

Section 5

Alternatives

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) require that an Environmental Impact Report (EIR) “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6(a)). If mitigation measures or a feasible project alternative that would meet most of the basic project objectives would substantially lessen the significant environmental effects of a proposed project, then the lead agency should not approve the proposed project unless it determines that specific technological, economic, social, or other considerations make the mitigation measures and the project alternative infeasible (PRC Section 21002, CEQA Guidelines Section 15091(a)(3)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency’s determination (CEQA Guidelines Section 15126.6(c)).

One of the alternatives that must be analyzed is the “No Project” Alternative. The “No Project” analysis must discuss the existing conditions at the time the Notice of Preparation (NOP) is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (CEQA Guidelines Section 15126.6(e)(2)). Therefore, pursuant with the CEQA Guidelines, this section discusses and analyzes a No Project Alternative.

In addition to the No Project Alternative, this section provides an additional alternative (Reduced Intensity Alternative) to the Project and analyzes the impacts of each. This section later provides a description of the alternatives and compares the significant impacts of the alternatives to the significant environmental impacts of the Project as proposed.

5.2 DESCRIPTION OF ALTERNATIVES CONSIDERED

As discussed in Section 2, Project Description, the Project Sponsor has identified the following Project objectives that are relevant to the physical impacts considered in this document:

- Establish Facebook’s permanent headquarters in the City.
- Develop an integrated, multi-phased campus that is sized to accommodate Facebook’s long-term growth potential.
- Maximize the opportunity for its employees and vendors to interact and meet, both formally and informally.

- Provide multiple transportation options to employees to minimize traffic and greenhouse gas emissions.
- Create a pedestrian-friendly, bicycle- and transit-enabled campus, which encourages reduction in private vehicle trips and use of transit solutions.
- Increase connectivity of neighborhood paths and bikeways, and promote access to the Bay Trail from the Belle Haven neighborhood.
- Minimize traffic flow to and from Bayfront Expressway and Willow Road.
- Redevelop idle, “brownfield” property at the West Campus to accommodate flexible work space for expansion of operations.
- Rejuvenate the industrial district along the Willow Road corridor near the Bayfront Expressway.
- Respect the campus surroundings and residential neighbors through appropriate building height, siting, and massing.
- Increase occupancy of outdated, underutilized buildings on the East Campus with employees who rely on robust transportation alternatives consistent with the Project’s sustainability goals, which seek to avoid sprawl.
- Use “green” design practices and methods that promote energy efficiency and resource conservation.
- Create a pedestrian-friendly environment that enhances connectivity between the north side and south side of Bayfront Expressway, including use of existing tunnel.
- Provide new and diverse employment opportunities for the City’s residents.
- Generate revenue for the City and other public entities.

As stated above, the alternatives to a proposed project are meant to feasibly attain most of the basic project objectives while avoiding or substantially lessening its significant impacts. Significant and unavoidable Project-specific and cumulative impacts from the Project include:

East Campus

- **Impacts to Intersections.** Increases in traffic associated with the Project under the Near Term 2015 East Campus Only Condition would result in increased delays at the following intersections: Marsh and Middlefield Road; Willow Road and Bayfront Expressway; University Avenue and Bayfront Expressway; Bayfront Expressway and Chrysler Drive; and Middlefield Road and Lytton Avenue. (TR-1)
- **Impacts on Roadway Segments.** Increases in traffic associated with the Project under the Near Term 2015 East Campus Only Condition would result in significantly increased ADT volumes on the following roadway segments: Marsh Road between Bay Road and the railroad tracks; Willow Road between Durham Street and Chester Street; Willow Road between Nash

Avenue and Blackburn Avenue; and Middlefield Road between Linfield Drive and Survey Lane. (TR-2)

- **Impacts to Routes of Regional Significance.** Increases in traffic associated with the Project under Near Term 2015 East Campus Only Condition would result in significant impacts to the following Routes of Regional Significance: SR 84 between US 101 and Willow Road; SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and County Line; US 101 north of Marsh Road; US 101 between Marsh Road and Willow Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (TR-3)
- **Violation of any Air Quality Standard.** Operation of the East Campus would create NOx emissions that would exceed BAAQMD's significance thresholds. (AQ-2)
- **Substantial Permanent Increase in Noise Level.** Operation of the Project at the East Campus would result in a substantial permanent ambient noise level increase in the Project vicinity due to an increase in traffic. (NO-3)

West Campus

- **Violation of any Air Quality Standard.** Operation of the West Campus would create NOx emissions that would exceed BAAQMD's significance thresholds. (AQ-2)
- **Temporary Increases in Ambient Noise Level.** The West Campus would result in levels of vibration that would disrupt operations at nearby vibration-sensitive land uses. (NO-2)
- **Substantial Permanent Increase in Noise Level.** Operation of the Project at the West Campus would result in a substantial permanent ambient noise level increase in the Project vicinity due to an increase in traffic. (NO-3)

Total Project

- **Impacts to Intersections.** Increases in traffic associated with the Project under the Near Term 2018 East Campus and West Campus Condition would result in increased delays at the following intersections: Marsh Road and Bayfront Expressway; Marsh Road and US 101 NB Ramps; Willow Road and Bayfront Expressway; Willow Road and Newbridge Street; Willow Road and Middlefield Road; University and Bayfront Expressway; Bayfront Expressway and Chrysler Drive; and Middlefield Road and Lytton Avenue. (TR-6)
- **Impacts on Roadway Segments.** Increases in traffic associated with the Project under the Near Term 2018 East Campus and West Campus Condition would result in increased volumes on the following roadway segments: Marsh Road between Bay Road and the railroad tracks; Willow Road between Durham Street and Chester Street; and Willow Road between Nash Avenue and Blackburn Avenue. (TR-7)
- **Impacts to Routes of Regional Significance.** Increases in traffic associated with the Project under Near Term 2018 East Campus and West Campus Condition would result in significant impacts the following Routes of Regional Significance: SR 84 between US 101 and Willow

Road; SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and County Line; US 101 north of Marsh Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (TR-8)

- **Violation of any Air Quality Standard.** Operation of the Project, at both the East Campus and West Campus, would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO_x, and PM₁₀ and would exceed BAAQMD's significance thresholds. (AQ-2)
- **Exposure to Excessive Noise Levels.** The increase in vehicular traffic associated with implementation of the East Campus and West Campus, combined, would result in an increase in the exposure of off-site noise sensitive receptors to noise levels in excess of the standards established in the General Plan or Municipal Code. (NO-1)

Cumulative

- **Impacts to Intersections.** Increases in traffic associated with the Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East and West Campuses Condition would result in increased delays at the following intersections: Marsh Road and Bayfront Expressway; Marsh Road and US 101 NB Ramps; Willow Road and Middlefield Road; Willow Road and Bayfront Expressway; Willow Road and Newbridge Street; University and Bayfront Expressway; Bayfront Expressway and Chrysler Drive; and Middlefield Road and Lytton Avenue. (TR-11)
- **Impacts on Roadway Segments.** Increases in traffic associated with the Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East and West Campuses Condition would result in increased volumes the following roadway segments: Marsh Road between Bay Road and the railroad tracks; Willow Road between Durham Street and Chester Street; Willow Road between Nash Avenue and Blackburn Avenue; and Middlefield Road between Linfield Drive and Survey Lane. (TR-12)
- **Impacts to Routes of Regional Significance.** Increases in traffic associated with the Project under Cumulative East Campus Only Condition and Cumulative East and West Campuses Condition would result in significant impacts to the following Routes of Regional Significance: SR 84 between US 101 and Willow Road; SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and County Line; US 101 north of Marsh Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (TR-13)
- **Violation of any Air Quality Standard.** The Project, in combination with other development within the City, would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO_x, and PM₁₀ resulting in a violation of an Air Quality Standard. (C-AQ-2)

- **Cumulative Construction Criteria Air Pollutant Emissions.** Construction activities associated with the West Campus, in combination with other construction activities in the City, would generate dust or diesel emissions, thus exposing people to particulate matter. (C-AQ-3)
- **Cumulative Toxic Air Contaminants Emissions.** The Project, in combination with other foreseeable development in the Project vicinity, would expose sensitive receptors to substantial TACs. (C-AQ-5)
- **Cumulative Exposure to Excessive Noise.** The Project, in combination with other development within the City, would result in a substantial increase in exposure of persons to noise in excess of the standards established in the General Plan or Municipal Code. The Project’s contribution would be cumulatively significant. (C-NO-1)
- **Cumulative Permanent Increase in Noise Levels.** Operation of the Project and other cumulative developments would result in a substantial permanent ambient noise level increase in the Project vicinity. The Project’s contribution would be cumulatively significant. (C-NO-3)

Based on the goal of reducing these significant and unavoidable impacts, the No Project Alternative and Reduced Intensity Alternative have been developed for the Project for evaluation in this Draft EIR. Table 5-1, below, provides a summary of key features of the Project and each alternative. Further details regarding each alternative are provided below.

Table 5-1			
Comparative Description of the Project and Alternatives			
	Project	No Project Alternative	Reduced Intensity Alternative
Floor Area (sf)			
East Campus ^a	1,035,840	1,035,840	1,035,840
West Campus	440,000	0	440,000
<i>Total</i>	1,475,690	1,035,840	1,475,690
<i>Net Over Existing</i>	440,000	0	440,000
Daily Trips			
East Campus	15,000	5,022	12,227
West Campus	6,350	0	4,763
<i>Total</i>	21,350	5,022	11,968
<i>Net Over Existing</i>	15,956	0	6,946
Employees			
East Campus Employees	6,600	3,600	4,950 ^b
West Campus Employees	2,800	0	2,100 ^b
<i>Total</i>	9,400	3,600	7,050 ^b
<i>Net Over Existing</i>	5,800	0	3,450

Source: Atkins, 2011.

Notes:

- East Campus floor area will not change over existing conditions for any of the alternatives.
- The employee estimate with the Reduced Intensity Alternative is approximate.

Initially, it was determined that, in order to minimize significant and unavoidable impacts relative to transportation, noise, and air quality, an approximately 80 percent reduction in daily trips would be necessary. This reduction would not meet any of the Project Sponsor's objectives and, therefore, would not be a feasible alternative. Similarly, a 50 percent reduction was determined to be infeasible because it would result in fewer employees than what is permitted under the existing CDP for the East Campus and the Project Sponsor would have no basis to move forward with the Project as a whole. Finally, a 40 percent reduction was also evaluated. This scenario would have resulted in the allowance of approximately 350 more employees at the East Campus than what is currently permitted. It would also result in fewer employees at the West Campus than proposed with the Project. These reductions would not meet the Project Sponsor's most basic objective of establishing a permanent central headquarters that would accommodate its anticipated employment growth. The 25 percent reduction was chosen because it allows for some increase in occupancy at the East Campus and development of the West Campus, while decreasing the overall number of trips. It also allows for the attainment of the majority of the Project objectives. For these reasons, the Reduced Intensity Alternative reducing daily trips by 25 percent was chosen as the most feasible alternative.

No Project Alternative

Under the No Project Alternative, the existing two sites would remain as-is. The nine existing buildings at the East Campus that include 1,035,840 sf would remain. Based on the existing Conditional Use Permit (CDP), the No Project Alternative would allow a maximum of 3,600 employees. No daily trip cap would be implemented. At the West Campus, the existing buildings would not be demolished and the current site conditions would remain the same. There would be no new construction and Facebook would not occupy the West Campus.

Reduced Intensity Alternative

Under this alternative, there would be a 25 percent reduction in daily trips for the East Campus and the West Campus. This 25 percent reduction would equate to an 11,250 daily trip cap for the East Campus (compared to 15,000 daily trip cap with the Project) and 4,763 daily trips for the West Campus (compared to 6,350 daily trips with the Project). For informational purposes, this Reduced Project Alternative could translate to fewer employees with approximately 4,950 employees for the East Campus (compared to approximately 6,600 with the Project) and approximately 2,100 employees for the West Campus (compared to approximately 2,800 with the Project). As with the Project, the Reduced Intensity Alternative would use the existing buildings at the East Campus and the square footages would remain the same. The site plan for the West Campus would remain the same as with Project implementation at approximately 440,000 sf, resulting in a larger allocation of square feet per employee. In addition, the proposed bicycle/pedestrian linkages would be constructed and implemented to enhance circulation between the campuses.

As stated above, the footprint of the proposed buildings on the West Campus would not change with the Reduced Intensity Alternative. As such, all footprint-based impacts would be identical to the Project and are not discussed in detail below. Instead, the discussion for the Reduced Intensity Alternative focuses on those topics that could be affected by changes in intensity of use at the sites (i.e.,

population-based impacts). The Reduced Intensity Alternative does not include an analysis of the following footprint-based impacts: Aesthetics, Wind, Cultural Resources, and Biological Resources. The remaining technical topics (Transportation, Air Quality, Greenhouse Gas Emissions, Noise, Geology and Soils, Hydrology and Water Quality, and Hazards and Hazardous Materials, Population and Housing, Public Services, and Utilities) are discussed as they relate to the Reduced Intensity Alternative.

5.3 ATTAINMENT OF PROJECT OBJECTIVES

An evaluation of how each alternative meets or does not meet the basic Project objectives is provided below. Pursuant to CEQA Guidelines Section 15126.6(a), this analysis compares the alternatives to the objectives of the Project. As described in detail above, there are two alternatives for the Project: No Project Alternative and Reduced Intensity Alternative. The following analysis describes the extent to which these alternatives meet or do not meet the Project Sponsor’s objectives as described in Section 2, Project Description, and reproduced above.

No Project Alternative

The No Project Alternative would not achieve the basic Project objectives. The No Project Alternative would not meet the primary objectives of providing a centralized headquarters and an integrated, highly connected campus. Although the No Project Alternative allows 3,600 employees at the East Campus, this would not accommodate Facebook’s long-term growth potential. As a result, the Project site could not serve as Facebook’s central headquarters. In addition, the No Project Alternative would not include demolition, renovation, or construction of buildings at the West Campus and the site would remain unoccupied and unmaintained.

Because the Project would not be implemented, the No Project Alternative would not provide multiple transportation options to minimize traffic and greenhouse gas (GHG) emissions, create a pedestrian-friendly, bicycle- and transit-enabled campus to reduce vehicle trips, increase connectivity of neighborhood paths and bikeways and promote access to the Bay Trail, or rejuvenate the industrial district along the Willow Road corridor. The “brownfield” property at the West Campus would not be developed. Without the proposed increase in trips at the East Campus, there would be a reduced incentive to develop a robust transportation demand management (TDM) program similar to what is proposed by the Project. Without the Project, there would be no need to cohesively develop the West Campus with the East Campus as a single integrated corporate headquarters, thereby eliminating the need for the enhanced connection under Bayfront Expressway. In fact, if the East Campus and West Campus were developed as separate projects by unrelated entities there may be an incentive to close the undercrossing. Thus, the No Project Alternative would not create a pedestrian-friendly environment that enhances connectivity between the north side and south side of Bayfront Expressway, including use of the existing tunnel, provide new and diverse employment opportunities for the City’s residents, or generate revenue for the City and other public entities. The No Project Alternative would not include green design practices and sustainability features that promote energy efficiency and resource conservation, as well as reduce vehicle miles traveled, vehicle emissions, and GHG emissions,

particularly as these measures relate to development of the West Campus. This is also due to the fact that the TDM program would be less aggressive and the energy efficient West Campus would not be developed. As such, the No Project Alternative would not meet the majority of the Project objectives.

Reduced Intensity Alternative

The Reduced Intensity Alternative would meet several of the Project Sponsor’s objectives. A reduction in daily trips of 25 percent would still allow the East Campus to be occupied at an employee level greater than existing conditions, but less than what is proposed with the Project. In addition, the Reduced Intensity Alternative would develop the West Campus with the same building program as the Project. However, at both sites, the total trips would be 25 percent less than what is proposed with the Project, which could translate to a reduction of employees. With the reduced trips, the Reduced Intensity Alternative would translate to approximately 7,050 employees instead of approximately 9,400 employees in total. This number of potential employees would not be able to accommodate Facebook’s long-term growth projections.

Without the ability to accommodate Facebook’s anticipated employee growth, it would not be feasible for Facebook to establish its permanent headquarters at the Project site since such permanence relies entirely on housing its future workforce. As such, the Project Sponsor would have to find a separate location to accommodate the employee shortfall, which could create other impacts at another location. This, in turn, would mean that the objective related to maximizing the opportunity for Facebook employees and vendors to interact and meet would not be met since the entire workforce could not be at one location. Finally, if Facebook had to seek space outside City limits to accommodate the overflow of employees who could not be housed at the Project site, the Reduced Intensity Alternative would also not fully meet the objective related to generating revenue for the City.

Since the Reduced Intensity Alternative would be in the same location, the Project would still be in a prominent location proximate to major transportation corridors. In addition, the same bicycle/pedestrian linkages would be constructed, including the Bayfront Expressway undercrossing, which would meet the objective of creating a pedestrian-friendly, bicycle- and transit-enabled campus, which encourages reduction in private vehicle trips and use of transit solutions. These bicycle/pedestrian linkages would also increase connectivity of neighborhood paths and bikeways, and promote access to the Bay Trail from the Belle Haven neighborhood.

The Reduced Intensity Alternative would be Leadership in Energy & Environmental Design (LEED) certified and designed in a sustainable manner. Since the same building program would be constructed with the Reduced Intensity Alternative, this alternative would meet the objective of having “green” design practices and methods that promote energy efficiency and resource conservation.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(f)(2) states that an Draft EIR must consider off-site alternatives if such alternatives are deemed to be feasible by the Lead Agency. As stated in CEQA Guidelines,

Section 15126.6(f)(1), factors that may be considered when a Lead Agency is assessing the feasibility of an alternative include: “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).”

Alternative Locations

In 2010, the Project Sponsor started an extensive search for headquarter sites that could meet its projected growth demands and square footage needs. The Project Sponsor considered numerous options, including: 1) the incremental acquisition of facilities near its current Palo Alto headquarters in the Stanford Research Park; 2) the long-term lease or acquisition of an existing campus (e.g., HP’s Page Mill campus, campuses in Mountain View, the Oracle/Sun Menlo Park campus, the Roche campus, or Moffett Towers); 3) the development of a new campus; and 4) bifurcated headquarters (e.g., Palo Alto and San Francisco).

The Project Sponsor rejected options 1 and 4 because they did not meet two of Project’s most basic objectives: establishment of permanent headquarters and development of an integrated, highly-connected, multi-phased campus that offers sustained long-term growth plans. Option 1 required scattered acquisitions, which, even if within a relatively close distance to the existing campus, would not establish a centralized, permanent headquarters or develop an integrated, highly connected campus. It is unlikely that the Project Sponsor would be able to acquire properties adjacent to the existing Palo Alto campus, and developing properties near the present campus would not achieve the goal of an integrated campus. In addition, since incremental acquisitions would occur over possibly long periods of time, this option would not enable the Project Sponsor to sustain its long-term growth, as it would be dependent on property availability and market conditions. Similarly, a bifurcated campus (option 4) would not result in an integrated campus or a centralized headquarters. The remaining sites (e.g. HP’s Page Mill campus, the Roche campus, or Moffett Towers) were then eliminated because of the infeasibility of acquiring or leasing those properties (whether for operational, economic, or other reasons).

Option 3, the development of an entirely new campus on an alternative site, was rejected as infeasible, as there was no property available in either Palo Alto or Menlo Park large enough to accommodate the Project and meet the Project Sponsor’s long-term growth needs. The Project Sponsor desires to remain in its current geographic area to maintain its current employee base. Alternative locations outside the general area are not feasible because the Project Sponsor currently leases the East Campus and already occupies a portion of it. Further, within the City, there are no alternative sites that could accommodate the development intensity proposed, given the City’s existing land use designations and zoning.

As such, because of the aforementioned issues relative to site suitability, economic viability, and acquisition and control, alternative site for the Project has been rejected as infeasible. Therefore, after much consideration, the Project Sponsor decided on a combination of options 2 and 3, which involved

purchasing the West Campus and entering into a long-term lease (with an option to purchase) of the East Campus.

Alternative Development Scenario

The Project Sponsor also considered development on the West Campus consistent with existing zoning ordinance requirements that allow a maximum of 35 feet in height. Under this scenario, the West Campus could be developed with buildings totaling approximately 440,000 square feet under existing FAR limitations. This would accommodate a similar number of employees as the Project. However, without an increase in height, the buildings would cover a larger portion of the site. Increasing the footprint would decrease the pedestrian-friendly campus atmosphere, reduce the landscaping, require significant on-grade parking, and result in a dramatic increase in impervious coverage. This would reduce the ability of the Project Sponsor to achieve its “green” building and design goals. The Project Sponsor rejected this alternative because the impacts resulting from the increase in population would remain without the commensurate improvements in work-environment connectivity, both in outdoor and indoor spaces, sustainability in design, site landscaping, and hydrology improvements.

5.5 IMPACT ASSESSMENT

This section evaluates whether the alternatives would reduce the significant impacts of the Project to less-than-significant levels and/or would generate impacts other than those identified for the Project. Summarized lists of recommended mitigation measures for each alternative are provided in the analysis below; however, these mitigation measures are fully described in Section 3, Environmental Analysis, of this document. In addition, a summary comparative analysis of the Project and its alternatives is provided in Table 5-5, at the end of this section.

No Project Alternative

As described above, under the No Project Alternative, the redevelopment of the West Campus would not occur and the employee cap on the East Campus would remain in place. No new land uses or rezoning would occur under this alternative.

Land Use

The Project would require a modification of the existing CDP for the East Campus to change the existing employee cap to a vehicle trip cap and a CDP at the West Campus to establish a new height limit. The No Project Alternative would not require discretionary review since the existing employee cap at the East Campus would remain and no development at the West Campus would occur. Similar to the Project, the No Project Alternative would result in no impact to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans, nor would it conflict with the existing land use designation. In addition, since the No Project Alternative would not increase operational traffic, the No Project Alternative would not result in policy conflicts with respect to the Noise Ordinance that would occur with the Project. 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. As such, there would be a less-than-significant cumulative impact as a result of cumulative development in the ABAG region and under the No Project Alternative, as with the Project.

The No Project Alternative would result in several other policy conflicts that would not occur with the Project. The General Plan and Bay Trail Plan promote the enhancement of bicycle and pedestrian linkages. The No Project Alternative would not enhance the existing Bay Trail by providing an improved connection at the intersection of Bayfront Expressway and Willow Road. Nonetheless, as described in Section 3.2, the ultimate findings of the General Plan consistency do not require that a project be entirely consistent with each individual General Plan policies. As such, because existing conditions would not change with the No Project Alternative, this alternative would be generally consistent with the applicable goals, policies, and actions, resulting in a less-than-significant impact.

Visual Quality

The No Project Alternative would not alter existing conditions, and therefore, would not block views from scenic vistas or change the existing visual character. The proposed development at the West Campus with implementation of the Project would significantly increase massing, height, and bulk over existing conditions and alter background views. While the impact would be less than significant under the Project, this impact would not occur under the No Project Alternative. The West Campus would remain unoccupied and its landscaping unimproved.

The Project would replace the abandoned West Campus with new buildings, enhanced landscaping, and bicycle/pedestrian amenities that would complement the existing office development at the East Campus and the other nearby commercial uses. These improvements to visual quality would not occur with the No Project Alternative. Since no new structures would be built under the No Project Alternative, a new source of light and glare would not be created compared to the potentially significant, but mitigable, light and glare impacts as a result of the Project. The less-than-significant shadow impacts of the Project would not occur under the No Project Alternative. No impact to visual quality would result with the No Project Alternative. (NI)

Wind

Similar to the Project, the No Project Alternative would not affect existing wind conditions on the East Campus because no exterior changes to the existing buildings would be made that would impact existing wind conditions. The West Campus has little shelter from northwest to north prevailing winds. It is likely that areas within and adjacent to the West Campus would experience accelerated winds due to the increased height, bulk, and alignment of the Project, which would not occur under the No Project Alternative. No wind-related impacts would result with the No Project Alternative. (NI)

Transportation

The No Project Alternative would retain existing conditions at the East Campus and West Campus and would not generate additional traffic or parking demand. This alternative would result in the same daily

vehicle trips and affected intersections as the baseline since no new uses would be added at the Project site. No transportation-related impacts would result with the No Project Alternative. (NI)

Air Quality

The No Project Alternative would not construct new uses at the Project site and would not generate air emissions above the baseline. Since no development would occur under the No Project Alternative existing uses would remain consistent with the Transportation Control Measures (TCMs) identified in the 2005 Ozone Strategy as critical to attaining the California Clean Air Act (CCAA) ozone standard. No impacts to air quality would result with the No Project Alternative. (NI)

Climate Change

The No Project Alternative would result in no new direct emissions from area and mobile sources, or indirect emissions from electricity generation and solid waste that would occur with intensification of use. Since this alternative would not construct new buildings and no new uses would operate at the Project site, there would be no increase in GHG emissions over the baseline, resulting in no impact. (NI)

Noise

Similar to the Project, the No Project Alternative would not result in noise impacts due to operations from public or private airports. The operational noise at the East Campus would remain the same. However, unlike the Project, the No Project Alternative would not result in a significant incremental increase in traffic noise levels at identified sensitive uses on Marsh Road and Willow Road and would not result in a significant cumulative impact from vehicular noise. Additionally, since construction at the West Campus would not occur, there would be no construction noise impacts to off-site receptors and the significant and unavoidable impact of the Project on vibration-sensitive users would be eliminated. There would be no exceedance of the City's Noise Ordinance. This alternative would avoid the potentially significant but mitigable operational noise impacts associated with generators and heating, ventilation, and air conditioning (HVAC) systems. No noise-related impacts would result with the No Project Alternative. (NI)

Cultural Resources

The existing structures on the Project site are not historically significant. Because no ground-disturbing construction would occur at the East Campus, similar to the Project, the No Project Alternative would result in no impact on historical resources. There is a moderate to high possibility that Native American sites exist on or near the Project site. With the No Project Alternative, unlike the Project, no ground disturbance would occur at the West Campus. The No Project Alternative would result in no impact on archaeological or paleontological resources or human remains. (NI)

Biological Resources

The No Project Alternative would not include the demolition of existing buildings, the construction of new buildings, or the removal of vegetation. As such, pallid bats and other potential crevice-roosting

bat species would not be impacted. Since no new buildings would be constructed, no new or additional nesting or perching opportunities would be provided to raptors or other predatory birds as a vantage point from which to prey on special-status species in the adjacent salt marshes. Migratory birds would not be impacted with the No Project Alternative because no trees would be removed and there would be no disruption of nesting habitat. As with the Project, since there is no riparian habitat, salt marsh, State or federally protected wetlands, and/or other sensitive natural community present in any portion of the site, there would be no impact on these resources. As such, no project or cumulative impacts would occur under the No Project Alternative and there would be no conflicts with local policies adopted to protect biological resources. No impacts to biological resources would result with the No Project Alternative. (NI)

Geology and Soils

There are no faults that cross the Project site and the site is not within an Alquist-Priolo Earthquake Fault Zone. There would be no impact from the No Project Alternative related to fault rupture. The Project site is primarily flat and not adjacent to any hillsides where seismically induced landslides or other downslope movement of rock or soil material that could pose a hazard. The No Project Alternative would not include any septic tanks or leach field systems. Consequently, the existence of soils incapable of supporting septic systems is not considered an impact associated with the Project and this impact is not evaluated. Thus, similar to the Project, the No Project Alternative would have no impact relative to fault rupture, landslide hazards, loss of topsoil, or septic systems.

Development of the Project site would involve the construction (West Campus) and occupancy (East Campus and West Campus) of buildings in a location where strong seismic groundshaking can be expected to occur over the life of the Project. The No Project Alternative would not construct new buildings or increase the amount of employees at the Project site over existing conditions. Therefore, the No Project Alternative would not expose additional people to groundshaking, resulting in no impact relative to seismic hazards, unlike the less-than-significant impact of the Project. (NI)

Hydrology

The No Project Alternative would not develop the West Campus or add employees to the East Campus over the baseline. Since no additional employees would be included with the No Project Alternative, additional people would not be exposed to the 100-year floodplain or potential sea level rise, resulting in no impact. Existing groundwater recharge potential within the Project area is minimal because portions of the site contain impervious surfaces, fill has been placed in other locations in conjunction with site remediation, and compacted gravel overlies other areas. The No Project Alternative would result in a similar less-than-significant impact on groundwater recharge potential. The potential for tsunami or seiche inundation is low, and the Project site is not subject to dam failure inundation. The No Project Alternative would not modify the existing conditions at the Project site, which would remain primarily covered with impervious surfaces, resulting in no impact.

Because the on-site storm drain system has capacity limitations, ponding at the West Campus and at the adjacent TE Connectivity site would continue to occur. The drainage swale would continue to provide

overflow storage. The flow reversals currently experienced in the Hamilton Avenue system would also continue to occur, as under the Project. The No Project Alternative would not include planned stormwater quality features, such as rain gardens and treatment areas, to temporarily store stormwater runoff and settle out pollutants. In addition, the West Campus is subject to 100-year flooding, which would occur with or without the Project. The Project would involve placement of fill to elevate finished floor elevations above the 100-year flood hazard elevation so that finished floor elevations of habitable structures would provide protection for the 100-year tidally induced flooding, consistent with requirements for development in the SFHA. This would not occur with the No Project Alternative, and therefore, the No Project Alternative would have a greater impact on stormwater runoff, and potential pollutants, than with the Project. Nonetheless, since this is an existing condition, the No Project Alternative would result in no impact. (NI)

Hazards and Hazardous Materials

Unlike the Project, the No Project Alternative would not demolish any structures or disturb the soil, and would, therefore, would result in no impact relative to the potential release of hazardous materials. Under the No Project Alternative, construction workers would not be exposed to potential risks from contaminated soil or groundwater or expose ecological receptors to residual contaminants in soil and/or groundwater. The No Project Alternative would also not interfere with the groundwater monitoring wells at the site or the groundwater network compared to the less-than-significant impact, with mitigation, of the Project. Operation at the East Campus would include routine hazardous materials use and maintenance activities; however, this would not increase over existing conditions, resulting in no impact. In addition, the No Project Alternative would not add traffic to the area and, therefore, would not impair emergency access and emergency plans.

However, while the Project proposes various on-site drainage features to convey stormwater runoff to the City system, the No Project Alternative would not include these features. As such, the potential for stormwater to infiltrate to groundwater, where it could affect flow characteristics, would remain. This could, in turn, interfere with the groundwater remediation system and contaminated groundwater could flow into the BMPs, from which treated stormwater would flow to the storm drain system, resulting in possible inadvertent, off-site contamination of stormwater. This is a greater impact than under the Project. Nonetheless, since this is an existing condition, the No Project Alternative would result in no impact. (NI)

Population and Housing

The No Project Alternative would result in no change in housing or employment levels over existing conditions. As such, the No Project Alternative would not result in a demand for new housing units within the City or proximate local jurisdictions. The No Project Alternative would avoid the direct and indirect population growth that would result from the Project, which is less than significant. The No Project Alternative would have no potential to contribute to cumulative impacts on population, housing, or employment growth. (NI)

Public Services

There would be no increase in employees on the site over existing conditions that could result in increased demand for police, fire protection, emergency services, and recreational facilities. In addition, as discussed above, the No Project Alternative would not increase the population and housing demand within the City. As such, the No Project Alternative would not increase the demand for schools or library services. The No Project Alternative would have no potential to contribute to cumulative impacts related to public services. (NI)

Utilities

The No Project Alternative would not change the existing use at the Project site; the East Campus would continue to serve approximately 3,600 employees and the West Campus would remain vacant. Therefore, the No Project Alternative would have similar water, sewer, storm drainage, energy, and operational solid waste demands as under existing conditions. The No Project Alternative would have no potential to contribute to cumulative impacts related to utilities. (NI)

Reduced Intensity Alternative

As described above, the Reduced Intensity Alternative would allow occupation of the Project site at a reduced scale due to the lower permitted trip cap. While the existing buildings at the East Campus would be used and the proposed Project site plan at the West Campus would be developed, the number of employees would be less than under the Project. Since the building program at the East Campus would remain the same as under existing conditions, and the West Campus site plan would be the same as under the Project, the Reduced Intensity Alternative would have the identical physical (footprint-based) impacts as the Project. These physical impacts are related to the following topics: Aesthetics, Wind, Cultural Resources, and Biological Resources. Since these impacts are identical to the Project, they are not discussed below.

Land Use

Conflicts with Adopted Land Use Plans and Policies. Similar to the Project, the Reduced Intensity Alternative would require a CDP amendment for the East Campus to change the existing employee cap to a vehicle trip cap and a CDP at the West Campus to establish a new height limit. The proposed new CDP and zoning (M-2-X for increased heights at the West Campus) would allow the Reduced Intensity Alternative to be consistent with the Zoning Ordinance, resulting in less-than-significant impacts. In addition, the Reduced Intensity Alternative would be consistent with the General Plan and Bay Trail Plan, which both promote the enhancement of bicycle and pedestrian linkages. As with the Project, the Reduced Intensity Alternative would enhance the existing Bay Trail by providing an improved connection at the intersection of Bayfront Expressway and Willow Road. In general, the Reduced Intensity Alternative would be consistent with the General Plan. (LTS)

Cumulative Impacts. 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. As such, there would be

a less-than-significant cumulative impact as a result of cumulative development in the ABAG region under the Reduced Intensity Alternative, as with the Project. (LTS)

Transportation

As shown in Table 5-2, the Reduced Intensity Alternative Project increment would result in 1,965 trips (1,818 inbound and 147 outbound trips) for the AM peak hour, 2,068 trips (225 inbound and 1,843 outbound trips) for the PM peak hour, and 11,968 daily trips.

Proposed Use	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
East Campus Increment (25% Reduction)	519	39	558	84	676	760	7,205
West Campus (25% Reduction)	799	60	859	73	587	660	4,763
Total Net New Increment Trips	1,818	147	1,965	225	1,843	2,068	11,968

Source: DKS Associates, 2011.

On a daily basis, 11,968 vehicle trips would be generated for the Reduced Intensity Alternative. With the trip generation detailed in Table 5-2 the same number of intersection, roadway segments, and Routes of Regional Significance impacts would occur when compared to the Cumulative 2025 East Campus and West Campus Condition.

A 75 percent reduction in the East Campus and West Campus project increment would result in the one fewer intersection potential impact and one fewer roadway segment impact. Additionally, an 80 percent reduction in the East Campus and West Campus project increment would result in one fewer impact to Routes of Regional Significance. As a result, there would be significant and unavoidable impacts on intersections, roadway segments, Routes of Regional Significance, and cumulative impacts with the Reduced Intensity Alternative, as with the Project. (SU)

Air Quality

Conflict with or Obstruct Implementation of the Applicable Air Quality Plan. The proposed development under both the Project and the Reduced Intensity Alternative are consistent with and supportive of the Transportation Control Measures (TCMs) identified in the 2005 Ozone Strategy as critical to attaining the California Clean Air Act (CCAA) ozone standard. Therefore, impacts are considered less than significant. (LTS)

Violation of Any Air Quality Standard. The proposed development under both the Project and the Reduced Intensity Alternative, would create new area and mobile sources of air pollutants that would generate emissions of reactive organic gas (ROG), nitrous oxide (NO_x), and particulate matter (PM₁₀), in exceedance of the Bay Area Air Quality Management District's (BAAQMD's) significance

thresholds. Even a 25 percent reduction in criteria pollutants associated with the Reduced Intensity Alternative is insufficient to reduce the emissions of ROG, NO_x, and PM₁₀, below the BAAQMD's significance thresholds. Therefore, this impact would remain significant and unavoidable. (SU)

Construction Criteria Air Pollutant Emissions. Construction activities associated with the proposed development at the West Campus, under both the Project and the Reduced Intensity Alternative, would generate emissions of ROG, NO_x, PM₁₀ and PM_{2.5} that would not exceed BAAQMD's significance thresholds. Since construction impacts would be identical under both scenarios, impacts are less than significant (LTS).

Localized Carbon Monoxide Impacts from Motor Vehicle Traffic. Localized carbon monoxide impacts under both the Project and the Reduced Intensity Alternative, would generate carbon monoxide emissions that would not exceed BAAQMD's significance thresholds, since emissions under the Project do not exceed the BAAQMD's significance thresholds. Therefore, impacts are less than significant (LTS).

Exposure to Toxic Air Contaminants. The exposure to TACs at the proposed development under both the Project and the Reduced Intensity Alternative, would result in less than significant impacts from exposure to TACs with mitigation. The emergency generator use, construction, and traffic are either the same under the Reduced Intensity Alternative, or less than the Project. Accordingly, impacts are less than significant. (LTS)

Exposure to Objectionable Odors. Exposure to objectionable odors at the proposed development at the East Campus and West Campus, under both the Project and the Reduced Intensity Alternative, would be less than significant. There is no change in land use under the Reduced Intensity Alternative, and therefore, no changes in potential for exposure to potential odors. (LTS)

Cumulative Impacts. Implementation of the Project or the Reduced Intensity Alternative, in combination with other cumulative development in the City, would not conflict with or obstruct implement of the applicable air quality plan resulting in a cumulatively significant impact. Additionally, the Project and the Reduced Intensity Alternative, in combination with other development within the City, would be consistent with the Ozone Attainment Plan and the Clean Air Plan. This would be a less than significant cumulative impact. (LTS)

However, similar to the Project, the Reduced Intensity Alternative, in combination with the Tier 1 and Tier 2 Projects within the City, would result in a cumulatively significant impact for ROG, NO_x, and PM₁₀. This is considered cumulatively significant according to BAAQMD's significance thresholds when a Project exceeds the BAAQMD's Project mass emission threshold for criteria air pollutants. Because no feasible mitigation has been identified for the Project or for the Reduced Intensity Alternative, the impact for ROG, NO_x, and PM₁₀ emissions is therefore significant and unavoidable. (SU)

Climate Change

GHGs from the Project and the Reduced Intensity Alternative would generate emissions of GHG that are below the BAAQMD's significance thresholds. While the Reduced Intensity Alternative would reduce service population, it would also reduce GHG emissions from traffic. However, the reduction in service population would cause the efficiency metric for the project to exceed thresholds for the West Campus when the service population and traffic emissions are reduced by 25 percent, as shown in Table 5-3. Energy use emissions, water use emissions, and waste disposed emissions would also likely be reduced as a result of the Reduced Intensity Alternative. In order to make the Reduced Intensity Alternative less than significant the Emissions would need to decrease by 131 metric tons or 1.3 percent. Given the increases in energy use and solid waste generation associated with additional people, the 25 percent reduction in people at the West Campus will likely result in at least this 1.3 percent additional reduction. However to quantitatively illustrate this case, an analysis beyond that typically conducted for alternatives would be required. Therefore, emissions are likely to be less than significant for the Reduced Intensity Alternative when these additional source categories are factored in to the analysis. (LTS)

Noise

Exposure to Excessive Noise Levels. The addition of traffic with implementation of the Reduced Intensity Alternative would further increase traffic noise levels above the City's standards for residential uses, but to a lesser extent than the Project. Because the existing noise levels along the major arterials in the City already are above the City standards, these noise levels would continue to be above the City standards in the near-term and long-term future with the addition of Project-related traffic. As shown in Table 5-4, operation of the Reduced Intensity Alternative would result in a maximum noise level increase of 1 dBA, which is the same as the 1 dBA with the Project. Even though the permitted trip cap would be lower under the Reduced Intensity Alternative (for the East Campus, 11,250 daily trips compared to 15,000 under the Project, and for the West Campus, 4,763 daily trips compared to 6,350 under the Project), the traffic noise impacts would remain similar in all future year scenarios evaluated for the Reduced Intensity Alternative, resulting in significant and unavoidable impacts, similar to the Project.

In the short-term, operation of the East Campus would result in a 1 dBA increase on Marsh Road in the near-term. Similarly, under operation of both the East Campus and West Campus there would be a 1 dBA increase in the near-term and long-term traffic scenarios. However, using FTA guidance, a 1 dBA increase is considered significant when the noise level without a project is 75 dBA CNEL or higher. As with the Project, the Reduced Intensity Alternative would include 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 Reduced Intensity Alternative's contribution to traffic noise to a less-than-significant level. Although the Reduced Intensity Alternative would lower the permitted daily trip cap, which would in turn reduce traffic noise, the impacts would remain significant and unavoidable, similar to the Project. (SU)

**Table 5-3
GHG Emissions for Project and Reduced Intensity Alternative**

Category	Project			Reduced Intensity Alternative		
	East Campus Incremental	West Campus	Total Project Increment	East Campus Incremental	West Campus	Total Project Increment
Area Emissions ^{1,2}	0	0	0	0	0	0
Energy Use Emissions ^{1,2}	-10,638	2,043	-8,595	-10,638	2,043	-8,595
Water Use Emissions ^{1,2}	29	30	59	29	30	59
Waste Disposed Emissions ^{1,2}	369	357	726	369	357	726
Traffic Emissions ^{1,2}	13,817	9,740	23,557	8,064	7,305	15,370
Construction Amortized ⁴	NA	57	57	NA	57	57
Total Emissions	3,577	12,226	15,804	-2,175	9,791	7,616
Service Population ³	3,000	2,800	5,800	1,350	2,100	3,450
Emissions per Service Population with Amortized	1.2	4.4	2.7	-1.6	4.66	2.2

Notes:

- All operational categories for which CalEEMod calculates emissions. Area source GHG emissions are less than 0.01 MT.
- Emissions as described in previous tables. CO₂e includes CO₂, CH₄, and N₂O emissions, weighted by their respective global warming potentials.
- Service population includes residents and workers associated with a project. Service population for each scenario consistent with traffic study.
- One-time emissions were amortized over a 30 year period.

**Table 5-4
Reduced Alternative Increment to Existing and Future Noise Levels at Representative Locations in the Project Vicinity (CNEL)**

Segment/Adjacent Land Use ^a	Traffic Noise Level Without Project	Traffic Noise Level With Reduced Alternative	Increase in Noise Level as a Result of Project	Allowable Increase ^b	Significant Impact?
Reduced Alternative Near Term Project I Scenario^c					
Bayfront Expressway - Chrysler Drive to Chilco Street	74	74	0	1	No
Marsh Road - Scott Drive to Bohannon Drive	82	83	+1	0	Yes
Willow Road - O'Brien Drive to Newbridge Street	78	78	0	0	No
Willow Road - Durham Street to Coleman Avenue	73	73	0	1	No
University Avenue - O'Brien Drive to Kavanaugh Drive	75	75	0	0	No
Reduced Alternative Near Term Project II Scenario^c					
Bayfront Expressway - Chrysler Drive to Chilco Street	74	74	0	1	No
Marsh Road - Scott Drive to Bohannon Drive	83	83	0	0	No

Table 5-4
Reduced Alternative Increment to Existing and Future Noise Levels at
Representative Locations in the Project Vicinity (CNEL)

Segment/Adjacent Land Use ^a	Traffic Noise Level Without Project	Traffic Noise Level With Reduced Alternative	Increase in Noise Level as a Result of Project	Allowable Increase ^b	Significant Impact?
Willow Road - O'Brien Drive to Newbridge Street	79	80	+1	0	Yes
Willow Road - Durham Street to Coleman Avenue	73	73	0	1	No
University Avenue - O'Brien Drive to Kavanaugh Drive	76	76	0	0	No
Reduced Alternative Long Term Project I Scenario^c					
Bayfront Expressway - Chrysler Drive to Chilco Street	74	74	0	1	No
Marsh Road - Scott Drive to Bohannon Drive	83	83	0	0	No
Willow Road - O'Brien Drive to Newbridge Street	79	79	0	0	No
Willow Road - Durham Street to Coleman Avenue	73	73	0	1	Yes
University Avenue - O'Brien Drive to Kavanaugh Drive	76	76	0	0	No
Reduced Alternative Long Term Project II Scenario^c					
Bayfront Expressway - Chrysler Drive to Chilco Street	74	74	0	1	No
Marsh Road - Scott Drive to Bohannon Drive	83	83	0	0	No
Willow Road - O'Brien Drive to Newbridge Street	79	80	+1	0	Yes
Willow Road - Durham Street to Coleman Avenue	73	74	+1	1	Yes
University Avenue - O'Brien Drive to Kavanaugh Drive	76	76	0	0	No

Source: FHWA Highway Noise Prediction Model. See Appendix 3.08 for model output.

Notes:

- a. Sensitive receptor and receptor distance from roadway centerline are:
 1. Bayfront Expressway (Chrysler Drive to Chilco Street): West Campus boundary, 75 feet from centerline of Bayfront Expressway
 2. Marsh Road (Scott Drive to Bohannon Drive): Residences 50 feet from centerline of Marsh Road
 3. Willow Road (O'Brien Drive to Newbridge Street): Residences 75 feet from centerline of Willow Road
 4. Willow Road (Durham Street to Coleman Avenue): Willow Oaks Elementary School playground, 75 feet from centerline of Willow Road
 5. University Avenue (O'Brien Drive to Kavanaugh Drive): Residences 50 feet from centerline of University Avenue
- b. Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment. May.
- c. Refer to Section 3.5, Traffic and Circulation, for a description of the traffic scenarios.

Significant impacts shown in **Bold**.

As with the Project, operation of the Reduced Intensity Alternative would consist of typical office operations. Noise sources associated with office uses include an increase in human activity; heating, ventilation, and air conditioning (HVAC) systems; parking lot and garage noise; truck pick-ups and deliveries; and emergency generator testing. The Reduced Intensity Alternative's changes to the operational noise levels at the Project site would be less than the Project and would be less than significant. However, operation of the West Campus would involve new emergency generator testing that would have the potential to exceed the Noise Ordinance noise level limit for residential land uses. Implementation of Mitigation Measures NO-1.1 and NO-1.2 would reduce this impact to a less-than-significant level. (LTS)

Temporary Increases in Ambient Noise Level. As with the Project, no construction activities would occur at the East Campus and therefore there would be no temporary noise increases associated with construction of the East Campus. As with the Project, construction of the West Campus would not result in significant impacts related to sleep disturbance or damage during pile driving. However, groundborne vibration-related impacts to buildings within 225 feet of general construction activities and 900 feet of pile-driving activities could occur if such buildings include vibration-sensitive equipment. Due to the research and development nature of these uses, it is assumed that there is vibration-sensitive equipment within these distances, thus the Reduced Intensity Alternative's impact to vibration-sensitive equipment would be potentially significant. Implementation of Mitigation Measures NO-2.1 and NO-2.2 would require the notification of nearby businesses of potential impacts to vibration-sensitive equipment uses and best management practices. Even though implementation of these measures would reduce ground-borne vibration impacts from construction, vibration-sensitive equipment at the TE Connectivity site, the Menlo Science and Technology Park (AMB), and other commercial facilities (if identified), could still be exposed to excessive construction-generated vibration levels. Therefore, similar to the Project, the Reduced Intensity Alternative would result in significant and unavoidable impacts. (SU)

Substantial Permanent Increase in Noise Level. Potential permanent increases in noise level associated with the Reduced Intensity Alternative would include roadway noise, an increase in human activity, and HVAC systems. As discussed above, the Reduced Intensity Alternative would result in a significant increase in local traffic noise levels on Marsh Road and Willow Road, based on FTA's guidance. Operational noise sources at the East Campus would be the same as existing conditions, with the exception of the increase in human activity. Noise from the increase in human activity and use of new HVAC systems at the West Campus would not exceed the City's noise standards on-site or at the adjacent land uses. Therefore, this impact would be less than significant. However, utilizing the FTA's incremental increase guidance, implementation of the Reduced Intensity Alternative would result in a significant increase in noise level on Marsh Road and Willow Road. No feasible mitigation is available to reduce traffic-related noise exposure to a less-than-significant level. As with the Project, this impact would be significant and unavoidable. (SU)

Substantial Temporary Increase in Noise Level. No construction activities would occur at the East Campus and, therefore, there would be no temporary noise increases. As with the Project, vehicle trips during construction of the West Campus would not result in significant noise impacts. However,

operation of heavy construction equipment would generate a substantial increase in ambient noise and would potentially exceed the City's Noise Ordinance standards. The impact is considered potentially significant. Implementation of Mitigation Measure NO-4.1, as required for the Project, would reduce construction noise associated with the Reduced Intensity Alternative to a less-than-significant level. (PS/LTS)

Cumulative Impacts. Cumulative noise impacts would be similar under this alternative as compared to the Project. As with the Project, the Reduced Intensity Alternative, in combination with other development in the City, could result in a substantial increase in exposure of persons to noise in excess of the standards established in the General Plan or Municipal Code due to traffic. The Reduced Intensity Alternative's contribution to the exceedance of the noise thresholds from vehicular traffic would be cumulatively considerable, although to a lesser extent than the Project. Since there is no mitigation measure to reduce this impact, it would be significant and unavoidable. (SU)

Geology and Soils

Strong Seismic Groundshaking and Seismic-Related Ground Failure. No new structures are proposed on the East Campus, but this alternative would increase the number of people who could be exposed to strong groundshaking and related hazards by approximately 1,350 net new workers. The Reduced Intensity Alternative would expose fewer people to seismic hazards than the Project. In addition, the new development at the West Campus would expose approximately 2,100 net new workers to groundshaking. The risks to public safety from seismic hazards can be mitigated to the extent required by law with implementation of the proper design and construction methods, which would be within the responsibility of the City and the Project Sponsor to monitor and enforce through its building permit process. In addition, the City, along with other Bay Area jurisdictions, participates in a coordinated planning and emergency response program, and has its own Emergency Operation Plan to respond to natural disasters. Consequently, the Reduced Intensity Alternative, as with the Project, would not have a significant adverse impact with regard to exposure of people or structures to damage resulting from seismic groundshaking or liquefaction-related hazards. Therefore, impacts at the East Campus and West Campus are considered less than significant. (LTS)

Soil Hazards. The Geotechnical Feasibility Evaluation for the West Campus indicates that site soils are expected to have a moderate to high shrink-swell potential. Structural damage, warping, and cracking of roads, driveways, parking areas and sidewalks, and rupture of utility lines may occur if the potential expansive soils and the nature of the imported fill are not considered during design and construction of improvements. Adherence to the soil and foundation support parameters of the City Building Code, as required by City and State law, would ensure the maximum practicable protection available from soil failures under static or dynamic conditions for structures and their associated trenches and foundations. With implementation of the Reduced Intensity Alternative although fewer people would be exposed to soil related hazards than with the Project the Project Sponsor would be required to incorporate these recommendations into Project design at the West Campus. Therefore, as with the Project, hazards related to unstable geologic or soil units at the West Campus are considered less than significant. (LTS)

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

Cumulative Impacts. Soil and geologic conditions are site-specific and there is little, if any, cumulative relationship between the Project site and other areas in the City. As such, the potential for cumulative impacts to occur is geographically limited for many geology and soils impact analyses. The Reduced Intensity Alternative would have a less-than-significant potential to cause cumulatively substantial erosion or siltation. Construction and operational activities embodied in the Reduced Intensity Alternative would be subject to the same regulations as the Project. Consequently, cumulative impacts would be less than significant. (LTS)

Hydrology

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

100-Year Floodplain. New structures at the West Campus with implementation of both the Reduced Intensity Alternative and the Project would be placed in a Special Flood Hazard Area (SFHA), indicating development could be vulnerable to 100-year flood hazard risk. This alternative would involve placement of fill to elevate finished floor elevations above the 100-year flood hazard elevation. According to the Project Sponsor, the thickness of fill placed at the site would raise the site elevation such that finished floor elevations of habitable structures would provide protection for the 100-year tidally-induced flooding, consistent with requirements for development in the SFHA, plus 16 inches of sea level rise by 2050. However, implementation of Mitigation Measure HY-2.1, as required with the Project, would reduce the potentially significant flood risk impacts at the West Campus to less than significant. (PS/LTS)

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

Sea Level Rise. Sea level rise could result in higher flood elevations, alterations in the frequency of flood events, higher shallow groundwater tables, reduced storm drain system water surface elevation gradients, and overtopping or failure of levees. Different scenarios and models used to predict sea level rise result in different estimates of the magnitude of sea level rise. At the East Campus, the site is already developed with structures that could be vulnerable to sea level rise flooding, and the City's participation in the formulation of a sea level rise adaption strategy would ensure that impacts are less than significant. With the West Campus, the Reduced Intensity Alternative would expose people to this hazard through the development of new buildings. This would be a potentially significant impact, but could be mitigated through Mitigation Measures HY-4.1 and HY-4.2, as required for the Project. (PS/LTS)

Construction and Operational Stormwater Pollutants. Stormwater runoff from the Reduced Intensity Alternative at the West Campus would contain urban pollutants, similar to the Project. Compliance with applicable federal, State, and local regulations would ensure the Project would not violate water quality standards or permits, contribute additional sources of polluted runoff, or otherwise cause water quality degradation. With the use of Best Management Practices (BMPs) incorporated into the Project design and compliance with requirements of the SMCWPPP, which would be the responsibility of the City to enforce and monitor, operation of the West Campus would be in compliance with applicable permits. The reductions in stormwater pollutants that would be achieved through decreased stormwater runoff and use of BMPs would ensure that the Reduced Intensity Alternative does not contribute to additional sources of polluted runoff or otherwise degrade surface water quality. As a result, like the Project, Reduced Intensity Alternative operational water quality impacts would be less than significant. (LTS)

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

Cumulative Impacts. The Reduced Intensity Alternative would result in the same hydrology impacts as the Project. Cumulative impacts under the Project, including storm drain impacts, flooding and sea level rise, water quality, and groundwater supplies and recharge would result in less than cumulatively

considerable impacts. As such, the Reduced Intensity Alternative would result in the same less than cumulatively considerable impacts as the Project. (LTS)

Hazards and Hazardous Materials

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

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

The Reduced Intensity Alternative, like the Project, proposes various on-site drainage features to convey stormwater runoff to the City system. Although fill would be placed at the West Campus, which would increase the amount of separation between the BMP and groundwater and residual contaminants in soil, there is still the potential for stormwater to infiltrate to groundwater, where it could affect flow characteristics. This could, in turn, interfere with the groundwater remediation system. In addition, although the West Campus has been comprehensively evaluated, there is a potential for construction activities associated with the Reduced Intensity Alternative to encounter previously unidentified hazards, such as an abandoned underground storage tank located before permitting requirements were imposed, or other subsurface hazards, including soil. All of these activities proposed with the Reduced Intensity Alternative, similar to the Project, have the potential to result in a release of hazardous materials that could pose a human or environmental risk. However, implementation of Mitigation Measures HM-2.1 through HM-2.9 would reduce the potentially significant soil and groundwater contamination impacts at the West Campus to less than significant. (PS/LTS)

Effects on Ecological Systems. Studies have concluded that the conditions at the West Campus pose very little threat to biota from areas contaminated with hazardous substances due to lack of complete exposure pathways. The saltwater evaporation ponds located north of the West Campus and the wetland-mitigation area located east of the West Campus are separated from the site by paved roads/highways (Bayfront Expressway and Willow Road). However, because residual contaminants remain in soil, on-site soil movement during construction could provide a new potential pathway through which wildlife species could be exposed to contaminants in soil or fill material. Soil disturbance could be the result of general construction activities in which previously unidentified contaminants have been discovered, or it could be the result of implementation of Mitigation Measure HM-2.1. Compliance with the required procedures, as described for the Project in Section 3.13, Hazards and Hazardous Materials, would ensure that soil movement at the West Campus would not present a significant risk to the ecological environment. Therefore, with implementation of Mitigation Measure HM-2.1, potential Reduced Intensity Alternative construction ecosystem impacts related to handling of soil with residual contaminants and groundwater would be reduced to less-than-significant levels, similar to the Project. (LTS)

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

Maintenance Activities. Following occupancy of the Reduced Intensity Alternative, soil excavation may be required to maintain or replace utilities, repair foundations, or make other subsurface repairs. There is a potential for future maintenance or repair activities involving disturbance of subsurface soils on the West Campus to encounter previously unidentified hazards, such as contaminated soil or other subsurface features that could pose a hazard. This would be a potentially significant impact because it could expose maintenance workers to previously unidentified contaminated soil or other hazards. However, Mitigation Measure HM-5.1, as required for the Project, would reduce the potentially significant impact at the West Campus to less than significant. (PS/LTS)

Routine Hazardous Materials Use. As with the Project, the Reduced Intensity Alternative would be required to comply with mandatory hazardous materials regulations and SWPPP requirements; compliance would ensure that potential releases from the transport and use or disposal of hazardous materials during Reduced Intensity Alternative construction activities would be reduced to a less-than-

significant level. No mitigation is required. Operation of the Reduced Intensity Alternative at both the East Campus and West Campus would involve the use of household and commercial hazardous materials, such as cleaning agents, and paints. However, these materials would not be used, stored, or transported in large enough quantities to cause a substantial impact, either during construction or operation of the Reduced Intensity Alternative. Furthermore, the use, storage, and transportation of hazardous materials are subject to applicable federal, State, and local regulations, the intent of which is to minimize the risk of upset. Therefore, the risk of accidental explosion or release of hazardous materials that could create a health hazard with the implementation of the Reduced Intensity Alternative is low, and impacts would be less than significant, as with the Project. (LTS)

Hazardous Materials Risks from Off-Site Uses. Compliance with existing federal, State, and local laws and regulations that are administered and enforced by the Certified Unified Program Agency (CUPA) (San Mateo County Environmental Health Division), and Menlo Park Fire Department (MPFD) standards (the local agency that implements applicable hazardous materials-related sections of the California Fire Code and California Building Code), along with the City permitting requirements, would reduce the potential for off-site uses to pose a substantial hazard to the Reduced Intensity Alternative through routine or upset conditions. This alternative would result in the same less-than-significant impacts as the Project. (LTS)

Impairment of Emergency Access or Emergency Plans. As discussed in Section 3.5, Transportation, the Project would increase traffic in the vicinity of the Project site. The Reduced Intensity Alternative would also increase traffic, but to a lesser extent than the Project due to the 25 percent reduction in daily trips. However, due to the close proximity of the existing fire Station 77 (approximately 0.5 miles), the existing response times would remain relatively consistent. Emergency access to the East Campus would remain the same as existing conditions and access to the West Campus would be the same as proposed under the Project. As such, implementation of the Reduced Intensity Alternative, similar to the Project, would not impede emergency access routes and would continue to maintain the existing City grid system. Therefore, a less-than-significant impact would occur. (LTS)

Cumulative Impacts. All cumulative impacts of the Project would be less than cumulatively considerable with implementation of the mitigation measures for the Project. Since the same site plan is proposed at the West Campus, the Reduced Intensity Alternative would have the same cumulative impacts. Development of the West Campus and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Reduced Intensity Alternative and other cumulative development could also expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures proposed for the Project, and compliance with current regulatory standards, would reduce the cumulative impacts to less than significant. (LTS)

Population and Housing

Population Increases. The Reduced Intensity Alternative would not include development of new housing units and would thus not directly increase the residential population within the region. However, as with the Project, there would be an indirect population increase associated with new visitorship and employment during construction and operation this alternative. Approximately 1,350 net new workers would be employed at the East Campus and 2,100 new net workers would be employed at the West Campus. As such, the Reduced Intensity Alternative would increase the daytime population at the Project site. The increase in employment would result in a demand for new housing units and an indirect increase in the residential population. However, the percentage of regional housing demand resulting from the Reduced Intensity Alternative would be relatively small in comparison with projected housing growth in the region. In addition, this alternative represents only a portion of the net population increase expected for the Project, which would have a less-than-significant impact. Therefore, the impact of the Reduced Intensity Alternative would be less than the Project and remains less than significant. (LTS)

Cumulative Impacts. This alternative, in combination with other projected growth in the City, would increase population, employment, and housing in the City. The contribution of the Reduced Intensity Alternative to any cumulative increase in employment would not result in direct adverse impact, resulting in a less than cumulatively considerable impact, as with the Project. (LTS)

Public Services

Police Impacts. Like the Project, the Reduced Intensity Alternative would require an increased level of police services due to increased employment and onsite activity. With more on-site activity, there could be more incidents requiring police response. However, the increased level of police services would not be large enough to trigger the need for construction of new or expanded facilities that could adversely affect the physical environment or affect human health and safety. This alternative's impacts regarding police services would be less than the Project, but would remain less than significant. (LTS)

Fire Impacts. Similar to the Project, the Reduced Intensity Alternative would require an increased level of fire services due to increased employment and on-site activities over existing conditions. With more on-site activity there could be more incidents requiring fire department response. As with the Project, this alternative would require additional staff to serve the increased activity at the East Campus and West Campus. However, the increased level of fire services would not be large enough to trigger the need for construction of new or expanded facilities that could adversely affect the physical environment or affect health and safety. This alternative's impacts on fire services would be less than the Project, but would remain less than significant. (LTS)

School Impacts. This alternative would not involve the construction of new residential units in the City and, therefore, would not directly generate students. Nonetheless, this alternative would indirectly generate student demand from the induced housing caused by increased employment at the Project site. However, as with the Project, impacts from the indirectly generated students would be mitigated by the payment of the school impact fees established by SB 50 by the Project Sponsor and any subsequent

residential projects as a result of this alternative. This alternative's impacts regarding schools would be less than the Project, but would remain less than significant. (LTS)

Recreational Impacts. Like the Project, this alternative would result in an increased demand and utilization of nearby parks and recreational services due to increased employment. However, the Reduced Intensity Alternative would include open spaces and fitness facilities at the campuses, which could offset the potential deterioration of City parks due to the increase in employees at the East Campus and West Campus. Although the residential population in the City would increase as a result of the Project, there are no capacity issues and the existing facilities would be able to accommodate the increase in residents. In addition, the Project would be subject to the City's property taxes that finance the maintenance of City parks. The Project would not trigger the need for the construction or expansion of parks or other recreational facilities. This alternative's impacts regarding recreation would be less than the Project, but would remain less than significant. (LTS)

Library Impacts. The Reduced Intensity Alternative would add employees to the Project site who could use the City's libraries. However, it is expected that the existing libraries in the City would be able to accommodate an increase in employment at the Project site and the associated increase in residents. This alternative's impacts regarding libraries would be less than the Project, but would remain less than significant. (LTS)

Cumulative Impacts. As discussed in Section 3.15, Public Services, cumulative impacts with respect to police, fire protection, schools, recreational facilities, and libraries would be less than significant. Because this alternative would involve fewer employees compared to the Project, cumulative impacts would also be less than significant. (LTS)

Utilities

Water Demand. Implementation of the Reduced Intensity Alternative would result in approximately 2,350 fewer employees than the Project. As such, the water demand with implementation of the Reduce Intensity Alternative would be less than the approximately 161,848 gpd of water demand at full buildout of the Project. Under the Project, the Menlo Park Municipal Water District (MPMWD) would have an adequate supply to meet its projected demands in normal and single dry years. As such, since the Reduced Intensity Alternative would demand less water than the Project, implementation of this alternative would have a less-than-significant impact on water supplies in the MPMWD's service area and expansion of existing entitlement would not be necessary. (LTS)

Impacts to Water Treatment Facilities. As described above, implementation of the Reduced Intensity Alternative would not require expansion of the existing water treatment facilities serving the MPMWD. Further, the MPMWD has sufficient capacity under normal year conditions to accommodate the water demands of the Project within its Individual Supply Guarantee (ISG). As such, since the Reduced Intensity Alternative would include fewer employees at the Project site than the Project, this alternative would not require the MPMWD to acquire additional water supplies. The San Francisco Public Utilities Commission (SFPUC) has sufficient capacity in its water treatment facilities to deliver treated water to its customers. Therefore, implementation of the Reduced Intensity Alternative would not

require the expansion of existing water treatment facilities or the construction of new facilities, similar to the Project. This alternative would have a less-than-significant impact related to water treatment facilities. (LTS)

Wastewater Generation. The technical study prepared by West Yost Associates for the Project determined that under existing conditions, the 12-inch diameter pipeline is operating at capacity and would not accommodate additional flows from the Project. Although the Reduced Intensity Alternative would include fewer employees at the Project site, wastewater generation would still increase over existing conditions, just to a lesser extent than the Project. Nonetheless, since the existing pipeline is already at capacity, implementation of the West Campus would still require a new wastewater line to connect to the West Bay Sanitary District's (WBSD) main sewer system. Due to the limitations of the WBSD sanitary sewer pipeline and HHPS, the increase in employees at the Project site would result in a potentially significant impact with regard to wastewater conveyance infrastructure. Mitigation Measure UT-3.1, as required for the Project, would ensure that necessary capacity improvements are implemented so that to the WBSD sanitary sewer system has sufficient capacity to accommodate additional wastewater generated by the Reduced Intensity Alternative. This mitigation measure would reduce potentially significant impacts associated with this alternative to a less-than-significant level. (PS/LTS)

Solid Waste Generation. At full buildout and occupancy, the Project would generate approximately 2,630 tons of solid waste per year, or approximately 7.2 tons per day. Since the Reduced Intensity Alternative would include approximately 2,350 fewer employees than the Project, solid waste generation would be less under this alternative. The solid waste facilities that would serve the Project have sufficient remaining capacity to accommodate the Project. Therefore, the solid waste facilities that would serve the Project site would be sufficient to accommodate the Reduced Intensity Alternative. Therefore, this alternative would not contribute to the need to expand existing or construct new solid waste disposal facilities. Since the Reduced Intensity Alternative would involve less development than the Project, this alternative would also result in less-than-significant impacts related to solid waste generation. (LTS)

Stormwater Generation. With implementation of the Reduced Intensity Alternative, the increased employee density at the East Campus and the development of the West Campus would not result in adverse impacts to the City's storm drain system. Further, implementation of this alternative would adhere to provisions included in the Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit and the City's grading and drainage policies, which regulate the quantity of stormwater runoff from new development, specifically prohibiting a net increase in the rate of runoff from new development. No new facilities would be required. Therefore, as with the Project, implementation of the Reduced Intensity Alternative would have a less-than-significant impact on the City's storm drain system. (LTS)

Energy Demand. The Reduced Intensity Alternative would use slightly less energy than the Project due to the decrease in the number of employees at the Project site. Under the Project, implementation of the East Campus and West Campus individually would result in less-than-significant impacts on existing electricity and natural gas supply and associated infrastructure. According to the Menlo Park

Facebook Campus Energy Demand memorandum, implementation of the Project would result in an overall 67 percent reduction in per capita energy consumption over existing conditions. Since the Reduced Intensity Alternative would demand fewer gas and electric services, this alternative would result in an even greater reduction. Because the Reduced Intensity Alternative would be served by Pacific Gas and Electric (PG&E) and would result in substantial per capita energy reductions, impacts related to electricity and natural gas supply would be less than significant, similar to the Project. (LTS)

Cumulative Impacts. As discussed in Section 3.16, Utilities, the City’s water, stormwater drainage, and solid waste facilities have sufficient capacity to serve the cumulative development of the City. The City and its service providers would have adequate supplies to meet customer demand until 2035, including the demand of the Project combined with existing and planned future uses. Since the Reduced Intensity Alternative would use less water and energy and generate less wastewater, stormwater, and solid waste than the Project, which would not be cumulatively considerable. (LTS)

**Table 5-5
Comparison of Impacts among Project Alternatives**

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Land Use			
Conflicts with Adopted Land Use Plans and Policies	LTS	LTS	LTS
Cumulative Impacts	LTS	LTS	LTS
Visual Quality			
Alteration of Scenic Views	LTS	NI	N/A
Degradation of Existing Visual Character or Quality	LTS	NI	N/A
New Sources of Light and Glare	PS/LTS	NI	N/A
New Sources of Shadows	LTS	NI	N/A
Cumulative Impacts	LTS	NI	N/A
Wind			
Wind Impacts	LTS	NI	N/A
Cumulative Wind Impacts	LTS	NI	N/A
Transportation			
Impacts to Intersections	SU	NI	SU
Impacts on Roadway Segments	SU	NI	SU
Impacts to Routes of Regional Significance	SU	NI	SU
Impacts to Local Bicycle and Pedestrian Facilities	LTS	NI	LTS
Transit Service, Pedestrian Facilities, and Bicycle Facilities	LTS	NI	LTS
Cumulative Impacts	SU	NI	SU
Air Quality			
Conflict with or Obstruct Implementation of the Applicable Air Quality Plan.	LTS	NI	LTS
Violation of Any Air Quality Standard	SU	NI	SU
Construction Criteria Air Pollutant Emissions	LTS	NI	LTS
Localized Carbon Monoxide Impacts from Motor Vehicle Traffic	LTS	NI	LTS
Exposure to Toxic Air Contaminants	LTS	NI	LTS

Table 5-5
Comparison of Impacts among Project Alternatives

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Exposure to Objectionable Odors	LTS	NI	LTS
Cumulative Impacts	SU	NI	SU
Climate Change			
Greenhouse Gas Emissions	LTS	NI	LTS
Noise			
Exposure to Excessive Noise Level	SU	NI	SU
Temporary Increases in Ambient Noise Level	SU	NI	SU
Substantial Permanent Increase in Noise Level	SU	NI	SU
Substantial Temporary Increase in Noise Level	PS/LTS	NI	PS/LTS
Cumulative Impacts	SU	NI	SU
Cultural Resources			
Impacts to Historic Resources	LTS	NI	N/A
Impacts to Archaeological Resources	PS/LTS	NI	N/A
Impacts to Paleontological Resources	PS/LTS	NI	N/A
Disturbance of Human Remains	PS/LTS	NI	N/A
Cumulative Impacts	LTS	NI	N/A
Biological Resources			
Impacts on Special-Status Species at the Project Site	PS/LTS	NI	N/A
Indirect Impacts on Special-Status Species Inhabiting the Adjacent Water Marshes	PS/LTS	NI	N/A
Loss of Riparian and Other Habitats	LTS	NI	N/A
Impacts to Wildlife Corridors or Nursery Sites	PS/LTS	NI	N/A
Conflicts with Local Policies or Ordinances	LTS	NI	N/A
Cumulative Impacts	LTS	NI	N/A
Geology and Soils			
Strong Seismic Groundshaking and Seismic-Related Ground Failure	LTS	NI	LTS
Soil Hazards	LTS	NI	LTS
Soil Erosion	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Hydrology and Water Quality			
Changes in Stormwater Runoff	LTS	NI	LTS
100-Year Floodplain	PS/LTS	NI	PS/LTS
Impeding or Redirecting Flood Flows	LTS	NI	LTS
Sea Level Rise	PS/LTS	NI	PS/LTS
Construction and Operational Stormwater Pollutants	LTS	NI	LTS
Effects on Groundwater Supplies and Recharge	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS

**Table 5-5
Comparison of Impacts among Project Alternatives**

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Hazards and Hazardous Materials			
Asbestos, Lead, or Other Hazardous Materials in Building Components	LTS	NI	LTS
Soil and Groundwater Contamination	PS/LTS	NI	PS/LTS
Effects on Ecological Systems	LTS	NI	LTS
Inference with Groundwater Monitoring Systems	LTS	NI	LTS
Maintenance Activities	PS/LTS	NI	PS/LTS
Routine Hazardous Materials Use	LTS	NI	LTS
Hazardous Materials Risks from Off-Site Uses	LTS	NI	LTS
Impairment of Emergency Access and Emergency Plans	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Population and Housing			
Population Increase	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Public Services			
Police Impacts	LTS	NI	LTS
Fire Impacts	LTS	NI	LTS
School Impacts	LTS	NI	LTS
Recreational Impacts	LTS	NI	LTS
Library Impacts	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Utilities and Service Systems			
Water Demand	LTS	NI	LTS
Impacts to Water Treatment Facilities	LTS	NI	LTS
Wastewater Generation	PS/LTS	NI	PS/LTS
Solid Waste Generation	LTS	NI	LTS
Stormwater Generation	LTS	NI	LTS
Energy Demand	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS

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

Source: Atkins, 2011.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Sections 21002 and 21081 of CEQA requires lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior

alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the proposed project (CEQA Guidelines Section 15126.6).

On the basis of comparing the extent to which the alternatives reduce or avoid the significant impacts of the Project, the No Project Alternative would be the environmentally superior alternative. Since no development would occur at the Project site, there would be no construction or operational impacts. However, legally the No Project cannot be selected as the environmentally superior alternative.

As previously discussed, the Reduced Intensity Alternative involving a 25 percent reduction in daily trips is the only other alternative that has been deemed feasible. This alternative would result in a reduction of the trip cap in order to limit the amount of daily trips to and from the Project site. This, in turn, would likely result in fewer employees. However, since the same site plan is proposed at the West Campus, the same construction and footprint impacts discussed for the Project would occur for the Reduced Intensity Alternative. Only the impacts related to the daily trip cap and the number employees would be reduced with this alternative. Nonetheless, the reduction would not be enough to reduce any of the significant and unavoidable impacts identified in the Project analysis.

While the Reduced Intensity Alternative would not eliminate significant and unavoidable impacts, it would reduce the severity of some identified impacts. As such, the Reduced Intensity Alternative is considered the Environmentally Superior Alternative.