measures identified in this Infill EIR were developed during the analysis and are designed to reduce, minimize, or avoid potential environmental impacts associated with the Project. According to CEQA Guidelines Section 15126.4:

The discussion of mitigation measures shall distinguish between measures that are proposed by the project proponents to be included in the project and other measures proposed by the lead, responsible, or trustee agency or other persons that are not included, but the agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.

In this Infill EIR, mitigation measures are provided immediately following each significant impact. The mitigation measures are numbered to correspond to the impacts they address. For example, Mitigation Measure HAZ-2.1 refers to the first mitigation measure for Impact HAZ-2 in the *Hazards and Hazardous Materials* section.

If the Project is approved by City Council, then a Mitigation Monitoring and Reporting Program (MMRP) must be adopted. Pursuant to CEQA Guidelines Section 15097, an MMRP is a mechanism used for the monitoring and reporting of revisions to the Project or conditions of approval that the public agency has required as mitigation measures to lessen or avoid a significant environmental effect. The City can conduct the reporting or monitoring, or it can delegate the responsibilities to another public agency or private entity that accepts the delegation. The MMRP for the Project will identify (1) the specific monitoring actions that shall be done, (2) the various City departments or other entities that shall oversee the completion of the mitigation, and (3) a timeline for implementation of the measures. The responsible departments will ensure that due diligence is carried out during implementation of the measures. Execution of the MMRP would reduce the severity or eliminate the significant impacts identified in this EIR.

## Environmental Baseline

In determining whether impacts are significant, an EIR ordinarily compares the potential impacts of the project with pre-project environmental conditions. Sections 15125(a) and 15126.2(a) of the CEQA Guidelines specify that the baseline normally consists of the physical conditions that exist at the time the notice of preparation (NOP) is published or the time the environmental analysis begins.

The approach to the analysis of the Project is consistent with the CEQA Guidelines. At the time the NOP was released (July 14, 2014), the Project site generally consisted of vacant, previously developed land in the northern portion and commercial buildings along Derry Lane and Oak Grove Avenue in the southern portion. Greenheart Land Company (Project Sponsor) proposes to demolish the existing structures in the southern portion of the site and construct approximately 420,000 square feet (sf) of mixed uses at the Project site. In total, the Project would include three mixed-use buildings, a surface parking lot, an underground parking garage, onsite linkages, and landscaping. Therefore, the baseline, and the point from which all impacts are measured for the Project site, is as a partially unoccupied site with vacant buildings and partially occupied site with commercial buildings.

## Approach to Cumulative Impacts

In addition to the evaluation of project-specific impacts, CEQA also requires an evaluation of cumulative impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. According to Section 15355 of the CEQA Guidelines:

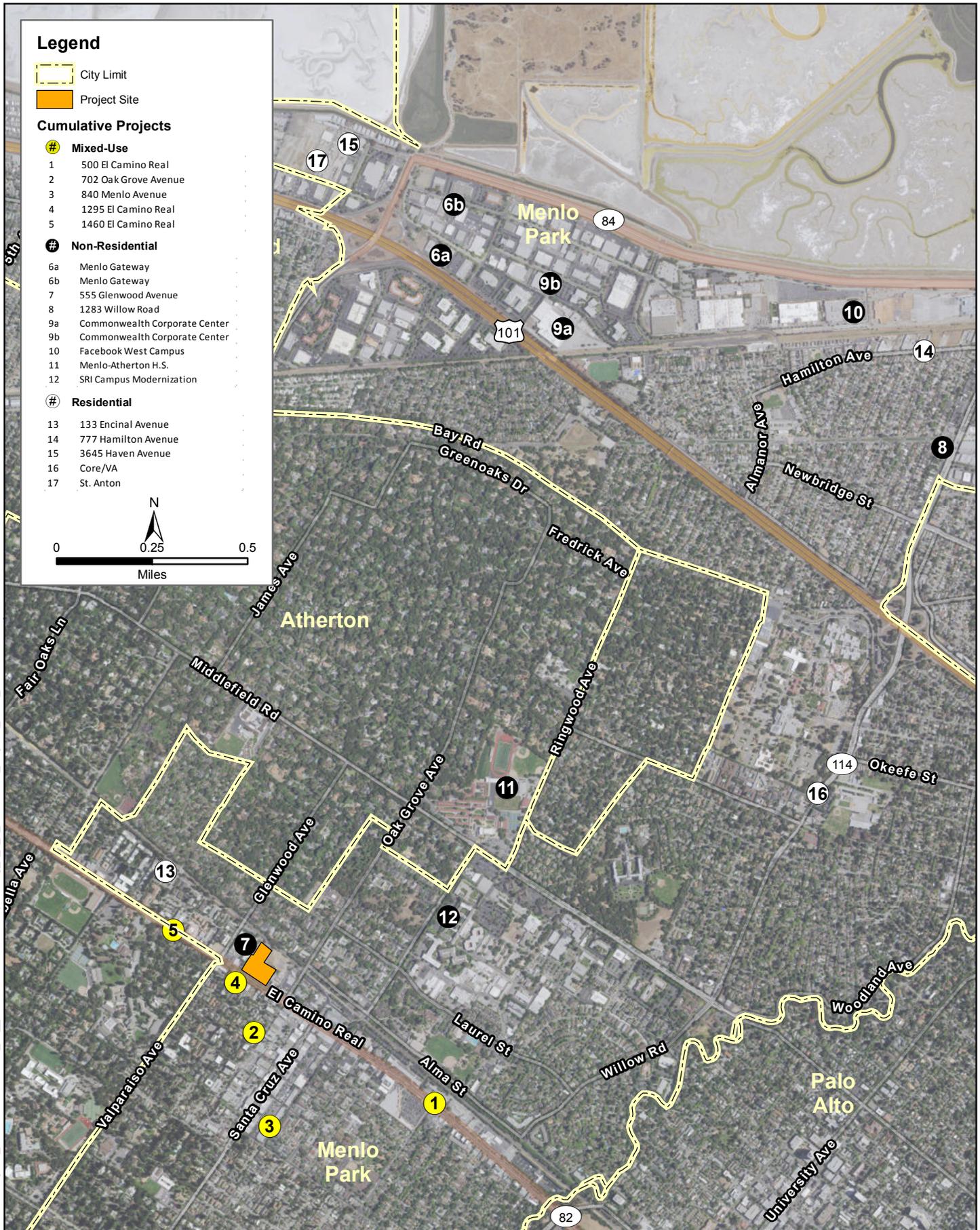
“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time.

Throughout this Infill EIR, cumulative impacts are denoted by a “C” (i.e., Impact C-NOI-1). An analysis of cumulative impacts follows the Project-specific impact evaluation and recommendation of mitigation measures in each section. An introductory statement defining the cumulative context that is being analyzed for respective sections (e.g., the City, the San Francisco Bay Area Air Basin) is included at the beginning of each cumulative impacts section. In some instances, a Project-related impact may be considered *less than significant* but would be considered *significant* in combination with development of the surrounding area. Similarly, a Project-specific significant impact may not result in a cumulatively considerable impact. Cumulative projects are summarized in Table 3.0-1 (presented at the end of this section) and shown in Figure 3.0-1.

## Impacts Requiring No Further Analysis

Section 15128 of the CEQA Guidelines states, “An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.” As described in Chapter 1, *Introduction*, the *Infill Environmental Checklist* (Appendix 1-1) determined that no further analysis was required for the following impacts: Agricultural and Forestry Resources, Air Quality (operational), Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hydrology/Water Quality, Land Use and Planning, Mineral Resources, Noise (all but traffic noise), Population and Housing, Public Services, and Utilities and Service Systems. Therefore, these issues are not discussed further in Chapter 3 of this Draft



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Source: City of Menlo Park, ICF 2015



**Figure 3.0-1**  
Cumulative Projects



Infill EIR but are briefly summarized below. In addition, because of the Project's consistency with SB 743 criteria, as discussed above, aesthetics and parking issues are not considered to be impacts under CEQA.

For the impact topics discussed below, the Project would incorporate all applicable mitigation measures from the Specific Plan EIR. The physical conditions, as they relate to these topics, have not changed substantially in the Specific Plan area since the preparation of the Specific Plan EIR. No substantial new information has since been presented that shows more significant effects than those originally analyzed in the Specific Plan EIR and, therefore, there would be no new specific effects as a result of the Project related to these topics. No additional mitigation measures beyond those in the Specific Plan EIR are required.

## Agricultural and Forestry Resources

The Project site is zoned SP-ECR/D and within the El Camino Real Mixed Use-Residential General Plan land use designation, which permits a variety of retail uses, personal services, business and professional offices, and residential uses. These land uses would continue with the implementation of the Project. No agricultural or forestry resources exist at the Project site. Thus, the Project would have no impact on farmlands, agricultural resources, the loss of forest land, or the conversion of forest land to nonforest land. Agricultural and forestry resources were analyzed in the Specific Plan EIR (page 6-4) and were determined to result in no impact. Thus, no mitigation measures are required.

## Air Quality (Operational)

The Project was analyzed as part of the Specific Plan EIR under the Bay Area Air Quality Management District (BAAQMD) 2010 Clean Air Plan. The Specific Plan EIR found that VMT would increase at a greater rate than population; therefore, the Specific Plan would be inconsistent with the BAAQMD 2010 Clean Air Plan, resulting in significant and unavoidable impacts. As described in the Specific Plan EIR, implementation of Mitigation Measure TR-2 would require Transportation Demand Management (TDM) strategies be implemented to help reduce VMT impacts, but impacts would not be reduced to a less-than-significant level. TDM measures proposed as part of the Project (see Chapter 2, *Project Description*) would ensure that Project operations would not result in a cumulatively considerable net increase of any criteria pollutants. Therefore, the Project would not result in any additional operations-related impacts beyond those originally analyzed in the Specific Plan EIR.

While roadway volumes would increase along El Camino Real with implementation of the Project, this increase would be below the BAAQMD significance criterion for cancer, non-cancer, and health risks related to particulate matter with a diameter of 2.5 micrometers or less (PM<sub>2.5</sub>). However, implementation of the Project would locate new residences along El Camino Real and the Caltrain right-of-way, which have elevated concentrations of toxic air contaminants (TACs) and PM<sub>2.5</sub>. Mitigation Measures AIR-5 and AIR-7 in the Specific Plan EIR (page 4.2-21 and pages 4.2-23 to 4.2-25, respectively) would reduce cancer risk to a less-than-significant level. The Project would not include any typical odors of concern and, therefore, would have no impact.

Construction of the proposed land uses could overlap, resulting in substantial pollutant emissions that would contribute to an air quality violation and exceed the BAAQMD's applicable significance threshold. Because of the potential overlap, construction emissions associated with the Project would cause a significant and unavoidable impact. Mitigation Measures AIR-1a and AIR-1b (pages 4.2-15 to 4.2-16) would reduce the amount of criteria pollutant emissions associated with construction of the Project but not to a less-than-significant level. However, because the proposed land uses were included in the

Specific Plan development scenario, the Project would not result in any additional construction-related impacts beyond those disclosed in the Specific Plan EIR. Construction of the Project could also expose sensitive receptors to increased TACs. The Specific Plan EIR did not conduct an analysis related to TAC exposure during construction; therefore, health risks to nearby receptors from exposure to construction-related diesel particular matter and PM<sub>2.5</sub> exhaust emissions are analyzed in Section 3.2, *Air Quality*.

## Biological Resources

The pallid bat (*Antrozous pallidus*) is the only special-status bat species that has the potential to roost in the Project site, particularly in the 37 heritage trees to be removed and the seven structures to be demolished during Project construction. These direct disturbances, along with indirect disturbances including noise or increased human activity in the area, would have a significant impact on the pallid bat. Mitigation Measures BIO-5a, BIO-5b, and BIO-5c, as described in the Specific Plan EIR (pages 4.3-29 to 4.3-31), would reduce this impact to a less-than-significant level. In addition, Cooper's hawk (*Accipiter cooperii*) may be present at the Project site. Implementation of Mitigation Measures BIO-1a and BIO-1b, as presented in the Specific Plan EIR (pages 4.3-24 to 4.3-27), would reduce potential impacts on Cooper's hawk to a less-than-significant level. The Project would include the removal of 37 heritage trees, but the City code requires a removal permit and replacement at a 1:1 ratio for residential projects and a 2:1 ratio for commercial projects. As such, the City's procedures and the Specific Plan guidelines would mitigate the loss of heritage trees. There would be a less-than-significant impact. No additional mitigation would be required.

The Project site boundaries do not include riparian habitat or natural plant communities, and no wetlands or other waters of the United States are present or adjacent to the Project site. Therefore, there would be a less-than-significant impact on riparian habitats or other sensitive natural communities. The Project site does not include federally protected wetlands and is not part of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation. Therefore, the Project would result in no impact, and no mitigation would be required. Impacts on the riparian habitat, etc., were reviewed in the Specific Plan EIR.

## Cultural Resources

A site-specific evaluation was conducted in January 2014, which concluded that none of the seven existing buildings at the Project site are listed on, or appear to be eligible for listing on, the California Register of Historic Places or local registers. Additionally, none of the buildings meet the definition of historical resources pursuant to CEQA Guidelines Section 15064.5. However, the Project site is highly sensitive for paleontological and archaeological deposits, which may meet the definition of historical resources under CEQA. Subsurface Project construction could result in damage to such deposits and, therefore, Mitigation Measures CUL-2 and CUL-3, as presented in the Specific Plan EIR (page 4.4-18 to 4.4-19), would reduce these impacts to a less-than-significant level. Additionally, Project construction would include soil excavation and grading, which may disturb potential human remains near the Project site. Disturbance of human remains would result in a significant impact, and Mitigation Measure CUL-4, as described in the Specific Plan EIR (pages 4.4-19 to 4.4-20), would reduce this impact to a less-than-significant level.

## Geology and Soils

As stated above, the CBIA vs. BAAQMD case does not require analysis of how existing environmental conditions will impact a project's future users or residents. The following text is summarized from the Infill Environmental Checklist, which was prepared prior to the CBIA vs. BAAQMD ruling. The following discussion is provided here for informational purposes only. The Project site is not within an Alquist-Priolo Fault Rupture Hazard Zone and no mapped active faults are known to pass through the immediate Project region. Alluvial deposits present at the Project site could expose Project occupants to substantial ground shaking. Construction of the Project would remove the existing groundcover and expose the underlying soils to wind and water, potentially contributing to erosion. However, the Project site consists of relatively flat topography, and there is little potential for erosion. The preliminary geotechnical investigation indicated that the soils at the Project site have low expansion potential. Nonetheless, prior to construction, uniformly applicable policies would require the Project site to be evaluated for the potential for landslides, lateral spreading, subsidence, and collapse using geotechnical practices; no additional mitigation is required. The Project would not require septic tanks or leach systems and wastewater would be disposed through the existing sanitary sewer system. The Project would not exacerbate any existing geologic hazards.

## Greenhouse Gas Emissions

The Specific Plan EIR concluded that vehicle trips, natural gas and electricity consumption, solid waste generation, water and wastewater conveyance and treatments, and landscape maintenance would exceed the applicable BAAQMD per capita threshold and would result in a significant and unavoidable impact on the environment. The Project would implement Mitigation Measures GHG-1, GHG-2a, and GHG-2b, as discussed in the Specific Plan EIR (pages 4.6-19 to 4.6-25). In addition, the Project Sponsor would comply with the guidelines and standards in the Specific Plan aimed at reducing GHG emissions, obtain and install electric vehicle/plug-in vehicle recharging stations, and participate in a recycling program as required by the City. Although impacts would be significant and unavoidable, even with the implementation of mitigation measures, the Project would not result in new specific effects or more significant effects than those evaluated in the Specific Plan EIR.

## Hazards and Hazardous Materials

The Project site is not located within an airport land use plan area or within the vicinity of a public or private use airport, resulting in no impacts involving airport hazards to people residing or working at the Project site. In addition, the Project would not physically impair or interfere with emergency response or evacuation in the Project vicinity. Adherence to the Local Hazard Mitigation Plan, the City's Emergency Operation Plan (EOP), and the requirements of the Menlo Park Fire Protection District (MPFPD) would reduce the potential for interfering with emergency plans. Therefore, the Project would result in a less-than-significant impact. Since the Project site is not located within a *very high* fire risk area or near wildlands, the Project would have no impact on people or structures involving wildland fires.

Contamination exists at the Project site in the form of perchloroethylene (PCE), trichloroethylene (TCE), dichloroethane (DCE), and vinyl chloride, which have affected soil and groundwater, from historical activities conducted by Wo Sing Laundry and Dry Cleaners. In addition, as detailed in the Phase I ESA for

the 1300 El Camino Real site,<sup>5</sup> historic automotive detailing and painting operations, a former pad-mounted transformer, and undocumented fill may have affected soil within the site. Portions of 21 hydraulic lifts remain on the property. Therefore, residual hydraulic oil may exist within these components, and affected soil may exist in the soil below the lifts and their surroundings. The pad-mounted transformer was located in the western portion of the property and may have contained dielectric oil (with polychlorinated biphenyls [PCBs]). Additionally, historical information suggests that building materials from 1300 El Camino Real, 1258 El Camino Real, and Derry Lane could contain unknown quantities of asbestos-containing materials (ACMs) and lead-based paint. Potential ACMs in the area would consist of concrete, stucco, paint, sheetrock, mortar, mastic, window putty, and roofing materials. Potential lead-based paint might be found in cinder block walls, stucco, sheetrock, concrete flooring, and wood ceilings.

The physical conditions, as they relate to the transport and use of hazardous materials and the accidental release of hazardous materials, have not changed in the Specific Plan area since the preparation of the Specific Plan EIR. However, due to the extent of the identified hazardous materials at the Project site and the possibility that the project may exacerbate these existing hazards, it has been determined that these topics require further discussion. These topics are analyzed in further detail in Section 3.4, *Hazards and Hazardous Materials*.

## Hydrology/Water Quality

Excavation activities during Project construction would result in short-term disturbance and exposure of surface soils, which could cause erosion and increase sediment and pollutant loading in stormwater runoff. Therefore, the Project Sponsor would be required to implement a stormwater pollution prevention plan (SWPPP), including the implementation of stormwater quality best management practices (BMPs) during Project construction. In addition, the Project Sponsor would have to apply for an individual waste discharge requirement (WDR)/National Pollutant Discharge Elimination System (NPDES) permit if substantial dewatering is required, as well as a grading and drainage (G&D) permit to show that sediment-laden water would not leave the site..

Compliance with these requirements, as set forth by the City, San Mateo County, the Regional Water Quality Control Board, and Specific Plan guidelines, would ensure that the Project would have a less-than-significant impact on erosion and runoff of soils, siltation, water quality standards, and groundwater supplies during construction and operation. The Project would be served by the City's stormwater drainage, which has adequate capacity, and, consequently, would have a less-than-significant impact on existing stormwater drainage systems. The Project site is not within a Federal Emergency Management Agency (FEMA)-designated flood zone, within a potential dam inundation area, or an area susceptible to tsunamis and, consequently, would not exacerbate any hazards related to these conditions. Therefore, there would be no impact related to levee or dam flooding and seiche, tsunami, or mudflow.

## Land Use and Planning

The Project would not include changes to the Caltrain corridor and El Camino Real barriers that currently limit east-west connectivity. Rather, implementation of the Project would include the extension of Garwood Way through the Project site, thereby promoting additional connectivity in the

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<sup>5</sup> Green Environment, Inc. 2012. *Phase I Environmental Site Assessment, 1300 El Camino Real, Menlo Park, California*. (GEI Project: A12777.) March 20. Prepared for Bayfront Investments, LLC.

area. The Project would not exacerbate existing barriers or create new ones. The Project site is not part of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation. Therefore, the Project would have no impact on these plans.

Since the Project site is within the Specific Plan Area, the Project is required to abide by the Specific Plan land use designations, goals, and policies. The Project would meet the guiding principles of the Specific Plan by, providing public plazas, developing vacant and underutilized space, increasing retail sales, promoting east-west and north-south connectivity, and encouraging access to public transit. The Project is eligible for a Public Benefit Bonus and would be consistent with the floor area ratio (FAR), height, and densities permitted in the Specific Plan EIR. Although the Project would include taller buildings than the buildings that currently exist, the Project would comply with the building height and massing controls set forth in the Specific Plan. In addition, although the Project would introduce more residential uses to the immediate area than already exist, the residential uses would complement existing retail, restaurant, cinema, and service uses. Overall, the proposed land uses at the Project site would be consistent with the existing land uses and the Specific Plan area standards and guidelines, resulting in less-than-significant impacts.

## Mineral Resources

There are no known mineral resources at the Project site, and it is not delineated as a locally important mineral resource by the California Geological Survey (CGS) or on any county or city land use plan. Thus, there would be no impact on known mineral resources. This topic was analyzed in the Specific Plan EIR and also determined to result in no impact.

## Noise (Construction)

Project construction would result in noise-related impacts from the operation of heavy-duty construction equipment and on-road vehicles, including construction worker commute vehicles, delivery trucks, and haul trucks. Construction noise as a result of the Project would be exempt during weekday hours but otherwise limited by the City's Noise Ordinance. Implementation of Mitigation Measures NOI-1a, NOI-1b, and NOI-1c, as described in the Specific Plan EIR (pages 4.10-11 to 4.10-12), would further reduce construction noise impacts applicable to daytime thresholds to a less-than-significant level.

Noise from roadway traffic, Caltrain, and Union Pacific Railroad operations could result in impacts on residential uses at the Project site. Train noise could be significant, as residences would be located near the train tracks. Although the effect of existing noise and vibration on the Project is no longer considered a CEQA impact, the residential units would be subject to analyses by acoustical engineers to document the necessary design features to meet interior noise criteria, per Mitigation Measure NOI-3 (pages 4.10-15 to 4.10-16 of the Specific Plan EIR). A vibration study, as required as Mitigation Measure NOI-4 (pages 4.10-16 to 4.10-17 of the Specific Plan EIR), would account for the impacts of groundborne vibrations from Caltrain operations and reduce impacts to an acceptable level. No additional mitigation measures are required. The Project site is not located within proximity of an airport or private airstrip, resulting in no associated noise impacts.

With regard to traffic, operational noise could result in a permanent increase in ambient noise levels from the Project that was not considered in the Specific Plan EIR. Furthermore, this increase would expose nearby residences to increased noise levels. As such, this topic requires further environmental review in this Infill EIR. Noise impacts as a result of roadway traffic during Project operations are discussed in Section 3.3, *Noise*.

## Population and Housing

The Project could include a mix of non-medical office, community-serving, and residential uses. Depending on the scenario, the Project could include a higher amount of office uses, or include a higher amount of community-serving uses within the office and residential buildings. In general, office uses generate the need for more employees than community-serving uses. If the Project would include the maximum amount of office and the minimum amount of community-serving uses,<sup>6</sup> then it is estimated that approximately 702 employees would be generated.<sup>7</sup> This is the conservative scenario and, therefore, is analyzed here. The Specific Plan would develop retail and commercial uses by 2030 that would employ up to 1,357 people. Therefore, the Project would represent approximately 52 percent of the anticipated job growth in the Specific Plan area.

The Project would also include the construction of up to 202 new housing units at the Project site. The units are generally expected to be utilized by singles and couples rather than large families. As such, the average household size would be more similar to that used in the Specific Plan rather than the current City average. Based on an average household size of 2.38 persons per household (per the Specific Plan), implementation of the Project would add approximately 481 people to the City's population. The Specific Plan would develop 680 housing units by 2030 that would house approximately 1,537 residents. Therefore, the Project would represent approximately 30 percent of the anticipated housing unit growth in the Specific Plan area.

The anticipated population growth from the proposed housing units and the employment growth as proposed under the Project would represent less than 1 percent of the City's current population and would result in approximately one-third of the City projected population growth through 2020. Therefore, the Project would not directly result in substantial population growth. The demand for additional housing as a result of the Project would be less than significant.

The Association of Bay Area Governments' (ABAG's) *Projections 2013* includes buildout of the Specific Plan, which encompasses development of the Project. Table 3.0-2 illustrates job and housing projections for the city through 2030, which are based on ABAG projections. These projections would not be affected by development of the Project because it is already accounted for in the projections.

**Table 3.0-2. Jobs and Housing in the City**

	2010	2015	2020	2030
<b>Jobs/Housing without Project</b>				
Jobs	29,830	31,920	34,130	34,760
Housing	14,128	14,490	14,870	15,610
Jobs/Housing Ratio	2.11	2.20	2.30	2.23

Source: Association of Bay Area Governments (ABAG). 2013. Projections 2013. December.

<sup>6</sup> Residential uses would require minimal employees and, therefore, are not included in the calculations. However, under both scenarios, the same amount of residential uses would be provided (202,100 sf).

<sup>7</sup> This estimate assumes 300 sf per office employee and 500 sf per retail employee. With full office buildout, approximately 199,300 sf of office and 18,600 sf of retail uses would be constructed (199,300 sf of office/300 sf) + (18,600 sf of retail/500 sf) = ~702 employees.

## Public Services

The Project would increase the City's daytime population by approximately 702 people due to the increase in onsite employment. Additionally, the Project is anticipated to generate approximately 481 onsite residents. This would add to the service population of the MPFPD and the Menlo Park Police Department (MPPD). With an increase in the service population, approximately one additional staff member from each service would need to be hired to maintain the City's service ratios. Since the Project is within the proposed growth of the Specific Plan, and no new facilities would need to be constructed, the Project would have a less-than-significant impact on the MPFPD and the MPPD.

Due to the increase in onsite residents and Project employees potentially living in the City, new students would be added to the Menlo Park City School District and the Sequoia Union High School District. Therefore, the Project could trigger the need for new or expanded high school facilities. However, the Project is subject to SB 50, School Impact Fees, in which the payment of school fees is deemed as full and complete mitigation, resulting in less-than-significant impacts on schools. In addition, the population growth generated by the Project would increase the demand for park, recreation, and library services, but to a less-than-significant level.

## Transportation/Traffic

As described above, the Project site is not located within an airport land use plan area and is not within 2 miles of a public airport or public use airport. Additionally, the maximum building height at the Project site would be approximately 48 feet. Therefore, the Project would have no impact on air traffic patterns. No mitigation would be required. Emergency access to the Project site would likely improve over existing conditions due to the new driveway at Garwood Way and, therefore, would have a less-than-significant impact on emergency access.

Conflicts with applicable transportation plans, ordinances, or policies, were analyzed in the Specific Plan EIR. The development under the Specific Plan was determined to result in significant and unavoidable impacts to area intersections and local roadway segments, even with implementation of Mitigation Measures TR-1a, TR-1b, TR-1c, and TR-1d and Mitigation Measure TR-2 (pages 4.13-40 to 4.13-53). The Project would likely affect intersections that were not previously evaluated under the Specific Plan EIR and could potentially impact pedestrian and bicycle facilities and transit load factors. Because the Project would potentially affect intersections not evaluated in the Specific Plan EIR, these topics require further environmental review in the Infill EIR. Therefore, these topics are further discussed in Section 3.1, *Transportation and Traffic*.

## Utilities and Service Systems

The Project would continue to drain to the existing underground storm drains and would incorporate Low Impact Development (LID) treatment measures for stormwater management. Additionally, the Project would comply with applicable Specific Plan guidelines and implement a landscaping plan designed to provide stormwater treatment areas. As such, the Project would not require the construction of new stormwater drainage facilities or the expansion of existing facilities, resulting in a less-than-significant impact. The Project would be served by Ox Mountain Sanitary Landfill and would comply with federal, state, and local statutes and regulations. As such, there would be a less-than-significant impact on solid waste generation. The Project would also increase the demand for gas and electric service. However, existing electricity and gas lines in the vicinity of the Project site, provided by

Pacific Gas and Electric Company (PG&E), would continue to serve the site. Therefore, the Project would have a less-than-significant impact on wastewater treatment requirements, water demand, water supplies, water treatment facilities, and electric and gas utilities.

**Table 3.0-1. Cumulative Projects (Near-Term Planned Developments in Project Vicinity)**

Map ID	Project	Address	Land Use	Size (sf)	Approval Status
<b>Mixed-Use Projects</b>					
1	500 El Camino Real	500 El Camino Real	Residential Office Retail	170 du 199,500 sf 10,000 sf	Pending
2	702 Oak Grove Avenue	702 Oak Grove Avenue	Residential Office	4 du 3,469 sf	
3	840 Menlo Avenue	840 Menlo Avenue	Residential Office	3 du 6,300 sf	Pending
4	1295 El Camino Real	1295 El Camino Real	Residential Commercial	15 du 1,906 sf	Pending
5	1460 El Camino Real	1460 El Camino Real	Residential Office	16 du 26,800 sf	Approved
<b>Non-Residential Projects</b>					
6	Menlo Gateway	100-190 Independence Drive and 101-155 Constitution Drive	Office Health Club Restaurant Hotel	694,669 sf 68,964 sf 4,285 sf 230 rooms	Approved
7	555 Glenwood Avenue	555 Glenwood Avenue	Hotel	138 rooms	Approved
8	1283 Willow Road	1283 Willow Road	Office Retail	3,800 sf 5,096 sf	Approved
9	Commonwealth Corporate Center	151 Commonwealth Drive and 164 Jefferson Drive	Office	259,920 sf	Approved
10	Facebook West Campus	1 Facebook Way (formerly 312 and 313 Constitution Drive)	Office	433,656 sf	Approved
11	Menlo-Atherton H.S.	555 Middlefield Road	School	460 students	Pending
12	SRI Campus Modernization	333 Ravenswood Avenue	R&D Campus	3,000 employees	Pending
<b>Residential Projects</b>					
13	133 Encinal Avenue	133 Encinal Avenue	Residential	26 du	Pending
14	777 Hamilton Avenue	777 Hamilton Avenue	Residential	196 du	Approved
15	3645 Haven Avenue	3645 Haven Avenue	Residential	146 du	Approved
16	Core/VA	605 Willow Road	Residential	60 du	Approved
17	St. Anton	3639 Haven Avenue (formerly 3605-3639 Haven Avenue)	Residential	396 du	Approved

Notes: sf = square feet, du = dwelling unit

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