

5. Alternatives to the Proposed Project

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any significant effects of the proposed project.

The CEQA Guidelines set forth the intent and extent of alternatives analysis to be provided in an EIR. Section 15126.6(a) of the CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

5.1 PURPOSE

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

5.2 PROJECT OBJECTIVES

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the proposed project. The proposed project addresses growth in the Bayfront Area but also circulation citywide and will seek to accomplish the following objectives:

- Establish and achieve the community's vision.
- Realize economic and revenue potential.

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- Directly involve Bayfront Area property owners (as land use changes are expected only in that area).
- Streamline development review.
- Improve mobility for all travel modes.
- Preserve neighborhood character.

5.3 SELECTION OF A REASONABLE RANGE OF ALTERNATIVES

Section 15126.6(c) of the State CEQA Guidelines states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

5.3.1 ALTERNATIVE CONSIDERED AND REJECTED AS BEING INFEASIBLE

As described above, Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in and EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of an alternative that was considered and rejected, along with the reasons it was not included in the analysis.

REDUCED RESIDENTIAL LAND USE ALTERNATIVE

The land uses proposed in the Bayfront Area represent buildout projections intended to achieve a balance between residential and non-residential land uses. Measures that local governments take to support shifts in land use patterns are anticipated to emphasize compact, low-impact growth, resulting in fewer Vehicles Miles Traveled (VMT).¹ The VMT estimates in the City/County Association of Governments of San Mateo County (C/CAG) model are sensitive to changes in land use. Generally, land uses that reflect a more balanced jobs-housing ratio in the C/CAG model result in lower per capita VMT. Reducing only residential land uses would potentially off-set the land use balance and therefore, result in greater VMT than the proposed project. Accordingly, this alternative was rejected.

¹ California Air Resources Board, 2008. *Climate Change Scoping Plan, a Framework for Change*.

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This alternative was also rejected because it would not help meet the demand for high-density dwelling units as a result of increased employment from projected office, life science, and retail growth under the proposed project. Providing housing near these land uses helps reduce regional as well as local traffic trips and related adverse cumulative air quality and GHG emission impacts and by reducing housing, impacts to traffic, greenhouse gas emissions and air quality would be greater. For these reasons, a Reduced Residential Land Use Alternative was considered and rejected.

5.3.2 ALTERNATIVES ANALYSIS

In accordance with the CEQA Guidelines, three project alternatives and the comparative merits of the alternatives are discussed below.

All of the potential environmental impacts associated with adoption and implementation of the proposed project were found to be either less than significant without mitigation or less than significant with mitigation, with the exception of some impacts associated with air quality, greenhouse gas (GHG) emissions, population and housing (cumulative and temporary), and transportation and circulation, which were found to be significant and unavoidable with mitigation measures. The alternatives were selected because of their potential to further reduce and avoid these impacts.

The alternatives to be analyzed in comparison to the proposed project include:

- No Project Alternative: Current General Plan
- Reduced Non-Residential Intensity Alternative
- Reduced Intensity Alternative

The first alternative discussed is the CEQA-required “No Project” Alternative. The second alternative, the Reduced Non-Residential Intensity Alternative, assumes a 50 percent reduction in the amount of future net new non-residential development allowed in the Bayfront Area under the proposed project. The third alternative, the Reduced Intensity Alternative, assumes a 25 percent reduction in the amount of net new residential and non-residential development allowed in the Bayfront Area under the proposed project – therefore, the total number of population and employees would be 25 percent less than anticipated under the proposed project.

5.3.3 ASSUMPTIONS AND METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the proposed project. The development intensity for the alternatives varies from the proposed project. The estimated buildout of each alternative, as well as the proposed project, is provided in Table 5-1.

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TABLE 5-1 COMPARISON OF ALTERNATIVES AND THE PROPOSED PROJECT

| Category | Proposed Project | | No Project Alternative ^d | Reduced Non-Residential Intensity Alternative ^e | Reduced Intensity Alternative ^f |
|------------------------------------|-----------------------------------|--------------------------|-------------------------------------|--|--|
| | Current General Plan ^c | + Proposed Bayfront Area | | | |
| BAYFRONT AREA | | | | | |
| Non-residential Square Feet | 1.4 million | 2.3 million | 1.4 million | 2.6 million | 3.1 million |
| Hotel Rooms ^a | n/a | 400 | n/a | 200 | 300 |
| Residential Units | 150 | 4,500 | 150 | 4,650 | 3,525 |
| Population ^b | 390 | 11,570 | 390 | 11,960 | 9,068 |
| Employees | 3,400 | 5,500 | 3,400 | 6,150 | 7,525 |
| REMAINDER OF CITY | | | | | |
| Non-residential Square Feet | 355,000 | n/a | 355,000 | 355,000 | 355,000 |
| Hotel Rooms ^a | n/a | n/a | n/a | n/a | n/a |
| Residential Units | 850 | n/a | 850 | 850 | 850 |
| Population ^b | 2,190 | n/a | 2,190 | 2,190 | 2,190 |
| Employees | 1,000 | n/a | 1,000 | 1,000 | 1,000 |
| CITYWIDE TOTALS | | | | | |
| <i>Non-Residential Square Feet</i> | 1.8 million | 2.3 million | 1.8 million | 2.9 million | 3.5 million |
| <i>Hotel Rooms^a</i> | 0 | 400 | 0 | 200 | 300 |
| <i>Residential Units</i> | 1,000 | 4,500 | 1,000 | 5,500 | 4,375 |
| <i>Population^b</i> | 2,580 | 11,570 | 2,580 | 14,150 | 11,258 |
| <i>Employees</i> | 4,400 | 5,500 | 4,400 | 7,150 | 8,525 |

a. An unknown number of additional hotel rooms could be proposed under the current General project.

b. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

c. This represents the previously-approved and ongoing development potential under the existing General Plan.

d. This represents what could be built if the proposed project were not approved, which is the previously-approved and ongoing development potential under the existing General Plan.

e. The "Reduced Non-Residential Intensity Alternative" assumes a 50 percent reduction in the amount of non-residential development proposed in the Bayfront Area plus the previously-approved and ongoing development potential under the existing General Plan.

f. The "Reduced Intensity Alternative" assumes a 25 percent reduction in the amount of residential and non-residential development in the Bayfront Area plus the previously-approved and ongoing development potential under the existing General Plan.

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The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project would apply to each alternative. The following analysis compares the potentially significant environmental impacts of the three alternatives with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4, Environmental Evaluation, of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed project. Table 5-2 below, summarizes the relative impacts of each of the alternatives compared to the proposed project.

TABLE 5-2 COMPARISON OF IMPACTS FROM PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

| Topic | Proposed Project ^a | No Project Alternative | Reduced Non-Residential Intensity Alternative | Reduced Intensity Alternative |
|---------------------------------|-------------------------------|------------------------|---|-------------------------------|
| Aesthetics | LTS | > | = | = |
| Air Quality | SU | > | < | < |
| Biological Resources | LTS | < | < | < |
| Cultural Resources | LTS/M | < | = | = |
| Geology, Soils, and Seismicity | LTS | = | = | = |
| Greenhouse Gas Emissions | SU | > | < | = |
| Hazards and Hazardous Materials | LTS | < | < | < |
| Hydrology and Water Quality | LTS | = | = | = |
| Land Use and Planning | LTS | = | = | = |
| Noise | SU | < | < | < |
| Population and Housing | SU | < | = | < |
| Public Services and Recreation | LTS | < | < | < |
| Transportation and Circulation | SU | > | < | = |
| Utilities and Service Systems | LTS | < | < | < |

a: The impacts listed in this column represent the highest significance determination for each respective threshold.

| | | | |
|-------|---------------------------------------|---|---|
| LTS | Less Than Significant | < | Less impact in comparison to the proposed project |
| LTS/M | Less Than Significant with Mitigation | = | Similar impacts in comparison to the proposed project |
| SU | Significant and Unavoidable | > | Greater impact in comparison to the proposed project |

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5.4 NO PROJECT ALTERNATIVE

5.4.1 DESCRIPTION

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the no project alternative will be the continuation of the existing plan. Per CEQA Guidelines Section 15126.6(e)(3)(C), the City of Menlo Park, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. Implementation of the No Project Alternative assumes that the development buildout throughout the city would remain unchanged until the buildout horizon year 2040, which is the same horizon year of the proposed project. Table 5-1 above shows the remaining development buildout in the current General Plan under the “No Project Alternative” column.

Future development permitted under the No Project Alternative would not increase development potential in Menlo Park beyond what was considered in the existing General Plan and analyzed in the 2013 Housing Element Environmental Assessment, but rather would allow development of the remaining development buildout shown in Table 5-1. No General Plan land use or Zoning designation changes would be required to accommodate these uses.

As shown in Table 5-1, the No Project Alternative would result in 1.8 million square feet of non-residential space, 1,000 residential units, and no anticipated hotel development. The No Project Alternative would result in a population increase of 2,580 new residents, and 3,400 new employees in the city.

5.4.2 IMPACT DISCUSSION

The potential environmental impacts associated with the No Project Alternative when compared to the proposed project are described below.

5.4.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would result in less than significant impacts and no mitigation measures are required.

The City of Menlo Park does not designate scenic corridors or vistas, thus, same as the proposed project, previously-approved development under the No Project Alternative would not block views scenic vistas or scenic corridors. Therefore, impacts related to these topics would be similar to the proposed project.

Under the No Project Alternative, previously-approved development would be concentrated on locations either already developed and/or underutilized, and/or in close proximity to existing development. Development under the No Project Alternative would also be subject to architectural control review or

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would be required to comply with design standards in the El Camino Real/Downtown Specific Plan and R-4-S zoning designations to ensure compatibility with adjoining land uses. Thus, unlike the proposed project, which includes design standards as part of the proposed Zoning for the Bayfront Area, development under this alternative would not provide the same level of design consideration related to the visual character or quality of a project site and its surrounding; thus, aesthetic impacts related to these topics would be greater to those of the proposed project.

Similar to the proposed project, the No Project Alternative would result in new lighting sources that could result in sources of glare. However, the future development under the No Project Alternative would be required to comply with CAL Green's best management practices and General Plan policies and Municipal Code provisions that ensure new land uses do not generate excessive light levels and reduce light and glare spillover from future development to surrounding land uses. Given that the No Project Alternative allows for lower intensity development than the proposed project, it is likely that the aesthetic impacts related to light or glare would be less than those under the proposed project.

Overall, impacts related to aesthetics would be *greater* than those of the proposed project under this alternative because no new design standards would be applied to the Bayfront Area.

5.4.2.2 AIR QUALITY

As described in Chapter 4.2, Air Quality, of this Draft EIR, the proposed project would result in three significant and unavoidable impacts even with implementation of Mitigation Measures AQ-2a, AQ-2b1, AQ-2b2, and AQ-5, and two significant impacts that would be mitigated to a less-than-significant level with the implementation of Mitigation Measures AQ-3a and AQ-3b.

Under the No Project Alternative, future development in the study area would continue to occur under the City's existing General Plan. However, under this alternative, future development would be less intense compared to the proposed project; therefore, would reduce overall air quality impacts associated with the construction and operation of future development from that of the proposed project. Although future development under the No Project Alternative would be less intense, operational and construction criteria air pollutant emissions would still generate a net increase in criteria air pollutant emissions. Furthermore, while, the proposed Mitigation Measures AQ-2a, AQ-2b1, AQ-2b2, AQ-3a, AQ-3b, and AQ-5 would apply to the No Project Alternative, the proposed new General Plan goals, policies, and programs, and new zoning regulations such as requiring a 20 percent reduction in vehicular traffic that would be adopted under the proposed project, which are intended to provide for greater opportunities to reduce VMT and protect and improve air quality, would not be implemented. As discussed further, under Section 5.4.2.6, Greenhouse Gas Emissions, below, the VMT per capita would be 19 miles under the No Project Alternative and 14 miles under the proposed project (see Table 4.13-13). For these reasons, while business-as-usual development under the No Project Alternative would result in less intense development, because of the higher VMT, air quality impacts under the No Project Alternative would be *greater* when compared to the proposed project.

5.4.2.3 BIOLOGICAL RESOURCES

As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, the proposed project would result in seven significant-but-mitigable impacts and one less-than-significant impact. Implementation of

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Mitigation Measure BIO-1 would require project-specific baseline biological resources assessments on sites containing natural habitat, which would be required to reduce impacts to biological resources.

Similar to the proposed project, future development under this alternative would occur in previously urbanized areas where special-status species are generally not expected to occur. Further, future development would still be required to comply with existing federal, State, and local regulations, such as Municipal Code Chapters 12.44 and 13.24, as well as the Migratory Bird Treaty Act, that serve to reduce or minimize potential impacts to biological resources. Although future development under the No Project Alternative and the proposed project would generally occur within the same previously urbanized study area, and would be subject to the same regulations protecting biological resources, the No Project Alternative would still result in less intense development overall; therefore, resulting in less potential for disturbance to biological resources associated with the construction and operation of future development.

Overall, impacts to biological resources under the No Project Alternative would be *less* when compared to the proposed project.

5.4.2.4 CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources, of this Draft EIR, the proposed project would result in six significant-but-mitigable impacts. Implementation of Mitigation Measures CULT-1, CULT-2a, CULT-2b, CULT-3, and CULT-4 would reduce impact related to historical, archeological, paleontological, human remains, and tribal cultural resources.

Under the No Project Alternative, future development in the study area would continue to occur, but would be less intense than the proposed project. Similar to the proposed project, development under this alternative would involve ground-disturbing activities during construction of future structures which could affect cultural resources. Similar to the proposed project, future development under the No Project Alternative would be subject to existing federal, State, and local regulations laws to protect cultural resources, which would generally ensure less-than-significant impacts to cultural resources. In addition, under this alternative, Mitigation Measures CULT-1, CULT-2a, CULT-2b, CULT-3, and CULT-4 as recommended under the proposed project, would also be required under this alternative.

Overall, this alternative would result in less overall development within the study area; thus, the potential to impact a cultural resource would be *less* when compared to the proposed project.

5.4.2.5 GEOLOGY, SOILS, AND SEISMICITY

As described in Chapter 4.5, Geology, Soils, and Seismicity, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Under the No Project Alternative, future development would result in less non-residential and residential development, thereby reducing potential new development that would occur within the study area compared to the proposed project. As such, fewer structures would be subject to the potential for damage from soil/geologic conditions, liquefaction, lateral spreading, or other geologic instabilities. However, future development under both the No Project Alternative and proposed project would be

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subject to the same erosion control measures as specified in the City of Menlo Park Engineering Division’s Grading and Drainage Control Guidelines, as well as the California Building Code (CBC) regulations relating to seismic safety, which would address and prevent hazards associated with geology, soils, and seismicity.

Although the No Project Alternative would result in less overall development, compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under the No Project Alternative and the proposed project; therefore, would result in *similar* impacts when compared to the proposed project.

5.4.2.6 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts with implementation of Mitigation Measure GHG-1.

The No Project Alternative would result in less non-residential and residential development within the study area when compared to the proposed project. As a result, GHG emissions associated with the construction and operation of less development would therefore reduce overall GHG emissions to that of future development anticipated under the proposed project.

The proposed project includes land uses that balance jobs and housing, and results in a Vehicles Miles Traveled (VMT) per capita of 14 miles, which is lower than the No Project Alternative where the VMT per capita would be 19 miles (see Table 4.13-13). Furthermore, the proposed goals, policies, and programs of the Land Use (LU) and Circulation (CIRC) Elements that would require local planning and development decisions to consider impacts to GHG and proposed Zoning regulations that would promote the creation of a live/work/play environment with travel patterns that are oriented toward pedestrian, transit, and bicycle use, including identifying public paseos to improve connectivity on the Zoning map, and the requirement to prepare Transportation Demand Management (TDM) Plans to reduce trip generation by 20 percent below standard use rates, would not be adopted under the No Project Alternative.

Consequently, because the No Project Alternative would result in less development and would continue the business-as-usual land use balance, this alternative would result in *greater* GHG emissions than the proposed project.

5.4.2.7 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Chapter 4.7, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in six less-than-significant impacts, two significant-but-mitigable impacts, and one no impact conclusion. Implementation of Mitigation Measures HAZ-4a and HAZ-4b would reduce impacts related to sites with known hazardous materials.

As described in Chapter 4.7, the study area contains leaking underground storage tanks (LUST), as well as several locations that are listed under the Spills, Leaks, Investigation, and Cleanups (SLIC) Program, which investigates and regulates non-permitted discharges, also have been identified within the study area. However, the SLIC sites are found mostly in the downtown area and the northeastern portion of the study area, and most of these sites are listed as “Completed-Case Closed,” with some of the sites still open undergoing site assessment, remediation action, or verification monitoring of remediation action.

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Future development under the No Project Alternative and the proposed project that involves the handling, transport, use, or disposal of hazardous materials would be regulated pursuant to federal, State, and local laws. In addition, although the study area is located approximately 2 miles from Palo Alto Airport, no portions of the city are within the airport land use compatibility zones established by the Palo Alto Airport Comprehensive Land Use Plan. Further, the study area is located more than 2 miles from the San Carlos Airport; therefore, future development under both scenarios would not result in any airport hazards. As a result, future development under the No Project Alternative would not interfere with the use of the public or private use of nearby airports nor would future development expose people to hazards or risks related to airport use.

Overall, while the No Project Alternative would result in less overall development, compliance with existing federal, State, and local regulations related to the safe use, handling, disposal, transport, and generation of hazardous materials, would ensure that potential impacts related to hazards and hazardous materials be minimized. In addition, HAZ-4a and HAZ-4b would be required under both scenarios to reduce impacts to sites with known hazardous materials. Therefore, the No Project Alternative would result in *less* impacts when compared to the proposed project.

5.4.2.8 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Although the No Project Alternative would result in less development overall, future development would occur within previously urbanized areas and would be subject to the same existing federal, State, and local regulations relating to hydrology and water quality, similar to the proposed project. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality be minimized as future development occurs. As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, some dewatering of groundwater could occur during construction of future development in the Bayfront Area; however, would be at a shallow level where water supplies aren't drawn from. In addition, because future development under the No Project Alternative would occur primarily within already urbanized areas, development would connect to existing drainage systems already in place. Although there are 100-year flood zones within the Bayfront Area where housing could be placed, compliance with existing local regulations, such as requiring fill to elevate structures above flood level, and compliance with the Federal Emergency Management Agency's (FEMAs) flood regulations, would minimize potential flood impacts. Further, while there is Searsville Reservoir and Felt Lake where dams are located within the city, both of these are not expected to be threats as described in Chapter 4.8. Further, the Bayfront Area is not within either of these dam inundations zones.

Overall, hydrology and water quality impacts under the No Project Alternative would be *similar* when compared to the proposed project.

5.4.2.9 LAND USE AND PLANNING

As described in Chapter 4.9, Land Use and Planning, of this Draft EIR, the proposed project would result in two less-than-significant impacts and two significant-but-mitigatable impacts. Implementation of Mitigation Measure LU-2 would ensure the future projects in Menlo Park are consistent with the City's

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General Plan policies. While the proposed project would aim to improve connectivity and would not create physical barriers within existing communities, the No Project Alternative also supports the integration of infill development and does not propose physical features that could divide a community.

Under the No Project Alternative, development would continue to occur throughout the study area under the existing General Plan and zoning code. Similar to the proposed project, future development would generally occur on underdeveloped or underutilized sites and would rely on existing infrastructure. The No Project Alternative also includes goals, policies and actions to promote cohesive neighborhoods included in the proposed project. Like the proposed project, the No Project Alternative does not propose any new major roadways or physical features, or propose development that would conflict with land uses in existing neighborhoods.

The proposed project was found to not conflict with any land use plans adopted for the purpose of avoiding or mitigating an environmental effect. Furthermore, the proposed project was found to be consistent with *Plan Bay Area* as a result of proposed development that is consistent with the one PDA identified in the city, as well as overall infill development, and land use and transportation policies that promote non-vehicular travel. Although the PDA designations are separate from the General Plan and would remain in place under the No Project Alternative, the No Project Alternative lacks a series of new and enhanced transit-oriented development- and circulation-related policies and actions aimed to improve circulation in the Bayfront Area that are included as part of the proposed project.

Further, because development under the No Project Alternative would occur under the previously adopted General Plan and Zoning Code, the enhanced General Plan Land Use and Circulation Elements goals and policies that better promote sustainability and circulation improvements would not be adopted.

Overall, because the No Project Alternative would result in development in the same setting and would be subject to the same existing land use regulations, including Mitigation Measure LU-2, which would ensure the future projects in Menlo Park are consistent with the City's General Plan policies, land use impacts when compared to the proposed project, would be *similar*.

5.4.2.10 NOISE

As described in Chapter 4.10, Noise, of this Draft EIR, the proposed project would result in three less-than-significant impacts and four significant-but-mitigable impacts. Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4 would reduce noise impacts from construction and operation of future development in the study area.

Future development under the designations of the proposed project would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the provisions of the noise chapter. The No Project Alternative would also be subject to these applicable standards. Additionally, implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4, which would apply under both scenarios would reduce impacts from future development in the study area.

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Similar to the proposed project, future development under this alternative would result in temporary and permanent increases to ambient noise levels attributed to the construction and operation of non-residential and residential land uses; however, the development under both scenarios would be located in already urbanized areas where similar uses already occur. Further, compliance with relevant General Plan Noise (N) Element policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the No Project Alternative would not result in significant permanent increases in the ambient noise level in the study and vicinity.

There are no areas of Menlo Park which fall within an airport land use plan for any of the airports located in close proximity to the study area, thus, future development under the No Project Alternative and the proposed project would not expose people to excessive aircraft noise levels and impacts would be less than significant. In addition, there are no airstrips within Menlo Park, thus, there would be no impact related to excess noise levels of a private airstrip.

In summary, noise related impact from future development under the No Project Alternative would be *less* than that of the proposed project.

5.4.2.11 POPULATION AND HOUSING

As described in Chapter 4.11, Population and Housing, of this Draft EIR, growth under the proposed project would exceed the ABAG's 2013 projections. However, the General Plan serves as the City's constitution for the physical development of the city, thus, the General Plan goals and policies will provide the framework to adequately plan orderly development under the proposed project and the impact would be less than significant. However, when considered in a regionally cumulative context, impacts were found to be significant and unavoidable until the regional growth projections for the Bay Area are updated.

No new land use designations proposed under the project are located on sites where residential land uses currently exist; thus, no displacement of existing housing units would occur and impacts, including cumulative impacts, would be less than significant. In addition, there are no plans for removal of existing housing under the proposed project; thus, displacement of people would not occur and impacts would be less than significant.

Under the No Project Alternative, future development would continue to occur in the study area under the City's existing General Plan; however, less non-residential and residential development would occur and would not result in hotel development. As shown above in Table 5-1, population and housing growth in the Bayfront Area would be significantly less than anticipated under the proposed project. Because no new development potential would occur under the No Project Alternative, no regional growth would occur where adequately planning has not also occurred.

Overall, the impacts related to population and housing would be *less* than that of the proposed project.

5.4.2.12 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.12, Public Services and Recreation, of this Draft EIR, impacts to fire protection services, police services, parks, schools, and libraries, under the proposed project, were found to be less than significant.

Fire and Police Services

As discussed in Chapter 4.12, Public Services and Recreation, the proposed projects would not require the expansion of the Menlo Park Fire Protection District (MPFPD) facilities; however, when considered in a cumulative setting, the project would contribute to the need for expansion of Station 77. Impacts were found to be less than significant as no plans are available to evaluate potential impacts and once plans are available, the expansion project would be subject to separate environmental review, as needed. Developers of future projects in Menlo Park would be required to pay the MPFPD's developer impact fees under both scenarios; thus, would contribute to the ability of the MPFPD to provide adequate fire protection services. In addition, the proposed project would not require the expansion of Menlo Park Police Department (MPPD) facilities. The No Project Alternative would result in fewer residents, and therefore, would result in less demand on the MPFPD and the MPPD. Thus, the impacts under the No Project Alternative would be *less* than the proposed project.

Parks and Recreation Services

The proposed project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks; would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The No Project Alternative would result in fewer residents; thus fewer primary users of the parks and recreational services, and therefore, the impacts under the No Project Alternative would be *less* than the proposed project.

Schools

Buildout of the No Project Alternative would occur over the course of 24 years, and like the proposed project, would result in a gradual increase in demand for school services. Like development under the proposed project, development under the No Project Alternative would be subject to development impact fees in accordance with the provisions of Senate Bill 50. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while the No Project Alternative would generate less residential growth and subsequently fewer students, impacts would be still be *similar* when compared to the proposed project given the future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools.

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Libraries

The proposed project would not require the physical expansion of library facilities; however, when considered in a cumulative setting, the project would contribute to the need for expansion of the library. The No Project Alternative would generate fewer residents; thus fewer primary users of the library and fewer demands on library facilities and resources would result. Therefore, impacts to library services would be *less* than the proposed project.

5.4.2.13 TRANSPORTATION AND CIRCULATION

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed project would exceed acceptable level of service standards at intersections and roadway segment capacity at roadway segments in the study area even with implementation of mitigation measures TRANS-1a and TRANS-1b. Implementation of Mitigation Measure TRANS-1b would provide the funding by requiring future developers to pay their fair share of the infrastructure necessary to reduce impacts.

As shown in Section 4.13.1.5, 2040 No Project, in Chapter 4.13, implementation of the No Project Alternative would also result in intersections that exceed level of service standards and roadway segments that exceed capacity in the study area (see Table 4.13-9 and 4.12-10). Because Mitigation Measure TRANS-1a and TRANS-1b could also apply to the No Project Alternative, impacts in this regard would be considered similar under both scenarios.

The proposed project includes land uses that balance jobs and housing, and results in a Vehicles Miles Traveled (VMT) per capita of 14 miles, which is lower than the No Project Alternative where the VMT per capita would be 19 miles (see Table 4.13-13). Therefore, impacts related to VMT would be greater under this alternative.

Chapter 4.13 finds that the proposed project would conflict with adopted transportation policies, plans, or programs regarding public transit, and bicycle and pedestrian facilities and requires implementation of Mitigation Measures TRANS-6a through TRANS-6c, which similar to Mitigation Measure TRANS-1b, require the City to secure funding for future improvements that could potentially reduce these impacts. These would also be required under the No Project Alternative. The proposed project contains policies supporting transit; it also includes infrastructure improvements and guiding policies that encourage and anticipate increased transit use. Similarly, the proposed project proposes substantial improvements to pedestrian and bicycle infrastructure. The No Project Alternative would similarly conflict with adopted policies, but it would also lack the infrastructure improvements and guiding policies that support transit, bicycles, and pedestrians that are called for in the proposed project. As described in Chapter 4.9, Land Use and Planning, of this Draft EIR, while many of the goals and policies in the City's current General Plan (No Project) are germane to current conditions, the updates to the Circulation Elements (proposed project) integrate extensive community input on strategies that would be effective in creating the most functional circulation system possible.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed project would not cause impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the No Project Alternative would be subject to the same development review process and City Codes, and it would not

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impact regional air travel, so emergency access and air traffic pattern impacts would also be similar to those of the proposed project.

Overall, while the No Project Alternative would not include the provisions of the updated Circulation Element, impacts under the No Project Alternative would be *greater* when compared to the proposed project given both scenarios would warrant the same level of improvements to update the circulation system to consider all modes of transportation and the No Project Alternative results in a greater VMT per capita.

5.4.2.14 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.13, Utilities and Service Systems, of this Draft EIR, impacts to water, sanitary wastewater, solid waste, stormwater infrastructure, and energy conservation, under the proposed project, were found to be less than significant.

Water

Implementation of the proposed project would have sufficient water supplies from existing entitlements, conservation plans and resources. In addition, the proposed project would not require the construction of new water facilities or expansion of existing facilities on its own, but when considered in a cumulative context, the current water storage facilities need to provide adequate water pressure in the Bayfront Area would be required. Because this is an existing condition, the impact under the No Project Alternative would be the same when compared to the proposed project. Under the No Project Alternative, less non-residential and residential development would occur; thus, impacts to the water supply and infrastructure under the No Project Alternative would be *less* than those of the proposed project.

Wastewater

Wastewater generated from potential future development under the proposed project would not exceed the wastewater treatment requirements or capacity of the SVCW WWTP. In addition, the proposed project would not require the construction of new or expanded wastewater treatment facilities and West Bay Sanitary District (WBSD) has adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. Under the No Project Alternative, less non-residential and residential development would occur; thus, impacts related to wastewater under the No Project Alternative would be *less* than those of the proposed project.

Solid Waste

The impacts to adequate landfill capacity under the proposed project were found to be less than significant, but significant-but-mitigable in a cumulative setting. This is due to the fact that the Ox Mountain landfill is near capacity and the proposed project together with the other users of this landfill could result in inadequate landfill capacity. Implementation of Mitigation Measure UTIL-10 would be required under both scenarios, which would reduce the impact to a less-than-significant level. As part of the Zoning update, the proposed project includes green and sustainable building standards in the Bayfront Area that require all applicants to submit a zero-waste management plan to the City. The zero-waste management plan must clearly outline the applicants plan to reduce, recycle, and compost waste from

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demolition, construction and occupancy phases of the building. Zero waste is defined as 90 percent overall diversion of non-hazardous waste from landfill and incineration. While these new Zoning standards would not be adopted under the No Project Alternative, the No Project Alternative would result in less non-residential and residential development, and therefore, less solid waste would be generated. Thus, impacts under the No Project Alternative would be *less* than those of the proposed project.

Energy

Implementation of the proposed project would result in a less-than-significant impact related to natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. The proposed General Plan goals, policies and programs, and Zoning regulations that would increase energy conservation and minimize potential impacts associated with energy use would not be adopted under the No Project Alternative. Specifically, as part of the Zoning update, the proposed project includes green and sustainable building standards in the Bayfront Area. These standards require all new buildings within the Bayfront Area to comply with specific green building requirements for LEED certification, providing outlets for Electric Vehicle charging, on-site renewable energy generation (electrical and natural gas), and enrollment in EPA Energy Star Building Portfolio Manager. However, because the No Project Alternative would result in less non-residential and residential development, and thus, overall less energy use, impacts under the No Project Alternative would be *less* than those of the proposed project.

5.4.3 RELATIONSHIP OF THE ALTERNATIVE TO THE OBJECTIVES

Under the No Project Alternative, the proposed project would not be implemented and therefore, does not meet the intent of the project objectives prepared during the ConnectMenlo process. Specifically, the General Plan goals, policies and programs, and Zoning regulations that serve to improve mobility for all travel modes and directly involve Bayfront Area property owners (as land use changes are expected only in that area) would not be achieved. Also, the No Project Alternative would not establish and achieve the community's vision as determined under the ConnectMenlo process.

5.5 REDUCED NON-RESIDENTIAL INTENSITY ALTERNATIVE

5.5.1 DESCRIPTION

Under the Reduced Non-Residential Intensity Alternative, all non-residential development under the proposed project would be reduced by 50 percent. In addition to the residential development and the 50 percent reduced non-residential development under the proposed project, the Reduced Non-Residential Intensity Alternative would include the ongoing development potential under the existing General Plan. Potential development under the existing General Plan would not be reduced. As shown above in Table 5-1 under the "Reduced Non-Residential Intensity Alternative" column, this alternative would result in 2.9 million square feet of non-residential space, 200 hotel rooms, and 5,500 residential units, which could result in up to 14,150 new residents and 7,150 new jobs. All other components under the proposed project as described under Section 3.7 of Chapter 3, Project Description, of this Draft EIR, would occur,

such as an update to the City's Zoning Ordinance for the Bayfront Area to ensure consistency with the General Plan Update and previously adopted ordinances and policies.

Further, the Reduced Non-Residential Intensity Alternative assumes that the same recommended mitigation measures identified throughout Chapters 4.1 through 4.14 for the proposed project would apply under this alternative.

5.5.2 IMPACT DISCUSSION

The potential environmental impacts associated with the Reduced Non-Residential Intensity Alternative are described below and are compared to the proposed project.

5.5.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would result in less than significant impacts and no mitigation measures are required.

The City of Menlo Park does not designate scenic corridors or vistas. Similar to the proposed project, development under the Reduced Non-Residential Intensity Alternative would not block views scenic vistas or scenic corridors. Thus, aesthetic impacts related to these topics would be *similar* to the proposed project.

Development under the proposed project would not degrade the existing visual character or quality of the site and its surrounding. Similar to the proposed project, development under the Reduced Non-Residential Intensity Alternative would be concentrated on locations either already developed and/or underutilized, and/or in close proximity to existing development. Development under the Reduced Non-Residential Intensity Alternative would also be subject to architectural control review or would be required to comply with proposed new design standards in the Bayfront Area to ensure compatibility with adjoining land uses. Thus, aesthetic impacts related to these topics would be *similar* to the proposed project.

Similar to the proposed project, the Reduced Non-Residential Intensity Alternative would result in new lighting sources that could result in sources of glare. New development under the Reduced Non-Residential Intensity Alternative would be required to comply with CAL Green's best management practices and General Plan policies and Municipal Code provisions that ensure new land uses do not generate excessive light levels and reduce light and glare spillover from future development to surrounding land uses. Therefore, it is likely that impacts related to light or glare under the Reduced Non-Residential Intensity Alternative would be *similar* than those under the proposed project.

5.5.2.2 AIR QUALITY

As described in Chapter 4.2, Air Quality, of this Draft EIR, the proposed project would result in three significant and unavoidable impacts even with implementation of Mitigation Measures AQ-2a, AQ-2b1, AQ-2b2, and AQ-5, and two significant impacts that would be mitigated to a less-than-significant level with the implementation of Mitigation Measures AQ-3a and AQ-3b.

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Development under the proposed project would generate a substantial net increase in criteria air pollutant emissions that would exceed the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds. Operational criteria air pollutant emissions would be generated from on-site area sources (e.g., landscaping fuel, consumer products), vehicle trips generated by the proposed project, and energy use (e.g., natural gas used for cooking and heating). Construction emissions associated with individual development projects under the proposed project would generate an increase in criteria air pollutants and Toxic Air Contaminants (TACs). Impacts associated with these effects were found to be significant and unavoidable. In addition, new development allowed under the proposed project such as industrial land uses, chemical processing facilities, chrome-plating facilities, dry cleaners, and gas stations would have the potential to generate substantial stationary sources of emissions and would require a permit from BAAQMD for emissions of TACs. Impacts associated with these effects were found to be less than significant.

As discussed further, under Section 5.5.2.6, Greenhouse Gas Emissions, below, the VMT per capita would be 14 miles under the proposed project (see Table 4.13-13). While development under the Reduced Non-Residential Intensity Alternative would result in less non-residential development but maintain the same level of residential as the proposed project, both scenarios have the potential to better balance the existing land use to job balance in the study area. Accordingly, air quality impacts from VMT under the Reduced Non-Residential Intensity Alternative would be *similar* when compared to the proposed project.

The Reduced Non-Residential Intensity Alternative would allow for a 50 percent reduction of non-residential development in the Bayfront Area. Although development resulting from the Reduced Non-Residential Intensity Alternative would be less intense when compared to the proposed project, it is likely that the operational and construction criteria air pollutant emissions would still generate a substantial net increase in criteria air pollutant emissions. In addition, it is anticipated that the Reduced Non-Residential Intensity Alternative would have the potential to generate substantial stationary sources of emissions requiring a permit from BAAQMD for emissions of TACs. Therefore, the impacts to air quality under the Reduced Non-Residential Intensity Alternative would be *less* than the proposed project.

5.5.2.3 BIOLOGICAL RESOURCES

As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, the proposed project would result in seven significant-but-mitigable impacts and one less-than-significant impact. Implementation of Mitigation Measure BIO-1 would require project-specific baseline biological resources assessments on sites containing natural habitat, which would be required to reduce impacts to biological resources.

Development under the proposed project could result in an impact to special-status species in the study area; however, compliance with Municipal Code Chapters 12.44 and 13.24, and federal and State laws and implementation of the General Plan goals, policies, and programs in the existing Open Space/Conservation, Noise and Safety Element, and proposed Land Use Element, would reduce potential impacts to a less-than-significant level. Similarly, compliance with existing Open Space/Conservation, Noise and Safety Element policies would ensure that development under the proposed project would not conflict with any local plans or policies and reduce any potential impacts to sensitive natural communities, federally protected wetlands, sensitive wildlife movement corridors, and cumulative impacts to a less-than-significant level.

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Future development under the Reduced Non-Residential Intensity Alternative would also need to comply with existing Open Space/Conservation, Noise and Safety Element policies, therefore potential impacts to sensitive natural communities, federally protected wetlands, sensitive wildlife movement corridors, and cumulative impacts would be similar to the proposed project. In addition, development under the Reduced Non-Residential Intensity Alternative would need to comply with proposed policies in the Land Use Element in addition to Municipal Code Chapters 12.44 and 13.24, and federal and State laws in order to address the impacts to special-status species in the study area. Thus, impacts to sensitive natural communities would be similar under the Reduced Non-Residential Intensity Alternative.

Overall, impacts to biological resources under the Reduced Non-Residential Intensity Alternative would be *less* when compared to the proposed project.

5.5.2.4 CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources, of this Draft EIR, the proposed project would result in six significant-but-mitigable impacts. Implementation of Mitigation Measures CULT-1, CULT-2a, CULT-2b, CULT-3, and CULT-4 would reduce impact related to historical, archeological, paleontological, human remains, and tribal cultural resources.

Under the Reduced Non-Residential Intensity Alternative, future development in the study area would continue to occur, but would be less intense than the proposed project. Similar to the proposed project, development under this alternative would involve ground-disturbing activities during construction of future structures which could affect cultural resources. Similar to the proposed project, future development under the Reduced Non-Residential Intensity Alternative would be subject to existing federal, State, and local regulations laws to protect cultural resources, which would generally ensure less-than-significant impacts to cultural resources. In addition, under this alternative, Mitigation Measures CULT-1, CULT-2a, CULT-2b, CULT-3, and CULT-4 as recommended under the proposed project, would also be required under this alternative.

Future development under the Reduced Non-Residential Intensity Alternative would need to comply with federal and State laws, the Zoning Ordinance, the General Plan goals, policies, and programs in the existing Open Space/Conservation, Noise and Safety Element, therefore potential impacts to buried archaeological deposits, geological features, human remains, tribal cultural resources, and architectural resources, under the Reduced Non-Residential Intensity Alternative would be *similar* to the proposed project.

5.5.2.5 GEOLOGY, SOILS, AND SEISMICITY

As described in Chapter 4.5, Geology, Soils, and Seismicity, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Under the Reduced Non-Residential Intensity Alternative, future development would result in less non-residential but the same amount of residential development, thereby reducing potential new development that would occur within the study area compared to the proposed project. As such, fewer structures would be subject to the potential for damage from soil/geologic conditions, liquefaction, lateral spreading, or other geologic instabilities. However, future development under both the Reduced Non-

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Residential Intensity Alternative and proposed project would be subject to the same erosion control measures as specified in the City of Menlo Park Engineering Division's Grading and Drainage Control Guidelines, as well as the California Building Code (CBC) regulations relating to seismic safety, which would address and prevent hazards associated with geology, soils, and seismicity.

Although the Reduced Non-Residential Intensity Alternative would result in less non-residential development, compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under the Reduced Non-Residential Intensity Alternative and the proposed project; therefore, would result in *similar* impacts when compared to the proposed project.

5.5.2.6 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts with implementation of Mitigation Measure GHG-1.

Development under the proposed project would generate a substantial increase in GHG emissions resulting in a significant impact. The proposed project would be consistent with the *Plan Bay Area* and the City's CAP; however, additional state and federal measures are necessary to achieve the aggressive targets established for 2050 in Executive Order S-03-05. Therefore, the impact would be significant. Mitigation Measure GHG-1 would ensure that the City updates the CAP to identify a post-2020 GHG reduction goal to align with the upcoming CARB Scoping Plan Update for statewide 2030 GHG emissions reductions target and identify a GHG reduction goal for the proposed project horizon year. However, at this time there are no post-2020 federal and state measures that would assist the City in achieving the efficiency target at the proposed project year. Therefore, the impacts in this respect would remain significant and unavoidable.

The proposed project includes land uses that balance jobs and housing, and results in a Vehicles Miles Traveled (VMT) per capita of 14 miles, which is lower than the No Project Alternative where the VMT per capita would be 19 miles (see Table 4.13-13). This is generally due to the existing imbalance in types of land use. As previously described, the VMT estimates in the City/County Association of Governments of San Mateo County (C/CAG) model are sensitive to changes in land use. Generally, land uses that reflect a more balanced jobs-housing ratio in the C/CAG model result in lower per capita VMT. Reducing only one type of land uses would potentially off-set the land use balance and therefore, result in greater VMT. However, because the Reduced Non-Residential Intensity Alternative continues the same level of residential development as the proposed project, yet reduces the non-residential component, this shift continues to improve the existing imbalance; thus, theoretically improving VMT. Furthermore, the proposed goals, policies, and a programs of the Land Use (LU) and Circulation (CIRC) Elements that would require local planning and development decisions to consider impacts to GHG and proposed Zoning regulations that would promote the creation of a live/work/play environment with travel patterns that are oriented toward pedestrian, transit, and bicycle use, including identifying public paseos to improve connectivity on the Zoning map, and the requirement to prepare Transportation Demand Management (TDM) Plans to reduce trip generation by 20 percent below standard use rates, would be adopted under the this alternative.

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Future development under the Reduced Non-Residential Intensity Alternative would result in 50 percent less non-residential square footage, hotel rooms, and subsequently, employees, and could reduce VMT. Therefore, the impacts related to GHG emissions could be *less* than those of the proposed project.

5.5.2.7 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Chapter 4.7, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in six less-than-significant impacts, two significant-but-mitigable impacts, and one no impact conclusion. Implementation of Mitigation Measures HAZ-4a and HAZ-4b would reduce impacts related to sites with known hazardous materials.

As described in Chapter 4.7, the study area contains leaking underground storage tanks (LUST), as well as several locations that are listed under the Spills, Leaks, Investigation, and Cleanups (SLIC) Program, which investigates and regulates non-permitted discharges, also have been identified within the study area. However, the SLIC sites are found mostly in the downtown area and the northeastern portion of the study area, and most of these sites are listed as “Completed-Case Closed,” with some of the sites still open undergoing site assessment, remediation action, or verification monitoring of remediation action.

Future development under the Reduced Non-Residential Intensity Alternative and the proposed project that involves the handling, transport, use, or disposal of hazardous materials would be regulated pursuant to federal, State, and local laws. In addition, although the study area is located approximately 2 miles from Palo Alto Airport, no portions of the city are within the airport land use compatibility zones established by the Palo Alto Airport Comprehensive Land Use Plan. Further, the study area is located more than 2 miles from the San Carlos Airport; therefore, future development under both scenarios would not result in any airport hazards. As a result, future development under the Reduced Non-Residential Intensity Alternative would not interfere with the use of the public or private use of nearby airports nor would future development expose people to hazards or risks related to airport use.

Overall, while the Reduced Non-Residential Intensity Alternative would result in less non-residential development, compliance with existing federal, State, and local regulations related to the safe use, handling, disposal, transport, and generation of hazardous materials, would ensure that potential impacts related to hazards and hazardous materials be minimized. In addition, HAZ-4a and HAZ-4b would be required under both scenarios to reduce impacts to sites with known hazardous materials.

Given that development under the Reduced Non-Residential Intensity Alternative would result in a 50 percent reduction in non-residential development, impacts would be *less* than the proposed project.

5.5.2.8 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Although the Reduced Non-Residential Intensity Alternative would result in less non-residential development, future development would occur within previously urbanized areas and would be subject to the same existing federal, State, and local regulations relating to hydrology and water quality, similar to

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the proposed project. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality be minimized as future development occurs.

As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, some dewatering of groundwater could occur during construction of future development in the Bayfront Area; however, would be at a shallow level where water supplies aren't drawn from. In addition, because future development under the Reduced Non-Residential Intensity Alternative would occur primarily within already urbanized areas, development would connect to existing drainage systems already in place.

Although there are 100-year flood zones within the Bayfront Area where housing could be placed, compliance with existing local regulations, such as requiring fill to elevate structures above flood level, and compliance with the Federal Emergency Management Agency's (FEMAs) flood regulations, would minimize potential flood impacts. Furthermore, while there is Searsville Reservoir and Felt Lake where dams are located within the city, both of these are not expected to be threats as described in Chapter 4.8. Also, the Bayfront Area is not within either of these dam inundations zones.

Overall, hydrology and water quality impacts under the Reduced Non-Residential Intensity Alternative would be *similar* when compared to the proposed project.

5.5.2.9 LAND USE AND PLANNING

As described in Chapter 4.9, Land Use and Planning, of this Draft EIR, the proposed project would result in two less-than-significant impacts and two significant-but-mitigatable impacts. Implementation of Mitigation Measure LU-2 would ensure the future projects in Menlo Park are consistent with the City's General Plan policies. While the proposed project would aim to improve connectivity and would not create physical barriers within existing communities, the Reduced Non-Residential Intensity Alternative also supports the integration of infill development and does not propose physical features that could divide a community.

Development under the proposed project would be required to be consistent with the General Plan polices and Zoning Ordinance that promote cohesive and compatible neighborhoods and prevent new development from dividing existing uses where different land uses abut one another. The proposed project, and accordingly, the Reduced Non-Residential Intensity Alternative by location, would not conflict with and adopted habitat conservation plans or natural community conservation plans within the Menlo Park.

The proposed project was found to not conflict with any land use plans adopted for the purpose of avoiding or mitigating an environmental effect. Furthermore, the proposed project was found to be consistent with *Plan Bay Area* as a result of proposed development that is consistent with the one PDA identified in the city, as well as overall infill development, and land use and transportation policies that promote non-vehicular travel.

Overall, because the Reduced Non-Residential Intensity Alternative would result in development in the same setting and would be subject to the same existing land use regulations, including Mitigation Measure LU-2, which would ensure the future projects in Menlo Park are consistent with the City's General Plan policies, land use impacts when compared to the proposed project, would be *similar*.

5.5.2.10 NOISE

As described in Chapter 4.10, Noise, of this Draft EIR, the proposed project would result in three less-than-significant impacts and four significant-but-mitigable impacts. Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4 would reduce noise impacts from construction and operation of future development in the study area.

Future development under the designations of the proposed project would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the provisions of the noise chapter. Development under the Reduced Non-Residential Intensity Alternative would also be subject to these applicable standards. Additionally, implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4, which would apply under both scenarios would reduce impacts from future development in the study area.

Similar to the proposed project, future development under this alternative would result in temporary and permanent increases to ambient noise levels attributed to the construction and operation of non-residential and residential land uses; however, the development under both scenarios would be located in already urbanized areas where similar uses already occur. Further, compliance with relevant General Plan Noise (N) Element policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the Reduced Non-Residential Intensity Alternative would not result in significant permanent increases in the ambient noise level in the study and vicinity.

There are no areas of Menlo Park which fall within an airport land use plan for any of the airports located in close proximity to the study area, thus, future development under the Reduced Non-Residential Intensity Alternative and the proposed project would not expose people to excessive aircraft noise levels and impacts would be less than significant. In addition, there are no airstrips within Menlo Park, thus, there would be no impact related to excess noise levels of a private airstrip.

The Reduced Non-Residential Intensity Alternative would result in a 50 percent reduction of non-residential development in the Bayfront Area and would be subject to the same regulatory setting as the proposed project. Therefore, the impacts related to noise would be *less* when compared to the proposed project.

5.5.2.11 POPULATION AND HOUSING

As described in Chapter 4.11, Population and Housing, of this Draft EIR, growth under the proposed project would exceed the ABAG's 2013 projections. However, the General Plan serves as the City's constitution for the physical development of the city, thus, the General Plan goals and policies will provide the framework to adequately plan orderly development under the proposed project and the impact would be less than significant. However, when considered in a regionally cumulative context, impacts were found to be significant and unavoidable until the regional growth projections for the Bay Area are updated. Under the Reduced Non-Residential Intensity Alternative, while the employment projections

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would be reduced, the proposed residential buildout would be the same as the proposed project; therefore, impacts would be similar with respect to regional growth projections.

No new land use designations proposed under the project, or under the Reduced Non-Residential Intensity Alternative, are located on sites where residential land uses currently exist; thus, no displacement of existing housing units would occur. In addition, there are no plans for removal of existing housing under either scenario; thus, the displacement of people would not occur and impacts would be less than significant.

The Reduced Non-Residential Intensity Alternative would result in a 50 percent reduction of non-residential development in the Bayfront Area. In addition to the development under Reduced Non-Residential Intensity Alternative, the development potential under the General Plan would be carried forward to the 2040 horizon year. Thus, the same amount of residential development is anticipated under the Reduced Non-Residential Intensity Alternative. Therefore, impacts related to population and housing would be *similar* than the proposed project.

5.5.2.12 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.12, Public Services and Recreation, of this Draft EIR, impacts to fire protection services, police services, parks, schools, and libraries, under the proposed project, were found to be less than significant.

Fire and Police Services

As discussed in Chapter 4.12, Public Services and Recreation, the proposed projects would not require the expansion of the Menlo Park Fire Protection District (MPFPD) facilities; however, when considered in a cumulative setting, the project would contribute to the need for expansion of Station 77. Impacts were found to be less than significant as no plans are available to evaluate potential impacts; however, once plans are available, the expansion project would be subject to separate environmental review, as needed. Developers of future projects in Menlo Park would be required to pay the MPFPD's developer impact fees under both scenarios; thus, would contribute to the ability of the MPFPD to provide adequate fire protection services. In addition, the proposed project would not require the expansion of Menlo Park Police Department (MPPD) facilities. The Reduced Non-Residential Intensity Alternative would result in fewer non-residential land uses, but the same amount of residential development, and therefore, would result in less demand on the MPFPD and the MPPD. Thus, the impacts under the Reduced Non-Residential Intensity Alternative would be *less* than the proposed project.

Parks and Recreation Services

The proposed project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks; would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The Reduced Non-Residential Intensity Alternative would result in the same number of residents as the proposed project; thus, the same number of primary users of the parks and recreational services. Accordingly, the impacts under the Reduced Non-Residential Intensity Alternative would be *similar* to those of the proposed project.

Schools

Buildout of the Reduced Non-Residential Intensity Alternative would occur over the course of 24 years, and like the proposed project, would result in a gradual increase in demand for school services with the same amount of students. Like development under the proposed project, development under the Reduced Non-Residential Intensity Alternative would be subject to development impact fees in accordance with the provisions of Senate Bill 50. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while the Reduced Non-Residential Intensity Alternative would generate less residential growth and subsequently fewer students, impacts would be still be *similar* when compared to the proposed project given the future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools.

Libraries

The proposed project would not require the physical expansion of library facilities; however, when considered in a cumulative setting, the proposed project would contribute to the need for expansion of the library. The Reduced Non-Residential Intensity Alternative would generate the same number of residents as the proposed project; thus, the same number of primary users of the library and the same demands on library facilities and resources would result. Therefore, impacts to library services would be *similar* than the proposed project.

5.5.2.13 TRANSPORTATION AND CIRCULATION

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed project would exceed acceptable level of service standards at intersections and roadway segment capacity at roadway segments in the study area even with implementation of mitigation measures TRANS-1a and TRANS-1b. Implementation of Mitigation Measure TRANS-1b would provide the funding by requiring future developers to pay their fair share of the infrastructure necessary to reduce impacts. Because Mitigation Measure TRANS-1a and TRANS-1b could also apply to the Reduced Non-Residential Intensity Alternative, impacts in this regard would be considered similar under both scenarios.

The proposed project includes a land use to job balance that results in a Vehicles Miles Traveled (VMT) per capita of 14 miles. The VMT estimates are sensitive to changes in land use. Generally, land uses that reflect a more balanced jobs-housing ratio result in lower per capita VMT; therefore, while no model runs have been prepared for this alternative, it is likely the VMT would be further reduced under the Reduced Non-Residential Intensity Alternative due the additional housing under this alternative to help support correcting this imbalance. See Section 5.5.2.6, Greenhouse Gas Emissions, above.

Chapter 4.13 finds that the proposed project would conflict with adopted transportation policies, plans, or programs regarding public transit, and bicycle and pedestrian facilities and requires implementation of Mitigation Measures TRANS-6a through TRANS-6c, which similar to Mitigation Measure TRANS-1b, require the City to secure funding for future improvements that could potentially reduce these impacts. These would also be required under the Reduced Non-Residential Intensity Alternative. The proposed project

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contains policies supporting transit; it also includes infrastructure improvements and guiding policies that encourage and anticipate increased transit use. Similarly, the proposed project proposes substantial improvements to pedestrian and bicycle infrastructure. The Reduced Non-Residential Intensity Alternative would similarly conflict with adopted policies, and would also include the infrastructure improvements and guiding policies that support transit, bicycles, and pedestrians that are called for in the proposed project. Therefore, impacts to alternative modes of transportation would be similar under both scenarios.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed project would not cause impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the Reduced Non-Residential Intensity Alternative would be subject to the same development review process and City Codes, and it would not impact regional air travel, so emergency access and air traffic pattern impacts would also be similar to those of the proposed project.

Overall, because the Reduced Non-Residential Intensity Alternative would include the provisions of the updated Circulation Element, but with less non-residential development yet the same level of residential development, which could help to correct the existing land use imbalance, impacts under the Reduced Non-Residential Intensity Alternative would be *less* when compared to the proposed project.

5.5.2.14 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.13, Utilities and Service Systems, of this Draft EIR, impacts to water, sanitary wastewater, solid waste, stormwater infrastructure, and energy conservation, under the proposed project, were found to be less than significant.

Water

Implementation of the proposed project would have sufficient water supplies from existing entitlements, conservation plans and resources. In addition, the proposed project would not require the construction of new water facilities or expansion of existing facilities on its own, but when considered in a cumulative context, the current water storage facilities need to provide adequate water pressure in the Bayfront Area would be required. Because this is an existing condition, the impact under the Reduced Non-Residential Intensity Alternative would be the same when compared to the proposed project. Under the Reduced Non-Residential Intensity Alternative, less non-residential would occur; thus, impacts to the water supply and infrastructure under the Reduced Non-Residential Intensity Alternative would be *less* than those of the proposed project.

Wastewater

Wastewater generated from potential future development under the proposed project would not exceed the wastewater treatment requirements or capacity of the SVCW WWTP. In addition, the proposed project would not require the construction of new or expanded wastewater treatment facilities and West Bay Sanitary District (WBSD) has adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. Under the Reduced Non-Residential Intensity Alternative, 50 percent less non-residential would occur; thus, impacts related to wastewater under the Reduced Non-Residential Intensity Alternative would be *less* than those of the proposed project.

Solid Waste

The impacts to adequate landfill capacity under the proposed project were found to be less than significant, and significant-but-mitigable in a cumulative setting. This is due to the fact that the Ox Mountain landfill is near capacity and the proposed project together with the other users of this landfill could result in inadequate landfill capacity. Implementation of Mitigation Measure UTIL-10 would be required under both scenarios, which would reduce the impact to a less-than-significant level. The Reduced Non-Residential Intensity Alternative would result in 50 percent less non-residential, and therefore, less solid waste would be generated. Thus, impacts under the Reduced Non-Residential Intensity Alternative would be *less* than those of the proposed project.

Energy

Implementation of the proposed project would result in a less-than-significant impact related to natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. The Reduced Non-Residential Intensity Alternative would result in 50 percent less non-residential. Thus, impacts under the Reduced Non-Residential Intensity Alternative would be *less* than those of the proposed project.

5.5.3 RELATIONSHIP OF THE ALTERNATIVE TO THE OBJECTIVES

Under the Reduced Non-Residential Intensity Alternative the total number of non-residential square footage, hotel rooms, and employees would be 50 percent less than anticipated under the proposed project. Because this alternative would only result in a 50 percent reduction of non-residential development, the Reduced Non-Residential Intensity Alternative would generally meet all of the project objectives. However, it is unlikely that this alternative would realize the full economic and revenue potential objective set forth by the proposed project.

5.6 REDUCED INTENSITY ALTERNATIVE

5.6.1 DESCRIPTION

Under the Reduced Intensity Alternative, the net new development in the Bayfront Area under the proposed project would be reduced by 25 percent. Potential development under the existing General Plan would not be reduced. As shown above in Table 5-1 under the “Reduced Intensity Alternative” column, this alternative would result in 3.5 million square feet of non-residential space, 300 hotel rooms, and 4,375 residential units, which could generate up to 11,258 new residents and 8,525 new jobs. All other components proposed by the proposed project as described under Section 3.7 of Chapter 3, Project Description, of this Draft EIR, would occur, such as an update to the City’s Zoning Ordinance for the Bayfront Area to ensure consistency with the General Plan Update and previously adopted ordinances and policies.

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Further, the Reduced Intensity Alternative assumes that the same recommended mitigation measures identified throughout Chapters 4.1 through 4.14 for the proposed project would apply under this alternative

5.6.2 IMPACT DISCUSSION

The potential environmental impacts associated with the Reduced Intensity Alternative are described below and are compared to the proposed project.

5.6.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would result in less than significant impacts and no mitigation measures are required.

The City of Menlo Park does not designate scenic corridors or vistas. Similar to the proposed project, development under the Reduced Intensity Alternative would not block views scenic vistas or scenic corridors. Thus, aesthetic impacts related to these topics would be *similar* to the proposed project.

Development under the proposed project would not degrade the existing visual character or quality of the site and its surrounding. Similar to the proposed project, development under the Reduced Intensity Alternative would be concentrated on locations either already developed and/or underutilized, and/or in close proximity to existing development. Development under the Reduced Intensity Alternative would also be subject to architectural control review or would be required to comply with enumerated design standards and the proposed design standards that would be applicable to the proposed Bayfront Area Zoning district's to ensure compatibility with adjoining land uses. Thus, aesthetic impacts related to these topics would be *similar* to the proposed project.

Similar to the proposed project, the Reduced Intensity Alternative would result in new lighting sources that could result in sources of glare. New development under the Reduced Intensity Alternative would be required to comply with CAL Green's best management practices and General Plan policies and Municipal Code provisions that ensure new land uses do not generate excessive light levels and reduce light and glare spillover from future development to surrounding land uses. Therefore, impacts related to light or glare under the Reduced Intensity Alternative would be *similar* than those under the proposed project.

5.6.2.2 AIR QUALITY

As described in Chapter 4.2, Air Quality, of this Draft EIR, the proposed project would result in three significant and unavoidable impacts even with implementation of Mitigation Measures AQ-2a, AQ-2b1, AQ-2b2, and AQ-5, and two significant impacts that would be mitigated to a less-than-significant level with the implementation of Mitigation Measures AQ-3a and AQ-3b.

Development under the proposed project would generate a substantial net increase in criteria air pollutant emissions that would exceed the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds. Operational criteria air pollutant emissions would be generated from on-site area sources (e.g., landscaping fuel, consumer products), vehicle trips generated by the proposed project, and energy use (e.g., natural gas used for cooking and heating). Construction emissions associated with

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individual development projects under the proposed project would generate an increase in criteria air pollutants and Toxic Air Contaminants (TACs). Impacts associated with these effects were found to be significant and unavoidable. In addition, new development allowed under the proposed project such as industrial land uses, chemical processing facilities, chrome-plating facilities, dry cleaners, and gas stations would have the potential to generate substantial stationary sources of emissions and would require a permit from BAAQMD for emissions of TACs. Impacts associated with these effects were found to be less than significant.

As discussed further, under Section 5.6.2.6, Greenhouse Gas Emissions, below, the VMT per capita would be 14 miles under the proposed project (see Table 4.13-13). While development under the Reduced Intensity Alternative would result in 25 percent less non-residential and residential development from that of the proposed project, the Reduced Intensity scenarios have the potential to exacerbate the current imbalance the existing land use to job balance in the study area. Accordingly, air quality impacts from VMT under the Reduced Intensity Alternative would be greater when compared to the proposed project.

The Reduced Intensity Alternative would allow for a 25 percent reduction of residential and non-residential development in the Bayfront Area. Although development resulting from the Reduced Intensity Alternative would be less intense when compared to the proposed project, it is likely that the operational and construction criteria air pollutant emissions would still generate a substantial net increase in criteria air pollutant emissions. In addition, it is anticipated that the Reduced Intensity Alternative would have the potential to generate substantial stationary sources of emissions requiring a permit from BAAQMD for emissions of TACs.

Therefore, because the overall development potential is less than the proposed project, the impacts to air quality under the Reduced Intensity Alternative would also be *less* than the proposed project.

5.6.2.3 BIOLOGICAL RESOURCES

As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, the proposed project would result in seven significant-but-mitigable impacts and one less-than-significant impact. Implementation of Mitigation Measure BIO-1 would require project-specific baseline biological resources assessments on sites containing natural habitat, which would be required to reduce impacts to biological resources.

Development under the proposed project could result in an impact to special-status species in the study area; however, compliance with Municipal Code Chapters 12.44 and 13.24, and federal and State laws and implementation of the General Plan goals, policies, and programs in the existing Open Space/Conservation, Noise and Safety Element, and proposed Land Use Element, would reduce potential impacts to a less-than-significant level. Similarly, compliance with existing Open Space/Conservation, Noise and Safety Element policies would ensure that development under the proposed project would not conflict with any local plans or policies and reduce any potential impacts to sensitive natural communities, federally protected wetlands, sensitive wildlife movement corridors, and cumulative impacts to a less-than-significant level.

Future development under the Reduced Intensity Alternative would also need to comply with existing Open Space/Conservation, Noise and Safety Element policies, therefore potential impacts to sensitive natural communities, federally protected wetlands, sensitive wildlife movement corridors, and cumulative

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impacts would similar to the proposed project. In addition, development under the Reduced Intensity Alternative would need to comply with proposed policies in the Land Use Element in addition to Municipal Code Chapters 12.44 and 13.24, and federal and State laws in order to the impacts to special-status species in the study area. Thus, impacts to sensitive natural communities would be *similar* under the Reduced Intensity Alternative.

Overall, impacts to biological resources under the Reduced Intensity Alternative would be *less* when compared to the proposed project.

5.6.2.4 CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources, of this Draft EIR, the proposed project would result in six significant-but-mitigable impacts. Implementation of Mitigation Measures CULT-1, CULT-2a, CULT-2b, CULT-3, and CULT-4 would reduce impact related to historical, archeological, paleontological, human remains, and tribal cultural resources.

Under the Reduced Intensity Alternative, future development in the study area would continue to occur, but would be less intense than the proposed project. Similar to the proposed project, development under this alternative would involve ground-disturbing activities during construction of future structures which could affect cultural resources. Similar to the proposed project, future development under the Reduced Intensity Alternative would be subject to existing federal, State, and local regulations laws to protect cultural resources, which would generally ensure less-than-significant impacts to cultural resources. In addition, under this alternative, Mitigation Measures CULT-1, CULT-2a, CULT-2b, CULT-3, and CULT-4 as recommended under the proposed project, would also be required under this alternative.

Future development under the Reduced Intensity Alternative would need to comply with federal and State laws, the Zoning Ordinance, the General Plan goals, policies, and programs in the existing Open Space/Conservation, Noise and Safety Element, therefore potential impacts to buried archaeological deposits, geological features, human remains, tribal cultural resources, and architectural resources, under the Reduced Intensity Alternative would be *similar* to the proposed project.

5.6.2.5 GEOLOGY, SOILS, AND SEISMICITY

As described in Chapter 4.5, Geology, Soils, and Seismicity, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Under the Reduced Intensity Alternative, future development would result in 25 percent less residential and non-residential development, thereby reducing potential new development that would occur within the study area compared to the proposed project. As such, fewer structures would be subject to the potential for damage from soil/geologic conditions, liquefaction, lateral spreading, or other geologic instabilities. However, future development under both the Reduced Intensity Alternative and proposed project would be subject to the same erosion control measures as specified in the City of Menlo Park Engineering Division's Grading and Drainage Control Guidelines, as well as the California Building Code (CBC) regulations relating to seismic safety, which would address and prevent hazards associated with geology, soils, and seismicity.

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Although the Reduced Intensity Alternative would result in 25 percent less residential and non-residential development, compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under the Reduced Intensity Alternative and the proposed project; therefore, would result in *similar* impacts when compared to the proposed project.

5.6.2.6 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts with implementation of Mitigation Measure GHG-1.

Development under the proposed project would generate a substantial increase in GHG emissions resulting in a significant impact. The proposed project would be consistent with the *Plan Bay Area* and the City's CAP; however, additional state and federal measures are necessary to achieve the aggressive targets established for 2050 in Executive Order S-03-05. Therefore, the impact would be significant. Mitigation Measure GHG-1 would ensure that the City updates the CAP to identify a post-2020 GHG reduction goal to align with the upcoming CARB Scoping Plan Update for statewide 2030 GHG emissions reductions target and identify a GHG reduction goal for the proposed project horizon year. However, at this time there are no post-2020 federal and state measures that would assist the City in achieving the efficiency target at the proposed project year. Therefore, the impacts in this respect would remain significant and unavoidable.

The proposed project includes land uses that balance jobs and housing, and results in a Vehicles Miles Traveled (VMT) per capita of 14 miles, which is lower than the No Project Alternative where the VMT per capita would be 19 miles (see Table 4.13-13). This is generally due to the existing imbalance in types of land use. As previously described, the VMT estimates in the City/County Association of Governments of San Mateo County (C/CAG) model are sensitive to changes in land use. Generally, land uses that reflect a more balanced jobs-housing ratio in the C/CAG model result in lower per capita VMT. Reducing both residential and non-residential land uses equally maintains the same imbalance, which would result in greater VMT similar to the No Project scenario.

The proposed goals, policies, and programs of the Land Use (LU) and Circulation (CIRC) Elements that would require local planning and development decisions to consider impacts to GHG and proposed Zoning regulations that would promote the creation of a live/work/play environment with travel patterns that are oriented toward pedestrian, transit, and bicycle use, including identifying public paseos to improve connectivity on the Zoning map, and the requirement to prepare Transportation Demand Management (TDM) Plans to reduce trip generation by 20 percent below standard use rates, would be adopted under the this alternative.

While, future development under the Reduced Intensity Alternative would result in 25 percent less residential and non-residential development, because VMT would not necessarily be reduced with an even land use reduction, GHG emissions impacts are considered *similar* to those of the proposed project.

5.6.2.7 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Chapter 4.7, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in six less-than-significant impacts, two significant-but-mitigable impacts, and one no impact

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conclusion. Implementation of Mitigation Measures HAZ-4a and HAZ-4b would reduce impacts related to sites with known hazardous materials.

As described in Chapter 4.7, the study area contains leaking underground storage tanks (LUST), as well as several locations that are listed under the Spills, Leaks, Investigation, and Cleanups (SLIC) Program, which investigates and regulates non-permitted discharges, also have been identified within the study area. However, the SLIC sites are found mostly in the downtown area and the northeastern portion of the study area, and most of these sites are listed as “Completed-Case Closed,” with some of the sites still open undergoing site assessment, remediation action, or verification monitoring of remediation action.

Future development under the Reduced Intensity Alternative and the proposed project that involves the handling, transport, use, or disposal of hazardous materials would be regulated pursuant to federal, State, and local laws. In addition, although the study area is located approximately 2 miles from Palo Alto Airport, no portions of the city are within the airport land use compatibility zones established by the Palo Alto Airport Comprehensive Land Use Plan. Further, the study area is located more than 2 miles from the San Carlos Airport; therefore, future development under both scenarios would not result in any airport hazards. As a result, future development under the Reduced Intensity Alternative would not interfere with the use of the public or private use of nearby airports nor would future development expose people to hazards or risks related to airport use.

Overall, while the Reduced Intensity Alternative would result in less non-residential development, compliance with existing federal, State, and local regulations related to the safe use, handling, disposal, transport, and generation of hazardous materials, would ensure that potential impacts related to hazards and hazardous materials be minimized. In addition, HAZ-4a and HAZ-4b would be required under both scenarios to reduce impacts to sites with known hazardous materials.

Given that development under the Reduced Intensity Alternative would result in a 25 percent reduction in residential and non-residential development, impacts would be *less* than the proposed project.

5.6.2.8 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Although the Reduced Intensity Alternative would result in 25 percent less residential and non-residential development, future development would occur within previously urbanized areas and would be subject to the same existing federal, State, and local regulations relating to hydrology and water quality, similar to the proposed project. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality be minimized as future development occurs.

As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, some dewatering of groundwater could occur during construction of future development in the Bayfront Area; however, would be at a shallow level where water supplies aren’t drawn from. In addition, because future development under the Reduced Intensity Alternative would occur primarily within already urbanized areas, development would connect to existing drainage systems already in place.

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Although there are 100-year flood zones within the Bayfront Area where housing could be placed, compliance with existing local regulations, such as requiring fill to elevate structures above flood level, and compliance with the Federal Emergency Management Agency's (FEMAs) flood regulations, would minimize potential flood impacts. Furthermore, while there is Searsville Reservoir and Felt Lake where dams are located within the city, both of these are not expected to be threats as described in Chapter 4.8. Also, the Bayfront Area is not within either of these dam inundations zones.

Overall, hydrology and water quality impacts under the Reduced Intensity Alternative would be *similar* when compared to the proposed project.

5.6.2.9 LAND USE AND PLANNING

As described in Chapter 4.9, Land Use and Planning, of this Draft EIR, the proposed project would result in two less-than-significant impacts and two significant-but-mitigatable impacts. Implementation of Mitigation Measure LU-2 would ensure the future projects in Menlo Park are consistent with the City's General Plan policies. While the proposed project would aim to improve connectivity and would not create physical barriers within existing communities, the Reduced Intensity Alternative also supports the integration of infill development and does not propose physical features that could divide a community.

Development under the proposed project would be required to be consistent with the General Plan polices and Zoning Ordinance that promote cohesive and compatible neighborhoods and prevent new development from dividing existing uses where different land uses abut one another. The proposed project, and accordingly, the Reduced Intensity Alternative by location, would not conflict with and adopted habitat conservation plans or natural community conservation plans within the Menlo Park.

The proposed project was found to not conflict with any land use plans adopted for the purpose of avoiding or mitigating an environmental effect. Furthermore, the proposed project was found to be consistent with *Plan Bay Area* as a result of proposed development that is consistent with the one PDA identified in the city, as well as overall infill development, and land use and transportation policies that promote non-vehicular travel.

Overall, because the Reduced Intensity Alternative would result in development in the same setting and would be subject to the same existing land use regulations, including Mitigation Measure LU-2, which would ensure the future projects in Menlo Park are consistent with the City's General Plan policies, land use impacts, when compared to the proposed project, would be *similar*.

5.6.2.10 NOISE

As described in Chapter 4.10, Noise, of this Draft EIR, the proposed project would result in three less-than-significant impacts and four significant-but-mitigatable impacts. Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4 would reduce noise impacts from construction and operation of future development in the study area.

Future development under the designations of the proposed project would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or

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environmental review would serve to ensure that individual uses would comply with the provisions of the noise chapter. Development under the Reduced Intensity Alternative would also be subject to these applicable standards. Additionally, implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4, which would apply under both scenarios would reduce impacts from future development in the study area.

Similar to the proposed project, future development under this alternative would result in temporary and permanent increases to ambient noise levels attributed to the construction and operation of non-residential and residential land uses; however, the development under both scenarios would be located in already urbanized areas where similar uses already occur. Further, compliance with relevant General Plan Noise (N) Element policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the Reduced Intensity Alternative would not result in significant permanent increases in the ambient noise level in the study and vicinity.

There are no areas of Menlo Park which fall within an airport land use plan for any of the airports located in close proximity to the study area, thus, future development under the Reduced Intensity Alternative and the proposed project would not expose people to excessive aircraft noise levels and impacts would be less than significant. In addition, there are no airstrips within Menlo Park, thus, there would be no impact related to excess noise levels of a private airstrip.

The Reduced Intensity Alternative would result in a 25 percent less residential and non-residential in the Bayfront Area and would be subject to the same regulatory setting as the proposed project. Therefore, the impacts related to noise would be *less* when compared to the proposed project.

5.6.2.11 POPULATION AND HOUSING

As described in Chapter 4.11, Population and Housing, of this Draft EIR, growth under the proposed project would exceed the ABAG's 2013 projections. However, the General Plan serves as the City's constitution for the physical development of the city, thus, the General Plan goals and policies will provide the framework to adequately plan orderly development under the proposed project and the impact would be less than significant. However, when considered in a regionally cumulative context, impacts were found to be significant and unavoidable until the regional growth projections for the Bay Area are updated to consider the proposed project. Under the Reduced Intensity Alternative, the proposed residential buildout would be the 25 percent less than the proposed project; therefore, impacts would be less with respect to regional growth projections.

No new land use designations proposed under the project, or under the Reduced Intensity Alternative, are located on sites where residential land uses currently exist; thus, no displacement of existing housing units would occur. In addition, there are no plans for removal of existing housing under either scenario; thus, the displacement of people would not occur and impacts would be less than significant.

The Reduced Intensity Alternative would result in a 25 percent less residential and non-residential development in the Bayfront Area. In addition to the development under Reduced Intensity Alternative, the development potential under the General Plan would be carried forward to the 2040 horizon year.

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Thus, less residential development is anticipated under the Reduced Intensity Alternative. Therefore, impacts related to population and housing would be *less* than the proposed project.

5.6.2.12 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.12, Public Services and Recreation, of this Draft EIR, impacts to fire protection services, police services, parks, schools, and libraries, under the proposed project, were found to be less than significant.

Fire and Police Services

As discussed in Chapter 4.12, Public Services and Recreation, the proposed projects would not require the expansion of the Menlo Park Fire Protection District (MPFPD) facilities; however, when considered in a cumulative setting, the project would contribute to the need for expansion of Station 77. Impacts were found to be less than significant as no plans are available to evaluate potential impacts; however, once plans are available, the expansion project would be subject to separate environmental review, as needed. Developers of future projects in Menlo Park would be required to pay the MPFPD's developer impact fees under both scenarios; thus, would contribute to the ability of the MPFPD to provide adequate fire protection services. In addition, the proposed project would not require the expansion of Menlo Park Police Department (MPPD) facilities. The Reduced Intensity Alternative would result in 25 percent less residential and non-residential land uses; therefore, would result in less demand on the MPFPD and the MPPD. Thus, the impacts under the Reduced Intensity Alternative would be *less* than the proposed project.

Parks and Recreation Services

The proposed project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks; would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The Reduced Intensity Alternative would result in fewer residents; thus fewer primary users of the parks and recreational services, and therefore, the impacts under the Reduced Intensity Alternative would be *less* than the proposed project.

Schools

Buildout of the Reduced Intensity Alternative would occur over the course of 24 years, and like the proposed project, would result in a gradual increase in demand for school services with the 25 percent fewer students. Like development under the proposed project, development under the Reduced Intensity Alternative would be subject to development impact fees in accordance with the provisions of Senate Bill 50. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while the Reduced Intensity Alternative would generate less residential growth and subsequently fewer students, impacts would be still be *similar* when compared to the proposed project

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given the future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools.

Libraries

The proposed project would not require the physical expansion of library facilities; however, when considered in a cumulative setting, the proposed project would contribute to the need for expansion of the library. The Reduced Intensity Alternative would generate the fewer residents from the proposed project; thus, the fewer primary users of the library and the fewer demands on library facilities and resources would result. Therefore, impacts to library services would be *less* than the proposed project.

5.6.2.13 TRANSPORTATION AND CIRCULATION

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed project would exceed acceptable level of service standards at intersections and roadway segment capacity at roadway segments in the study area even with implementation of mitigation measures TRANS-1a and TRANS-1b. Implementation of Mitigation Measure TRANS-1b would provide the funding by requiring future developers to pay their fair share of the infrastructure necessary to reduce impacts. Because Mitigation Measure TRANS-1a and TRANS-1b could also apply to the Reduced Intensity Alternative, impacts in this regard would be considered similar under both scenarios.

The proposed project includes a land use to job balance that results in a Vehicles Miles Traveled (VMT) per capita of 14 miles. The VMT estimates are sensitive to changes in land use. Generally, land uses that reflect a more balanced jobs-housing ratio result in lower per capita VMT; therefore, while no model runs have been prepared for this alternative, it is likely the VMT could be higher than that of the proposed project under the this alternative due the balanced reduction in housing and jobs which could continue to exacerbate this current imbalance. Therefore, VMT impacts under this alternative are considered to be greater than those of the proposed project under this alternative.

Chapter 4.13 finds that the proposed project would conflict with adopted transportation policies, plans, or programs regarding public transit, and bicycle and pedestrian facilities and requires implementation of Mitigation Measures TRANS-6a through TRANS-6c, which similar to Mitigation Measure TRANS-1b, require the City to secure funding for future improvements that could potentially reduce these impacts. These would also be required under the Reduced Intensity Alternative. The proposed project contains policies supporting transit; it also includes infrastructure improvements and guiding policies that encourage and anticipate increased transit use. Similarly, the proposed project proposes substantial improvements to pedestrian and bicycle infrastructure. The Reduced Intensity Alternative would similarly conflict with adopted policies, and would also include the infrastructure improvements and guiding policies that support transit, bicycles, and pedestrians that are called for in the proposed project. Therefore, impacts to alternative modes of transportation would be similar under both scenarios.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed project would not cause impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the Reduced Intensity Alternative would be subject to the same development review process and City Codes, and it would not

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impact regional air travel, so emergency access and air traffic pattern impacts would also be similar to those of the proposed project.

Overall, because the Reduced Intensity Alternative would include the provisions of the updated Circulation Element, but with equally less residential and non-residential development, which could exacerbate the existing land use imbalance and greater per capita VMT than the proposed project, impacts under the Reduced Intensity Alternative would be *similar* when compared to the proposed project.

5.6.2.14 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.13, Utilities and Service Systems, of this Draft EIR, impacts to water, sanitary wastewater, solid waste, stormwater infrastructure, and energy conservation, under the proposed project, were found to be less than significant.

Water

Implementation of the proposed project would have sufficient water supplies from existing entitlements, conservation plans and resources. In addition, the proposed project would not require the construction of new water facilities or expansion of existing facilities on its own, but when considered in a cumulative context, the current water storage facilities need to provide adequate water pressure in the Bayfront Area would be required. Because this is an existing condition, the impact under the Reduced Intensity Alternative would be the same when compared to the proposed project. Under the Reduced Intensity Alternative, less residential and non-residential development would occur; thus, impacts to the water supply and infrastructure under the Reduced Intensity Alternative would be *less* than those of the proposed project.

Wastewater

Wastewater generated from potential future development under the proposed project would not exceed the wastewater treatment requirements or capacity of the SVCW WWTP. In addition, the proposed project would not require the construction of new or expanded wastewater treatment facilities and West Bay Sanitary District (WBSD) has adequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. Under the Reduced Intensity Alternative, 25 percent less residential and non-residential would occur; thus, impacts related to wastewater under the Reduced Intensity Alternative would be *less* than those of the proposed project.

Solid Waste

The impacts to adequate landfill capacity under the proposed project were found to be less than significant, and significant-but-mitigable in a cumulative setting. This is due to the fact that the Ox Mountain landfill is near capacity and the proposed project together with the other users of this landfill could result in inadequate landfill capacity. Implementation of Mitigation Measure UTIL-10 would be required under both scenarios, which would reduce the impact to a less-than-significant level. The Reduced Intensity Alternative would result in 25 percent less residential and non-residential development,

ALTERNATIVES TO THE PROPOSED PROJECT

and therefore, less solid waste would be generated. Thus, impacts under the Reduced Intensity Alternative would be *less* than those of the proposed project.

Energy

Implementation of the proposed project would result in a less-than-significant impact related to natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. The Reduced Intensity Alternative would result in 25 percent less residential and non-residential development. Thus, impacts under the Reduced Intensity Alternative would be *less* than those of the proposed project.

5.6.3 RELATIONSHIP OF THE ALTERNATIVE TO THE OBJECTIVES

Under the Reduced Intensity Alternative the total number of residential and non-residential square footage, hotel rooms, and employees would be 25 percent less than anticipated under the proposed project. Because this alternative would only result in a 25 percent reduction of non-residential development, the Reduced Intensity Alternative would generally meet all of the project objectives. However, it is unlikely that this alternative would realize the full economic and revenue potential objective set forth by the proposed project.

5.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of Menlo Park. The project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “No Project” Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown in Table 5-2, the No Project Alternative would, in comparison to the project, result in reduced environmental impacts related to biological resources, cultural resources, hazards and hazardous materials, noise, population and housing (cumulative), public services, and utilities and service systems, but would ultimately result in greater impacts related to aesthetics, air quality, greenhouse gas emissions and transportation and traffic. Neither the Reduced Non-Residential Alternative nor the Reduced Intensity Alternative would result in greater impacts when compared to the proposed project. Therefore, as shown on Table 5-2, the Reduced Non-Residential Intensity Alternative would be the environmentally superior alternative because it would result in fewer significant impacts than the Reduced Intensity Alternative. This is in part because the equal reduction of jobs and housing in the Reduced Intensity Alternative would maintain the imbalance that currently exists in the city, which could result in a higher VMT than both the proposed project and the Reduced Non-Residential Intensity Alternative.