
3.2 LAND USE

Introduction

Land use and planning analyses under the California Environmental Quality Act (CEQA) generally consider the compatibility of a project with neighboring areas, change to or displacement of existing uses, and consistency of a project with relevant local land use policies that have been adopted with the intent to mitigate or avoid an environmental effect. With respect to land use conflicts or compatibility issues, the magnitude of these impacts depends on how a project affects the existing development pattern, development intensity, and local air quality, noise, and visual setting in the immediately surrounding area. Specific environmental-related issues (visual, air quality, noise, etc.) and their potential significance are discussed in detail in the associated topical sections of this Draft EIR (such as Section 3.3, Visual Quality; Section 3.5, Transportation; Section 3.6, Air Quality; and Section 3.8, Noise).

This section describes the existing and proposed land uses within and around the Project site and evaluates the potential for land use incompatibilities to occur with the development of the Project. New development adjacent to existing land uses, particularly if it is much more intensive or involves operations or activities whose effects extend beyond the property, may create land use incompatibilities. This section also addresses the consistency of the Project with applicable land use goals and policies from the City of Menlo Park General Plan (General Plan), adopted in 1994, and the City of Menlo Park Municipal Code (Municipal Code), Title 16 Zoning Ordinance (current through Ordinance 973, passed December 2010) that were specifically adopted to mitigate, or avoid, a significant environmental effect. The General Plan and Municipal Code consistency analysis is provided for environmental review; however, City Council will ultimately determine the Project's consistency with the goals and policies contained in the General Plan and other City planning documents.

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1) were considered in preparing this analysis. Applicable issues that were identified pertain to Bay Conservation and Development Commission (BCDC) permits for development within the 100-foot shoreline band and consistency with the General Plan Circulation Element and the City/County Association of Governments (C/CAG).

Applicable Plans and Regulations

Plans and regulations applicable to the Project include the General Plan, the Municipal Code, the BCDC Bay Plan and Public Access Guidelines for the San Francisco Bay, the Association of Bay Area Governments (ABAG) Bay Trail Plan and Design Guidelines, and the C/CAG Congestion Management Plan (CMP). These plans and regulations are discussed in detail below.

General Plan

The General Plan guides the physical development and character of the City. The General Plan sets forth City policies regarding the types and locations for future land uses and activities and is used by the City Council and Planning Commission in considering planning and land use decisions. The central purpose of the General Plan, as stated in the document, “is to maintain Menlo Park’s special character as a residential community that includes a broad range of residential, business, and employment opportunities and to provide for the change necessary to maintain a vital community.”

Land Use Designations. The Land Use Diagram in the General Plan depicts the land use pattern for future development in the City. The boundaries of the land use designations on the Land Use Diagram are depicted generally. The land use designations are meant to outline building intensity and population density for the various land uses.

The Project site is designated as Limited Industry in the General Plan. The Limited Industry designation allows for light manufacturing and assembly, distribution of manufactured products, research and development facilities, industrial supply, incidental warehousing, offices, limited retail sales (such as sales to serve businesses in the area), public and quasi-public uses, and similar and compatible uses. The maximum floor area ratio (FAR) allowed shall be in the range of 0.45 for office uses to 0.55 for related office uses (such as amenities). Under the Limited Industry designation, hotel and other commercial uses are not allowed.

Goals and Policies. Applicable land use goals, policies, and programs from the Land Use Element, Circulation and Transportation Element, Open Space and Conservation Element, Seismic Safety and Safety Element, and Noise Element of the General Plan are discussed under Impact LU-1, below. In addition, applicable policies are outlined in the relevant sections of this Draft EIR.

City of Menlo Park Municipal Code (Title 16, Zoning Ordinance)

The Zoning Ordinance enforces the land uses designated in the General Plan. Title 16 of the Municipal Code was adopted as a precise zoning plan for the City and is designed “to preserve and extend the charm and beauty inherent to the residential character of the city; to regulate and limit the density of population; encourage the most appropriate use of land; to conserve land and stabilize the value of property to provide adequate open space for light, air, and fire protection; to lessen traffic congestion; to facilitate the provision of community facilities; to encourage tree and shrub planting; to encourage building construction of pleasing design; and to provide the economic and social advantages of a planned community.” The Zoning Ordinance defines the zoning districts that the City is divided into and identifies the land uses permitted and conditionally permitted. The ordinance also establishes development regulations such as building height, land cover by buildings, and floor area restrictions.

The East Campus is currently zoned M-2-X (General Industrial, Conditional Development) and the West Campus is zoned M-2 (General Industrial). The M-2 District permits warehousing, manufacturing, printing, assembling, and office uses. Conditional uses allowed in the M-2 District include cafés, convenience stores, personal services (such as barbers, beauty, laundrette, dry cleaning, and shoe repair), and daycare facilities all intended to serve the employees in the immediate area.

Development regulations for the M-2 district include a maximum land cover by structures of 50 percent of the site and a maximum of 0.45 FAR for office buildings and 0.55 FAR for general industrial uses. In addition, the maximum building height should not exceed 35 feet; however, additional height may be permitted with a conditional development permit.

BCDC Bay Plan and Public Access Design Guidelines for the San Francisco Bay (Bay Plan)

The Bay Plan was completed and adopted by the BCDC in 1968 and submitted to the California State Legislature in 1969. The Legislature acted upon the BCDC's recommendations in the Bay Plan and revised the McAteer-Petris Act by designating the BCDC as the agency responsible for maintaining and carrying out the provisions of the Act and the Bay Plan for the protection of the Bay and its natural resources, as well as the development of the Bay and shoreline. The McAteer-Petris Act directs the BCDC to exercise its authority to issue or deny permit applications for placing fill, extracting materials, or changing the use of any land, water, or structure within the area of its jurisdiction ¹

The latest amendment to the Bay Plan was adopted in October 2011 (Resolution 11-08), which added new climate change findings and policies and encourages jurisdictions to develop regional adaptive management strategies. It also revised findings and policies pertaining to tidal marsh and tidal flats, safety of fills, protection of shoreline, and public access.² However, the analysis contained in this Draft EIR bases its compliance conclusions on the BCDC Bay Plan effective at the time the NOP was released (April 2011) in accordance with CEQA.

The purpose of the BCDC Public Access Design Guidelines for the Bay is to provide the Bay region with a design resource for development projects along the shoreline of the Bay. These guidelines provide suggestions for site planning, as well as recommendations for designing and developing attractive and usable public access areas. The guidelines are not legally enforceable standards, but are an advisory set of design principles aimed at enhancing shoreline access while providing for the protection of Bay resources, regional livability, and local economic prosperity.³

The East Campus is just within the 100-foot BCDC shoreline band and, therefore, the Bay Plan and Public Access Design Guidelines would be applicable to the East Campus.

ABAG Bay Trail Plan and Design Guidelines

The Bay Trail Plan proposes development of a regional hiking and bicycling trail around the perimeter of the San Francisco and San Pablo Bays. The Bay Trail Plan mandates that the Bay Trail provide

¹ San Francisco Bay Conservation and Development Commission, "San Francisco Bay Plan," 1969, amended February 2008, website: <http://www.bcdc.ca.gov/pdf/planning/plans/bayplan/bayplan.pdf>, accessed September 15, 2011.

² San Francisco Bay Conservation and Development Commission, "Resolution No. 11-08: Adoption of Bay Plan Amendment No. 1-08 Adding New Climate Change Findings and Policies to the Bay Plan; And Revising the Bay Plan Tidal Marsh and Tidal Flats; Safety of Fills; Protection of the Shoreline; and Public Access Findings and Policies," website: http://www.bcdc.ca.gov/proposed_bay_plan/10-01Resolution.pdf, accessed October 31, 2011.

³ San Francisco Bay Conservation and Development Commission, "Shoreline Spaces: Public Access Design Guidelines for the San Francisco Bay," April 2005.

connections to existing park and recreation facilities, create links to existing and proposed transportation facilities, and be planned in a way to avoid adverse effects on environmentally sensitive areas. The Bay Trail Plan policies and design guidelines are intended to complement, rather than supplant, the adopted regulations and guidelines of local managing agencies. Implementation of the Bay Trail Plan relies on the continued cooperation among shoreline property owners, and federal, State, and local agencies with jurisdictions over the trail alignment.⁴ The Bay Trail Plan and Design Guidelines would be applicable to the Project because the existing Bay Trail crossing at the intersection of Bayfront Expressway and Willow Road would be diverted to the undercrossing beneath Bayfront Expressway.

C/CAG Congestion Management Program (CMP)

The C/CAG has prepared a CMP to identify strategies to respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide solutions. The intersection of Bayfront Expressway and Willow Road is a CMP-designated intersection and is monitored by C/CAG.⁵ Project consistency with the CMP is discussed further in Section 3.5, Transportation.

Existing Conditions

For the purpose of this land use discussion, the “Project vicinity” encompasses approximately 0.5-mile radius from the center of the Project site. The subsequent paragraphs document the land uses and development intensities in the Project vicinity. The land use and zoning designations of the Project site are discussed under Applicable Plans and Regulations, later in this section.

Adjacent Uses

The City encompasses an area of about 19 square miles, including nearly 12 square miles of the Bay and wetlands. The approximately seven-square-mile urbanized portion of the City is virtually built out. The character in the Project vicinity is influenced by both the undeveloped areas along the Bay and the mix of development uses in the area that include industrial, office, residential, and commercial uses. Within a 0.5-mile radius of the Project site, land uses include the Bay, salt ponds, and Ravenswood Slough to the north, east, and northwest; Menlo Science and Technology Park (AMB) to the southeast; Belle Haven neighborhood with residential, commercial, and industrial uses to the south; and industrial buildings and warehouses to the southwest. Further to the northwest, across the salt ponds, is the open space of Bedwell-Bayfront Park (Bayfront Park) and the Bay beyond. Development in the Project vicinity ranges from large industrial buildings and warehouses to low-density single-family residential units. Figure 3.2-1 depicts the surrounding development and existing zoning.

⁴ Association of Bay Area Governments, “Bay Trail Plan,” June 30, 1999, website: <http://www.baytrail.org/baytrailplan.html>, accessed on September 19, 2011.

⁵ City/County Association of Governments of San Mateo County, “Final San Mateo County Congestion Management Program 2009,” September 2009, website: http://www.ccag.ca.gov/pdf/tac/2009/FINAL_SMC_2009_CMP.pdf, accessed September 15, 2011.

AMB is located to the southeast of the Project site, across the Dumbarton Rail Corridor and to the east of Willow Road. This area includes businesses involved in the science and technology sector, including biotech, research and development, and high-tech firms. AMB consists of large industrial warehouses approximately two stories in height with surface parking lots and street trees. AMB is designated as Limited Industry under the General Plan and is mainly zoned M-2, General Industrial District. However, two small properties at the intersection of O'Brien Drive and Willow Road are zoned C-4 (General Commercial). Also included in the office park is the Mid-Peninsula High School, which is a non-profit, independent day school for students in grades nine through 12.

The Belle Haven neighborhood, to the south of the Project site, generally consists of one- to two-story single-family units. The neighborhood also features open space areas, parks, low-intensity commercial retail areas adjacent to Willow Road, and the Belle Haven Elementary School. The Dumbarton Rail Corridor separates the Belle Haven neighborhood from the Project site to the north. The majority of the Belle Haven neighborhood is zoned as R-1-U, Single Family Urban Residential District, with a General Plan land use designation of Low Density Residential. However, along the southern border of Dumbarton Rail Corridor, within the Project vicinity, zoning includes R-3 (Apartment District), M-1 (Light Industrial District), and C-2-S (Neighborhood Commercial District, Special). Similarly, along Willow Road in the Belle Haven neighborhood, zoning includes C-2-S, R-3, and C-2-B (Neighborhood Commercial District, Restrictive). Along US 101, to the north, are areas that are zoned R-3 and R-2 (Low Density Apartment District). Other zoning in the Belle Haven neighborhood include PF (Public Facilities) for Belle Haven Elementary School and Kelly Park and OSC (Open Space and Conservation) for Hamilton Park.

To the west of the Project site are properties zoned as M-2 and M-2-X (General Industrial, Conditional) with a General Plan land use designation of Limited Industrial. These large parcels feature low-rise buildings surrounded by paved parking lots and sparse landscaping. In general, the uses in this area include research and development for the electronics firm TE Connectivity.

Pedestrian and bicycle trails are also located in the vicinity of the Project site. A BCDC Public Shore Trail borders the East Campus and runs along the perimeter. In addition, the Bay Trail travels along Bayfront Expressway. The Bay Trail is a series of existing and planned regional hiking and bicycle trails administered by the ABAG that will eventually connect continuously around the perimeter of the San Francisco and San Pablo Bays and link 47 cities with 500 miles of trails.⁶ This portion of the Bay Trail runs to the north of Bayfront Expressway, west of the East Campus, travels over the Bayfront Expressway/Willow Road intersection, and continues along the southern portion Bayfront Expressway, to the east.

⁶ Association of Bay Area Governments, "Overview," website: <http://www.baytrail.org/overview.html>, accessed July 12, 2011.

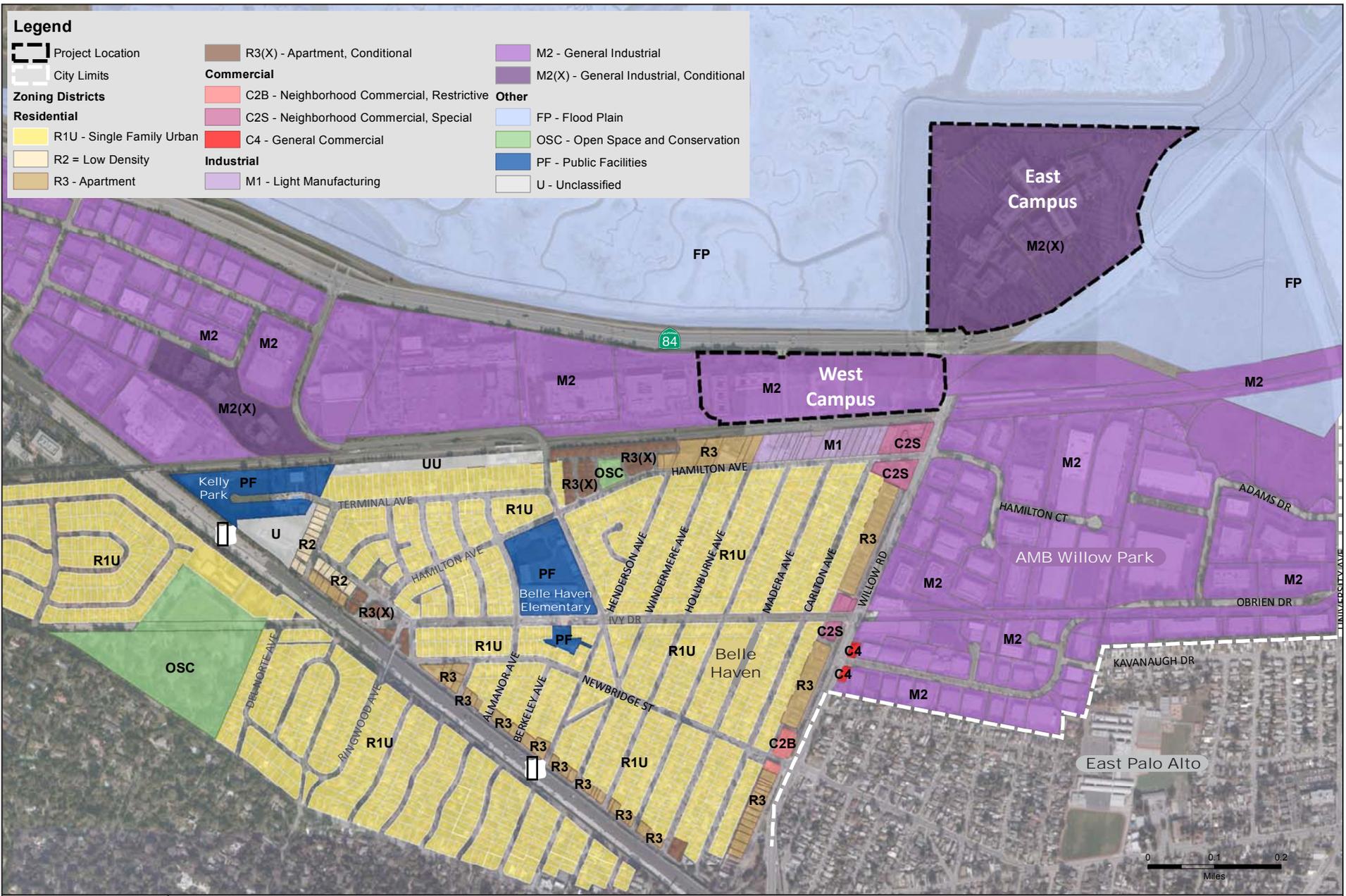


FIGURE 3.2-1
Existing Zoning

Source: Menlo Park, 2011.

Project Site

As described in Section 2, Project Description, for the purposes of this analysis, the Project site refers to both the East Campus and West Campus. These two sites collectively comprise 78.9 acres. The East Campus is approximately 56.9 acres and the West Campus is approximately 22 acres. The Project site is in the northeastern portion of the City, north of US 101 and immediately adjacent to the Bay to the north, east, and west. The East Campus and the West Campus are separated by Bayfront Expressway, which runs in an east-west direction between the two campuses. The campuses are connected by an existing undercrossing beneath Bayfront Expressway.

East Campus. The East Campus, which was formerly occupied by Oracle (formerly Sun Microsystems), is bound by the tidal mudflats and marshes of the Bay and Ravenswood Slough to the north, east, and west and Bayfront Expressway to the east and south. The East Campus consists of one parcel, which was recently merged and has not yet been assigned an Assessor's Parcel Number (APN) by the County. The site is accessible via the main egress/ingress point at 1601 Willow Road, which is adjacent to the intersection of Bayfront Expressway and Willow Road. A second access point for vehicles coming from the East Bay is located off of Bayfront Expressway in the eastern portion of the site.

There are nine existing buildings on the East Campus, totaling more than one million square feet (sf). These buildings mainly include office uses except for Buildings 11, 18 and 19, which include cafés and a fitness center, respectively. The buildings range in height from 31.5 feet to 47 feet to the top of the parapet. In addition to these buildings, the site also includes surface parking for 3,165 vehicles (including 36 motorcycle parking spaces), 10 parking spaces for the BCDC Trail (which are not included as part of the parking calculations), a central courtyard, landscape features, and a sports field and lighted basketball courts adjacent to the fitness center.

West Campus. The West Campus, which was formerly owned by GM and TE Connectivity, is bound by Bayfront Expressway to the north, Willow Road to the east, the Dumbarton Rail Corridor to the south, and the TE Connectivity site to the west. The residential Belle Haven neighborhood is located across the Dumbarton Rail Corridor, further to the south. Approximately half of the West Campus is developed and the entire site is currently unoccupied. The West Campus is currently accessible by an unsignalized entrance on Bayfront Expressway. The driveway includes left- and right-turn in access, and right-turn out access. Secondary and emergency vehicle access is provided via Constitution Drive, along the site's southern edge.

The West Campus currently consists of two parcels: APN 055-260-210 to the west and APN 055-260-220 to the east, which will be merged as part of the West Campus entitlements. Also included in the proposed West Campus is a 0.13-acre plot of land in the northwestern corner. This area includes APN 055-260-200 and is currently part of the adjacent TE Connectivity site, but would become part of the West Campus with implementation of the Project by way of a lot line adjustment. The developed, western portion of the site consists of approximately 13.5 acres with 12 percent of the parcel occupied by development. Existing development at this site includes two office buildings totaling 127,246 sf, with a maximum height of 35.4 feet, a surface parking lot with 347 parking stalls, landscape features, a

basketball court, and a guard house. The vacant, eastern portion of the site is approximately 8.5 acres and consists of previously developed land with minimal vegetation. There is also fencing around an engineered cap on the eastern area of the West Campus to control the existing area of contaminated soil.

Impacts and Mitigation Measures

Standards of Significance

A project would have a significant adverse land use impact if it would:

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

Land Use Analysis Methodology

CEQA requires that an EIR consider whether a proposed project may conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental impact. This environmental determination differs from the larger policy determination of whether a proposed project is consistent with a jurisdiction's general plan. The former determination (that is intended for consideration in a CEQA document) is based on, and limited to, a review and analysis of environmental matters. The latter determination, by comparison, is made by the decision-making body of the jurisdiction and is based on a jurisdiction's broad discretion to assess whether a proposed project would conform to the policies and objectives of its general plan/specific plan as a whole. In addition, the broader general plan consistency determination takes into account all evidence in the record concerning the project characteristics, its desirability, as well as its economic, social, and other non-environmental effects.

Conflicts of a project with land use policies do not, in and of themselves, constitute significant environmental impacts. Policy conflicts are considered environmental impacts only when they would result in direct environmental effects. Decision-makers will need to consider the consistency of the proposed development with applicable plans and policies that do not directly relate to physical environmental issues when determining whether to approve or disapprove the Project. As such, this discussion is provided to help decision-makers (in this case, the Menlo Park City Council).

Impacts Not Evaluated In Detail

The Project would not divide an established community. The Project site is located to the north of the Dumbarton Rail Corridor in an area that is characterized by light-industrial uses. The East Campus is developed with office buildings and the Project would not alter the existing buildings or permitted uses

and will replace the previous use with a similar use. The West Campus would include the construction of five new office buildings with additional amenities structures and a parking garage. Although this would add new development to the area, it would be located in an area of similar uses and be physically separated by the Dumbarton Rail Corridor from the Belle Haven neighborhood. As such, the Project would not divide the established community, resulting in *no impact*.

In addition, the Project is not a part of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. However, the Project site is adjacent to the salt marshes to the north and west that are a part of the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge). The Refuge is actively pursuing expansion and the protection of the habitats and associated plant and wildlife species contained therein. The Refuge is also closely involved with the South Bay Salt Pond Restoration Project that has active restoration sites near the Project site. Because implementation of the Project would not involve any construction outside the currently developed boundaries of the East Campus and West Campus, none of the construction activities would interfere with the management and/or expansion of the Refuge or with the restoration of the salt ponds. *No impact* to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan would occur from the implementation of the Project.

Further, the East Campus is within the 100-foot shoreline band that is under the jurisdiction of BCDC; however, no new development is proposed within the 100-foot shoreline band. Since there would be no change from existing conditions, the Project would not conflict with the BCDC Bay Plan or Public Access Design Guidelines. Additionally, the West Campus is not within the 100-foot shoreline band; therefore, the Project at the West Campus would not conflict with the BCDC Bay Plan or the Public Access Design Guidelines resulting in *no impact*.

Environmental Analysis

LU-1 Conflicts with Adopted Land Use Plans and Policies. Implementation of the Project at both the East Campus and 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)

East Campus

Consistency with the General Plan

Land Use Designations. The Project is required to be consistent with the land use designations and goals and policies outlined in the General Plan. As described above, the East Campus has a land use designation of Limited Industry, which allows for light manufacturing and assembly, distribution of manufactured products, research and development facilities, industrial supply, incidental warehousing, offices, limited retail sales (such as sales to serve businesses in the area), public and quasi-public uses, and similar and compatible uses. The maximum FAR shall be in the range of 0.45 to 0.55, depending on the land use. The East

Campus would retain the existing structures and continue to use the buildings for office uses, which are permitted under the Limited Industry designation. As such, the Project would not conflict with the existing land use designation.

Goals and Policies. Table 3.2-2, later in this section, outlines the General Plan goals, policies, and actions that have been identified as applicable to the Project (both the East Campus and West Campus) and describes environmental effects and potential policy conflicts. In the table, a determination of “Consistent” or “Inconsistent” is provided for each policy.

The determination of whether or not the Project at the East Campus would conflict with the applicable General Plan policies is based on the effects of changing the CDP from an employee cap to a trip cap to allow the addition of adding approximately 3,000 new employees. Since the Project at the East Campus would not result in physical changes or impacts related to ground disturbance, the East Campus would not conflict with General Plan policies related to these topics. In these instances, a determination of “Not Applicable” is made for the East Campus. Where the environmental analysis identifies necessary mitigation measures for the East Campus, the analysis in Table 3.2-2 briefly describes those measures as they relate to consistency with the General Plan. These mitigation measures and the impacts are addressed further in the relevant subsections of Section 3.

Generally, the Project at the East Campus would be consistent with the General Plan goals and policies. However, the ultimate determinations of General Plan consistency can and will be made by City Council. In addition, the ultimate finding of General Plan consistency does not require that a project be entirely consistent with each individual General Plan policy. A proposed project can be generally consistent with a general plan even though the project may not promote every applicable goal and policy. Considering this, the Project as it relates to the East Campus would generally be consistent with the applicable goals, policies, and actions, resulting in a *less-than-significant* impact.

Consistency with the Zoning Ordinance

The East Campus is currently zoned M-2-X (General Industrial, Conditional Development), which permits warehousing, manufacturing, printing, assembling, and office uses. Conditional uses allowed in the M-2-X District include cafés, convenience stores, personal services (such as barbers, beauty, laundrette, dry cleaning, and shoe repair), and daycare facilities all intended to serve the employees in the immediate area. The Project at the East Campus would include uses consistent with those permitted under the M-2-X District. In addition, since the Project would retain the existing buildings and would not include new construction, the FAR, gross floor area (GFA), site coverage, building heights, and parking would remain the same.

The Project Sponsor can occupy the East Campus in compliance with the existing CDP and zoning. However, the Project Sponsor seeks to increase the density on the site. Rather than establish a new maximum number of on-site employees, the Project Sponsor seeks to convert the existing density cap to a trip cap. Since the Project would not change the use of the

buildings, the Project would be consistent with the Zoning Ordinance, resulting in a *less-than-significant* impact.

Consistency with the ABAG Bay Trail and Design Guidelines

The existing undercrossing of Bayfront Expressway at Willow Road would be improved with Phase 1 of the Project to provide a connection from Menlo Park to the Bay Trail. This connection would provide bicyclists and pedestrians a grade-separated route to cross Bayfront Expressway. The undercrossing would be opened during initial occupancy of the East Campus. Since the connector would be part of the Bay Trail, the Project would comply with the Bay Trail Design Guidelines, resulting in *less-than-significant* impacts. However, the improvements to the existing tunnel would not occur until implementation of the Project at the West Campus.

Consistency with the C/CAG Congestion Management Plan

According to the 2009 CMP, for freeway segments currently in compliance with the adopted LOS standard, a project is considered to have an impact if the project will cause the freeway segments to operate at a level of service that violates the standard adopted. Additionally, a project would have an impact if the cumulative analysis indicates that the combination of the proposed project and future cumulative traffic demand would result in the freeway segment to operate at a level of service that violates the adopted standard. An impact could also occur if the proposed project increased traffic demand on the freeway segment by an amount equal to 1 percent or more of the segment capacity, or would cause the freeway segment v/c ratio to increase by 1 percent.

As shown in Tables 3.5-13 (2015 East Campus Only) and 3.5-27 (Cumulative East Campus) in Section 3.5, Transportation, several Routes of Regional Significance under the CMP would be impacted by the Project. The Project would implement Mitigation Measures TR-3.1 and TR-13.1, which would make improvements to the 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 significant and unavoidable 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. The Project impacts at the East Campus are considered transportation-related and are fully evaluated in the Section 3.5, Transportation.

West Campus

Consistency with the General Plan

Land Use Designations. The Project is required to be consistent with the land use designations and goals and policies outlined in the General Plan. The West Campus has a land use designation of Limited Industry, which allows for light manufacturing and assembly, distribution of manufactured products, research and development facilities, industrial supply,

incidental warehousing, offices, limited retail sales (such as sales to serve businesses in the area), public and quasi-public uses, and similar and compatible uses. The maximum FAR shall be in the range of 0.45 to 0.55, depending on the land use. The West Campus would include office uses with ancillary structures for uses such as cafés, a fitness center, meeting rooms, and parking. These uses are permitted under the Limited Industry designation. As such, the Project would not conflict with the existing land use designation.

Goals and Policies. Table 3.2-2, below, outlines the General Plan goals, policies, and actions that have been identified as applicable to the Project and describes environmental effects and potential policy conflicts. The determination of whether or not the West Campus would conflict with applicable policies is based on either the Project Description or, for policies adopted for the purpose of mitigating an environmental impact, on the environmental analysis provided in the applicable sections of this Draft EIR. Where the environmental analysis identifies necessary mitigation measures for the West Campus, the analysis in Table 3.2-2 briefly describes those measures as they relate to consistency with the General Plan. These mitigation measures and the impacts are addressed further in the relevant subsections of Section 3.

Generally, the Project at the West Campus would be consistent with the General Plan goals and policies. The ultimate determinations of General Plan consistency can and will be made by City Council. In addition, the ultimate finding of General Plan consistency does not require that a project be entirely consistent with each individual General Plan policy. A proposed project can be generally consistent with a general plan even though the project may not promote every applicable goal and policy. Assuming the approval of the project, the Project would generally be consistent with the applicable goals, policies, and actions, resulting in a *less-than-significant* impact.

Consistency with the Zoning Ordinance

The West Campus is currently zoned M-2, which permits warehousing, manufacturing, printing, assembling, and office uses. The Project would require rezoning to M-2-X in order to allow a maximum building height in excess of 35 feet. Table 3.2-1, below, summarizes the existing development at the West Campus, the allowed development under current M-2 zoning, and the development proposed for the West Campus.

Floor Area Ratio. The M-2 District currently allows a FAR of between 0.45 and 0.55, depending on the land use. However, for office buildings, the FAR must not exceed 0.45. The office building proposed at the West Campus would be built in accordance of the allowable FAR, therefore, would not conflict with the existing FAR requirements outlined in the Zoning Ordinance or, as discussed above, the General Plan designation.

**Table 3.2-1
Existing, Allowed, and Proposed West Campus Development**

	Existing Development	Maximum Allowed Development (M-2 Zoning)	Proposed Development
Floor Area Ratio (FAR)	0.23	0.45	0.45
Total Square Feet (sf)	127,246	449,346 ^a	439,850
Site Coverage	12%	50%	28% ^b
Building Heights	35.4 feet	35 feet	75 feet ^c
Parking	242 stalls	1,302 stalls	1,554 stalls

Sources: City of Menlo Park, 2011; Gensler, 2011.

Notes:

- a. Per the Zoning Code, and based on the size of the West Campus and Facebook’s needs, up to 363,058 sf can be dedicated to office uses and up to 86,288 sf can be dedicated to amenities.
- b. Buildings would occupy 28 percent of the site. In addition, open space would constitute 49 percent of the site and paving would make up 24 percent of the site. (Totals exceed 100 percent due to rounding)
- c. Exceeds existing height permitted under M-2 Zoning.

Gross Floor Area and Site Coverage. Per the Zoning Ordinance, and based on the size of the West Campus and the Project Sponsor’s needs, buildings can occupy approximately 449,346 sf of gross floor area. Up to 363,058 sf can be dedicated to office uses and up to 86,288 sf can be dedicated to amenities. The Project would include 361,850 sf for office uses and 78,000 sf for associated amenities and, therefore, would be within the allowed floor area. The proposed buildings would occupy 28 percent of the West Campus. In addition, open space would constitute 49 percent of the site and paving would make up 24 percent of the site.⁷ As such, the West Campus would be consistent with the gross floor area and site coverage requirements.

Building Heights. The M-2 District has a height limit of 35 feet, which does not include the screened mechanical areas on rooftops. The proposed buildings would range from two to four stories in height, with the Project Sponsor proposing an overall height limit of 75 feet for the entire West Campus. This increase in the height limit from 35 feet to 75 feet would require rezoning the site to M-2-X. In addition, a CDP would be required to authorize the increase in height and deviation from standard development regulations in the M-2 zone. The proposed new zoning and CDP would allow the Project to be consistent with the Zoning Ordinance, resulting in less-than-significant impacts.

Parking. Parking on the West Campus would be provided in the undercroft of Buildings 4 and 5 and in the five-level parking structure in the western portion of the campus. In total, approximately 1,544 parking stalls would be provided at the West Campus. Building 4 would contain 52 parking stalls and Building 5 would include 62 parking stalls, which would be reserved as priority parking for energy efficient vehicles. The five-level parking structure

⁷ The percentages exceed 100 percent due to rounding.

would have capacity for approximately 1,430 vehicles. The M-2 zoning requires parking for 1,302 vehicles. The Project exceeds this requirement.

Consistency with the ABAG Bay Trail and Design Guidelines

As stated above, the undercrossing at Bayfront Expressway would be open during implementation of the East Campus. With construction of the West Campus, the undercrossing would be enhanced to provide lighting and security improvements, final grading of the approaches for ADA-compliant access, removal of the narrow elevated walkway within the undercrossing, and signing/stripping improvements. In addition, a pump would be installed to protect the undercrossing from seasonal flooding. The number of crossings that public Bay Trail users would need to make is minimized by placing the pedestrian path on the eastern side of the tunnel. As they approach from Willow Road, pedestrians would travel through the tunnel unimpeded; on the north side of the tunnel near the East Campus, a single crossing point to access the Bay Trail would be provided. The crossing would be enhanced with advanced yield lines and high visibility crosswalk striping to maximize visibility. Facebook employees would be required to cross the people mover lane in a single crossing point near the West Campus. The crossing would also be enhanced with similar treatments of advanced yield lines and high visibility crosswalk striping.

Since the connector would be part of the Bay Trail, the Project would comply with the Bay Trail Design Guidelines. The Design Guidelines require multi-use paths to have a minimum horizontal clearance of 14 to 16 feet and a vertical clearance of 10 feet.⁸ The rehabilitated and extended Bay Trail would be 17-foot-wide and 10.5-feet in height, meeting these standards. The paths would include the required trail markings, signage, and lighting and would result in *less-than-significant* impacts.

Consistency with the C/CAG Congestion Management Plan

As shown in Table 3.5-19 (2018 East Campus Plus West Campus) in Section 3.5, Transportation, several Routes of Regional Significance under the CMP would be impacted by the Project. The Project would implement Mitigation Measure TR-8.1, which would make improvements to the 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 significant and unavoidable 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. The Project's impacts are considered transportation-related impacts and are fully evaluated in the Section 3.5, Transportation.

⁸ Association of Bay Area Governments, "Bay Trail Plan," June 30, 1999, website: <http://www.baytrail.org/baytrailplan.html>, accessed on September 16, 2011.

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<i>Land Use Element, adopted December 1, 1994 and amendments through December 7, 2010</i>		
<p><i>Policy I-E-4:</i> Any new or expanded office must include provisions for adequate off-street parking, mitigating traffic impacts, and developing effective alternatives to auto commuting, must adhere to acceptable architectural standards, and must protect adjacent residential uses from adverse impacts.</p>	<p>CONSISTENT. The Project would include a Transportation Demand Management (TDM) program to reduce the number of vehicles driving to/from the East Campus, which would attempt to mitigate traffic impacts and provide alternatives to auto commuting. No new construction would occur and, therefore, would be consistent with architectural standards and adjacent residential areas. Adequate off-street parking would be provided consistent with the zoning ordinance requirements and in compliance with previously permitted CDP.</p>	<p>CONSISTENT. The Project would attempt to mitigate traffic impacts by providing its employees with a TDM program and alternative modes of transportation including shuttles, vanpools, subsidized public transit, etc. In addition, the new development would undergo review by the Planning Commission regarding architectural control to ensure that design is not detrimental to the existing surroundings and matches with the character of the neighborhood. Adequate off-street parking would be provided consistent with the zoning ordinance.</p>
<p><i>Policy I-G-7:</i> Public access to the Bay for the scenic enjoyment of the open water, sloughs, and marshes shall be protected.</p>	<p>CONSISTENT. Public access to the Bay is currently provided via the BCDC Public Shoreline Trail along the perimeter of the East Campus. The BCDC Trail would not be affected by the Project. However, the Bay Trail runs to the southwest of the East Campus. Phase 1 of the Project would open the undercrossing at the intersection of Bayfront Expressway and Willow Road and would be accessible to users of the Bay Trail.</p>	<p>CONSISTENT. The Project would enhance the existing Bay Trail by providing an improved connection to the Bay Trail. The undercrossing that would be opened during Phase 1 would be enhanced under Phase 2 to provide lighting and security improvements, final grading of the ADA-compliant approaches, elevated walkway removal, and signing/stripping improvements.</p>
<p><i>Policy I-G-8:</i> The Bay, its shoreline, San Francisquito Creek, and other wildlife habitat and ecologically fragile areas shall be maintained and preserved to the maximum extent possible. The City shall work in cooperation with other jurisdictions to implement this policy.</p>	<p>NOT APPLICABLE. The Project at the East Campus would not result in physical changes.</p>	<p>CONSISTENT. The Project could affect wildlife habitat due to vegetation and building removal, as well as the construction of new buildings, at the West Campus. However, implementation of Mitigation Measures BR-1.1 and BR-4.1 would reduce the potentially significant impacts on bats and nesting migratory birds. In addition, Mitigation Measure BR-2.2 would reduce the potential for increased raptor predation on special-status marsh species.</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p><i>Policy I-G-10:</i> Extensive landscaping should be included in public and private development, including greater landscaping in large parking areas. Where appropriate, the City shall encourage placement of a portion of the required parking in landscape reserve until such time as the parking is needed. Plant material selection and landscape and irrigation design shall adhere to the City’s Water Efficient Landscaping Ordinance.</p>	<p>NOT APPLICABLE. Landscaping is already included at the East Campus and will not be altered with change to the CDP for the East Campus.</p>	<p>CONSISTENT. Landscaping would be provided throughout the West Campus in a manner that supports sustainability goals, encourages active use of the outdoors, and reflects the various adjacent native environments. The new landscaping would be developed pursuant to the City’s Water-Efficient Landscape Ordinance. Landscape features would include hardscape paving, groundcover, landscape buffers along the perimeter, and stormwater gardens.</p>
<p><i>Policy I-G-11:</i> Well-designed pedestrian facilities should be included in areas of intensive pedestrian activity.</p>	<p>CONSISTENT. Pedestrians traveling between the two campuses would use the tunnel under Bayfront Expressway and would generally access the East Campus buildings via the central courtyard. Designated pedestrian ways would be located adjacent to bike paths. The BCDC Shore Trail along the northern, eastern, and western perimeter of the East Campus would also continue to serve pedestrians.</p>	<p>CONSISTENT. Multi-modal travel at the West Campus and between campuses would be encouraged through the central courtyard, which would be designed to facilitate pedestrian and bicycle movement. The West Campus would be arranged around a common area, which would establish bicycle and pedestrian connections to the East Campus, the Belle Haven neighborhood, and the Bay Trail. In addition, the Bay Trail would continue to provide recreational opportunities along Bayfront Expressway and within an improved connection via the underground tunnel.</p>
<p>Goal I-H: To promote the development and maintenance of adequate public and quasi-public facilities and services to meet the needs of the City’s residents, businesses, workers, and visitors.</p>	<p>CONSISTENT. The Project would not develop or include public and quasi-public facilities. The BCDC Public Shore Trail along the perimeter would not be altered and would continue to be used by the public. However, Phase 1 of the Project would open the undercrossing at the intersection of Bayfront Expressway and Willow Road and would be accessible to users of the Bay Trail. Instead of crossing at-grade, the Bay Trail would travel in the undercrossing.</p>	<p>CONSISTENT. The Project would improve the public-access Bay Trail along the segment that crosses Bayfront Expressway. Phase 2 would enhance the undercrossing for improved accessibility and lighting. The Project would adhere to the design guidelines outlined in the Bay Trail Plan.</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<i>Policy I-H-1:</i> The community design should help conserve resources and minimize waste.	NOT APPLICABLE. The buildings at the East Campus already include design features to conserve resources and minimize waste. This would not be altered by the change to the CDP for the East Campus.	CONSISTENT. The West Campus would pursue LEED BD+C Gold certification. Several sustainability features to conserve resources and reduce waste would be employed including, but not limited to: energy efficient building design, water-efficient plumbing fixtures and landscaping, a construction waste management plan to recycle 75 percent of materials, reuse of existing paving, and indoor environmental quality measures.
<i>Policy I-H-2:</i> The use of water-conserving plumbing fixtures in all new public and private development shall be required.	NOT APPLICABLE. The buildings at the East Campus already include water-conserving fixtures and would not be altered by the change to the CDP for the East Campus.	CONSISTENT. The sustainability features at the West Campus would include water-efficient plumbing fixtures to reduce water consumption by at least 40 percent of California Title 24 Energy Code Standards baseline. In addition, water efficient landscape and irrigation design would be included to reduce potable water consumption by at least 50 percent of standard design CalGreen (the green building code) baseline.
<i>Policy I-H-3:</i> Plant material selection and landscape and irrigation design for City parks and other public facilities and in private developments shall adhere to the City’s Water Efficient Landscaping Ordinance.	NOT APPLICABLE. The landscaping within the interior courtyard at the East Campus is already consistent with the Water Efficient Landscaping Ordinance.	CONSISTENT. The new landscaping at the West Campus, which would include groundcover, landscape buffers, and stormwater gardens would be developed pursuant to the City’s Water Efficient Landscape Ordinance.
<i>Policy I-H-7:</i> The use of reclaimed water for landscaping and any other feasible uses shall be encouraged.	NOT APPLICABLE. The existing landscaping is water-efficient and uses irrigation to reduce water use.	CONSISTENT. No reclaimed water is available at the West Campus; however, an efficient irrigation design would minimize potable water use for irrigation.
<i>Policy I-H-9:</i> Urban development in areas with geological and earthquake hazards, flood hazards, and fire hazards shall be regulated in attempt to prevent loss of life, injury, and property damage.	CONSISTENT. The East Campus is already developed with buildings and, therefore, is not new development. The levee around the perimeter serves to reduce flood hazards and reduce risk to the additional employees at the East Campus.	CONSISTENT. Although there are seismic hazards, the Geotechnical Feasibility Evaluation for the West Campus concluded development of the Project is feasible provided the potential hazards are mitigated through design and construction. Adherence to federal, State, and local laws would reduce natural hazards. In addition, the Project would raise the site above the flood level to avoid flood hazards.

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<i>Policy I-H-11:</i> Buildings, objects, and sites of historic and/or cultural significance should be preserved.	NOT APPLICABLE. The East Campus does not include buildings of historical significance and no ground disturbance would occur.	CONSISTENT. The West Campus includes two buildings that would be demolished as part of the Project, but these are not considered historic. Ground disturbance would occur; however, implementation of Mitigation Measures CR-1.2, CR-3.1, and CR-4.1 would reduce impacts on archeological and paleontological resources or human remains.
<i>Policy I-H-12:</i> Street orientation, placement of buildings, and the use of shading should contribute to the energy efficiency of the community.	NOT APPLICABLE. The Project would not change street or building orientation at the East Campus.	CONSISTENT. The proposed sustainability features at the West Campus would attempt to reduce energy use. The features include, but are not limited to: heat island effect mitigation by shading more than 50 percent of parking and other hard surfaces with shade trees, building orientation on an east-west axis to capitalize on climate-responsive design benefits of south-facing façades, and floor plates that are conducive to daylighting strategies.
<i>Circulation and Transportation Element, December 1, 1994 and amendments through December 7, 2010</i>		
Goal II-A: To maintain a circulation system using the Roadway Classification system that will provide for the safe and efficient movement of people and goods throughout the City for residential and commercial purposes.	CONSISTENT. Safe and efficient movement of people within the City would be enhanced with the opening of the undercrossing at the intersection of Bayfront Expressway and Willow Road, which would allow bicyclists, pedestrians, and East Campus employees to easily access offsite areas. This undercrossing would connect the East Campus with the Bay Trail and the residential and commercial portions of the Belle Haven neighborhood. The bicycle improvements incorporated as part of the Project are expected to significantly improve bicycle access to the East Campus.	CONSISTENT. Safe and efficient movement of people within the City would be improved with the proposed enhancements to the undercrossing at the intersection of Bayfront Expressway and Willow Road, which would allow access to bicyclists, pedestrians, and the intra-campus people-mover. This undercrossing would connect the East Campus with the Bay Trail and the residential and commercial portions of the Belle Haven neighborhood. The bicycle improvements incorporated as part of the Project are expected to significantly improve bicycle access to the West Campus.

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p><i>Policy II-A-1:</i> Level of Service D (40 seconds average stopped delay per vehicle) or better shall be maintained at all City-controlled signalized intersection during peak hours, except at the intersection of Ravenswood Avenue and Middlefield Road and at intersections along Willow Road from Middlefield Road to US 101.</p>	<p>CONSISTENT. The Cumulative 2025 East Campus Only Condition (worst-case scenario) in the AM and PM peak hours would result in impacts at the intersection of two City-controlled arterials. The addition of Project-generated peak hour traffic would result in an increase in delay at the critical movements at the intersection of Willow Road and Middlefield Road, resulting in a potentially significant impact at this location. However, this intersection is exempt from Policy II-A-1.</p>	<p>CONSISTENT. The Cumulative 2025 East Campus and West Campus Condition (worst-case scenario) in the AM and PM peak hours would result in an increase in delay at the critical movements at the intersection of Willow Road and Middlefield Road resulting in a potentially significant impact at this location. However, this intersection is exempt from Policy II-A-1.</p>
<p><i>Policy II-A-2:</i> The City should attempt to achieve and maintain average travel speeds of 14 miles per hour (Level of Service D) or better on El Camino Real and other arterial roadways controlled by the State and at 46 miles per hour (Level of Service D) or better on US 101. The City shall work with Caltrans to achieve and maintain average travel speeds and intersection level of service consistent with standards established by the San Mateo County Congestion Management Plan.</p>	<p>INCONSISTENT. Under Cumulative East Campus Only Condition, the following Routes of Regional Significance would be potentially impacted by the Project: US 101 North of Marsh Road, US 101 between Willow Road and University Avenue, US 101 South of University Avenue.</p> <p>To the extent feasible, the City will work with Caltrans to maintain acceptable levels of service at these locations, but as discussed in Section 3.5, these impacts are considered significant and unavoidable.</p>	<p>INCONSISTENT. Under the Cumulative East Campus and West Campus Condition, the following Routes of Regional Significance would be potentially impacted by the Project: US 101 North of Marsh Road, US 101 between Willow Road and University Avenue, and US 101 South of University Avenue</p> <p>To the extent feasible, the City will work with Caltrans to maintain acceptable levels of service at these locations, but as discussed in Section 3.5, these impacts are considered significant and unavoidable.</p>
<p><i>Policy II-A-3:</i> The City shall work with Caltrans to ensure that average stopped delay on local approaches to State-controlled signalized intersections does not exceed Level of Service E (60 Seconds per vehicle).</p>	<p>INCONSISTENT. In the AM peak hour, at the State-controlled intersection of Willow Road and Newbridge Street, which currently operates at LOS E, the Project-related traffic would increase delay at the local approaches causing a potentially significant impact at this intersection.</p> <p>In the PM peak hour, at the State-controlled intersections of Marsh Road and US 101 northbound ramps and University Avenue and Bayfront Expressway, which currently operate at LOS F, the Project-related traffic would increase intersection delay by greater than four seconds causing an impact at this intersection.</p>	<p>INCONSISTENT. In the AM peak hour, at the State-controlled intersections of Marsh Road and US 101 northbound ramps, the Project-related traffic would increase intersection level of service from LOS D to LOS F, resulting in a potentially significant impact.</p> <p>In the PM peak hour, at the State-controlled intersection of University Avenue and Bayfront Expressway, which would operate at LOS F, the Project-related traffic would increase intersection delay by greater than four seconds causing a potentially significant impact at this intersection.</p> <p>Although the City will work with Caltrans to reduce Project impacts, these impacts would still be significant and unavoidable.</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
	Although the City will work with Caltrans to reduce Project impacts, these impacts would still be significant and unavoidable.	
<i>Policy II-A-4:</i> New development shall be restricted or required to implement mitigation measures in order to maintain the levels of service and travel speeds specified in Policies II-A-1 through II-A-3.	CONSISTENT. As discussed in Section 3.5, Transportation, the Project at the East Campus would result in several significant and unavoidable impacts to the levels of service and travel speeds within the City. Nonetheless, the Project would implement all feasible mitigation, as listed in Section 3.5 of this Draft EIR.	CONSISTENT. As discussed in Section 3.5, Transportation, the Project at the West Campus would result in several significant and unavoidable impacts to the levels of service and travel speeds within the City. Nonetheless, the Project would implement all feasible mitigation, as listed in Section 3.5 of this Draft EIR.
<i>Policy II-A-8:</i> New developments shall be reviewed for its potential to generate significant traffic volumes on local streets in residential areas and shall be required to mitigate potential significant traffic problems.	CONSISTENT. Traffic and circulation impacts for the Project are evaluated in Section 3.5, Transportation, and mitigation is included where necessary to address traffic impacts. Because the Project is located in a developed commercial area and is not accessed through residential neighborhoods, the increase of traffic as a result of the East Campus would result in significant impacts. Where feasible, mitigation measures have been identified, but impacts would remain significant and unavoidable.	CONSISTENT. Traffic and circulation impacts for the Project are evaluated in Section 3.5, Transportation, and mitigation is included where necessary to address traffic impacts. Because the Project is located in a developed commercial area and is not accessed through residential neighborhoods, the increase of traffic as a result of the West Campus would result in significant impacts. Where feasible, mitigation measures have been identified, but impacts would remain significant and unavoidable.
Goal II-B: To promote the use of public transit.	CONSISTENT. Currently, there are no public transit stops within the vicinity of the East Campus. However, the TDM program would provide shuttle service, which would connect the campus to public transit stations. In addition, subsidized public transit passes would be provided to employees who use public transit as a commuting option.	CONSISTENT. Currently, there are no public transit stops within the vicinity of the West Campus. However, the Project would provide shuttle service, which would connect the campus to public transit stations. Other incentives for using public transit as a commuting option would likely be included in the TDM program.
<i>Policy II-B-1:</i> The City shall consider transit modes in the design of transportation improvements and the review and approval of development projects.	CONSISTENT. The Project includes a TDM program that includes transit options and alternative travel modes to promote transit, carpooling, bicycling, and walking.	CONSISTENT. The West Campus would include a TDM program, which, similar to the East Campus TDM program, would likely include transit options and alternative travel modes to promote transit, carpooling, bicycling, and walking.

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p>Goal II-D: To promote the safe use of a bicycle as a commute alternative and for recreation.</p>	<p>CONSISTENT. The TDM program at the East Campus would promote bicycling as a commute alternative. Several incentives would be provided including bicycle parking/storage, subsidies, bicycle-share programs, and showers/changing rooms. In addition, the East Campus would include a bicycle/pedestrian route within the interior courtyard, linking together the buildings. The route would continue to the West Campus via the tunnel under Bayfront Expressway. The designated route would provide markings for a two-way bike path immediately adjacent to the pedestrian way.</p>	<p>CONSISTENT. A TDM program is proposed as part of the sustainability features at the West Campus. It is expected that the TDM program would support bicycling as a commute alternative, similar to the East Campus TDM program. The West Campus would provide bicycle parking/storage facilities and would include a bicycle/pedestrian route within the interior common area that would connect the five office buildings, the amenities structures, and the parking structure. The route would also connect to the Bayfront Expressway undercrossing to provide access to the East Campus and the Bay Trail.</p>
<p><i>Policy II-D-4:</i> The City shall require new commercial and industrial development to provide secure bicycle storage facilities on-site.</p>	<p>CONSISTENT. The TDM program at the East Campus includes bicycle parking, with short-term racks, long-term lockers, and storage facilities.</p>	<p>CONSISTENT. The West Campus would include areas for bicycle storage and related amenities in Buildings 4 and 5. Building 4 would include 7,650 sf for bicycle parking/storage and bicycle-related amenities, while Building 5 would not have parking/storage, but would have bicycle-related amenities.</p>
<p>Goal II-E: To promote walking as a commute alternative and for short trips.</p>	<p>CONSISTENT. The TDM program at the East Campus includes subsidies for employees who walk or bike to work. Walking will also be promoted through the proposed onsite pedestrian linkages.</p>	<p>CONSISTENT. As part of the West Campus sustainability features, a TDM program would be offered to the employees. The TDM program could include subsidies for employees who walk to work, similar to the East Campus. Walking would also be promoted through the proposed onsite pedestrian linkages.</p>
<p><i>Policy II-E-1:</i> The City shall require all new development to incorporate safe and attractive pedestrian facilities.</p>	<p>CONSISTENT. Pedestrians traveling between the two campuses would use the tunnel under Bayfront Expressway and would generally access the East Campus buildings via the central courtyard. Designated pedestrian ways would be located adjacent to bike paths. In addition, the Bay Trail would continue to provide recreational opportunities along Bayfront Expressway and within an improved connection via the underground tunnel. The BCDC Shore Trail along the northern, eastern, and western</p>	<p>CONSISTENT. Multi-modal travel at the West Campus and between campuses would be encouraged through the central courtyard, which would be designed to facilitate pedestrian and bicycle movement. The West Campus would be arranged around a common area, which would establish bicycle and pedestrian connections to the East Campus, the Belle Haven neighborhood, and the Bay Trail.</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p><i>Policy II-E-2:</i> The City shall endeavor to maintain safe sidewalks and walkways where existing within the public right of way.</p>	<p>perimeter of the East Campus would also continue to serve pedestrians.</p> <p>CONSISTENT. Phase 1 of the Project would open the undercrossing at the intersection of Bayfront Expressway and Willow Road and would be accessible to users of the Bay Trail.</p>	<p>CONSISTENT. The Project at the West Campus proposes to provide a new public right-of-way sidewalk along Willow Road, from Bayfront Expressway to the Dumbarton Rail Corridor. Currently, no sidewalk exists in this segment; therefore, the Project would improve pedestrian connectivity in this area. Phase 2 of the Project would also implement several safety features in the undercrossing such as lighting and pavement striping.</p>
<p><i>Policy II-E-3:</i> Appropriate traffic control shall be provided for pedestrians at intersections.</p>	<p>CONSISTENT. Phase 1 of the Project would close the at-grade crosswalk at Bayfront Expressway and Willow Road and would open the existing undercrossing to allow for unimpeded pedestrian movement. Subject to Caltrans approval.</p>	<p>CONSISTENT. The Project at the West Campus would enhance the pedestrian undercrossing with improved lighting and pavement striping. Currently, pedestrians, including those using the Bay Trail must cross the six-lane Bayfront Expressway. The Project, with Caltrans' approval, would remove the at-grade crosswalk and divert pedestrian traffic to the undercrossing.</p>
<p><i>Noise Element, adopted November 14, 1978</i></p>		
<p>Goal: To prevent the escalation of noise levels in areas where noise-sensitive uses are located.</p>	<p>INCONSISTENT. The on-site activity at the East Campus would not significantly increase the exposure of people to noise in excess of the existing General Plan standards because it would not result in new noise sources. The noise sources associated with operations at the East Campus, including HVAC systems, parking lots, emergency generator testing, and use of the existing sport field and basketball court would continue to operate as they do under existing conditions. The Project would not result in any new additional noise sources other than what is associated with the increase in employees.</p> <p>The exterior noise levels on the East Campus would incrementally increase, because with implementation of the Project, the East Campus would accommodate</p>	<p>INCONSISTENT. The West Campus would result in a human activity noise level increase because the West Campus is currently unoccupied. Noise from human activity would mostly occur during the beginning and end of the work day and during lunch hours. The outdoor common areas and amenities provided on the West Campus are intended to encourage informal (and, on occasion, formal) gatherings throughout the day. Human activity on the West Campus would not exceed 60 dBA at the nearest noise sensitive land use and would not exceed the Noise Ordinance limit for residential land uses or the General Plan compatibility standard. Noise from the increase in human activity would not be audible over roadway noise at sites near busy roadways and the increase in human activity</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
	<p>an additional approximately 3,000 employees over existing conditions. Noise generating activity would mostly occur during the beginning and end of the work day and during lunch hours. Exterior activity and noise levels would be minimal when most employees are inside working and outside of working hours.</p> <p>Residential uses and schools in the Project vicinity are currently exposed to noise levels in excess of the City standards. The addition of Project-related traffic would further increase traffic noise levels above the City's standards for residential uses. Particularly, the Project would result in significant incremental increases to noise levels at identified sensitive uses on Marsh Road and Willow Road. No feasible mitigation measure is available to reduce traffic-related noise exposure.</p>	<p>would not expose persons to noise in excess of standards.</p> <p>However, the West Campus is adjacent to noise-sensitive land uses such as the Belle Haven neighborhood and schools such as Belle Haven Elementary School and Mid-Peninsula High School. The addition of Project-related traffic would further increase traffic noise levels above the City's standards for residential uses. Particularly, the Project would result in significant incremental increases to noise levels at identified sensitive uses on Marsh Road and Willow Road. No feasible mitigation measure is available to reduce traffic-related noise exposure.</p> <p>In addition, the West Campus could exceed the Noise Ordinance standards as a result of emergency generator testing if noise attenuation is not installed. Mitigation Measure NO-1.1 and NO-1.2 would reduce emergency generator noise to less-than-significant levels. Construction activities would also temporarily increase noise. Implementation of Mitigation Measures NO-4.1 and NO-4.2 would reduce construction noise impacts.</p>
<p><i>Policy:</i> Analyze in detail the potential noise impacts of any actions that the City may take or act upon which could significantly alter noise level in the community.</p>	<p>CONSISTENT. Section 3.8, Noise, of this Draft EIR analyzes noise impacts as a result of the East Campus in detail. Where applicable and feasible, Section 3.8 includes mitigation measures to reduce the potential noise impacts.</p>	<p>CONSISTENT. Section 3.8, Noise, of this Draft EIR analyzes noise impacts as a result of the West Campus in detail. Where applicable and feasible, Section 3.8 includes mitigation measures to reduce the potential noise impacts.</p>
<p><i>Policy:</i> Encourage creative solutions when potential conflicts between noise levels and land use arise.</p>	<p>INCONSISTENT. Noise levels and land uses could conflict due to the increase in traffic in the area. 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.</p>	<p>INCONSISTENT. Noise levels and land uses could conflict due to new emergency generator testing, construction, and the increase in traffic in the area. Mitigation Measure NO-1.1 and NO-1.2 would reduce emergency generator and Mitigation Measures NO-4.1 and NO-4.2 would reduce construction noise impacts. However, no feasible mitigation measures would reduce the noise impacts associated with increases in traffic to a less-than-significant level. Although the</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<i>Policy:</i> Control unnecessary, excessive, and annoying noises within the City where not preempted by federal or State control.	CONSISTENT. Noise increases due to the additional employees at the East Campus would not be significant, with the exception of traffic noise, as discussed above. The Project would not generate unnecessary and excessive noise, but would generate standard noises from business land uses.	Project includes a TDM program as part of mitigation (see Section 3.5, Transportation), it may not reduce trips enough to reduce the Project’s contribution to traffic noise to a less-than-significant level. CONSISTENT. Noise increases due to the additional employees at the East Campus would not be significant, with the exception of traffic noise, as discussed above. The Project would not generate unnecessary and excessive noise, but would generate standard noises from business land uses.
<i>Policy:</i> Enforce applicable federal and State laws.	CONSISTENT. The East Campus would be required to comply with applicable federal and State laws and regulations with regard to noise impacts.	CONSISTENT. The West Campus would be required to comply with applicable federal and State laws and regulations with regard to noise impacts.
<i>Seismic Safety and Safety Element, adopted June 22, 1976</i>		
<i>Policy 11:</i> Require submission of geologic, seismic, and/or soils reports prior to taking action on development proposals for locations identified as potential problem areas in this element.	NOT APPLICABLE. Since no ground disturbance would occur at the East Campus, a geologic, seismic, and/or soil report is not required.	CONSISTENT. Cornerstone Earth Group prepared a Geotechnical Feasibility Evaluation for the West Campus in November 2010.
<i>Policy 12:</i> Prohibit structural development in areas where hazards cannot be mitigated by accepted methods to a level of acceptable risk.	NOT APPLICABLE. The East Campus is already developed with existing structures; therefore, the Project would not construct buildings in an area where hazards cannot be mitigated.	CONSISTENT. The West Campus is not in areas where hazards cannot be mitigated by accepted methods to a level of acceptable risk. The main hazard at the West Campus is the capped area consisting of deep PCB-contaminated soil. In addition, previously unidentified hazards could be unearthed during construction. Implementation of Mitigation Measures HM-2.1 through HM-2.9 would reduce the impacts of soil and groundwater contamination to a less-than-significant level.
<i>Policy 13:</i> Require that all new development incorporate adequate hazard mitigation measures to reduce risks from natural hazards.	NOT APPLICABLE. The East Campus is already developed with buildings and, therefore, is not considered new development. The levee around the perimeter serves to reduce flood hazards.	CONSISTENT. Although there are seismic hazards, the Geotechnical Feasibility Evaluation for the West Campus concluded development of the Project is feasible provided the potential hazards are mitigated through design and construction. Adherence to federal, State, and local laws would reduce natural

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p><u>Implementation Program 15:</u> Require that potential geologic, seismic, soils, and/or hydrologic problems confronting public or private development be thoroughly investigated at the earliest stages of the design process, and that these topics be comprehensively evaluated in the Environmental Impact Report for each project, by persons of competent geologic expertise.</p>	<p>CONSISTENT. The potential geologic, seismic, soils, and/or hydrologic problems at the East Campus have been investigated and evaluated in this Draft EIR. Geologic impacts are discussed in Section 3.11 of this document and hydrologic issues are discussed in Section 3.12.</p>	<p>hazards. In addition, the Project would raise the site above the flood level to avoid flood hazards.</p> <p>CONSISTENT. The potential geologic, seismic, soils, and/or hydrologic problems at the West Campus have been investigated and evaluated in this Draft EIR. Geologic impacts are discussed in Section 3.11 of this document and hydrologic issues are discussed in Section 3.12.</p>
<p><u>Implementation Program 16:</u> Require that all private roads be designed to allow unrestricted access to all emergency vehicles as a prerequisite to the granting of permits and approvals for construction.</p>	<p>NOT APPLICABLE. The existing interior road system at the East Campus, which loops around the surface parking lot, will remain the same with implementation of the Project. Currently, emergency vehicles can access the site and will continue to have full access.</p>	<p>CONSISTENT. Emergency vehicle access at the West Campus would be provided along the outside perimeter of the office buildings with access to the common area from the eastern end of the campus. Each building would be accessible to emergency vehicles via the perimeter roadway. In addition to the main entry and the secondary access points, emergency vehicles would be able to access the West Campus via an emergency access easement through the adjacent TE Connectivity property, to the west of the parking structure. Staging and turn-out areas for emergency vehicles would be located throughout the site and the design of the roundabout island to the southeast of Building 4 would meet the requirements established by the Fire Code, based on the size of the fire department's apparatus.</p>
<p><u>Implementation Program 47:</u> Monitor manufacturing, storage, transportation, and use of hazardous and/or explosive materials.</p>	<p>CONSISTENT. Operation at the East Campus would involve the use of hazardous materials-containing products. However, these products would be used in moderation, consistent with other office developments in the area, and would comply with federal, State, and local regulations.</p>	<p>CONSISTENT. Construction and operation of the Project at the West Campus would involve the use of hazardous materials-containing products. However, these products would be used in moderation, consistent with other office developments in the area, and would comply with federal, State, and local regulations.</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<i>Policy 48:</i> Consider the threat of tsunamis in the planning and management of bayland areas.	CONSISTENT. As discussed in Section 3.12, Hydrology and Water Quality, the potential for tsunami is low according to the California Emergency Management Agency (Cal EMA).	CONSISTENT. As discussed in Section 3.12, Hydrology and Water Quality, due the location of Bayfront Expressway in between the site and the Bay, the West Campus is not vulnerable to the threat of tsunamis.
<u>Implementation Policy 51:</u> Require that new structures in potential inundation areas either be elevated above the inundation level, or utilize waterproof hardware.	NOT APPLICABLE. No new structures are proposed on the East Campus.	CONSISTENT. As discussed in Section 3.12, Hydrology and Water Quality, development on the West Campus involves placement of fill to raise the site above the Base Flood Elevation. Mitigation Measures HY-4.1 and HY-4.2 would ensure that the West Campus is further protected from inundation related to sea level rise through infrastructure protection and stormwater improvements.
<i>Policy 52:</i> Consider potential risks from inundation in the development approval process.	CONSISTENT. No new development would occur on the East Campus; however, the Project at the East Campus would expose additional people to the risk from inundation. However, as explained in Section 3.12, Hydrology and Water Quality, this would not be significant.	CONSISTENT. As discussed in Section 3.12, Hydrology and Water Quality, development on the West Campus involves placement of fill to raise the site above the Base Flood Elevation. Mitigation Measures HY-4.1 and HY-4.2 would ensure that the West Campus is further protected from inundation related to sea level rise through infrastructure protection and stormwater improvements.
<i>Policy 57:</i> Encourage City-Fire District coordination in the planning process.	CONSISTENT. The City has coordinated with the Menlo Park Fire Protection District (MPFD) regarding the increase in employees at the East Campus. The input from the MPFD is reflected in Section 3.15, Utilities and Service Systems, of this Draft EIR.	CONSISTENT. The City has coordinated with the MPFD regarding the new development at the West Campus. The input from the MPFD is reflected on the plans and in Section 3.15 of this Draft EIR.
<i>Open Space and Conservation Element, adopted June 26, 1973</i>		
Goal 2: To encourage the enhancement of boulevards, plazas, and other urban open spaces in residential, commercial, and industrial neighborhoods.	CONSISTENT. The interior courtyard at the East Campus would be enhanced and would contain plazas that would serve as urban open space for the employees.	CONSISTENT. The common area between the five office buildings would include hardscaping and courtyards to create an urban open space. Pathways within the campus would provide for interior circulation.

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
Goal 3: To retain the unique appeal and visual amenities of the City’s Baylands.	NOT APPLICABLE. The East Campus would not include exterior changes from existing conditions (with the exception of minimal signage). As such, views of the Bay would not be altered.	CONSISTENT. Although it is unknown at this time what types of façade articulation and architectural design will be used for the buildings, it is expected that they will be harmonious with each other and their surroundings. The buildings would likely develop an architectural language of massing, materiality, transparency of façade, and interconnectivity of buildings that links the campus visually to its broader context. In addition, the Project Sponsor would be required to adhere to the City’s architectural review, as outlined in Section 16.68.020 of the Municipal Code.
Goal 4: To conserve in a natural state the bay and its shoreline as they are valuable natural resources.	NOT APPLICABLE. The Project would not impact the adjacent Bay and shoreline as no exterior development or ground disturbance would occur.	CONSISTENT. The West Campus would include construction of a new office campus, significantly altering the site. However, it is separated from the Bay by the six-lane Bayfront Expressway and, therefore, would not have direct impacts on the Bay.
Goal 7: To protect and conserve open areas rich in wildlife or of a fragile ecological nature.	NOT APPLICABLE. The East Campus is directly adjacent to the Bay, salt ponds, and marshes, which feature diverse wildlife. However, no physical changes would occur.	CONSISTENT. The Project could affect wildlife habitat due to vegetation and building removal, as well as the construction of new buildings, at the West Campus. However, implementation of Mitigation Measures BR-1.1 and BR-4.1 would reduce the potentially significant impacts on bats and nesting migratory birds. The Project would also include new perching or nesting opportunities for predatory birds, providing them with a vantage point to prey on special-status species in the adjacent salt marshes. Nonetheless, implementation of Mitigation Measure BR-2.2 would reduce the potential for increased raptor predation.
Goal 8: To preserve historic building, objects, and sites of historic and cultural significance.	NOT APPLICABLE. The East Campus does not include buildings of historical significance and no ground disturbance would occur.	CONSISTENT. The West Campus includes two buildings that would be demolished as part of the Project, but these are not considered historical. Ground disturbance would occur; however, implementation of Mitigation Measures CR-1.2, CR-3.1, and CR-4.1 would reduce impacts on

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p>Goal 12: To enhance and preserve air quality in accord with regional standards.</p>	<p>INCONSISTENT. Operation of the East Campus would create new area and mobile sources of air pollutants 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 East Campus operations would exceed BAAQMD’s significance thresholds. There are no feasible mitigation measures that would reduce these emissions.</p>	<p>archeological and paleontological resources or human remains.</p> <p>INCONSISTENT. Operation of the West Campus would create new area and mobile sources of air pollutants 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. There are no feasible mitigation measures that would reduce these emissions.</p>
<p><i>Policy 2:</i> Include landscaping and plazas on public and private lands and well-designed pedestrian facilities in areas of intensive pedestrian activity. Require greater landscaping in extensive parking areas.</p>	<p>NOT APPLICABLE. The interior courtyard at the East Campus includes pedestrian linkages between the buildings. The parking lot includes landscaping.</p>	<p>CONSISTENT. The entire West Campus would include new landscaping and hardscape for use by the employees. Pedestrian connectors would be located between the new buildings and would link to the East Campus. Parking areas, however, would be included at the parking garage and in the basements of Buildings 4 and 5.</p>
<p><i>Policy 4:</i> Develop hiking and biking paths consistent with the recommendations of the proposed bikeway system.</p>	<p>CONSISTENT. The East Campus includes a bicycle/pedestrian route within the interior courtyard, linking together the buildings. Under Phase 1, the undercrossing would be open to pedestrians and cyclists.</p>	<p>CONSISTENT. The West Campus would include a bicycle/pedestrian route within the interior common area that would connect the five office buildings, the amenities structures, and the parking structure. The route would also connect to the Bayfront Expressway undercrossing to provide access to the East Campus and the Bay Trail.</p>
<p><i>Policy 5:</i> Provide public access to the bay for the scenic enjoyment of the open water, the sloughs, and the marshes.</p>	<p>CONSISTENT. The East Campus would not restrict public access to the Bay shoreline. The BCDC Public Shoreline Trail would continue to be accessible to the public for scenic enjoyment of the open water, salt ponds, and the marshes. The Bayfront Expressway undercrossing would be opened during Phase 1 for users of the Bay Trail.</p>	<p>CONSISTENT. The Project at the West Campus would allow for public enjoyment of the Bay. The Project would improve the segment of the Bay Trail that crosses Bayfront Expressway by allowing public access in the undercrossing and enhancing the connection with features such as lighting, security, and pavement striping.</p>

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<i>Policy 6:</i> Protect conservation and scenic areas, historic and cultural sites from deterioration or destruction by vandalism, private actions or public actions.	NOT APPLICABLE. No new development would occur at the East Campus.	CONSISTENT. While the Project would result in additional height, bulk, and massing that would interrupt existing views of the Santa Cruz Mountain Range, the increase of development would represent a small portion of the overall vista. Views from all of scenic viewpoints generally tend to focus away from the West Campus and more towards the north, where views encompass panoramic and expansive scenery of the marsh, salt ponds, Bay, and the East Bay Hills. As such, the proposed development would not impact scenic areas. Implementation of Mitigation Measures CR-1.2, CR-3.1, and CR-4.1 would reduce impacts on archeological and paleontological resources or human remains.
<i>Policy 7:</i> Preserve and protect water, water-related areas, wildlife and plant habitat areas to maintain and enhance their open-space and conservation purposes.	CONSISTENT. The East Campus is directly adjacent to the Bay, salt ponds, and marshes, which feature wildlife and plant habitats. However, no construction would occur.	CONSISTENT. The Project at the West Campus would not create runoff that would be discharged directly into the Bay, which could impact water resources. However, the Project could affect wildlife habitat due to vegetation and building removal, as well as the construction of new buildings, at the West Campus. However, implementation of Mitigation Measures BR-1.1 and BR-4.1 would reduce the potentially significant impacts on bats and nesting migratory birds. The Project would also include new perching or nesting opportunities for predatory birds, providing them with a vantage point to prey on special-status species in the adjacent salt marshes. Nonetheless, implementation of Mitigation Measure BR-2.2 would reduce the potential for increased raptor predation.
<i>Policy 9:</i> Discourage, and in some instance prohibit, urban development in hazardous area. These hazards include geologic and earthquake hazards, flood hazards, and fire hazards.	CONSISTENT. The East Campus is already developed with buildings and, therefore, is not considered new development. The levee around the perimeter serves to reduce flood hazards for the increase of employees exposed at the site.	CONSISTENT. Although there are seismic hazards, the Geotechnical Feasibility Evaluation for the West Campus concluded development of the Project is feasible provided the potential hazards are mitigated through design and construction. Adherence to federal, State, and local laws would reduce natural

**Table 3.2-2
Comparison of Project to General Plan Goals and Policies**

General Plan Goal/Policy	East Campus	West Campus
<p><u>Action Program 8:</u> The City will continue architectural and site review for all development (except single family dwelling) within the City since this process has improved site planning and building design.</p>	<p>CONSISTENT. The Project at the East Campus would not change the exterior appearance and, therefore, would not require architectural and site review.</p>	<p>hazards. In addition, the Project would raise the site above the flood level to avoid flood hazards.</p> <p>CONSISTENT. Per Section 16.68.020 of the Municipal Code, any proposal for a new structure, addition to an existing structure, or change to the exterior of a structure that requires a building permit requires that the Planning Commission conduct architectural control review with regard to the following findings: general appearance of the structures is consistent with the character of the neighborhood, the development would not be detrimental to the harmonious growth of the City, the development would not impair the desirability of the neighborhood, and the development would provide adequate parking. The Project would be required to adhere to all of these requirements.</p>

Sources: City of Menlo Park General Plan; Atkins, 2011.

Cumulative Impacts

Because land use policies are regional in scope, the geographic context for the cumulative impacts associated with land use issues is broader than the City and would include regional development under the jurisdiction of the ABAG. Past, present, and future cumulative development within this geographic context assumes full build-out of the General Plan of these nine counties, as well as development envisioned in the Land Use Element of the General Plan, including the Tier 1 and Tier 2 cumulative projects identified in Section 3.1 (Introduction to the Environmental Analysis). Cumulative impacts are only addressed for those thresholds that have a Project-related impact, whether it is less than significant, significant, or significant and unavoidable. If the Project results in no impact under a particular threshold, it cannot contribute to any cumulative impact, and no analysis is required. This cumulative analysis examines the effects of the Project in the relevant geographic area, in combination with other current projects, probable future projects, and projected future growth.

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)

Tier 1/Tier 2

As noted, CEQA requires that an EIR consider whether a proposed project may conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental impact. This environmental determination differs from the larger policy determination of whether a proposed project is consistent with a jurisdiction's general plan. Regional growth in general is reviewed for consistency with adopted land use plans and policies by the individual cities and counties in the geographic context in accordance with the requirements of CEQA, the State Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. This process applies to all cumulative projects identified in Table 3.1-2. Analysis of project consistency with land use policies or regulations adopted for the purpose of avoiding or mitigating an environmental impact is similarly evaluated for each individual project and would be addressed in the analysis for each specific resource area. For example, if an individual project resulted in a loss of trees protected by a tree ordinance, this would be addressed in the biological resources section of that project's EIR or other environmental document. The environmental evaluation for this individual project would also include an analysis of the loss of protected trees on a cumulative basis.

Because consistency with land use plans and policies is inherently a project-specific issue, and each jurisdiction would decide on project consistency on the project level, there would be no cumulative impact as a result of cumulative development in the ABAG region. As discussed above, implementation of the Project at both the East Campus and West Campus

would be generally consistent with the General Plan, Municipal Codes, and BCDC, ABAG, and C/CAG plans. For this reason, the Project's cumulative impact would be *less than significant*.