

Summary

S.1 PROJECT OVERVIEW AND PROJECT LOCATION

As part of the Menlo Park Facebook Campus Project (Project), Facebook (Project Sponsor) is moving its operations from its existing facilities in the City of Palo Alto to the City of Menlo Park (City). The Project Sponsor proposes to move its operations to two sites located north of US 101 near the intersection of Bayfront Expressway and Willow Road. The Project site consists of a 56.9-acre East Campus, which was formerly occupied by Oracle (formerly Sun Microsystems), and a 22-acre West Campus, which was formerly owned by General Motors (GM) and by TE Connectivity (formerly Tyco Electronics). The East Campus and the West Campus are connected by an existing undercrossing beneath Bayfront Expressway.

The Project Sponsor proposes to modify the existing Conditional Development Permit (CDP) that applies to the East Campus by converting the 3,600 employee cap included in the CDP into a vehicle trip cap for the East Campus. The trip cap (Trip Cap) proposed by the Project Sponsor includes a maximum of 2,600 trips during the AM Peak Period from 7:00 a.m. to 9:00 a.m. and the PM Peak Period from 4:00 p.m. to 6:00 p.m. and a maximum of 15,000 daily trips. The Trip Cap would allow approximately 6,600 employees to occupy the East Campus. The Project Sponsor also proposes to develop the West Campus to accommodate approximately 2,800 employees. No employee cap is proposed as part of the Project.

To accommodate the Project Sponsor's rapid employment growth, the first phase of the Project includes occupying the East Campus' nine existing buildings, which contain 1,035,840 square feet (sf). Tenant Improvements (TIs) are being undertaken to convert existing hardware-intensive laboratory spaces and individual hard-wall offices to a more open, shared workspace characteristic of the Facebook work environment, which is intended to foster innovation, teamwork, and creativity. However, the TIs are being done through ministerial building permits and are not part of the Project.¹

The second phase of the Project includes developing the West Campus. The existing buildings at the West Campus would be demolished and developed with office buildings and amenities structures totaling approximately 440,000 sf. Although the Project Sponsor does not intend to apply for entitlements for the West Campus at this time, this second phase of development is evaluated as part of the Project in this Draft Environmental Impact Report (EIR).

¹ In addition to the TIs, the Project Sponsor proposed new construction on the East Campus resulting in an increase in gross floor area, which required approval of a use permit in the M-2 zoning district. The addition of approximately 1,400 sf to accommodate two small structures in the courtyard area and minor additions to Buildings 11 and 15 for two security control points was subject to CEQA review but determined to be categorically exempt under Class 3 (Section 15303) of the CEQA Guidelines.

S.2 AREAS OF CONTROVERSY

CEQA Guidelines Section 15123 specifies that the Draft EIR summary identify “areas of controversy” known to the Lead Agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

A Notice of Preparation (NOP) was released for the Project on April 21, 2011 for a 36-day public review period. A public scoping meeting was held before the City’s Planning Commission on May 16, 2011. This summary list is compiled based on written comments received (included in Appendix 1 of this Draft EIR) and comments stated during the public scoping meeting. The topics that would result in physical impacts under CEQA are addressed in the EIR analysis. Major areas of controversy include, but are not limited to, the following:

- Land Use
 - Issues related to required permits for development on the shore of the San Francisco Bay.
 - Conflicts with the General Plan and other relevant policies.
- Aesthetics
 - Appropriateness of increased building heights at the West Campus.
- Transportation
 - Increase in traffic and potential conflicts with the City’s General Plan goals and policies.
 - Impacts to the Willow Road/US 101 interchange.
 - Impacts to the Bay Trail; impacts to bicycle and pedestrian facilities near the Project site.
- Air Quality and Greenhouse Gas (GHG) Emissions
 - Air quality impacts and carbon dioxide (CO₂) emissions as a result of increased traffic.
- Noise
 - Impacts associated with traffic noise generated by the Project.
- Biology
 - Facilitation of raptor predation on special-status species occurring in the nearby salt and brackish water marshes.
 - Removal and replacement of heritage trees.
 - Disturbance to nesting migratory birds and roosting bats.
- Geology and Soils
 - Impacts associated with liquefaction.
- Hydrology/Flood Hazards
 - Impacts of sea level rise on the Project.

- Hazardous Materials
 - Impacts to air and health if soil is excavated and if any applicable local standards would be exceeded.
 - Transportation impacts from removal or remedial activities.
 - The potential for soil excavation to result in an accident involving the release of hazardous materials.
- Population and Housing
 - The potential increase in housing demand.
 - Impacts associated with population increase on community needs.
- Public Services
 - Impacts to police services.
 - Impacts to fire services.
 - Impacts to schools and recreation regarding the Bay Trail.
 - Effects on wildlife at nearby recreational facilities.
 - Shoreline access and improvements.
 - Impacts to schools.
- Utilities
 - Increases in water demand.
 - Impacts related to wastewater conveyance.
 - Impacts related to constructing underground power lines to serve the Project site.

S.3 ALTERNATIVES

Section 5 of this Draft EIR analyses a range of reasonable alternatives to the Project. Alternatives to the Project that are analyzed include:

- **No Project Alternative.** The No Project Alternative is provided in this Draft EIR to compare the impacts of the Project with what would be reasonably expected to occur in the foreseeable future if the Project were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (CEQA Guidelines Section 15126.6(e)(2)).
- **Reduced Intensity Alternative.** The Reduced Intensity Alternative assumes a 25 percent reduction in daily trips for the East Campus and the West Campus. This could also translate to fewer employees. As discussed in Section 5, Alternatives, of this Draft EIR, the Reduced Intensity Alternative is the Environmentally Superior Alternative.

S.4 IMPACTS AND MITIGATION MEASURES

Table S-1 (for the East Campus) and Table S-2 (for the West Campus) present a summary of the impacts of the Project, proposed mitigation and improvement measures, and each impact's level of significance after mitigation. The environmental impacts are identified and classified as "Significant," "Potentially Significant," "Less Than Significant," or "No Impact." According to the CEQA Guidelines Section 15382, a significant impact is "... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project..." CEQA Guidelines Section 15126.4(a)(1) also states that an EIR "... shall describe feasible mitigation measures which could minimize significant adverse impacts..." In this Draft EIR, mitigation measures are identified for all of the impacts labeled "Potentially Significant."

S.5 DRAFT EIR CONCLUSIONS

In accordance with CEQA Guidelines Section 15123(b)(3), this Summary must identify issues to be resolved including whether or how to mitigate the significant effects and the choice among alternatives. Section 3 of the Draft EIR presents mitigation measures to reduce or avoid significant impacts identified for the Project. In some instances, the Draft EIR identifies mitigation options to address specific impacts. During the CEQA environmental review process, the City will need to resolve which mitigation measures are suitable and whether they can effectively reduce impacts to a less-than-significant level. A Mitigation Monitoring and Reporting Program (MMRP) will be prepared to define the timing of implementation of the measures, parties responsible for implementation, and parties responsible for reporting and verifying implementation.

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

Finally, Section 5 of this EIR presents the alternatives for the Project, as outlined above. Although the Reduced Intensity Alternative would meet some Project objectives, none of the alternatives would avoid all of the significant and unavoidable impacts of the Project. The City will need to resolve whether these options or others that have not been considered are preferable from an environmental and community perspective, compared to the Project as proposed.

**Table S-1
Summary of Impacts and Mitigation Measures – East Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.2 Land Use			
<p>LU-1 Conflicts with Adopted Land Use Plans and Policies. Implementation of the Project, at the East Campus, would be generally consistent with the General Plan, Municipal Codes, and BCDC, ABAG, and C/CAG plans. As such, the impact would be less than significant.</p>	LTS	None Required.	N/A
<p>C-LU-1 Cumulative Land Use Impacts. The Project, in combination with other foreseeable development in the nine-county ABAG region, would have a less-than-significant cumulative impact with regard to consistency with applicable land use plans, policies, and regulations.</p>	LTS	None Required.	N/A
3.5 Transportation			
<p>TR-1 Impacts to Intersections in the Near Term 2015 East Campus Only Condition. Increases in traffic associated with the Project under the Near Term 2015 East Campus Only Condition would result in increased delays at several intersections during peak hours causing a potentially significant impact to the operation of several of the study intersections.</p>	PS	<p>MITIGATION MEASURE. Mitigation Measure TR-1.1 involves intersection improvements to mitigate or reduce the impacts of the Project under the Near Term 2015 East Campus Only Condition. However, intersection impacts would still remain since many improvements require obtaining additional right-of-way and several intersections are not under the City’s jurisdiction.</p> <p><i>TR-1.1 Intersection Improvements.</i> The operations at several of the intersections could be improved by modifying the intersection geometry to provide additional capacity. Some of these modifications may be made by restriping the existing roadway; however, others may require additional right-of-way when travel lanes are added. See Appendix 3.5-I for intersection conceptual layout plans for mitigation measures.</p> <p>a. Willow Road and Bayfront Expressway</p> <p>The proposed partial mitigation measures for the intersection of Willow Road and Bayfront Expressway include an additional</p>	SU

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		<p>eastbound right turn lane with a right turn overlap phase from Willow Road to Bayfront Expressway, a new Class I bikeway between the railroad tracks and the existing Bay Trail, closing the outbound direction of the driveway at Building 10 to simplify maneuvering through the Hacker Way stop-controlled intersection (inbound access would still be provided), lengthening the existing right-turn pocket at the westbound approach to a full lane between Bayfront Expressway and Hacker Way, and ensuring the crosswalk across Hacker Way is accommodated safely.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the proposed mitigation measures at the intersection of Willow Road and Bayfront Expressway for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the effective date of the Development Agreement, the Project Sponsor shall submit complete plans to construct the intersection improvements.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way and on the East Campus egress approach, including but not limited to, grading and drainage improvements, utility relocations, traffic signal relocations/modifications, tree protection requirements, signage and striping modifications further west on Willow Road, and the design of the eastbound direction Class I bikeway from the railroad tracks to the intersection of Willow Road and Bayfront Expressway. The plans shall be subject to review and approval of the Public Works Department prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit</p>	

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		<p>for approval by the City and Caltrans prior to construction of the intersection improvements. The Project Sponsor shall construct the on-site improvements within 180 days of City approval of the plans. The Project Sponsor shall construct the off-site improvements within 180 days of receiving approval from Caltrans.</p> <p>If Caltrans does not approve the intersection improvements proposed within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the improvement and the bond shall be released by the City. Construction of this improvement by the Project Sponsor shall count as a future credit toward payment of the Transportation Impact Fee (TIF) pursuant to the TIF Ordinance. In the event any portion of the intersection improvements is eligible for funding in whole or in part by C/CAG, such improvements may be deferred by the City in its sole discretion to pursue such funding and the Project Sponsor may be relieved of its responsibility to construct such portion of the intersection improvements as may be funded by C/CAG, or such responsibility may be deferred until eligibility for funding is determined. Because the proposed mitigation would not fully mitigate the impact, it remains significant and unavoidable.</p> <p>b. Willow Road and Middlefield Road</p> <p>The proposed mitigation measure for the intersection of Willow Road and Middlefield Road includes restriping an existing northbound through lane to a shared through a right-turn lane. Implementing this improvement would require traffic signal modifications, removal of the existing triangular median on the</p>	

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		<p>southeast corner of the intersection, along with realignment of the crosswalks on the south and east side of the intersection.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the proposed mitigation measure at the intersection of Willow Road and Middlefield Road for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the effective date of the Development Agreement, the Project Sponsor shall submit complete plans to construct the intersection improvements.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way, including but not limited to, grading and drainage improvements, utility relocations, traffic signal relocations/modifications, tree protection requirements, and signage and striping modifications. The plans shall be subject to review and approval of the Public Works Director. Upon obtaining approval from the City, the Project Sponsor shall construct the improvements within 180 days of the encroachment permit approval date by the City. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. With the implementation of this mitigation measure, the impact would be reduced to a less-than-significant level.</p> <p>c. University Avenue and Bayfront Expressway</p> <p>The proposed mitigation measure for the intersection of University Avenue and Bayfront Expressway includes an additional southbound through lane and receiving lane. A revised signal timing plan would also be needed. The additional southbound</p>	

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		<p>through lane and southbound receiving lane are not feasible due to the right-of-way acquisition from multiple property owners, potential wetlands, relocation of the Bay Trail, and significant intersection modifications, which are under Caltrans jurisdiction. However, the installation of a Class I bikeway (portion of the Bay Trail from west of the railroad tracks to the intersection of University Avenue and Bayfront Expressway) is a feasible, partial mitigation measure for the impact. This partial mitigation measure would require paving, grading, drainage and signing and striping improvements.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the proposed partial mitigation measure along University Avenue between Bayfront Expressway and the railroad tracks for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the effective date of the Development Agreement, the Project Sponsor shall submit complete plans to construct the improvements.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way, including but not limited to, grading and drainage improvements, utility relocations, and signage and striping modifications. The plans shall be subject to review and approval by the City and coordination with the City of East Palo Alto Public Works Departments prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit for approval by the cities of Menlo Park and East Palo Alto, if required, and Caltrans prior to construction of the intersection improvements. The Project</p>	

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		<p>Sponsor shall construct the improvements within 180 days of receiving approval from Caltrans.</p> <p>If Caltrans does not approve the proposed improvements within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the improvement and the bond shall be released by the City after the Project Sponsor submits funds equal to the bid construction cost to the City. The City may use the funds for other transportation improvements, including, but not limited to, bicycle, pedestrian, and transit improvements, and TDM programs throughout the City, with priority given to portions of the City east of US 101. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. Because the proposed mitigation would not fully mitigate the impact, it remains significant and unavoidable.</p> <p>d. Bayfront Expressway and Chrysler Drive</p> <p>The proposed mitigation measures for the intersection of Bayfront Expressway and Chrysler Drive include restriping the existing eastbound right turn lane to a shared left-right-turn lane.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the proposed mitigation measures at the intersection of Bayfront Expressway and Chrysler Drive for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the effective date of the</p>	

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		<p>Development Agreement, the Project Sponsor shall submit complete plans to construct the intersection improvements.</p> <p>The plans shall be subject to review and approval of the Public Works Director prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit for approval by the City and Caltrans prior to construction of the intersection improvements. The Project Sponsor shall construct the improvements within 180 days of receiving approval from Caltrans.</p> <p>If Caltrans does not approve the intersection improvements proposed within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the improvement and the bond shall be released by the City after the Project Sponsor submits funds equal to the bid construction cost to the City. The City may use the funds for other transportation improvements, including, but not limited to, bicycle, pedestrian, and transit improvements and TDM programs, throughout the City with priority given to portions of the City east of US 101. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. Although the proposed mitigation would fully mitigate the impact, it remains significant and unavoidable because the intersection is under the jurisdiction of Caltrans and the City cannot guarantee the mitigation measure would be implemented.</p> <p>e. Middlefield Road and Lytton Avenue</p> <p>The proposed mitigation measures for the intersection of Middlefield Road and Lytton Avenue include adding an additional eastbound</p>	

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<p>TR-2 Impacts on Roadway Segments in the Near Term 2015 East Campus Only Condition. Increases in traffic associated with the Project under the Near Term 2015 East Campus Only Condition would result in increased ADT volumes on Project area roadway segments resulting in a potentially significant impact.</p>	<p>PS</p>	<p>left-turn lane. The additional eastbound left-turn lane is not feasible due to the additional right-of-way acquisition from multiple owners, and significant intersection modifications, which are under City of Palo Alto jurisdiction. Because the improvement is under the City of Palo Alto jurisdiction and is infeasible and the City cannot guarantee it would be implemented, the impact remains significant and unavoidable.</p> <p>MITIGATION MEASURE. Mitigation Measure TR-2.1 involves roadway improvements to mitigate or reduce the impacts of the Project under the Near Term 2015 East Campus Only Condition on daily roadway segment operations. However, to improve daily roadway operations a typical mitigation measure would seek to widen the road to add travel lanes and capacity. These roadway segments would still have impacts because much of the City and surrounding areas are built out, making roadway widening difficult because right-of-way acquisition impacts local property owners.</p> <p><i>TR-2.1 Roadway Segment Improvements.</i> Roadways could be improved with additional travel lanes to accommodate the increase in net daily trips, but increasing the capacity of the roadway requires additional right-of-way, which can impact local property owners.</p> <p>a. Marsh Road between Bay Road and the railroad tracks An additional lane of travel would provide an increase in capacity and would mitigate the impacts to the roadway segment; however, the mitigation is not feasible because there is a lack of sufficient available right-of-way to construct the improvements. Therefore, the impacts to the roadway segment would remain significant and unavoidable.</p> <p>b. Willow Road between Durham Street and Chester Street An additional lane of travel would provide an increase in capacity and would mitigate the impacts to the roadway segment; however,</p>	<p>SU</p>

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<p>TR-3 Impacts to Routes of Regional Significance in the Near Term 2015 East Campus Only Condition. Increases in traffic associated with the Project under Near Term 2015 East Campus Only Condition would potentially result in significant impacts to several Routes of Regional Significance.</p>	PS	<p>the mitigation is not feasible because there is a lack of sufficient available right-of-way to construct the improvements. Therefore, the impacts to the roadway segment would remain significant and unavoidable.</p> <p>c. Willow Road between Nash Avenue and Blackburn Avenue An additional lane of travel would provide an increase in capacity and would mitigate the impacts to the roadway segment; however, the mitigation is not feasible because there is a lack of sufficient available right-of-way to construct the improvements. Therefore, the impacts to the roadway segment would remain significant and unavoidable.</p> <p>d. Middlefield Road between Linfield Drive and Survey Lane An additional lane of travel would provide an increase in capacity and would mitigate the impacts to the roadway segment; however, the mitigation is not feasible because there is a lack of sufficient available right-of-way to construct the improvements. Therefore, the impacts to the roadway segment would remain significant and unavoidable.</p> <p>MITIGATION MEASURE. Mitigation Measure TR-3.1 involves roadway improvements to mitigate impacts of the Project under the Near Term 2015 East Campus Only Condition on Routes of Regional Significance. A typical mitigation measure would seek to widen the road to add travel lanes and capacity. However, impacts to Routes of Regional Significance would remain because these roadways are not under the jurisdiction of the City. In addition, freeway improvement projects, which add travel lanes are planned and funded on a regional scale and would be too costly for a single project to be expected to fund.</p>	SU

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		<p><i>TR-3.1 Routes of Regional Significance Improvements.</i> Routes of Regional Significance could be improved with additional travel lanes, but the routes are under the jurisdiction of Caltrans.</p> <ul style="list-style-type: none"> a. SR 84 between US 101 and Willow Road Adding a travel lane would increase capacity, but adding an additional lane to the roadway is not a feasible mitigation due to right-of-way constraints and because it is under Caltrans’ jurisdiction. Therefore, the impact is significant and unavoidable. b. SR 84 between Willow Road and University Avenue Adding a travel lane would increase capacity, but adding an additional lane to the roadway is not a feasible mitigation due to right-of-way constraints and because it is under Caltrans’ jurisdiction. Therefore, the impact is significant and unavoidable. c. SR 84 between University Avenue and County Line Adding a travel lane would increase capacity, but adding an additional lane to the roadway is not a feasible mitigation due to right-of-way constraints and because it is under Caltrans’ jurisdiction. Therefore, the impact is significant and unavoidable. d. US 101 North of Marsh Road Adding a travel lane would increase capacity, but adding an additional lane to the freeway is not a feasible mitigation due to right-of-way constraints and because it is under Caltrans’ jurisdiction. Therefore, the impact is significant and unavoidable. e. US 101 between Willow Road and University Avenue Adding a travel lane would increase capacity, but adding an additional lane to the freeway is not a feasible mitigation due to right-of-way constraints and because it is under Caltrans’ jurisdiction. Therefore, the impact is significant and unavoidable. 	

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		f. US 101 between South of University Avenue Adding a travel lane would increase capacity, but adding an additional lane to the freeway is not a feasible mitigation due to right-of-way constraints and because it is under Caltrans' jurisdiction. Therefore, the impact is significant and unavoidable.	
TR-4 Impacts to Local Transit Systems in the Near Term 2015 East Campus Only Condition. The Project under Near Term 2015 East Campus Only Condition would not result in any impacts to the local transit system. This impact is less than significant.	LTS	None Required.	N/A
TR-5 Impacts to Local Bicycle and Pedestrian Facilities in the Near Term 2015 East Campus Only Condition. The Project under Near Term 2015 East Campus Only Condition would not result in any impacts to local bicycle and pedestrian facilities. This impact is less than significant.	LTS	None Required.	N/A
3.6 Air Quality			
AQ-1 Conflict with or Obstruct Implementation of the Applicable Air Quality Plan. The Project at the East Campus would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	None Required.	N/A
AQ-2 Violation of any Air Quality Standard. The Project at the East Campus could result in the violation of air quality standards: <ul style="list-style-type: none"> Operation of the Project at the East Campus would create new area and mobile sources of air pollutants that would generate emissions of reactive organic gases (ROG), PM₁₀, and PM_{2.5} (fine particulate 	PS	MITIGATION MEASURES. At this time there are no feasible mitigation measures that would reduce the NO _x , ROG, and PM ₁₀ emissions to less than significant. Thus, this impact would be significant and unavoidable.	SU

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<p>matter), but would not exceed BAAQMD's significance thresholds. However, emissions of NO_x (nitrogen oxide) from the East Campus operations would exceed BAAQMD's significance thresholds, resulting in a potentially significant impact.</p> <ul style="list-style-type: none"> • Operation of the Project at the East Campus would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO_x, and PM₁₀ and would exceed BAAQMD's significance thresholds. Thus, this impact would be potentially significant. 			
<p>AQ-4 Localized Carbon Monoxide Impacts from Motor Vehicle Traffic. The addition of Project-related traffic from the East Campus would result in increased concentrations of carbon monoxide around intersections in the vicinity of the Project, but not to the extent that the ambient air quality standards for CO would be exceeded. As a result, impacts of localized CO concentrations would be less than significant.</p>	LTS	None Required.	N/A
<p>AQ-5 Exposure to Toxic Air Contaminants. The Project at the East Campus could expose sensitive receptors to substantial TACs, resulting in a potentially significant impact.</p>	PS	MITIGATION MEASURE. Since the DPM emissions from the fleet mix contributed substantially to the exceedance of health risk thresholds; the HRA evaluated a reduction in the DPM emissions that would result in a less-than-significant impact.	LTS
<p>AQ-6 Exposure to Objectionable Odors. The Project at the East Campus would not be expected to create objectionable odors that would affect a substantial number of people. This impact would be less than significant.</p>	LTS	None Required.	N/A

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C-AQ-1 Consistency with Applicable Air Quality Plans. The Project, combined with other development within the City, would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	None Required.	N/A
C-AQ-2 Violation of any Air Quality Standard. The Project, in combination with other development within the City, would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO _x , and PM ₁₀ resulting in a violation of an Air Quality Standard.	PS	MITIGATION MEASURE. Because no feasible mitigation has been identified, the impact for ROG, NO _x , and PM ₁₀ is therefore significant and unavoidable.	SU
C-AQ-4 Cumulative Localized CO Concentrations. Cumulative development in the Project vicinity would not result in CO concentrations above the ambient air quality standards. Therefore, cumulative impacts on localized CO concentrations would be less than significant.	LTS	None Required.	N/A
C-AQ-5 Cumulative Toxic Air Contaminants Emissions. The Project, in combination with other foreseeable development in the Project vicinity, would expose sensitive receptors to substantial TACs. Therefore, cumulative impacts from these pollutants would be potentially significant.	PS	MITIGATION MEASURE. The Project's contribution to a significant health impact is less than five percent. In this instance, the receptors identified above the significance threshold would be significant even without the Project. Many of these existing receptors are closer than the recommended 500 foot distance from a freeway or other high traffic roadway as suggested by CARB in its guidance document on air quality and land use, Air Quality and Land Use Handbook: A Community Health Perspective. The CARB guidance acknowledges the need to balance this recommendation with other State and local policies addressing housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality of life issues. The best solution would be to not have these receptors so close to a freeway, but since they already exist this is not a	SU

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feasible option. There are no feasible Project-related mitigation measures that will reduce the impact to less than significant. Therefore, the cumulative health impacts remain significant and unavoidable.			
3.7 Greenhouse Gas Emissions			
CC-1 Greenhouse Gas Emissions. The Project at the East Campus would result in a net increase in GHG emissions. However, the increase would not exceed the BAAQMD’s standards of significance, resulting in a less-than-significant impact.	LTS	None Required.	N/A
CC-2 Conflicts with Applicable Plans and Policies. The Project at the East Campus would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, resulting in a less-than-significant impact.	LTS	None Required.	N/A
3.8 Noise			
NO-1 Exposure to Excessive Noise Levels. The increase in vehicular traffic associated with implementation of the East Campus could result in an increase in the exposure of off-site noise sensitive receptors to noise levels potentially in excess of the standards established in the General Plan or Municipal Code. This impact would be potentially significant.	PS	MITIGATION MEASURES. The Project would result in a potentially significant increase in traffic noise on Marsh Road between Scott Drive and Bohannon Drive and Willow Road between O’Brien Drive and Newbridge Street. There are no feasible mitigation measures that could reduce or eliminate the impact related to traffic noise, other than reducing traffic. Typical sound mitigation consists of walls or other barriers that would attenuate noise to the sensitive receptors behind the barrier. This measure would require installation of a noise wall within private property or within a designated right-of-way, which may not be allowed by an affected property owner or by the City. The feasibility of noise walls is restricted by access requirements for driveways, presences of local cross streets, underground utilities, other noise sources in the area, and safety considerations. For example, a noise wall would be ineffective on the impacted segment of	SU

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**Table S-1
Summary of Impacts and Mitigation Measures – East Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>Marsh Road because existing residential driveways directly access Marsh Road, and Rolison Road merges with Marsh Road along this segment. Breaks in the noise wall for access would not provide any noise attenuation and would render the wall ineffective. Additionally, for safety reasons, Caltrans states that noise barriers should not exceed 14 feet in height. Due to the high existing noise level, a noise barrier of more than 14 feet would be required to reduce noise levels along these roadways segments to an acceptable noise level for residential land uses. Finally, sensitive receptors along Marsh Road and Willow Road are currently oriented toward these roadways. Construction of a noise barrier would wall off these uses from the surrounding community, which could result in adverse impacts to aesthetics and potentially public safety because the noise walls would limit the visibility of the homes from the surrounding area. Natural surveillance is one of the four principles of Crime Prevention through Environmental Design. Therefore, installation of a noise wall along these segments would not be feasible.</p>	
<p>NO-3 Substantial Permanent Increase in Noise Level. Operation of the Project at the East Campus would result in a substantial permanent ambient noise level increase in the Project vicinity due to an increase in traffic. This would be a significant impact.</p>	PS	<p>MITIGATION MEASURE. Implementation of the Project would have the potential to result in a significant increase in noise level on Marsh Road and Willow Road. As described under Impact NO-1, no feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level.</p>	SU
<p>C-NO-1 Cumulative Exposure to Excessive Noise. The Project, in combination with other development within the City, could result in a substantial increase in exposure of persons to noise in excess of the standards established in the General Plan or Municipal Code. The Project’s contribution would be cumulatively significant.</p>	PS	<p>MITIGATION MEASURE. Implementation of the Project would result in a cumulatively considerable increase in noise levels from vehicular traffic on Marsh Road and Willow Road. As described under Impact NO-1, Mitigation Measure NO-1.1 would reduce noise levels to below the existing noise level along Willow Road. However, installation of a noise wall would not be feasible and no other feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level. Therefore, the Project’s cumulative impact would be significant and unavoidable.</p>	SU

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Table S-1
Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-NO-2 Cumulative Exposure to Ground-borne Vibration. Construction activities associated with Project-related development and other future development in the City would not expose sensitive receptors to excessive ground-borne vibration. The Project’s cumulative impact would be less than significant.	LTS	None Required.	N/A
C-NO-3 Cumulative Permanent Increase in Noise Levels. Operation of the Project and other cumulative developments would result in a substantial permanent ambient noise level increase in the Project vicinity. The Project’s contribution would be cumulatively significant.	PS	MITIGATION MEASURE. Implementation of the Project would have the potential to result in a significant increase in noise level on Marsh Road and Willow Road. No feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level.	SU
C-NO-4 Cumulative Temporary Increase in Noise Levels. Construction activities associated with Project-related development and other future development in the City would not expose sensitive receptors to a substantial temporary increase in ambient noise level. The Project’s cumulative impact would be less than significant.	LTS	None Required.	N/A

3.11 Geology and Soils

GS-1 Strong Seismic Groundshaking and Seismic-Related Ground Failure. The Project at the East Campus would have a less-than-significant potential to expose persons and structures to strong seismic groundshaking and seismic-related ground failure.	LTS	None Required.	N/A
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Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-GS-1 Cumulative Seismic Hazards. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase the risk of exposure or people or structures to seismic hazards. As such, the cumulative impact would be less than significant.	LTS	None Required.	N/A
C-GS-2 Cumulative Soil Hazards. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase soil hazards. As such, the cumulative impact would be less than significant.	LTS	None Required.	N/A
C-GS-3 Cumulative Soil Erosion. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase soil erosion potential. As such, the cumulative impact would be less than significant.	LTS	None Required.	N/A
3.12 Hydrology and Water Quality			
HY-4 Sea Level Rise. The Project at the East Campus would have a less-than-significant potential to expose people to flooding from climate change-induced sea level rise.	LTS	None Required.	N/A
HY-6 Effects on Groundwater Supplies and Recharge. The Project at the East Campus would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge because it would not increase groundwater demand or decrease recharge areas. This impact would be less than significant.	LTS	None Required.	N/A

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Table S-1
Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-HY-1 Cumulative Storm Drain Impacts. Development of the Project and other cumulative development could increase the rate and volume of stormwater runoff, which could cause or exacerbate localized flooding or cause the City’s storm drainage capacity to be exceeded in some locations. However, the Project’s contribution to cumulative impacts would not be cumulative considerable.	LTS	None Required.	N/A
C-HY-2 Cumulative Flooding and Sea Level Rise. Development of the Project and other cumulative development could expose people and structures to risk of 100-year flooding, including sea level rise. However, the Project’s contribution to cumulative impacts would not be cumulatively considerable.	LTS	None Required.	N/A
C-HY-3 Cumulative Water Quality. Development of the Project and other development would contribute pollutants to stormwater during construction and occupancy of the various projects, but this would not substantially degrade water quality. The Project’s contribution would not be cumulatively considerable. This cumulative impact would be less than significant.	LTS	None Required.	N/A
C-HY-4 Cumulative Groundwater Supplies and Recharge. Development of the Project and other cumulative development within the San Mateo subbasin would not substantially degrade groundwater supplies. As a result, cumulative impacts on the subbasin would be less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.13 Hazards and Hazardous Materials			
HM-2 Soil and Groundwater Contamination. The Project at the East Campus would have a less-than-significant potential to expose people to residual contaminants in soil and/or groundwater.	LTS	None Required.	N/A
HM-5 Maintenance Activities. Maintenance activities at the East Campus would have a less-than-significant potential to disturb soil containing residual contaminants.	LTS	None Required.	N/A
HM-6 Routine Hazardous Materials Use. Construction and operation of the Project the East Campus would involve the use of hazardous materials-containing products. However, these products would be used in moderation and would comply with federal, State, and local regulations, resulting in less-than-significant impacts.	LTS	None Required.	N/A
HM-7 Hazardous Materials Risks from Off-Site Uses. The Project at the East Campus could expose occupants to potential risks from off-site routine use or upset/accident conditions involving hazardous materials. However, compliance with federal, State, and local regulations would reduce the potential for off-site uses to pose a substantial hazard to the Project to less-than-significant.	LTS	None Required.	N/A
HM-8 Impairment of Emergency Access or Emergency Plans. The Project at the East Campus would result in a less-than-significant impact regarding the implementation of or interference to an adopted emergency response or evacuation plan.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – East Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-HM-1 Cumulative Hazardous Materials Use. Construction and operation of the Project and other cumulative development would involve routine hazardous materials use, generation, disposal, or transport. This is a less-than-significant cumulative impact.	LTS	None Required.	N/A
C-HM-3 Cumulative Hazardous Materials in Building Components. Development of the Project and other cumulative development could expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. This is a less-than-significant cumulative impact.	LTS	None Required.	N/A
C-HM-4 Cumulative Impairment of Emergency Access or Emergency Plan Impacts. Development of the Project and other cumulative development would not impair implementation of or interfere with an adopted emergency response or evacuation plan. The cumulative impact is less than significant.	LTS	None Required.	N/A

3.14 Population and Housing

PH-1 Indirect Population Growth. Implementation of the Project would not induce substantial population growth indirectly through job growth, nor would projected growth result in adverse direct impacts to the physical environment. Therefore, this impact would be less than significant.	LTS	None Required.	N/A
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Table S-1
Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-PH-1 Cumulative Population Impact. Cumulative development in the City and County would increase the resident population but would not exceed growth projections. The cumulative impact would be less-than-significant.	LTS	None Required.	N/A
C-PH-2 Cumulative Housing Impacts. Cumulative development in the City would increase the demand for housing in the City but would not exceed growth projections. The cumulative impact would be less than significant.	LTS	None Required.	N/A
3.15 Public Services			
PS-1 Impacts to Police Services. The Project at the East Campus would not result in the need for new or physically altered police service facilities. Therefore, police service impacts would be less than significant.	LTS	None Required.	N/A
PS-2 Impacts to Fire Services. The Project at the East Campus would not result in the need for new or physically altered fire service facilities. Fire service impacts would be less than significant.	LTS	None Required.	N/A
PS-3 Impacts to School Facilities. The Project at the East Campus would not result in the need for new or physically altered school facilities. Impacts related to school facilities would be less than significant impact.	LTS	None Required.	N/A
PS-4 Impacts to Parks and Recreation Facilities. The Project at the East Campus, would not result in the need for new or physically altered parks and recreation facilities. Park and recreation impacts would be less than significant.	LTS	None Required.	N/A

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
PS-5 Impacts Library Facilities. The Project at the East Campus would not result in the need for new or physically altered library facilities, resulting in a less-than-significant impact.	LTS	None Required.	N/A
C-PS-1 Cumulative Police Service Impacts. The Project, in combination with other foreseeable development in the City, would have a less-than-significant cumulative impact on police services.	LTS	None Required.	N/A
C-PS-2 Cumulative Fire and Emergency Service Impacts. The Project, in combination with other foreseeable development in the fire service area, would have a less-than-significant cumulative impact on fire and emergency services.	LTS	None Required.	N/A
C-PS-3 Cumulative School Service Impacts. The Project, in combination with other foreseeable development in the City, would have a less-than-significant cumulative impact on school services.	LTS	None Required.	N/A
C-PS-4 Cumulative Parks and Recreation Impacts. The Project, in combination with other foreseeable development in the City, would result in a less-than-significant cumulative impact on parks and recreation	LTS	None Required.	N/A
C-PS-5 Cumulative Library Service Impacts. The Project, in combination with other foreseeable development in the City, would have a less-than-significant cumulative impact on library services.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.16 Utilities			
<p>UT-1 Water Demand. The Project at the East Campus would not exceed water supplies available under normal year conditions to serve the Project from existing entitlements. Therefore, implementation of the Project would have a less-than-significant impact on water supplies.</p>	LTS	None Required.	N/A
<p>UT-2 Impacts to Water Treatment Facilities. The Project at the East Campus would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, which could cause significant environmental effects. Therefore, the Project would have a less-than-significant impact on water treatment facilities.</p>	LTS	None Required.	N/A
<p>UT-3 Wastewater Generation. The Project at the East Campus would not exceed wastewater treatment requirements of the San Francisco Regional Water Quality Control Board, require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, or result in a determination by the South Bayside System Authority that it has inadequate capacity to serve the Project’s expected demand and existing entitlements. However, the existing sanitary sewer system serving the Project site would not have sufficient capacity to accommodate the Project. Therefore, this impact would be potentially significant.</p>	PS	<p>MITIGATION MEASURES. The technical study prepared by West Yost Associates determined that the existing wastewater conveyance system serving the Project site would have insufficient capacity to accommodate the Project. Mitigation Measure UT-3.1 would ensure that necessary capacity improvements are implemented so that to the WBSD sanitary sewer system has sufficient capacity to accommodate additional wastewater generated by the Project. The following measure would reduce potentially significant impacts associated with the Project to a <i>less-than-significant</i> level.</p> <p><i>UT-3.1 Sanitary Sewer System Improvements.</i> The Project Sponsor shall upsize the existing 114 feet of 12-inch diameter pipeline that runs north along Hamilton Avenue, beginning at the Hamilton Avenue/Willow Road intersection, to a 15-inch diameter pipe. To ensure that this work is completed, the Project Sponsor shall enter into an agreement with the City concurrently with granting of land use entitlements for the East Campus and post a bond equal to 200 percent of the estimated cost of the work. In</p>	LTS

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Summary of Impacts and Mitigation Measures – East Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>UT-4 Solid Waste Generation. The Project would be served by Ox Mountain Sanitary Landfill, which has sufficient permitted capacity to accept the Project’s solid waste disposal needs. The Project at the East Campus would comply with federal, State, and local statutes and regulations related to solid waste. Therefore, impacts on solid waste facilities would be less than significant.</p>	LTS	None Required.	N/A
<p>UT-5 Stormwater Generation. Implementation of the Project at the East Campus would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, resulting in a less-than-significant impact.</p>	LTS	None Required.	N/A
<p>UT-6 Energy Demand. The Project at the East Campus would not exceed existing gas and electric supply. Therefore, this impact would be less than significant.</p>	LTS	None Required.	N/A
<p>C-UT-1 Cumulative Water Demand. The Project, in combination with other development within the City, would increase water demand, but there are sufficient water supplies available to serve the cumulative projects from existing entitlements under normal, dry and multiple dry years, and the increased demand would not require or result in the construction of new water treatment facilities or the expansion</p>	LTS	None Required.	N/A

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**Table S-1
Summary of Impacts and Mitigation Measures – East Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
of existing facilities, which could cause significant environmental effects. This cumulative water supply impact would be less than significant.			
C-UT-2 Cumulative Wastewater Generation. The Project, in combination with other development within the West Bay Sanitary District service area, would not exceed wastewater treatment requirements of the San Francisco Regional Water Quality Control Board, require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, nor result in a determination by the South Bayside System Authority that it has inadequate capacity to serve the Project’s expected demand and existing entitlements. Therefore, this cumulative wastewater impact would be less than significant.	LTS	None Required.	N/A
C-UT-3 Cumulative Solid Waste Generation. The Project, combined with other development within the RethinkWaste’s service area, would be served by Ox Mountain Sanitary Landfill, which has sufficient permitted capacity to accommodate future solid waste disposal needs through 2034. These cumulative projects would be expected to comply with federal, State, and local statutes and regulations related to solid waste. Therefore, this cumulative solid waste impact would be less than significant.	LTS	None Required.	N/A
C-UT-4 Cumulative Stormwater Generation. The Project, in combination with cumulative development in the City, could require the construction or expansion of stormwater facilities. However, the Project’s contribution to this impact would be less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – East Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-UT-5 Cumulative Energy Demand. The Project, in combination with other development served by PG&E, would not exceed existing gas and electric supply capacity. Therefore, this cumulative impact would be less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.2 Land Use			
LU-1 Conflicts with Adopted Land Use Plans and Policies. Implementation of the Project at the West Campus would be generally consistent with the General Plan, Municipal Codes, and BCDC, ABAG, and C/CAG plans. As such, the impact would be less than significant.	LTS	None Required.	N/A
C-LU-1 Cumulative Land Use Impacts. The Project, in combination with other foreseeable development in the nine-county ABAG region, would have a less-than-significant cumulative impact with regard to consistency with applicable land use plans, policies, and regulations.	LTS	None Required.	N/A
3.3 Aesthetics			
AE-1 Alteration of Scenic Views. The Project at the West Campus would have a less-than-significant impact to scenic vistas in areas surrounding the Project site.	LTS	None Required.	N/A
AE-2 Degradation of Existing Visual Character or Quality. The Project at the West Campus could substantially alter the existing visual character. However, compliance with the City’s design review and landscaping requirements would help reduce the potential aesthetic degradation of the visual character of the surroundings. Therefore, this impact would be less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>AE-3 New Sources of Light and Glare. The Project at the West Campus could create new sources of light or glare that could adversely affect day or nighttime views. Therefore, this impact would be potentially significant.</p>	<p>PS</p>	<p>MITIGATION MEASURES. Implementation of Mitigation Measure AE-3.1, AE-3.2, and AE-3.3 would reduce potential light and glare impacts at the West Campus to a less-than-significant level.</p> <p><i>AE-3.1 Design Lighting at the West Campus to Meet Minimum Safety and Security Standards.</i> Concurrent with the building permit submittal, the Project Sponsor shall incorporate lighting design specifications to meet minimum safety and security standards. The comprehensive site lighting plans shall be subject to review and approval by the Planning Division prior to building permit issuance of the first building on that site. The following measures shall be included in all lighting plans:</p> <ul style="list-style-type: none"> • Luminaries shall be designed with cutoff-type fixtures or features that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties. Fixtures that shine light upward or horizontally shall not spill any light onto adjacent private properties. • Luminaries shall provide accurate color rendering and natural light qualities. Low-pressure sodium and high-pressure sodium fixtures that are not color-corrected shall not be used, except as part of an approved sign or landscape plan. • Luminary mountings shall be downcast and pole heights minimized to reduce potential for back scatter into the nighttime sky and incidental spillover light onto adjacent properties and undeveloped open space. Light poles shall be no higher than 20 feet. Luminary mountings shall be treated with non-glare finishes. <p><i>AE-3.2 Treat Reflective Surfaces at the West Campus.</i> The Project Sponsor shall ensure application of low-emissivity coating on exterior glass surfaces of the proposed structures. The low-emissivity coating shall reduce visible light reflection of the visible light that strikes the glass exterior and prevent interior light from being emitted brightly through the glass.</p>	<p>LTS</p>

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<i>AE-3.3 Provide Obstruction for Glare from Vehicle Headlights in the West Campus Garage.</i> The Project Sponsor shall ensure that the design for the parking garage provides concrete barriers and/or landscaping along the entire perimeter of all parking levels of the garage. These barriers shall be at a height so that glare from vehicle headlights is screened from off-site viewers.	
AE-4 New Sources of Shadows. Shadows cast by the proposed structures at the West Campus would not shade open spaces or public areas for an extended period and are, therefore, considered to be less than significant.	LTS	None Required.	N/A
C-AE-1 Cumulative Alteration of Scenic Views. The Project at the West Campus, in combination with other foreseeable development in the surrounding area, would not have a significant cumulative impact on scenic views.	LTS	None Required.	N/A
C-AE-2 Cumulative Degradation of Visual Character or Quality. The Project at the West Campus, in combination with other foreseeable development in the surrounding area, would not have a significant cumulative impact on visual character or quality.	LTS	None Required.	N/A
C-AE-3 Cumulative Sources of Light and Glare. Implementation of the Project at the West Campus, in combination with foreseeable development, would not create new sources of light or glare that could adversely affect day or nighttime views. Therefore, this impact would be less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-AE-4 Cumulative Shadow Impacts. Shadows cast by the proposed structures at the West Campus, in combination with other foreseeable development, would not shade open spaces or public areas for an extended period and are, therefore, considered to be less than significant.	LTS	None Required.	N/A
3.4 Wind			
WD-1 Wind Impacts. Implementation of the Project at the West Campus would not change the existing wind conditions at the Project site in a manner that would adversely affect the comfort of a public area, resulting in less-than-significant impacts.	LTS	None Required.	N/A
C-WD-1 Cumulative Wind Impacts. The Project at the West Campus in combination with other foreseeable development in the Project area, would have a less-than-significant impact on cumulative wind conditions in public areas.	LTS	None Required.	N/A
3.5 Transportation			
TR-6 Impacts on Intersections in the Near Term 2018 East Campus and West Campus Condition. Increases in traffic associated with the Project under the Near Term 2018 East Campus and West Campus Condition would result in increased delays at several intersections during peak hours causing a potentially significant impact to the operation of the several study intersections.	PS	MITIGATION MEASURES. Mitigation Measure TR-6.1 involves a West Campus Vehicle Trip Cap to mitigate or reduce the impacts of the Project under the Near Term 2018 East Campus and West Campus Condition. Mitigation Measure TR-6.2 involves intersection improvements to mitigate or reduce the impacts of the Project under the Near Term 2018 East Campus and West Campus Condition. However, intersection impacts would still remain since many improvements require obtaining additional right-of-way and several intersections are not under the City’s jurisdiction.	

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Summary of Impacts and Mitigation Measures – West Campus**

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		<p><i>TR-6.1 West Campus Vehicle Trip Cap.</i></p> <p>a. West Campus 1,100 vehicle trip cap for both the AM Peak Period and PM Peak Period.</p> <p>One This mitigation measure would reduce AM and PM peak trips, and thus reduce trips at impacted intersections, and involves the imposition of a trip cap on the West Campus comparable to the Trip Cap that is part of the Project for the East Campus.</p> <p>The 1,100 peak hour vehicle trip cap has been calculated in a similar fashion to the East Campus trip cap and is based on a comparative ratio between the East and West Campus employee totals in the following manner:</p> <p style="padding-left: 40px;">2,800 W. Campus Employees x (2,600 E. Campus Peak Period Trip Cap/6,600 E. Campus Employees) = 1,100 W. Campus Peak Period Trip Cap</p> <p>The West Campus vehicle trip cap mitigation shall generally comply with Trip Cap Monitoring and Enforcement Policy, which is included in Appendix 3.5-F. A peak period trip cap of 1,100 trips for the West Campus does not, in and of itself, fully mitigate the impacts in either the AM peak or PM peak for any of the impacted intersections. Because the proposed mitigation would not fully mitigate the impact, it remains significant and unavoidable unless the impact is fully mitigated through a specific intersection improvement as outlined below.</p> <p><i>TR-6.2 Intersection Improvements.</i> The operations at several of the intersections could be improved by modifying the intersection geometry to provide additional capacity. Some of these modifications may be made by restriping the existing roadway; however, others may require additional right-of-way to add travel lanes. These mitigation measures are not</p>	

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Summary of Impacts and Mitigation Measures – West Campus**

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		<p>dependent on the West Campus vehicle trip cap. See Appendix 3.5-I for intersection conceptual layout plans for mitigation measures.</p> <p>a. Marsh Road and Bayfront Expressway</p> <p>The proposed mitigation measures for the intersection of Marsh Road and Bayfront Expressway include restriping the westbound approach from a shared left-through-right lane to a shared left-through lane and a shared through-right lane.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the proposed mitigation measure at the intersection of Marsh Road and Bayfront Expressway for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the effective date of the Development Agreement, the Project Sponsor shall submit complete plans to construct the intersection improvements.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way, including but not limited to, grading and drainage improvements, utility relocations, traffic signal relocations/modifications, tree protection requirements, and signage and striping modifications. The plans shall be subject to review and approval of the Public Works Director prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit for approval by the City and Caltrans prior to construction of the intersection improvements. The Project Sponsor shall construct the improvements within 180 days of receiving approval from Caltrans.</p>	

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>If Caltrans does not approve the intersection improvements proposed within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the improvement and the bond shall be released by the City after the Project Sponsor submits funds equal to the bid construction cost to the City. The City may use the funds for other transportation improvements, including, but not limited to, bicycle, pedestrian, transit improvements, and TDM programs, throughout the City, with priority given to those portions of the City east of US 101. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. Although the proposed mitigations would fully mitigate the impact, the impact remains significant and unavoidable because the intersection is under the jurisdiction of Caltrans and the City cannot guarantee the mitigation measure would be implemented.</p>	
		<p>b. Marsh Road and US 101 NB Ramps</p> <p>The proposed mitigation measures for the intersection of Marsh Road and US 101 Northbound off-ramp include widening the northbound off-ramp on the western side of the approach and adding an additional left-turn lane along with adding a second right-turn lane by restriping one of the existing left-turn lanes. This improvement will require relocation of existing traffic signal poles, utility relocation and reconstruction of the curb ramp on the southwest corner of the intersection.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the proposed mitigation measures at the intersection of Marsh Road and US 101</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>Northbound off-ramp for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the effective date of the Development Agreement, the Project Sponsor shall submit complete plans to construct the intersection improvements.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way, including but not limited to, grading and drainage improvements, utility relocations, traffic signal relocations/modifications, tree protection requirements, and signage and striping modifications. The plans shall be subject to review and approval of the Public Works Director prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit for approval by the City and Caltrans prior to construction of the intersection improvements. The Project Sponsor shall construct the improvements within 180 days of receiving approval from Caltrans.</p> <p>If Caltrans does not approve the intersection improvements proposed within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the improvement and the bond shall be released by the City after the Project Sponsor submits funds equal to the bid construction cost to the City. The City may use the funds for other transportation improvements, including, but not limited to, bicycle, pedestrian, transit improvements, and TDM programs, throughout the City,</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>with priority given to those portions of the City east of US 101. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. Although the proposed mitigation would fully mitigate the impact, the impact remains significant and unavoidable because the intersection is under the jurisdiction of Caltrans and the City cannot guarantee the mitigation measure would be implemented.</p> <p>c. Willow Road and Bayfront Expressway</p> <p>The proposed mitigation measures for the intersection of Marsh Road and Middlefield Road include an additional southbound left turn lane and restriping an additional eastbound receiving lane. The improvements would require potential additional right of way, widening the edge of pavement for the southbound direction of traffic into the existing landscape buffer, signing and striping improvements, and relocation of utility poles and traffic signal poles along the west side of Middlefield Road.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare an updated construction cost estimate for the proposed mitigation measures at the intersection of Marsh Road and Middlefield Road for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a bond for the improvements in the amount equal to the Project’s fair share contribution of the estimated construction cost for the intersection improvements plus a 30 percent contingency. The Project’s fair share contribution is estimated to be 30.4 percent.</p> <p>Funds will be payable to the Town of Atherton upon substantial completion of construction of the intersection improvements. Funds will remain available to the Town of Atherton for a seven</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>year period from the effective date of the Development Agreement, after which funds will be returned to the Project Sponsor. Construction of these improvements is not eligible for a Transportation Impact Fee (TIF) credit. Although the proposed mitigation would fully mitigate the impact, the impact remains significant and unavoidable because the intersection is under the jurisdiction of the Town of Atherton and the City cannot guarantee the mitigation measure would be implemented.</p> <p>d. Willow Road and Newbridge Street</p> <p>The potential mitigation measure for the intersection of Willow Road and Newbridge Street includes an additional eastbound left turn lane, an additional northbound receiving lane for the eastbound left turning traffic, an additional westbound through/right turn lane, and an additional receiving lane for the westbound through traffic. The additional eastbound left turn lane and northbound receiving lane are not feasible due to the right-of-way acquisition and property impacts required along Newbridge Street and at the southwest quadrant of the intersection, which is in the City of East Palo Alto. However, the additional westbound through/right turn lane and westbound receiving lane is a feasible, partial mitigation measure for the impact. This partial mitigation measure would require traffic signal modifications, the removal of at least one heritage tree in front of 1157 Willow Road in order to accommodate the receiving lane, and the removal and relocation of a portion of the concrete masonry wall and landscaping near 1221 Willow Road.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the feasible mitigation measure at the intersection of Willow Road and Newbridge Street for review and approval of the Public Works Director. Within 90</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a performance bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the Development Agreement effective date, the Project Sponsor shall submit complete plans to construct a westbound through/right turn lane approximately 300 feet in length, and a westbound through receiving lane, from the Willow Road and Newbridge Street intersection to the beginning of the northbound US 101 on-ramp, based on impacts to the intersections of Willow Road and Newbridge Street.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way, including, but not limited to, grading and drainage improvements, utility relocations, traffic signal relocations/modifications, tree protection requirements, and striping modifications. The plans shall be subject to review and approval by the City and coordination with the City of East Palo Alto Public Works Departments prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit for approval by the cities of Menlo Park and East Palo Alto, if required, and Caltrans prior to construction of the intersection improvements. The Project Sponsor shall construct the improvements within 180 days of receiving approval from Caltrans.</p> <p>If Caltrans does not approve the intersection improvements proposed within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>TR-7 Impacts to Roadway Segments in the Near Term 2018 East Campus and West Campus Condition. Increases in traffic associated with the Project under the Near Term 2018 East Campus and West Campus Condition would result in increased volumes on Project area roadway segments resulting in a potentially significant impact.</p>	PS	<p>improvement and the bond shall be released by the City after the Project Sponsor submits funds equal to the bid construction cost to the City. The City may use the funds for other transportation improvements, including, but not limited to, bicycle, pedestrian, transit improvements, and TDM programs, throughout the City, with priority given to those portions of the City east of US 101. The partial mitigation improvements are not eligible for a Transportation Impact Fee (TIF) credit. Because the proposed mitigation would not fully mitigate the impact, it remains significant and unavoidable.</p> <ul style="list-style-type: none"> e. Willow Road and Middlefield Road See Near Term 2015 East Campus Only TR-1.1b. f. University Avenue and Bayfront Expressway See Near Term 2015 East Campus Only TR-1.1c. g. Bayfront Expressway and Chrysler Drive See Near Term 2015 East Campus Only TR-1.1d. h. Middlefield Road and Lytton Avenue See Near Term 2015 East Campus Only TR-1.1e. <p>MITIGATION MEASURE. Mitigation Measure TR-7.1 involves roadway improvements to mitigate or reduce the impacts of the Project under the Near Term 2018 East Campus and West Campus Condition on daily roadway segment operations. However, to improve daily roadway operations, a typical mitigation measure would seek to widen the road to add travel lanes and capacity. These roadway impacts would still remain because much of the City and surrounding areas are built out, making roadway widening difficult because right-of-way acquisition impacts local property owners.</p>	SU

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>TR-8 Impacts to Routes of Regional Significance, in the Near Term 2018 East Campus and West Campus Condition. Increases in traffic associated with the Project under Near Term 2018 East Campus and West Campus Condition would result in significant impacts to several Routes of Regional Significance.</p>	<p>PS</p>	<p><i>TR-7.1 Roadway Segment Improvements.</i> Roadways could be improved with additional travel lanes to accommodate the increase in net daily trips, but increasing the capacity of the roadway requires additional right-of-way, which can impact local property owners.</p> <ul style="list-style-type: none"> a. Marsh Road between Bay Road and the railroad tracks See Near Term 2015 East Campus Only TR-2.1a. b. Willow Road between Durham Street and Chester Street See Near Term 2015 East Campus Only TR-2.1b. c. Willow Road between Nash Avenue and Blackburn Avenue See Near Term 2015 East Campus Only TR-2.1c. <p>MITIGATION MEASURE. Mitigation Measure TR-8.1 involves roadway improvements to mitigate or reduce the impacts of the Project under the Near Term 2018 East Campus and West Campus Condition on Routes of Regional Significance. A typical mitigation measure would seek to widen the road to add travel lanes and capacity. However, impacts to Routes of Regional Significance would remain because these roadways are not under the jurisdiction of the City. In addition, freeway improvement projects, which add travel lanes are, planned and funded on a regional scale and would be too costly for a single project to be expected to fund.</p> <p><i>TR-8.1 Routes of Regional Significance Improvements.</i> Routes of Regional Significance could be improved with additional travel lanes, but the freeways are under the jurisdiction of Caltrans.</p> <ul style="list-style-type: none"> a. SR 84 between US 101 and Willow Road See Near Term 2015 East Campus Only TR-3.1a. b. SR 84 between University Avenue and County Line See Near Term 2015 East Campus Only TR-3.1c. 	<p>SU</p>

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> c. US 101 North of Marsh Road See Near Term 2015 East Campus Only TR-3.1d. d. US 101 between Willow Road and University Avenue See Near Term 2015 East Campus Only TR-3.1e. e. US 101 between South of University Avenue See Near Term 2015 East Campus Only TR-3.1f. 	
<p>TR-9 Impacts to Local Transit System in the Near Term 2018 East Campus and West Campus Condition. The Project under the Near Term 2018 East Campus and West Campus Condition would not result in any impacts to the local transit system. This impact is less than significant.</p>	LTS	None Required.	N/A
<p>TR-10 Impacts to Local Bicycle or Pedestrian Facilities in the Near Term 2018 East Campus and West Campus Condition. The Project under the Near Term 2018 East Campus and West Campus Condition would not result in any impacts to local bicycle or pedestrian facilities. This impact is less than significant.</p>	LTS	None Required.	N/A
<p>TR-11 Impacts to Intersections in the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition. Increases in traffic associated with the Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition would result in increased delays at several intersections during peak hours causing a potentially significant impact to the operation of the several study intersections.</p>	PS	<p>MITIGATION MEASURE. Mitigation Measure TR-11.1 involves intersection improvements to mitigate or reduce the impacts of the Project under the Cumulative 2025 East Campus Only Condition. However, intersection impacts would still remain since many improvements require obtaining additional right-of-way and several intersections are not under the City’s jurisdiction.</p> <p><i>TR-11.1 Intersection Improvements.</i> The operations at several of the intersections could be improved by modifying the intersection geometry to provide additional capacity. Some of these modifications may be made by restriping the existing roadway; however, others may require additional</p>	SU

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>right-of-way when travel lanes are added. See Appendix 3.5-I for intersection conceptual layout plans for mitigation measures.</p> <ul style="list-style-type: none"> a. Marsh Road and Bayfront Expressway See Near Term 2018 East and West Campus TR-6.2a. b. Marsh Road and US 101 NB Ramps See Near Term 2018 East and West Campus TR-6.2b. c. Willow Road and Bayfront Expressway See Near Term 2015 East Campus Only TR-1c. d. Willow Road and Newbridge Street See Near Term 2018 East and West Campus TR-6.2d. e. Willow Road and Middlefield Road See Near Term 2015 East Campus Only TR-1.1b. f. University Avenue and Bayfront Expressway See Near Term 2015 East Campus Only TR-1.1c. g. Bayfront Expressway and Chrysler Drive See Near Term 2015 East Campus Only TR-1.1d. h. Middlefield Road and Lytton Avenue See Near Term 2015 East Campus Only TR-1.1e. <p>MITIGATION MEASURE. Mitigation Measure TR-11.2 involves a West Campus Vehicle Trip Cap to mitigate or reduce the impacts of the Project under the Cumulative 2025 East Campus and West Campus Condition. Mitigation Measure TR-11.3 involves intersection improvements to mitigate or reduce the impacts of the Project under the Cumulative 2025 East Campus and West Campus Condition. However, intersection impacts would still remain since many improvements require obtaining additional right-of-way and several intersections are not under the City’s jurisdiction.</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p><i>TR-11.2 West Campus Vehicle Trip Cap.</i></p> <p>a. See Near Term 2018 East and West Campus TR-6.1.</p> <p><i>TR-11.3 Intersection Improvements.</i> The operations at several of the intersections could be improved by modifying the intersection geometry to provide additional capacity. Some of these modifications may be made by restriping the existing roadway; however, others may require additional right-of-way to add travel lanes. See Appendix 3.5-I for intersection conceptual layout plans for mitigation measures.</p> <p>a. Marsh Road and Bayfront Expressway See Near Term 2018 East and West Campus TR-6.2a.</p> <p>b. Marsh Road and US 101 NB Ramps See Near Term 2018 East and West Campus TR-6.2b.</p> <p>c. Marsh Road and Middlefield Road See Near Term 2018 and West Campus TR-1.1b.</p> <p>d. Willow Road and Bayfront Expressway See Near Term 2015 East Campus Only TR-1.1a.</p> <p>e. Willow Road and Newbridge Street See Near Term 2018 East and West Campus TR-6.2d.</p> <p>f. Willow Road and Middlefield Road See Near Term 2015 East Campus Only TR-1.1b.</p> <p>g. University Avenue and Bayfront Expressway See Near Term 2015 East Campus Only TR-1.1c.</p> <p>h. University Avenue and Donohoe Street The proposed mitigation measures for the intersection of University Avenue and Donohoe Street include restriping the</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>westbound approach of the intersection to add a right turn lane and modify the traffic signal to add a right turn overlap phase.</p> <p>Prior to the Development Agreement approval, the Project Sponsor shall prepare a construction cost estimate for the feasible mitigation measure at the intersection of University Avenue and Donohoe Street for review and approval of the Public Works Director. Within 90 days of the effective date of the Development Agreement for the East Campus, the Project Sponsor shall provide a performance bond for improvements in the amount equal to the estimated construction cost for the intersection improvements plus a 30 percent contingency. Within 180 days of the Development Agreement effective date, the Project Sponsor shall submit complete plans to construct the improvement.</p> <p>Complete plans shall include all necessary requirements to construct the improvements in the public right-of-way, including, but not limited to, grading and drainage improvements, utility relocations, traffic signal relocations/modifications, tree protection requirements, and striping modifications. The plans shall be subject to review and approval by the City and coordination with the City of East Palo Alto Public Works Departments prior to submittal to Caltrans. The Project Sponsor shall complete and submit an encroachment permit for approval by the cities of East Palo Alto, if required, and Caltrans prior to construction of the intersection improvements. The Project Sponsor shall construct the improvements within 180 days of receiving approval from Caltrans.</p> <p>If Caltrans does not approve the intersection improvements proposed within five years from the Development Agreement effective date, and the Project Sponsor demonstrates that it has worked diligently to pursue Caltrans approval to the satisfaction of</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>TR-12 Impacts to Roadway Segments in the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition . Increases in traffic associated with the Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition result in increased volumes on Project area roadway segments resulting in a potentially significant impact.</p>	<p>PS</p>	<p>the Public Works Director, in his/her sole discretion, then the Project Sponsor shall be relieved of responsibility to construct the improvement and the bond shall be released. Because the improvement is under Caltrans jurisdiction and the City cannot guarantee it would be implemented the impact remains significant and unavoidable.</p> <ul style="list-style-type: none"> i. Bayfront Expressway and Chrysler Drive See Near Term 2015 East Campus Only TR-1d. j. Middlefield Road and Lytton Avenue See Near Term 2015 East Campus Only TR-1.1e. <p>MITIGATION MEASURE. Mitigation Measure TR-12.1 involves roadway improvements to mitigate or reduce the impacts of the Project under the Cumulative 2025 East Campus Only Condition and under the Cumulative 2025 East Campus and West Campus Only Condition on daily roadway segment operations. However, to improve daily roadway operations, a typical mitigation measure would seek to widen the road to add travel lanes and capacity. These roadway impacts would still remain because much of the City and surrounding areas are built out, making roadway widening difficult because right-of-way acquisition impacts local property owners.</p> <p><i>TR-12.1 Roadway Segment Improvements.</i> Roadways could be improved with additional travel lanes to accommodate the increase in net daily trips, but increasing the capacity of the roadway requires additional right-of-way.</p> <ul style="list-style-type: none"> a. Marsh Road between Bay Road and the railroad tracks See Near Term 2015 East Campus Only TR-2.1a. b. Willow Road between Durham Street and Chester Street See Near Term 2015 East Campus Only TR-2.1b. 	<p>SU</p>

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>TR-13 Impacts on Routes of Regional Significance in the Cumulative East Campus Only Condition and Cumulative East Campus and West Campus Condition. Increases in traffic associated with the Project under Cumulative East Campus Only Condition and Cumulative East Campus and West Campus Condition would result in significant impacts to several Routes of Regional Significance.</p>	<p>PS</p>	<p>c. Willow Road between Nash Avenue and Blackburn Avenue See Near Term 2015 East Campus Only TR-2.1c.</p> <p>d. Middlefield Road between Linfield Drive and Survey Lane See Near Term 2015 East Campus Only TR-2.1d.</p> <p>MITIGATION MEASURE. Mitigation Measure TR-13.1 involves roadway improvements to mitigate or reduce the impacts of the Project under the Cumulative 2025 East Campus Only Condition and under the Cumulative 2025 East Campus and West Campus Only Condition on Routes of Regional Significance. A typical mitigation measure would seek to widen the road to add travel lanes and capacity. However, impacts to Routes of Regional Significance would remain because these roadways are not under the jurisdiction of the City. In addition, freeway improvement projects, which add travel lanes are, planned and funded on a regional scale and would be too costly for a single project to be expected to fund.</p> <p><i>TR-13.1 Routes of Regional Significance Improvements.</i> Routes of Regional Significance could be improved with additional travel lanes, but the freeways are under the jurisdiction of Caltrans.</p> <p>a. SR 84 between US 101 and Willow Road See Near Term 2015 East Campus Only TR-3.1a.</p> <p>b. SR 84 between Willow Road and University Avenue</p> <p>c. See Near Term 2015 East Campus Only TR-3.1b. SR 84 between University Avenue and County Line See Near Term 2015 East Campus Only TR-3.1c.</p> <p>d. US 101 North of Marsh Road See Near Term 2015 East Campus Only TR-3.1d.</p> <p>e. US 101 between Willow Road and University Avenue See Near Term 2015 East Campus Only TR-3.1e.</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		f. US 101 between South of University Avenue See Near Term 2015 East Campus Only TR-3.1f.	
TR-14 Impacts to Local Transit System in the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition. The Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition would not result in any impacts to the local transit system. This impact is less than significant.	LTS	None Required.	N/A
TR-15 Impacts to Local Bicycle or Pedestrian Facilities in the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition. The Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East Campus and West Campus Condition would not result in any impacts to local bicycle or pedestrian facilities. This impact is less than significant.	LTS	None Required.	N/A
3.6 Air Quality			
AQ-1 Conflict with or Obstruct Implementation of the Applicable Air Quality Plan. The Project at the West Campus would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	None Required.	N/A
AQ-2 Violation of any Air Quality Standard. The Project at the West Campus could result in the violation of air quality standards: <ul style="list-style-type: none"> Operation of the Project at the West Campus would create new area and mobile sources of air pollutants 	PS	MITIGATION MEASURES. At this time there are no feasible mitigation measures that would reduce the NO _x , ROG, and PM ₁₀ emissions to less than significant. Thus, this impact would be significant and unavoidable. However, the silt loading used to estimate fugitive dust emissions of PM ₁₀ is likely an overestimate of the actual silt loading on the roads on which the	SU

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>that would generate emissions of ROG, PM₁₀ and PM_{2.5}, but would not exceed BAAQMD’s significance thresholds. However, emissions of NO_x from the West Campus operations would exceed BAAQMD’s significance thresholds, resulting in a potentially significant impact.</p> <ul style="list-style-type: none"> • Operation of the Project at the West Campus would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO_x, and PM₁₀ and would exceed BAAQMD’s significance thresholds. Thus, this impact would be potentially significant. 		<p>Project trips would occur based on the range of silt loadings explained in EPA’s AP-42. Therefore, the actual PM₁₀ emissions would likely be less than shown. Nonetheless, since site-specific silt loadings are not available at this time, and the actual reduction in emissions is speculative, the emissions are significant and unavoidable.</p>	
<p>AQ-3 Construction Criteria Air Pollutant Emissions. Construction activities at the West Campus would not generate emissions of ROG, NO_x, PM₁₀ and PM_{2.5} that would exceed BAAQMD’s significance thresholds.</p>	LTS	<p>MITIGATION MEASURES. Mitigation Measure AQ-3.1 includes all appropriate dust control measures recommended by BAAQMD. Inclusion of these measures in the construction contracts for future development of the West Campus would ensure that construction-related air quality impacts remain at a less-than-significant level.</p> <p><i>AQ-3.1 Implement Recommended Dust Control Measures.</i> BAAQMD does not have mass emission thresholds for fugitive PM, but rather requires implementation of Best Management Practices (BMPs) as mitigation measures for all proposed projects. In order to ensure that these are implemented to minimize possible fugitive PM emissions, the BMPs are designated as mitigation measures.</p> <ol style="list-style-type: none"> a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. b. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 	LTS

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>AQ-4 Localized Carbon Monoxide Impacts from Motor Vehicle Traffic. The addition of Project-related traffic from the West Campus would result in increased concentrations of carbon monoxide around intersections in the vicinity of the Project, but not to the extent that the ambient air quality standards for CO would be exceeded. As a result, impacts of localized CO concentrations would be less than significant with implementation of the Project at the West Campus.</p>	LTS	<ul style="list-style-type: none"> c. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. d. All vehicle speeds on unpaved roads shall be limited to 15 mph. e. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. f. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. g. All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified visible emissions evaluator. h. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations. <p>None Required.</p>	N/A

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
AQ-5 Exposure to Toxic Air Contaminants. The Project at the West Campus could expose sensitive receptors to substantial TACs, resulting in a potentially significant impact.	PS	<p>MITIGATION MEASURE. Since the DPM emissions from the fleet mix contributed substantially to the exceedance of health risk thresholds; the HRA evaluated a reduction in the DPM emissions that would result in a less-than-significant impact. Mitigation Measure AQ-5.1 includes a plan to reduce Project fleet-wide average DPM emissions associated with off-road equipment by 35 percent from current fleet average DPM emissions levels. Inclusion of this measure in the construction contracts for future development in the Project area would reduce construction-related air quality impacts to a less-than-significant level. Therefore, implementation of Mitigation Measures AQ-5.1 would reduce construction-related mass emissions, resulting in a less-than-significant impact relative to exposure to TACs.</p> <p><i>AQ-5.1 Reduce Fleet-Wide Average DPM Emissions.</i> The Project shall develop a plan that is approved by the City prior to issuance of building permits demonstrating that the off-road equipment (more than 50 horsepower) to be used for the West Campus construction (i.e., owned, leased, and subcontractor vehicles) would achieve a Project wide fleet-average 35 percent PM reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.</p>	LTS
AQ-6 Exposure to Objectionable Odors. The Project at the West Campus would not be expected to create objectionable odors that would affect a substantial number of people. This impact would be less than significant.	LTS	None Required.	N/A
C-AQ-1 Consistency with Applicable Air Quality Plans. The Project, combined with other development within the City, would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	None Required.	N/A

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Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-AQ-2 Violation of any Air Quality Standard. The Project, in combination with other development within the City, would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO _x , and PM ₁₀ , resulting in a violation of an Air Quality Standard.	PS	MITIGATION MEASURE. Because no feasible mitigation has been identified, the impact for ROG, NO _x , and PM ₁₀ is therefore significant and unavoidable.	SU
C-AQ-3 Cumulative Construction Criteria Air Pollutant Emissions. Construction activities associated with the West Campus, in combination with other construction activities in the City, could generate dust or diesel emissions, thus exposing people to particulate matter. This is considered a potentially significant impact.	PS	MITIGATION MEASURE. Mitigation Measure AQ-3.1, identified for the Project, includes all appropriate dust control measures recommended by BAAQMD; therefore, construction-related air quality impacts associated with the West Campus would be reduced to a less-than-significant level. This measure would reduce the Project’s contribution to cumulative construction emissions to less than cumulatively considerable. In addition, these same measures would apply to other construction projects (i.e. Menlo Gateway) that might occur in the vicinity of the Project area. As a result, the cumulative impact would be considered to be less than significant.	LTS
C-AQ-4 Cumulative Localized CO Concentrations. Cumulative development in the Project vicinity would not result in CO concentrations above the ambient air quality standards. Therefore, cumulative impacts on localized CO concentrations would be less than significant.	LTS	None Required.	N/A
C-AQ-5 Cumulative Toxic Air Contaminants Emissions. The Project, in combination with other foreseeable development in the Project vicinity, would expose sensitive receptors to substantial TACs. Therefore, cumulative impacts from these pollutants would be potentially significant.	PS	MITIGATION MEASURE. The Project’s contribution to the significant health impact is less than five percent. In this instance, the receptors identified above the significance threshold would be significant even without the Project. Many of these existing receptors are closer than the recommended 500 foot distance from a freeway or other high traffic roadway as suggested by CARB in its guidance document on air quality and land use, <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> . The CARB guidance acknowledges the need to balance this recommendation with other State and local policies addressing housing and transportation needs, the benefits of urban infill, community economic development priorities, and	SU

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		other quality of life issues. The best solution would be to not have these receptors so close to a freeway, but since they already exist this is not a feasible option. There are no feasible Project related mitigation measures that will reduce the impact to less than significant. Therefore, the cumulative health impacts remain significant and unavoidable.	
3.7 Greenhouse Gas Emissions			
CC-1 Greenhouse Gas Emissions. The Project at the West Campus would result in a net increase in GHG emissions. However, the increase would not exceed the BAAQMD’s standards of significance, resulting in a less-than-significant impact.	LTS	None Required.	N/A
CC-2 Conflicts with Applicable Plans and Policies. The Project at the West Campus would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, resulting in a less-than-significant impact.	LTS	None Required.	N/A
3.8 Noise			
NO-1 Exposure to Excessive Noise Levels. The increase in vehicular traffic associated with implementation of the East Campus and West Campus, combined, could result in an increase in the exposure of off-site noise sensitive receptors to noise levels potentially in excess of the standards established in the General Plan or Municipal Code. This impact would be potentially significant.	PS	MITIGATION MEASURES. The Project would result in a potentially significant increase in traffic noise on Marsh Road between Scott Drive and Bohannon Drive and Willow Road between O’Brien Drive and Newbridge Street. There are no feasible mitigation measures that could reduce or eliminate the impact related to traffic noise, other than reducing traffic. Typical sound mitigation consists of walls or other barriers that would attenuate noise to the sensitive receptors behind the barrier. This measure would require installation of a noise wall within private property or within a designated right-of-way, which may not be allowed by an affected property owner or by the City. The feasibility of noise walls is restricted by access requirements for driveways, presences of local cross streets, underground	SU

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>utilities, other noise sources in the area, and safety considerations. For example, a noise wall would be ineffective on the impacted segment of Marsh Road because existing residential driveways directly access Marsh Road, and Rolison Road merges with Marsh Road along this segment. Breaks in the noise wall for access would not provide any noise attenuation and would render the wall ineffective. Additionally, for safety reasons, Caltrans states that noise barriers should not exceed 14 feet in height. Due to the high existing noise level, a noise barrier of more than 14 feet would be required to reduce noise levels along these roadways segments to an acceptable noise level for residential land uses. Finally, sensitive receptors along Marsh Road and Willow Road are currently oriented toward these roadways. Construction of a noise barrier would wall off these uses from the surrounding community, which could result in adverse impacts to aesthetics and potentially public safety because the noise walls would limit the visibility of the homes from the surrounding area. Natural surveillance is one of the four principles of Crime Prevention through Environmental Design. Therefore, installation of a noise wall along these segments would not be feasible.</p> <p>As mentioned above, there are no other feasible mitigation measures that could reduce or eliminate the impact related to traffic noise, other than reducing traffic. As noted in Section 2, Project Description, the Project includes a TDM program that sets forth a variety of measures designed to reduce the number of daily trips. However, the TDM program may not reduce trips enough to reduce the Project’s contribution to traffic noise to a less-than-significant level. Therefore, the increase in noise level on Marsh Road and Willow Road as a result of Project-generated traffic is considered to be significant and unavoidable.</p>	

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Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>The West Campus could increase the exposure of people to noise in excess of the standards established in the General Plan or Municipal Code. This impact would be potentially significant.</p>	PS	<p>MITIGATION MEASURES. Operation of the West Campus would involve new emergency generator testing that would have the potential to exceed the Noise Ordinance noise level limit for residential land uses. Mitigation Measure NO-1.1 would require emergency generators to be shielded in order to reduce the sound level from emergency generator testing to less than 60 dBA at the nearest noise sensitive land uses. Mitigation Measure NO-1.2 would limit generator testing to daytime hours only. Implementation of these mitigation measures would reduce this impact to a less-than-significant level.</p> <p><i>NO-1.1 Install Sound Enclosures Around Emergency Generators on the West Campus.</i> The Project Sponsor shall reduce the sound level from the operating generators to a maximum sound level of 88 dBA at 23 feet (7 meters) from the enclosure. Measures that could accomplish this standard include, but are not limited to, installing sound enclosures around all emergency generators, or purchasing equipment that meets this standard.</p> <p><i>NO-1.2 Limit Generator Testing to Daytime Hours on the West Campus.</i> The Project sponsor shall limit generator testing to between the hours of 8:00 a.m. and 6:00 p.m.</p>	LTS
<p>NO-2 Temporary Increases in Ambient Noise Level. The Project at the West Campus could result in levels of vibration that would disrupt operations at nearby vibration-sensitive land uses. This impact is potentially significant.</p>	PS	<p>MITIGATION MEASURES. Construction of the West Campus would have the potential to result in significant ground-borne vibration that would disturb vibration-sensitive land uses. Mitigation Measure NO-2.1 would require the notification of nearby businesses of potential impacts to vibration-sensitive equipment, in order to identify any vibration-sensitive equipment in the Project vicinity, and implement best management practices, as described in Mitigation Measure NO-2.2, to help reduce impacts to buildings with vibration-sensitive equipment. However, even though implementation of these measures would reduce ground-borne vibration impacts from construction, vibration-sensitive equipment at the TE Connectivity site, the Menlo Science and Technology Park (AMB’s Park along Willow Road), and other commercial facilities (if</p>	SU

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		<p>identified), could still be exposed to excessive construction-generated vibration levels. Therefore, this impact is considered to be significant and unavoidable.</p> <p><i>NO-2.1 Notify Nearby Businesses of Construction Activities on the West Campus that Could Affect Vibration-Sensitive Equipment.</i> The Project sponsor shall provide notification to property owners and occupants of vibration-sensitive buildings within 225 feet of general construction activities and 900 feet of pile-driving activities, prior to the start of construction at the West Campus, informing them of the estimated start date and duration of vibration-generating construction activities, such as would occur during site preparation, grading, and pile driving. This notification shall include information warning about potential for impacts related to vibration-sensitive equipment. The Project sponsor shall provide a phone number for the property owners and occupants to call if they have vibration-sensitive equipment on their sites. A copy of the notification and any responses shall be provided to the Planning Division prior to building permit issuance.</p> <p><i>NO-2.2 Implement Construction Best Management Practices to Reduce Construction Vibration on the West Campus.</i> If vibration-sensitive equipment is identified within 225 feet of general construction activities, including internal road construction or 900 feet of pile-driving activities on the West Campus, the Project sponsor shall implement the following measures during construction:</p> <ul style="list-style-type: none"> To the extent feasible, construction activities that could generate high vibration levels at identified vibration-sensitive locations shall be scheduled during times that would have the least impact on nearby land uses. This could include restricting construction activities in the areas of potential impact to the early and late hours of the work day, such as from 8:00 am to 10:00 a.m. or 4:00 p.m. to 6:00 p.m. Monday to Friday. 	

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<ul style="list-style-type: none"> • Stationary sources, such as construction staging areas and temporary generators, shall be located as far from nearby vibration-sensitive receptors as possible. • Trucks shall be prohibited from idling along streets serving the construction site where vibration-sensitive equipment is located. 	
<p>NO-3 Substantial Permanent Increase in Noise Level. Operation of the Project at the West Campus would result in a substantial permanent ambient noise level increase in the Project vicinity due to an increase in traffic. This would be a significant impact.</p>	PS	<p>MITIGATION MEASURE. Implementation of the Project would have the potential to result in a significant increase in noise level on Marsh Road and Willow Road. As described under Impact NO-1, no feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level. This impact would be significant and unavoidable.</p>	SU
<p>NO-4 Substantial Temporary Increase in Noise Level. The Project at the West Campus could result in construction noise levels that would exceed the City’s Noise Ordinance and substantially increase ambient noise levels. This impact is potentially significant.</p>	PS	<p>MITIGATION MEASURE. Construction of the West Campus would have the potential to result in noise levels that would exceed the City’s Noise Ordinance standards for construction equipment. Implementation of the following measure would reduce construction noise associated with the Project to a less-than-significant level.</p> <p><i>NO-4.1 Implement a Construction Noise Plan to Reduce Construction Noise on the West Campus.</i> The Project Sponsor shall submit a Construction Noise Plan for review and approval by the Planning and Building Divisions prior to the issuance of the demolition permit. The Project Sponsor shall implement the following measures during demolition and construction of the Project:</p> <ul style="list-style-type: none"> • To the extent feasible, the noisiest construction activities shall be scheduled during times that would have the least impact on nearby residential land uses. This would include restricting typical demolition and exterior construction activities to the hours of 8:00 a.m. to 6:00 p.m. Monday to Friday. • Equipment and trucks used for Project construction shall use the best available noise control techniques (e.g., improved mufflers, 	LTS

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds) wherever feasible.</p> <ul style="list-style-type: none"> • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for Project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. • Prior to any pile-driving activities, notification shall be sent to all surrounding property owners and occupants within 300 feet of the Project site informing them of the estimated start date and duration. • Construction contractors, to the maximum extent feasible, shall be required to use “quiet” gasoline-powered compressors or other electric-powered compressors, and use electric rather than gasoline or diesel powered forklifts for small lifting. • Stationary noise sources, such as temporary generators, shall be located as far from nearby receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible. • Install temporary plywood noise barriers eight feet in height around the construction site to minimize construction noise to 90 dBA as measured at the applicable property lines of the adjacent 	

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>C-NO-1 Cumulative Exposure to Excessive Noise. The Project, in combination with other development within the City, could result in a substantial increase in exposure of persons to noise in excess of the standards established in the General Plan or Municipal Code. The Project’s contribution would be cumulatively significant.</p>	PS	<p>uses, unless an acoustical engineer submits documentation that confirms that the barriers are not necessary to achieve the attenuation levels.</p> <ul style="list-style-type: none"> • Trucks shall be prohibited from idling along streets serving the construction site. • Implement “quiet” pile driving technology (e.g., vibratory pile driving or pre-drilled pile holes), where feasible, in consideration of geotechnical and structural requirements and conditions. • Monitor the effectiveness of noise attenuation measures by taking noise measurements during pile driving activities. <p>MITIGATION MEASURE. Implementation of the Project would have the potential to result in a significant increase in noise level on Marsh Road and Willow Road. No feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level.</p>	SU
<p>C-NO-2 Cumulative Exposure to Ground-borne Vibration. Construction activities associated with Project-related development and other future development in the City would not expose sensitive receptors to excessive ground-borne vibration. The Project’s cumulative impact would be less than significant.</p>	LTS	None Required.	N/A
<p>C-NO-3 Cumulative Permanent Increase in Noise Levels. Operation of the Project, in combination with other development in the City, would result in a substantial permanent ambient noise level increase in the Project vicinity. The Project’s contribution would be cumulatively significant.</p>	PS	<p>MITIGATION MEASURE. Implementation of the Project would have the potential to result in a significant increase in noise level on Marsh Road and Willow Road. No feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level.</p>	SU

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-NO-4 Cumulative Temporary Increase in Noise Levels. Construction activities associated with Project-related development and other future development in the City would not expose sensitive receptors to a substantial temporary increase in ambient noise level. The Project’s cumulative impact would be less than significant.	LTS	None Required.	N/A
3.9 Cultural Resources			
CR-1 Impacts to Historic Resources. The Project at the West Campus would not cause a substantial adverse change in the significance of a historical resource.	LTS	None required.	N/A
CR-2 Impacts to Archaeological Resources. The Project at the West Campus has the potential to encounter and damage or destroy previously unknown subsurface archaeological resources during construction. This impact would be potentially significant.	PS	<p>MITIGATION MEASURE. Mitigation Measure CR-2.1, below, would reduce potentially significant impacts on archaeological resources at the West Campus to a less-than-significant level.</p> <p><i>CR-2.1 Perform Construction Monitoring, Evaluate Uncovered Archaeological Features, and Mitigate Potential Disturbance for Identified Significant Resources at the West Campus.</i> Prior to demolition, excavation, grading, or other construction-related activities on the West Campus, the applicant shall hire a qualified professional archaeologist (i.e., one who meets the Secretary of the Interior’s professional qualifications for archaeology or one under the supervision of such a professional) to monitor, to the extent determined necessary by the archaeologist, Project-related earth-disturbing activities (e.g. grading, excavation, trenching). In the event that any prehistoric or historic-period subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, animal bone, obsidian, and/or mortar are discovered during demolition/ construction-related earth-moving activities, all ground-disturbing activity within 100 feet of the discovery shall be halted immediately, and the Planning and Building Divisions shall be</p>	LTS

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>notified within 24 hours. City staff shall consult with the Project archeologist to assess the significance of the find. Impacts on any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by the City and that are consistent with the Secretary of the Interior's Standards for Archaeological Documentation. If Native American archaeological, ethnographic, or spiritual resources are discovered, all identification and treatment of the resources shall be conducted by a qualified archaeologist and Native American representatives who are approved by the local Native American community as scholars of the cultural traditions. In the event that no such Native American is available, persons who represent tribal governments and/or organizations in the locale in which resources could be affected shall be consulted. When historic archaeological sites or historic architectural features are involved, all identification and treatment is to be carried out by historical archaeologists or architectural historians who meet the Secretary of the Interior's professional qualifications for archaeology and/or architectural history.</p>	
<p>CR-3 Impacts to Paleontological Resources. The Project at the West Campus has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. This impact would be potentially significant.</p>	PS	<p>MITIGATION MEASURE. Mitigation Measure CR-3.1, below, would reduce potentially significant impacts on paleontological resources to a less-than-significant level for the West Campus.</p> <p><i>CR-3.1 Conduct Protocol and Procedures for Encountering Paleontological Resources at the West Campus.</i> Prior to the start of any subsurface excavations that would extend beyond previously disturbed soils, all construction forepersons and field supervisors shall receive training by a qualified professional paleontologist, as defined by the Society of Vertebrate Paleontology (SVP), who is experienced in teaching non-specialists, to ensure they can recognize fossil materials and will follow proper notification procedures in the event any are uncovered during construction. Procedures to be conveyed to workers include halting</p>	LTS

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>CR-4 Impacts to Human Remains. The Project at the West Campus has the potential to encounter or discover human remains during excavation or construction in the Project area. This impact would be potentially significant.</p>	<p>PS</p>	<p>construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who will evaluate its significance.</p> <p>If a fossil is determined to be significant and avoidance is not feasible, the paleontologist will develop and implement an excavation and salvage plan in accordance with SVP standards. Construction work in these areas shall be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and cataloged. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall then be deposited in a scientific institution with paleontological collections. A final Paleontological Mitigation Plan Report shall be prepared that outlines the results of the mitigation program. The City shall be responsible for ensuring that monitor’s recommendations regarding treatment and reporting are implemented.</p> <p>MITIGATION MEASURE. Mitigation Measure CR-4.1, below, would reduce potentially significant impacts associated with the disturbance of human remains to a less-than-significant level.</p> <p><i>CR-4.1 Comply with State Regulations Regarding the Discovery of Human Remains at the West Campus.</i> If human remains are discovered during any construction activities, all ground-disturbing activity within 50 feet of the remains shall be halted immediately, and the County Coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California’s Health and Safety Code. Additionally, the Building Division shall be notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The Project Sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most</p>	<p>LTS</p>

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		Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The Planning Division shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of state law, as set forth in CEQA Guidelines Section 15064.5(e) and Public Resources Code Section 5097.98. The applicant shall implement approved mitigation, to be verified by the Planning Division, before the resumption of ground-disturbing activities within 50 feet of where the remains were discovered.	
C-CR-1 Cumulative Impacts on Historical Resources. Construction activities on the West Campus and other cumulative development would not result in a significant cumulative impact to historical resources.	LTS	None Required.	N/A
C-CR-2 Cumulative Impacts on Archaeological, Paleontological Resources, and Human Remains. Construction activities on the West Campus and other cumulative development could result in impacts to archaeological resources. This cumulative impact is potentially significant.	PS	MITIGATION MEASURE. Mitigation Measures CR-2.1, CR-3.1, and CR-4.1 prescribe discovery procedures for any previously unknown archaeological, paleontological resources, or human remains encountered during Project construction. The discovery procedures are consistent with professional standards and, as they pertain to discovered human remains, are compliant with State law. Compliance with these mitigation measures would reduce the Project’s contribution to the cumulative impact to less than cumulatively considerable, and reduce the potentially significant cumulative impacts associated with the loss of archeological, paleontological resources, and the disturbance of human remains to a less-than-significant level.	LTS

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Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.10 Biological Resources			
<p>BR-1 Impacts on Special-Status Species at the Project Site. The Project at the West Campus could have a potentially significant impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	PS	<p>MITIGATION MEASURE. The following measures would reduce the potentially significant impacts to roosting and breeding bats at the West Campus to less than significant.</p> <p><i>BR-1.1 Identify and protect roosting and breeding bats on the West Campuses.</i> The Project Sponsor shall implement the following measures to protect roosting and breeding bats found in a tree or structure to be removed with implementation of the Project:</p> <ol style="list-style-type: none"> 1. Prior to tree removal activities on each site, the Project Sponsor shall retain a qualified biologist to conduct a focused survey for bats and potential roosting sites within buildings to be demolished or trees to be removed. The surveys can be conducted by visual identification and can assume presence of hoary bats or the bats can be identified to a species-level with the use of a bat echolocation detector such as an “Anabat” unit. If no roosting sites or bats are found, a letter report confirming absence shall be sent to the California Department of Fish and Game and no further mitigation is required. If roosting sites or hoary bats are found, then the following monitoring and exclusion measures shall be conducted. The letter or surveys and supplemental documents shall be provided to the City prior to demolition permit issuance. <ol style="list-style-type: none"> a. If bats are found roosting outside of nursery season (May 1st through October 1st), then they shall be evicted as described under (b) below. If bats are found roosting during the nursery season, then they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined 	LTS

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<p>BR-2 Indirect Impacts on Special-Status Species Inhabiting the Adjacent Water Marshes. The Project at the West Campus would result in potentially significant indirect effects on special-status bird and mammal species inhabiting the adjacent salt and brackish water marshes due to increased raptor predation.</p>	<p align="center">PS</p>	<p>to not be a maternal roost, then the bats shall be evicted as described under (b). Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. A 250-foot (or as determined in consultation with the Department of Fish and Game) buffer zone shall be established around the roosting site within which no construction or tree removal shall occur.</p> <p>b. Eviction of bats shall be conducted using bat exclusion techniques, developed by Bat Conservation International (BCI) and in consultation with the Department of Fish and Game that allow the bats to exit the roosting site but prevent re-entry to the site. This would include, but not be limited to, the installation of one way exclusion devices. The devices shall remain in place for seven days and then the exclusion points and any other potential entrances shall be sealed. This work shall be completed by a BCI recommended exclusion professional. The exclusion of bats shall be timed and carried concurrently with any scheduled bird exclusion activities.</p> <p>MITIGATION MEASURE. The following measure would reduce the potentially significant impacts due to increased raptor predation at the West Campus to less than significant.</p> <p><i>BR-2.1 Installation of Bird Perching Deterrents on all New Buildings and Other Elevated Structures on the West Campus.</i> The Project Sponsor shall implement the following measures to reduce impacts to special-status marsh species:</p> <ol style="list-style-type: none"> 1. For all new buildings to be constructed on the West Campus, the Project Sponsor shall install bird deterrents along suitable perching sites that would allow raptors or other predatory birds a vantage 	<p align="center">LTS</p>

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>point from which to prey on western snowy plover, salt marsh harvest mouse or other special-status species inhabiting the adjacent salt marshes. Such deterrents may include one or more of the following deterrent devices as appropriate for the individual situation: bird spikes, bird netting, electric shock track, sound deterrents, or other devices approved by CDFG and/or USFWS.</p> <p>2. Trees used for replacement landscaping shall consist of species that generally do not reach heights of greater than 30 feet in order to limit the distance perching birds could see into the adjacent salt marshes to the north. These trees may include native or non-invasive ornamental species. Species with broad canopies would be preferred, as tall narrow canopies (e.g., palms or conifers) generally provide better hunting perches for raptors.</p>	
<p>BR-3 Loss of Riparian and Other Habitats, Including Wetlands as Defined by Section 404 of the Clean Water Act. The Project at the West Campus would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game, U.S. Fish and Wildlife Service, or as defined by Section 404 of the Clean Water Act.</p>	LTS	None Required.	N/A
<p>BR-4 Impacts to Wildlife Corridors or Nursery Sites. The removal of trees, shrubs, or woody vegetation with implementation of the Project at the West Campus would have a potentially significant impact on the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p>	PS	<p>MITIGATION MEASURE. The following measure would reduce the potentially significant impacts to nesting migratory birds at the West Campus to less than significant.</p> <p><i>BR-4.1 Identify and Protect Nesting Migratory Birds at the West Campus.</i> The Project Sponsor shall implement the following measures to reduce impacts to nesting migratory birds:</p> <p>a. To facilitate compliance with State and federal law (Fish and Game Code and the MBTA) and prevent impacts to nesting birds, the</p>	LTS

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Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>Project Sponsor shall avoid the removal of trees, shrubs, or weedy vegetation February 1 through August 31 during the bird nesting period. If no vegetation or tree removal is proposed during the nesting period, no surveys are required. If it is not feasible to avoid the nesting period, a survey for nesting birds shall be conducted by a qualified wildlife biologist no earlier than seven days prior to the removal of trees, shrubs, weedy vegetation, buildings, or other construction activity.</p> <p>b. Survey results shall be valid for the tree removals for 21 days following the survey. If the trees are not removed within the 21-day period, then a new survey shall be conducted. The area surveyed shall include all construction areas as well as areas within 150 feet outside the boundaries of the areas to be cleared or as otherwise determined by the biologist.</p> <p>In the event that an active nest for a protected species of bird is discovered in the areas to be cleared, or in other habitats within 150 feet of construction boundaries, clearing and construction shall be postponed for at least two weeks or until the biologist has determined that the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts.</p>	
BR-5 Conflicts with any Local Policies or Ordinances Protecting Biological Resources. The Project at the West Campus would not result in conflicts with Chapter 13.24 of the Municipal Code (Heritage Tree Ordinance).	LTS	None Required.	N/A
C-BR-1 Cumulative Impacts on Roosting Bats. Removal of buildings, trees, shrubs, or other woody vegetation associated with construction of the Project and other cumulative development would result in impacts to roosting bats. This cumulative impact is less than significant.	LTS	None Required.	N/A

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Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>C-BR-2 Cumulative Indirect Impacts on Special-Status Species Inhabiting the Adjacent Water Marshes. Construction of new multi-story buildings associated with the West Campus and other cumulative development would result in indirect effects on special-status bird and mammal species inhabiting the adjacent salt and brackish water marshes due to increased raptor predation. This cumulative impact is less than significant.</p>	LTS	None Required.	N/A
<p>C-BR-3 Cumulative Loss of Riparian and Other Habitats, Including Wetlands as Defined by Section 404 of the Clean Water Act. The Project at the West Campus, in combination with other cumulative development, would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game, U.S. Fish and Wildlife Service, or as defined by Section 404 of the Clean Water Act.</p>	LTS	None Required.	N/A
<p>C-BR-4 Cumulative Impact on Wildlife Corridors or Nursery Sites. Removal of buildings, trees, shrubs, or other woody vegetation associated with construction of the Project and other cumulative development would result in impacts to nesting birds. This cumulative impact is less than significant.</p>	LTS	None Required.	N/A
<p>C-BR-5 Cumulative Conflicts with any Local Policies or Ordinances Protecting Biological Resources. The Project, in combination with other reasonably foreseeable projects, would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	LTS	None Required.	N/A

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Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.11 Geology and Soils			
GS-1 Strong Seismic Groundshaking and Seismic-Related Ground Failure. The Project, at the West Campus, would have a less-than-significant potential to expose persons and structures to strong seismic groundshaking and seismic-related ground failure.	LTS	None Required.	N/A
GS-2 Soil Hazards. The Project at the West Campus would result in less-than-significant soil hazards.	LTS	None Required.	N/A
GS-3 Soil Erosion. The Project at the West Campus would have a less-than-significant impact to soil erosion.	LTS	None Required.	N/A
C-GS-1 Cumulative Seismic Hazards. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase the risk of exposure or people or structures to seismic hazards. As such, the cumulative impact would be less than significant.	LTS	None Required.	N/A
C-GS-2 Cumulative Soil Hazards. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase soil hazards. As such, the cumulative impact would be less than significant.	LTS	None Required.	N/A
C-GS-3 Cumulative Soil Erosion. The Project, in combination with other foreseeable development in the vicinity, would not substantially increase soil erosion potential. As such, the cumulative impact would be less than significant.	LTS	None Required.	N/A

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.12 Hydrology and Water Quality			
HY-1 Changes in Stormwater Runoff. The Project at the West Campus would result in less-than-significant impacts with regard to stormwater runoff.	LTS	None Required.	N/A
HY-2 100-Year Floodplain. The Project at the West Campus would place structures in a Special Flood Hazard Area (SFHA). This is considered a potentially significant impact.	PS	<p>MITIGATION MEASURE. Implementation of Mitigation Measure HY-2.1 would reduce the potentially significant flood risk impacts at the West campus to less than significant.</p> <p><i>HY-2.1 Prepare and Obtain a Conditional Letter of Map Revision – Fill (CLOMR-F) from FEMA Prior to Issuance of a Grading or Building Permit.</i> Concurrent with the first building permit submittal for the West Campus, the Project Sponsor shall submit a FEMA CLOMR-F application to the Public Works Department for review and approval. In accordance with the National Flood Insurance Program (NFIP) (Code of Federal Regulations (CFR) 44 Part 65), Section 65.6 (Revision of base flood elevation determinations), the Project Sponsor shall prepare supporting data, including relevant hydraulic and hydrologic analyses, delineation of floodplain boundaries and all other information required by FEMA to review and evaluate the request for a CLOMR-F. The analyses shall clearly show revised and new floodplain boundaries, for the Project area and adjacent areas not affected by the revision. Upon receiving City approval, the Project Sponsor shall submit the CLOMR-F application to FEMA. Prior to issuance of any grading or building permit on each site, the applicant shall obtain a CLOMR-F from FEMA. The applicant shall submit an elevation certificate prior to final signoff of the foundation inspection for each structure.</p>	LTS

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Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
HY-3 Impeding or Redirecting Flood Flows. The Project at the West Campus would place fill and structures in a 100-year floodplain. However, this would not impede or redirect flood flows.	LTS	None Required.	N/A
HY-4 Sea Level Rise. The Project at the West Campus could expose people to flooding from climate change-induced sea level rise, resulting in a potentially significant impact.	PS	<p>MITIGATION MEASURES. Implementation of Mitigation Measures HY-4.2, and HY-4.3 would reduce the potentially significant sea level rise impacts at the West Campus to less than significant.</p> <p><i>HY-4.1 Floodproofing of West Campus Underground Infrastructure.</i> Prior to, or at a minimum concurrent with, the issuance of the first construction activity permit at the West Campus and in connection with applicable FEMA requirements, the City shall ensure that the Project incorporates design features to flood-proof below-ground infrastructure, including storm drains, sewers, equipment facilities, to withstand hydrostatic forces and buoyancy from sea level rise changes in groundwater levels.</p> <p><i>HY-4.2 Provide Adequate Storm Flow Conveyance Capacity For Sea Level Rise Conditions at the West Campus.</i> Prior to, or at a minimum concurrent with, the issuance of the first construction activity permit at the West Campus, the City shall ensure that the Project incorporates design features to ensure that the storm drain system conveyance capacity is not constricted by sea level rise at the outlets, including the Caltrans pump station.</p>	LTS
HY-5 Construction and Operational Stormwater Pollutants. Stormwater runoff from the Project at the West Campus would contain urban pollutants. Compliance with applicable federal, State, and local regulations would ensure the Project would not violate water quality standards or permits, contribute additional sources of polluted runoff, or otherwise cause water quality degradation. As a result, this impact would be less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>HY-6 Effects on Groundwater Supplies and Recharge. The Project at the West Campus would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge because it would not increase groundwater demand or decrease recharge areas. This impact would be less than significant.</p>	LTS	None Required.	N/A
<p>C-HY-1 Cumulative Storm Drain Impacts. Development of the Project and other cumulative development could increase the rate and volume of stormwater runoff, which could cause or exacerbate localized flooding or cause the City’s storm drainage capacity to be exceeded in some locations. However, the Project’s contribution to cumulative impacts would not be cumulative considerable.</p>	LTS	None Required.	N/A
<p>C-HY-2 Cumulative Flooding and Sea Level Rise. Development of the Project and other cumulative development could expose people and structures to risk of 100-year flooding, including sea level rise. However, the Project’s contribution to cumulative impacts would not be cumulatively considerable.</p>	LTS	None Required.	N/A
<p>C-HY-3 Cumulative Water Quality. Development of the Project and other development would contribute pollutants to stormwater during construction and occupancy of the various projects, but this would not substantially degrade water quality. The Project’s contribution would not be cumulatively considerable. This cumulative impact would be less than significant.</p>	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-HY-4 Cumulative Groundwater Supplies and Recharge. Development of the Project and other cumulative development within the San Mateo subbasin would not substantially degrade groundwater supplies. As a result, cumulative impacts on the subbasin would be less than significant.	LTS	None Required.	N/A
3.13 Hazards and Hazardous Materials			
HM-1 Asbestos, Lead, or Other Hazardous Materials in Building Components. Project-related demolition or excavation at the West Campus could disturb hazardous materials in existing building components, but compliance with existing regulations would prevent adverse health or safety effects. This would be a less-than-significant impact.	LTS	None Required.	N/A
HM-2 Soil and Groundwater Contamination. The Project at the West Campus could expose people to residual contaminants in soil and/or groundwater, resulting in potentially significant impact.	PS	<p>MITIGATION MEASURE. The following measures would reduce the potentially significant soil and groundwater contamination impact at the West Campus to <i>less than significant</i>.</p> <p><i>HM-2.1 Update Operation, Maintenance, and Monitoring Plan (OMMP) for the West Campus.</i> Prior to commencement of site grading on the West Campus, the Project Sponsor shall retain a qualified professional to update the OMMP to incorporate site development considerations for the West Campus to ensure continued implementation of Article IV, Section 4.2 (Soil Management) of the Land Use Covenant (LUC).</p> <p>The updated OMMP shall include, at a minimum, requirements for soil sampling and laboratory analysis, action levels triggering the need for special handling, as well as stormwater runoff controls (Mitigation Measure HM-2.7), on-site soil movement associated with excavation and fill placement, off-site soil transport (if necessary), and contingency measures in the event activities encounter soil that is odorous, stained, visibly discolored, or is questionable. The Project Sponsor shall submit the updated</p>	LTS

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>OMMP to the California Department of Toxic Substance Control (DTSC) as required under Article IV Section 4.2 of the LUC, and in accordance with the applicable terms of the Voluntary Cleanup Agreement (VCA). The updated OMMP shall ensure that any human health risk evaluation or assessment used to support approval of soil or groundwater disturbance evaluates the proposed duration and extent of the Project activities, considers the potential for groundwater dermal exposure, and is based on the most current applicable risk evaluation methodologies. The updated OMMP shall also identify how deep foundation design and installation will be managed to reduce the potential for downward migration of contaminants in soil or groundwater.</p> <p>The City shall not authorize any activity on the West Campus that has the potential to disturb soil until approved by DTSC and all necessary permits and/or approvals have been obtained, including but not limited to any permits for wells and/or borings from San Mateo County and BAAQMD.</p> <p><i>HM-2.2 Health and Safety Plan for the West Campus.</i> Prior to commencement of site grading on the West Campus, the Project Sponsor shall retain a qualified professional to prepare an updated Health and Safety Plan to implement Article IV, Section 4.2 (Soil Management) of the LUC. The Project Sponsor shall submit the Health and Safety Plan to DTSC as required under Article IV Section 4.2 of the LUC, and in accordance with the applicable terms of the VCA. The City shall not authorize any activity on the West Campus that has the potential to disturb soil until DTSC has approved the updated Health and Safety Plan and all necessary permits have been obtained.</p> <p><i>HM-2.3 West Campus Construction Activity Dust Control Plan (DCP) and Asbestos Dust Management Plan (ADMP).</i> Prior to commencement of site grading on the West Campus, the Project Sponsor shall retain a qualified professional to prepare a DCP/ADMP. The DCP shall incorporate the applicable BAAQMD pertaining to fugitive dust control. The ADMP shall</p>	

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p>be submitted to and approved by the BAAQMD prior to the beginning of construction, and the Project Sponsor must ensure the implementation of all specified dust control measures throughout the construction of the Project. The ADMP shall require compliance with specific control measures to the extent deemed necessary by the BAAQMD to meet its standard.</p> <p><i>HM-2.4 West Campus Construction Activity Groundwater Management Plan.</i> Prior to site grading on the West Campus, the Project Sponsor shall retain a qualified professional to prepare a Groundwater Management Plan that describes how any groundwater extracted to accommodate site preparation will be tested and disposed of in accordance with existing regulations. The City shall not authorize any activity on the West Campus that would involve dewatering until DTSC has approved the Groundwater Management Plan and all necessary permits or approvals have been obtained, particularly if groundwater requires additional treatment and/or disposal at a permitted facility.</p> <p><i>HM-2.5 Soil Vapor Intrusion Barrier at the West Campus.</i> Prior to the issuance of the first building permit for the first occupied structure at the West Campus, the Project Sponsor shall retain a qualified professional to design a vapor intrusion barrier system consistent with the recommendations set forth in “Phase I Environmental Site Assessment, 312-314 Constitution Drive, Menlo Park, California” dated November 19, 2010 prepared by Cornerstone Earth Group. The City shall not issue a building permit until the vapor intrusion barrier design has been reviewed and approved by DTSC and the City Engineer has reviewed the final design plans to ensure the necessary features have been incorporated into the Project. Such measures could include, but would not be limited to, gas-impermeable membranes.</p> <p>Appropriate measures shall also be incorporated into Project design to reduce vapor and groundwater migration through trench backfill and utility conduits. Such measures could include placement of low-permeability backfill plugs.</p>	

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**Table S-2
Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
		<p><i>HM-2.6 Corrosion-Resistant Utility Pipeline Design for the West Campus.</i> Prior to, or at a minimum concurrent with the issuance of utility improvement plan permits, the Project Sponsor shall retain a qualified licensed professional engineer to determine protective measures for utilities. The City shall not issue any permit for utility construction until the City Engineer has reviewed the final design plans to ensure the necessary corrosion-resistant features have been incorporated into the Project.</p> <p><i>HM-2.7 Stormwater Quality BMPs.</i> The Project Sponsor shall ensure on-site detention/retention basins are lined to prevent groundwater interaction with stormwater and to prevent downward migration of stormwater into groundwater.</p> <p><i>HM-2.8 Construction Stormwater Pollution Prevention Plan for the West Campus.</i> The City shall not issue any permit for grading until a stormwater pollution prevention plan (SWPPP) has been completed to the satisfaction of the City and necessary construction BMPs have been incorporated into the Project.</p> <p><i>HM-2.9 Landscaping Restrictions on the Engineered Cap for the West Campus.</i> In accordance with the existing LUC, the Project Sponsor shall not plant trees on the engineered cap. Non-tree landscaping is permissible.</p>	
HM-3 Effects on Ecological Systems. Soil movement during construction of the Project at the West Campus could expose ecological receptors to residual contaminants in soil and/or groundwater if measures are not implemented to control contaminants.	PS	With implementation of Mitigation Measure HM-2.1, potential construction impacts to ecosystems related to handling of soil with residual contaminants and groundwater would be reduced to less-than-significant Levels.	LTS
HM-4 Interference with Groundwater Monitoring System. Site preparation activities and structures at the West Campus could interfere with the groundwater monitoring system.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
<p>HM-5 Maintenance Activities. Maintenance activities at the West Campus could have a potentially significant potential to disturb soil containing residual contaminants.</p>	PS	<p>MITIGATION MEASURE. While the updated OMMP (Mitigation Measure HM-2.1) provides for unexpected conditions, as an added safety measure, documentation ensuring that as-built conditions are fully described (e.g., locations where soils were further remediated or not remediated) and any additional restrictions are recorded is made available to future maintenance and repair workers. The following measure would reduce the potentially significant impact at the West Campus to less than significant.</p> <p>HM-5.1 <i>Record Additional Restrictions.</i> The Project Sponsor shall ensure that the updated OMMP (Mitigation Measure HM-2.1) includes provisions for disclosing information in DTSC-approved remediation reports along with any other requirements pertaining to post-construction, long-term operation and maintenance of subsurface utilities or maintenance or repair of foundations. Any such documentation shall be recorded in the Office of the County Recorder and a copy shall be provided to the City.</p>	LTS
<p>HM-6 Routine Hazardous Materials Use. Construction and operation of the Project at both the West Campus would involve the use of hazardous materials-containing products. However, these products would be used in moderation and would comply with federal, State, and local regulations, resulting in less-than-significant impacts.</p>	LTS	None Required.	N/A
<p>HM-7 Hazardous Materials Risks from Off-Site Uses. The Project at the West Campus could expose occupants to potential risks from off-site routine use or upset/accident conditions involving hazardous materials. However, compliance with federal, State, and local regulations would reduce the potential for off-site uses to pose a substantial hazard to the Project to less-than-significant.</p>	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
HM-8 Impairment of Emergency Access or Emergency Plans. The Project at the West Campus would result in a less-than-significant impact regarding the implementation of or interference to an adopted emergency response or evacuation plan.	LTS	None Required.	N/A
C-HM-1 Cumulative Hazardous Materials Use. Construction and operation of the Project and other cumulative development would involve routine hazardous materials use, generation, disposal, or transport. This is a less-than-significant cumulative impact.	LTS	None Required.	N/A
C-HM-2 Cumulative Soil and Groundwater Contamination. Development of the West Campus and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. This is a less-than-significant cumulative impact.	LTS	None Required.	N/A
C-HM-3 Cumulative Hazardous Materials in Building Components. Development of the Project and other cumulative development could expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. This is a less-than-significant cumulative impact.	LTS	None Required.	N/A
C-HM-4 Cumulative Impairment of Emergency Access or Emergency Plan Impacts. Development of the Project and other cumulative development would not impair implementation of or interfere with an adopted emergency response or evacuation plan. The cumulative impact is less than significant.	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
3.14 Population and Housing			
PH-1 Indirect Population Growth. Implementation of the Project would not induce substantial population growth indirectly through job growth, nor would projected growth result in adverse direct impacts to the physical environment. Therefore, this impact would be less than significant.	LTS	None Required.	N/A
C-PH-1 Cumulative Population Impact. Cumulative development in the City and County would increase the resident population but would not exceed growth projections. The cumulative impact would be less-than-significant.	LTS	None Required.	N/A
C-PH-2 Cumulative Housing Impacts. Cumulative development in the City would increase the demand for housing in the City but would not exceed growth projections. The cumulative impact would be less than significant.	LTS	None Required.	N/A
3.15 Public Services			
PS-1 Impacts to Police Services. The Project at the West Campus would not result in the need for new or physically altered police service facilities. Therefore, police service impacts would be less than significant.	LTS	None Required.	N/A
PS-2 Impacts to Fire Services. The Project at the West Campus would not result in the need for new or physically altered fire service facilities. Fire service impacts would be less than significant.	LTS	None Required.	N/A

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PS-3 Impacts to School Facilities. The Project at the West Campus would not result in the need for new or physically altered school facilities. Impacts related to school facilities would be less than significant impact.	LTS	None Required.	N/A
PS-4 Impacts to Parks and Recreation Facilities. The Project at the West Campus would not result in the need for new or physically altered parks and recreation facilities. Park and recreation impacts would be less than significant.	LTS	None Required.	N/A
PS-5 Impacts Library Facilities. The Project at the West Campus would not result in the need for new or physically altered library facilities, resulting in a less-than-significant impact.	LTS	None Required.	N/A
C-PS-1 Cumulative Police Service Impacts. The Project, in combination with other foreseeable development in the City, would have a less-than-significant cumulative impact on police services.	LTS	None Required.	N/A
C-PS-2 Cumulative Fire and Emergency Service Impacts. The Project, in combination with other foreseeable development in the fire service area, would have a less-than-significant cumulative impact on fire and emergency services.	LTS	None Required.	N/A
C-PS-3 Cumulative School Service Impacts. The Project, in combination with other foreseeable development in the City, would have a less-than-significant cumulative impact on school services.	LTS	None Required.	N/A

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C-PS-4 Cumulative Parks and Recreation Impacts. The Project, in combination with other foreseeable development in the City, would result in a less-than-significant cumulative impact on parks and recreation	LTS	None Required.	N/A
C-PS-5 Cumulative Library Service Impacts. The Project, in combination with other foreseeable development in the City, would have a less-than-significant cumulative impact on library services.	LTS	None Required.	N/A
3.16 Utilities			
UT-1 Water Demand. The Project at the West Campus would not exceed water supplies available under normal year conditions to serve the Project from existing entitlements. Therefore, implementation of the Project would have a less-than-significant impact on water supplies.	LTS	None Required.	N/A
UT-2 Impacts to Water Treatment Facilities. The Project at the West Campus would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, which could cause significant environmental effects. Therefore, the Project would have a less-than-significant impact on water treatment facilities.	LTS	None Required.	N/A
UT-3 Wastewater Generation. The Project at the West Campus would not exceed wastewater treatment requirements of the San Francisco Regional Water Quality Control Board, require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, or result in a determination by the South Bayside System Authority that it has inadequate capacity to serve the Project's	PS	MITIGATION MEASURES. The technical study prepared by West Yost Associates determined that the existing wastewater conveyance system serving the Project site would have insufficient capacity to accommodate the Project. Mitigation Measure UT-3.1 would ensure that necessary capacity improvements are implemented so that to the WBSD sanitary sewer system has sufficient capacity to accommodate additional wastewater generated by the Project. The following measure would reduce potentially	LTS

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<p>expected demand and existing entitlements. However, the existing sanitary sewer system serving the Project site would not have sufficient capacity to accommodate the Project. Therefore, this impact would potentially significant.</p>		<p>significant impacts associated with the Project to a less-than-significant level.</p> <p><i>UT-3.1 Sanitary Sewer System Improvements.</i> The Project Sponsor shall upsize the existing 114 feet of 12-inch diameter pipeline that runs north along Hamilton Avenue, beginning at the Hamilton Avenue/Willow Road intersection, to a 15-inch diameter pipe. To ensure that this work is completed, the Project Sponsor shall enter into an agreement with the City concurrently with granting of land use entitlements for the East Campus and post a bond equal to 200 percent of the estimated cost of the work. In addition, the Project Sponsor shall purchase a third wastewater pump to be placed into reserve in case of pump failure at HHPS. To ensure this work is completed, the Project Sponsor shall enter into an agreement with the City concurrently with granting of land use entitlements for the East Campus and post a bond equal to 120 percent of the cost of the wastewater pump.</p>	
<p>UT-4 Solid Waste Generation. The Project would be served by Ox Mountain Sanitary Landfill, which has sufficient permitted capacity to accept the Project’s solid waste disposal needs. The Project, at the West Campus, would comply with federal, State, and local statutes and regulations related to solid waste. Therefore, impacts on solid waste facilities would be less than significant.</p>	LTS	None Required.	N/A
<p>UT-5 Stormwater Generation. The Project at the West Campus would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, resulting in a less-than-significant impact.</p>	LTS	None Required.	N/A
<p>UT-6 Energy Demand. The Project at the West Campus would not exceed existing gas and electric supply. Therefore, this impact would be less than significant.</p>	LTS	None Required.	N/A

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Summary of Impacts and Mitigation Measures – West Campus**

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-UT-1 Cumulative Water Demand. The Project, in combination with other development within the City, would increase water demand, but there are sufficient water supplies available to serve the cumulative projects from existing entitlements under normal, dry and multiple dry years, and the increased demand would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, which could cause significant environmental effects. This cumulative water supply impact would be less than significant.	LTS	None Required.	N/A
C-UT-2 Cumulative Wastewater Generation. The Project, in combination with other development within the West Bay Sanitary District service area, would not exceed wastewater treatment requirements of the San Francisco Regional Water Quality Control Board, require or result in the construction of new wastewater treatment facilities or the expansion of existing facilities, nor result in a determination by the South Bayside System Authority that it has inadequate capacity to serve the Project’s expected demand and existing entitlements. Therefore, this cumulative wastewater impact would be less than significant.	LTS	None Required.	N/A
C-UT-3 Cumulative Solid Waste Generation. The Project, combined with other development within the RethinkWaste’s service area, would be served by Ox Mountain Sanitary Landfill, which has sufficient permitted capacity to accommodate future solid waste disposal needs through 2034. These cumulative projects would be expected to comply with federal, State, and local statutes and regulations related to solid waste. Therefore, this cumulative solid waste impact would be less than significant.	LTS	None Required.	N/A

SU = Significant Unavoidable

PS = Potentially Significant

LTS = Less-than-Significant

N/A = Not Applicable

Table S-2
Summary of Impacts and Mitigation Measures – West Campus

Impacts	Impact Significance Without Mitigation	Mitigation Measures	Impact Significance With Mitigation
C-UT-4 Cumulative Stormwater Generation. The Project, in combination with cumulative development in the City, could require the construction or expansion of stormwater facilities. However, the Project’s contribution to this impact would be less than significant.	LTS	None Required.	N/A
C-UT-5 Cumulative Energy Demand. The Project, in combination with other development served by PG&E, would not exceed existing gas and electric supply capacity. Therefore, this cumulative impact would be less than significant.	LTS	None Required.	N/A

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PS = Potentially Significant

LTS = Less-than-Significant

N/A = Not Applicable