

# CHAPTER 5

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## Alternatives

### 5.1 Criteria for Selecting Alternatives

CEQA requires that the EIR identify and describe a “reasonable range of alternatives” to the project. Beyond the required No Project Alternative, the alternatives selected for comparison would attain most of the basic objectives of the project and avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines Section 15126.6). The “range of alternatives” is governed by the “rule of reason” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the decision-making body and informed public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

The alternatives considered in this EIR were selected based on the following factors:

1. The extent to which the alternative would accomplish most of the basic objectives of the Specific Plan (identified in Chapter 3);
2. The extent to which the alternative would avoid or lessen any of the identified significant environmental effects of the project (discussed throughout Chapter 4);
3. The feasibility of the alternative, taking into account site suitability, availability of infrastructure, property control (ownership), and consistency with applicable plans and regulatory limitations;
4. The extent to which an alternative contributes to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
5. The CEQA Guidelines requirement to consider a no project alternative and to identify an environmentally superior alternative in addition to the no-project alternative (CEQA Guidelines, Section 15126.6(e)).

#### 5.1.1 Specific Plan Intent Relevant to Selection of Alternatives

The overall intent of the El Camino Real/Downtown Specific Plan is to enhance community life, character and vitality through mixed-use infill projects sensitive to the small-town character of Menlo Park, and to improve connections across El Camino Real over the next 30 years. The Menlo Park City Council unanimously accepted the El Camino Real/Downtown Vision Plan on July 15, 2008, to inform and guide the Specific Plan. The Vision Plan established the following twelve goals:

- Maintain a village character unique to Menlo Park.
- Provide greater east-west town-wide connectivity.
- Improve circulation and streetscape conditions on El Camino Real.
- Ensure that El Camino Real development is sensitive to and compatible with adjacent neighborhoods.
- Revitalize underutilized parcels and buildings.
- Activate the train station area.
- Protect and enhance pedestrian amenities on Santa Cruz Avenue.
- Expand shopping, dining and neighborhood services to ensure a vibrant downtown.
- Provide residential opportunities in the Vision Plan area.
- Provide plaza and park spaces.
- Provide an integrated, safe, and well-designed pedestrian and bicycle network.
- Develop parking strategies and facilities that meet the commercial and residential needs of the community.

Based on the goals of the Vision Plan, the Specific Plan was formulated with the following five “guiding principles”:

- Generate Vibrancy;
- Strengthen the Public Realm;
- Sustain Menlo Park’s Village Character;
- Enhance Connectivity; and
- Promote Healthy Living and Sustainability.

The Vision Plan goals and Specific Plan guiding principles together establish the project objectives.

### **5.1.2 Alternative Site Location**

Alternative sites were not selected for evaluation because the primary purpose of the Specific Plan is to guide development of this specific geographic area, and as such the project goals are intrinsic to the Plan area. As noted above, project objectives include enhancing the community experience of residents in the downtown area and improving east-west connections across the railroad tracks and El Camino Real. These and related objectives cannot be met at another site.

### **5.1.3 Significant Impacts Resulting from the Specific Plan**

To determine alternatives that would avoid or lessen any of the identified significant environmental effects of the Specific Plan, the significant impacts of the Specific Plan must be considered. Impacts that are not mitigated to less-than-significant levels are considered “significant and unavoidable.” The significant and unavoidable impacts identified for the project are listed below.

- **Impact AIR-1:** Implementation of the Specific Plan would result in increased long-term emissions of criteria pollutants associated with construction activities that could contribute substantially to an air quality violation.
- **Impact AIR-2:** Implementation of the Specific Plan would result in increased long-term emissions of criteria pollutants from increased vehicle traffic and on-site area sources that would contribute substantially to an air quality violation.
- **Impact GHG-1:** The Specific Plan would generate GHG emissions, both directly and indirectly, that would have a significant impact on the environment.
- **Impact GHG-2:** The Specific Plan could conflict with applicable plans, policies or regulations of an agency with jurisdiction over the Specific Plan adopted for the purpose of reducing the emissions of GHGs.
- **Impact NOI-5:** Implementation of the Specific Plan, together with anticipated future development in the area in general, would result in a significant increase in noise levels in the area.
- **Impact TR-1:** Traffic from future development in the Plan area would adversely affect operation of area intersections.
- **Impact TR-2:** Traffic from future development in the Plan area would adversely affect operation of local roadway segments.
- **Impact TR-7:** Cumulative development, along with development in the Plan area would adversely affect operation of local intersections.
- **Impact TR-8:** Cumulative development, along with development in the Plan area would adversely affect operation of local roadway segments.

Under CEQA, the important conclusion is whether the alternatives reduce significant impacts to less than significant levels. Each of the alternatives is discussed below. Table 5-3 at the end of this chapter compares all the impacts of the proposed Specific Plan to each of the alternatives and indicates whether the impact would have the same, lesser, or greater effect on the environment.

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## 5.2 Alternatives Selected for Consideration

### 5.2.1 Environmental Alternatives

With consideration given to the selection criteria identified above, a reasonable range of project alternatives as shown in **Table 5-1** below are discussed and analyzed throughout this chapter:

The percentages of Alternative 1 relative to the project were estimated comparing the likely FARs and dwelling unit totals under the existing Zoning Ordinance versus those proposed in the Specific Plan. Alternative 2 was estimated as a reduced intensity version of the project that is an equal interval between the Project and Alternative 1, and Alternatives 3 and 4 were constructed as

**TABLE 5-1  
FORECAST GROWTH FOR ALTERNATIVES**

	Project		Alternative 1 (No Project)		Alternative 2 (Reduced Project)		Alternative 3 (Reduced Commercial/ Retail Space)		Alternative 4 (Reduced Residential)	
	Quantity	% of project	Quantity	% of project	Quantity	% of project	Quantity	% of project	Quantity	% of project
<b>Residential (dwelling units)</b>	680	100%	320	47%	500	74%	680	100%	500	74%
<b>Retail (square feet)</b>	91,800	100%	60,588	66%	76,194	83%	76,194	83%	91,800	100%
<b>Commercial (square feet)</b>	240,820	100%	158,941	66%	199,881	83%	199,881	83%	240,820	100%
<b>Hotel (rooms)</b>	380	100%	251	66%	315	83%	315	83%	380	100%

thematic hybrids of the Project and Alternative 2, limiting retail/commercial space and residential units, respectively.

The trip generation estimates for the project and the four alternatives are summarized in **Table 5-2**, below. As can be seen from the table, Alternative 4 (Reduced Residential) is projected to generate the largest number of daily, and morning and evening peak hour trips. Alternative 1 is projected to generate the smallest number of daily, morning and evening peak hour trips. Alternatives 2 and 3 are projected to generate more trips than Alternative 1, but fewer than Alternative 4.

An EIR is required to evaluate the impacts of a no project alternative. The purpose of evaluating the no project alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.

## 5.2.2 Description and Analysis of Alternatives

Throughout this section, a description of each alternative is followed by a discussion of impacts and how those impacts compare to those of the Specific Plan.

As permitted by CEQA, the effects of the alternatives are discussed in less detail than the impact discussions of the Specific Plan (CEQA Guidelines Section 15126.6[d]). However, the alternatives analysis is conducted at a sufficient level of detail to provide the public, other public agencies, and City decision-makers adequate information to evaluate the alternatives and for the City to approve any of the alternatives without further environmental review.

The impacts associated with the Specific Plan and each alternative are for buildout conditions. Impacts are stated as levels of significance *after* implementation of mitigation measures identified in Chapter 4.

**TABLE 5-2  
ALTERNATIVES TRIP GENERATION SUMMARY**

Alternative	Number of Trips						
	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
<b>Proposed Project</b>							
Net Added Vehicle Trips	13,385	519	380	899	619	700	1319
<b>Alternative 1 (No Project)</b>							
Net Added Vehicle Trips	8,178	333	205	538	364	436	800
Percentage of Project Trips	61%	64%	54%	60%	59%	62%	61%
<b>Alternative 2 (Reduced Project)</b>							
Net Added Vehicle Trips	10,797	423	297	720	475	567	1,062
Percentage of Project Trips	81%	82%	78%	80%	80%	81%	81%
<b>Alternative 3 (Reduced Commercial/Retail Space)</b>							
Net Added Vehicle Trips	11,703	440	357	797	559	600	1,159
Percentage of Project Trips	87%	85%	94%	89%	90%	86%	88%
<b>Alternative 4 (Reduced Residential)</b>							
Net Added Vehicle Trips	12,479	502	320	822	555	667	1,222
Percentage of Project Trips	93%	97%	84%	91%	90%	95%	93%

SOURCES: Fehr & Peers, 2010; ITE Trip Generation, 8<sup>th</sup> Edition (2008)

## 5.2.3 Description of Alternatives

### Alternative 1—No Project Alternative

Under this alternative, a Specific Plan for the El Camino Real/Downtown area would not be adopted. Existing General Plan designations and zoning would remain in place, and permitted building heights and development intensities would not increase. In addition, none of the public realm improvements called for in the Specific Plan (such as pocket parks, sidewalks, and parking garages) would be undertaken.

Future development under the no project alternative would occur, but would be undertaken in accordance with existing regulations including applicable project-specific environmental review. The build out conditions under the Specific Plan, which would include 680 new residential units, 91,800 square feet of new retail, 240,820 square feet of new commercial space, 380 new hotel rooms, and 1,357 new jobs would not be realized. Instead, less growth would be anticipated, as shown in Table 5-1.

## **Alternative 2—Reduced Project**

Under this alternative, the Plan area would be developed under a similar land use plan as that proposed under the Specific Plan, but with approximately 20 percent less commercial and retail space and approximately 30 percent fewer residential units. The reduced project would include development of:

- 500 residential units;
- 76,194 square feet of retail space;
- 199,881 square feet of commercial space; and
- 315 hotel rooms.

Under this alternative, the overall land use and building regulations and guidelines would be enacted, likely with somewhat reduced density, intensity, and height standards. The conceptual plans, standards, and guidelines for circulation and streetscape improvements and public space facilities proposed under the Specific Plan would also be adopted. However, the reduced amount of private development could result in less impact fee revenue and associated funding opportunities for public improvements, which could reduce the number of public improvements that could be realized.

## **Alternative 3—Reduced Commercial/Retail Space**

Under this alternative, the Plan area would be developed under a similar land use plan as that proposed under the Specific Plan, but with roughly 20 percent less commercial and retail space. The residential development would remain the same as for the Specific Plan. The reduced commercial/retail space alternative would include development of:

- 680 residential units;
- 76,194 square feet of retail space;
- 199,881 square feet of commercial space; and
- 315 hotel rooms.

Under this alternative, the overall land use and building regulations and guidelines would be enacted, possibly with reduced intensity and/or height standards. The conceptual plans, standards, and guidelines for circulation and streetscape improvements and public space facilities proposed under the Specific Plan would also be adopted. However, the reduced amount of private development could result in less impact fee revenue and associated funding opportunities for public improvements, which could reduce the number of public improvements that could be realized.

## **Alternative 4—Reduced Residential**

Under this alternative, the Plan area would be developed under a similar land use plan as that proposed under the Specific Plan, but with roughly 30 percent less residential development. The commercial and retail development would remain the same as for the Specific Plan. The reduced residential alternative would include development of:

- 500 residential units;
- 91,800 square feet of retail space;
- 240,820 square feet of commercial space; and
- 380 hotel rooms.

Under this alternative, the overall land use and building regulations and guidelines would be enacted, possibly with reduced density and/or height standards. The conceptual plans, standards, and guidelines for circulation and streetscape improvements and public space facilities proposed under the Specific Plan would also be adopted. However, the reduced amount of private development could result in less impact fee revenue and associated funding opportunities for public improvements, which could reduce the number of public improvements that could be realized.

## 5.2.4 Less than Significant Impacts

All the alternatives as described in Table 5-1 above, show varying degrees of intensity in development. Table 5-3, at the end of this chapter, includes a comparison of all the impacts under each alternative, including less than significant impacts, compared to the Specific Plan.

The no project alternative would not be able to achieve the goals promoted by the guiding principles, namely, to generate vibrancy, strengthen the public realm, sustain Menlo Park's village character, enhance connectivity, and promote healthy living and sustainability. All other alternatives would further to some degree the project objectives through the enactment of the overall land use and building regulations and guidelines, as well as the adoption of the conceptual plans, standards, and guidelines for circulation and streetscape improvements and public space facilities. However, as noted above, the various reductions in overall development in Alternatives 2 through 4 would likely result in less funding and fewer opportunities for the public space and connectivity improvements, which are key goals of the project. The reduced development would also mean less vibrancy, and as such these Alternatives cannot be considered to achieve the project objectives as fully as the Specific Plan itself.

### Alternative 1—No Project Alternative

The no project alternative has the least amount of development compared to the Specific Plan because under this alternative the streetscape improvements, gathering places, and parking structures would not happen, and construction activities would occur at existing levels and under the current land use controls and regulations.

The development regulations and design guidelines of the Specific Plan would not be adopted, and as such the no project alternative would include neither increased heights nor the associated massing and design controls. The existing case-by-case architectural review process would be retained. As a result, the no project alternative would result in fewer overall changes to aesthetic character relative to the Specific Plan, although there would also be fewer improvements and enhancements. The reduction in maximum building heights would result in fewer shadow-related effects.

The no project alternative could result in more hydrology and water quality impacts because of the greater amount of impervious surfaces that would exist compared to the Specific Plan, which proposes porous paving materials and green roofs for new construction and introduction of new open space in the form of pocket parks. However, existing regulations such as National Pollution Discharge Elimination System (NPDES) permitting requirements would limit the potential for these impacts to become significant.

The no project alternative may be considered to have a greater land use impact with regard to physically dividing an established community, in that it would not include the Specific Plan's east-west connectivity improvements. The no project alternative could also be considered to have more population and housing impacts than the Specific Plan because residential uses would be reduced by a greater percentage than commercial uses, relative to the Specific Plan. This would result in the City's ratio of employed residents to jobs becoming even more weighted toward jobs.

Public services impacts could be fewer because neither the residential nor worker populations would increase as substantially relative to the Specific Plan. There would be fewer new students to be accommodated in schools and there would be less new demand for park and recreational facilities, although there would be fewer new open spaces as well.

All other less-than-significant impacts under the Specific Plan would also remain less than significant under this alternative. The no project alternative would not specifically include mitigations included in this EIR for the Specific Plan, but equivalent mitigations would likely be applied as part of project-specific environmental review.

## **Alternative 2—Reduced Project**

The reduced project alternative has the next lowest amount of development compared to the Specific Plan with an almost 30 percent reduction in residential development and a roughly 20 percent reduction in commercial/retail space development as shown in Table 5-1. All the streetscape improvements, new open spaces, and TDM programs would be approved as they would be under the Specific Plan. However, as stated above, the reduced amount of private development could result in less impact fee revenue and associated funding opportunities for public improvements, which could reduce the number of public improvements that could be realized. Compared to the Specific Plan, this alternative would result in fewer residents and fewer workers in the Plan area. Therefore, all of the less-than-significant impacts under the Specific Plan would still remain less-than-significant under this alternative, although to a lesser degree than under the Specific Plan, and also to a lesser degree than under the reduced commercial/retail space and reduced residential alternatives. None of the impacts increase under this alternative such that they would be significant because this alternative would result in incrementally less growth under the project, but would occur in a similar location.

## **Alternative 3—Reduced Commercial/Retail Space**

This alternative is similar to the Specific Plan in all respects, except with about a 20 percent reduction in commercial and retail space as shown in Table 5-1, resulting in a corresponding

reduction in workers in the Plan area. This would translate into a reduced indirect need for housing and parking for these workers. All other aspects of the Specific Plan, such as the housing development, streetscape improvements, new open spaces, and TDM programs would be approved as they would be under the Specific Plan. However, the reduced amount of private development could result in less impact fee revenue and associated funding opportunities for public improvements, which could reduce the number of public improvements that could be realized. Therefore, all the less-than-significant impacts under the Specific Plan would still remain less-than-significant under this alternative, although to a lesser degree than under the Specific Plan, but at a slightly higher degree than the reduced project alternative. None of the impacts increase under this alternative such that they would be significant because this alternative would result in incrementally less growth under the project, but would occur in a similar location.

### **Alternative 4—Reduced Residential**

This alternative is similar to the Specific Plan in all respects, except with about a 30 percent reduction in residential development as shown in Table 5-1, resulting in a corresponding reduction in residents in the Plan area. All other aspects of the Specific Plan, such as the commercial and retail development, streetscape improvements, new open spaces, and TDM programs would be approved as they would be under the Specific Plan. However, the reduced amount of private development could result in less impact fee revenue and associated funding opportunities for public improvements, which could reduce the number of public improvements that could be realized. Therefore, all of the less-than-significant impacts under the Specific Plan would still remain less-than-significant under this alternative, although at a lesser degree than under the Specific Plan, but at a slightly higher degree than the reduced project alternative. None of the impacts increase under this alternative such that they would be significant because this alternative would result in incrementally less growth under the project, but would occur in a similar location.

## **5.2.5 Significant and Unavoidable Impacts**

Table 5-3, at the end of this chapter provides a comparison of all the impacts under the Specific Plan, including significant and unavoidable impacts, against all the alternatives.

### **Alternative 1—No Project**

#### ***Air Quality***

The no project alternative would result in lesser impacts associated with construction than would the proposed project, including exposure of air pollutants to sensitive receptors, because less construction would occur under the no project alternative. The likelihood of a subsequent development project being large enough under the no project alternative to result in significant construction-related air quality impacts would be less than under the proposed Specific Plan, because, as noted above, existing height limits and development controls would provide less incentive for larger projects. However, depending on the nature of subsequent projects, construction-related air quality effects could exceed Bay Area Air Quality Management District

thresholds, and this impact is conservatively judged to be significant and unavoidable, as it would be under the proposed project. Because anticipated development levels would be less than those with the proposed project, operational air quality impacts under the no project alternative would be less than those under the Specific Plan because there would be fewer trips generated throughout the Plan area under the no project alternative (approximately 8,178 daily trips versus 13,385 daily trips at full project build out). In addition, the no project alternative would not generate as many operational air quality impacts that are associated with natural gas combustion for space and water heating, and the use of consumer products due to the smaller amount of building space and smaller population that would be located within the Plan area under the no project alternative. Overall, the no project alternative would result in less substantial air quality impacts than the Specific Plan.

### ***Greenhouse Gases and Climate Change***

By consisting of less overall development, the no project alternative would generate less total greenhouse gases from motor vehicle emissions, energy use, and other sources. However, the standard of significance for GHG emissions is a ratio of 4.6 metric tons of CO<sub>2</sub>e per service population (residents + employees) per year. Because the no project alternative would generate residents and employees at similar rates to the Specific Plan, the overall ratio of GHG emissions to service population under the no project alternative would be similar to the 5.8 ratio of the Specific Plan, which would still be a significant and unavoidable impact. In addition, the ratio could be worse, because the no project alternative would not include the Specific Plan's improved bicycle and pedestrian infrastructure, LEED requirements, and other sustainability measures that can reduce vehicle trips and energy use.

### ***Noise***

The no project alternative would add fewer daily trips (8,178) than the Specific Plan (13,385). However, the additional traffic would still generate noise increases on streets where the noise levels already exceed those permitted by the Menlo Park Municipal Code (60 dBA L<sub>eq</sub>) as well as on streets where noise levels exceed 70 dBA, L<sub>dn</sub>, which is considered "normally unacceptable" under the General Plan. Because the no project alternative would cumulatively contribute to increased noise levels on roadways where noise levels are currently in excess of standards and where mitigations (such as sound walls) are not feasible, this impact would be lessened in intensity relative to the Specific Plan but still considered significant and unavoidable.

### ***Transportation, Circulation and Parking***

The following discussion is based on the detailed traffic impact analysis that was prepared for this EIR and provided in Appendix E of this report.

#### **Intersection Impacts**

**Middlefield Road and Glenwood Avenue/Linden Avenue (Intersection Number 20).** As with the Specific Plan, the no-project Alternative would maintain the unacceptable intersection operating condition at the Middlefield Road and Glenwood Avenue/Linden Avenue intersection

and approach in the afternoon peak hour. This intersection currently operates at a level-of-service (LOS) F, which is below the LOS threshold of D.

At full build out of the Specific Plan (i.e., existing plus project conditions), the average intersection delay would be an increase of approximately 2.6 seconds during the morning peak-hour traffic and an increase of approximately 9.1 seconds in the evening peak hour traffic. However, mitigation measures that could be implemented under the Specific Plan propose signalization of the Middlefield Road and Glenwood Avenue/Linden Avenue intersection, which would improve the level of service to LOS B during the morning peak-hour traffic and LOS C during the evening peak-hour traffic. However, without a funding mechanism, this impact is considered to be significant and unavoidable under the Specific Plan.

Under the no project alternative, the traffic delays experienced at this intersection would remain at LOS F and the improvements proposed for this intersection as part of the Specific Plan would not be realized, and it would similarly remain significant and unavoidable.

**Other Intersections.** The no project alternative would generate fewer AM and PM peak-hour trips than the proposed Specific Plan's maximum land use program. These reductions would result in reduced traffic congestion resulting in fewer impacts under the proposed Plan. The following intersection and roadway segment delays would be eliminated with the no project alternative:

Intersection Number	Impact
3	El Camino Real and Valparaiso Avenue/Glenwood Avenue intersection in the PM peak hour under cumulative plus the Specific Plan;
19	Middlefield Road and Encinal Avenue intersection in the PM peak hour under the Specific Plan;
29	Bay Road and Willow Road intersection in the AM peak hour under cumulative plus the Specific Plan; and
33	Santa Cruz Avenue and Orange Avenue/Avy Avenue intersection in the PM peak hour under the Specific Plan;

  

Segment Number	Impact
7	Oak Grove Avenue roadway segment between El Camino Real and Crane Avenue under the Specific Plan;
13	Santa Cruz Avenue roadway segment between Orange Avenue/Avy Avenue and Alameda de las Pulgas under the Specific Plan; and
16	Ravenswood Avenue roadway segment between Middlefield Road and Laurel Drive under the Specific Plan.

Overall, the no project alternative would result in fewer impacts to transportation, circulation and parking compared to the Specific Plan.

### **Cumulative Impacts**

The no project alternative would result in fewer new trips than under the Specific Plan but would still add traffic to the cumulative scenario resulting in significant cumulative effects.

Overall, the reduced project alternative would result in slightly fewer intersection impacts, as listed above, to transportation, circulation and parking compared to the Specific Plan. However, impacts would be significant and unavoidable as with the Specific Plan.

## **Alternative 2—Reduced Project**

### ***Air Quality***

As with the Specific Plan, this alternative is likely to have significant and unavoidable impacts during construction, as the scale of development proposed under this alternative would be similar to the Specific Plan although at a lesser intensity. The mitigation measures discussed for the Specific Plan would also apply to this alternative; however, even with mitigation, the residual impact on air quality, particularly those associated with construction and exposure of air pollutants to sensitive receptors such as residences and schools is expected to be significant and unavoidable. The reduced project alternative would result in similar air quality impacts as for the Specific Plan.

Operational air quality impacts under this alternative would be less than those under the Specific Plan because this alternative would generate fewer daily traffic trips over existing conditions (approximately 10,797 net added vehicle trips as opposed to 13,385 at full build out of the Specific Plan). In addition, this alternative would generate fewer operational air quality impacts than the Specific Plan that are associated with natural gas combustion for space and water heating, landscaping, and the use of consumer products due to the smaller amount of building space and small population that would be located within the Plan area under this alternative. Overall, the reduced project alternative would result in fewer air quality impacts than the Specific Plan. However, the rate of increase in vehicle miles traveled under this alternative would remain greater than the rate of increase in population and, therefore, similar to the proposed Specific Plan, this alternative would also have a significant and unavoidable impact with regard to consistency with the assumptions of the Clean Air Plan.

### ***Greenhouse Gases and Climate Change***

By consisting of less overall development, Alternative 2 would generate less total greenhouse gases from motor vehicle emissions, energy use, and other sources. However, the standard of significance for GHG emissions is a ratio of 4.6 metric tons of CO<sub>2</sub>e per service population (residents + employees) per year. Because Alternative 2 would generate residents and employees at similar rates to the Specific Plan, the overall ratio of GHG emissions to service population under Alternative 2 would be similar to the 5.8 ratio of the Specific Plan, which would still be a significant and unavoidable impact.

## **Noise**

Alternative 2 would add fewer daily trips (10,797) than the Specific Plan (13,385). However, the additional traffic would still generate noise increases on streets where the noise levels already exceed those permitted by the Menlo Park Municipal Code (60 dBA  $L_{eq}$ ) as well as on streets where noise levels exceed 70 dBA,  $L_{dn}$ , which is considered “normally unacceptable” under the General Plan. Because Alternative 2 would cumulatively contribute to increased noise levels on roadways where noise levels are currently in excess of standards and where mitigations (such as sound walls) are not feasible, this impact would be lessened in intensity relative to the Specific Plan but still considered significant and unavoidable.

## **Transportation, Circulation and Parking**

The following discussion is based on the detailed traffic impact analysis that was prepared for this EIR and provided in Appendix E of this report.

### **Intersection Impacts**

**Middlefield Road and Glenwood Avenue/Linden Avenue (Intersection Number 20).** As with the Specific Plan (and all alternatives), the reduced project alternative would maintain the unacceptable intersection operating condition at the Middlefield Road and Glenwood Avenue/Linden Avenue intersection and approach. This intersection currently operates at a level-of-service (LOS) F, which is below the LOS threshold of D.

At full build out of the Specific Plan (i.e., existing plus project conditions), the average intersection delay would be an increase of approximately 2.6 seconds during the morning peak-hour traffic and an increase of approximately 9.1 seconds in the evening peak hour traffic. However, mitigation measures that could be implemented under the Specific Plan propose signalization of the Middlefield Road and Glenwood Avenue/Linden Avenue intersection, which would improve the level of service to LOS B during the morning peak-hour traffic and LOS C during the evening peak-hour traffic. These mitigation measures would apply to this alternative as well, improving level of service conditions and resulting in a less-than-significant impact at this intersection. However, without a funding mechanism, this impact is considered to be significant and unavoidable under the Specific Plan. Under Alternative 2, this impact would similarly remain significant and unavoidable.

**Other Intersections.** The reduced project alternative would generate fewer morning and evening peak-hour trips than with the Specific Plan. These reductions in vehicle trips would be approximately 20 percent less than under the Specific Plan as shown in Table 5-2, and therefore would not result in substantial reductions in traffic congestion. Impacts to the following intersections and roadway segments would be similar to those identified under the Specific Plan, as described in Section 4.13, *Transportation, Circulation, and Parking*.

<b>Intersection Number</b>	<b>Impact</b>
3	El Camino Real and Valparaiso Avenue/Glenwood Avenue intersection in the PM peak hour under cumulative plus the Specific Plan;
19	Middlefield Road and Encinal Avenue intersection in the PM peak hour under the Specific Plan;
29	Bay Road and Willow Road intersection in the AM peak hour under cumulative plus the Specific Plan; and
33	Santa Cruz Avenue and Orange Avenue/Avy Avenue intersection in the PM peak hour under the Specific Plan;

  

<b>Segment Number</b>	<b>Impact</b>
7	Oak Grove Avenue roadway segment between El Camino Real and Crane Avenue under the Specific Plan;
13	Santa Cruz Avenue roadway segment between Orange Avenue/Avy Avenue and Alameda de las Pulgas under the Specific Plan; and
16	Ravenswood Avenue roadway segment between Middlefield Road and Laurel Street under the Specific Plan.

The Specific Plan proposes implementation of a Transportation Demand Management (TDM) program that would reduce the number of vehicle trips, although the specific reduction cannot be quantified. The benefits of the TDM program include bicycle storage and use facilities, subsidies for alternate transportation methods, and car share and vanpool programs. This TDM program would be implemented under the reduced project alternative.

### **Cumulative Impacts**

The reduced project alternative would result in fewer new trips than under the Specific Plan but would still add traffic to the cumulative scenario resulting in significant cumulative effects.

Overall, the reduced project alternative would result in slightly fewer intersection impacts, as listed above, to transportation, circulation and parking compared to the Specific Plan. However, impacts would be significant and unavoidable as with the Specific Plan.

## **Alternative 3—Reduced Commercial/Retail Space**

### ***Air Quality***

As with the Specific Plan, this alternative is likely to have significant and unavoidable impacts during construction, as the scale of development proposed under this alternative would be similar to the Specific Plan although at a lesser intensity. The mitigation measures discussed for the Specific Plan would also apply to this alternative; however, even with mitigation, the residual impact is expected to be significant and unavoidable. The reduced commercial/retail space alternative would result in similar air quality impacts as for the Specific Plan, particularly those associated with construction and exposure of air pollutants to sensitive receptors.

Operational air quality impacts under this alternative would be less than those under the Specific Plan because this alternative would generate fewer daily traffic trips over existing conditions (approximately 11,703 net added vehicle trips as opposed to 13,385 at full build out of the Specific Plan). Overall, the reduced commercial/retail space alternative would result in fewer air quality impacts than the Specific Plan. However, the rate of increase in vehicle miles travelled under this alternative would remain greater than the rate of increase in population and, therefore, similar to the proposed Specific Plan, this alternative would also have a significant and unavoidable impact with regard to consistency with the assumptions of the Clean Air Plan.

### ***Greenhouse Gases and Climate Change***

By consisting of less overall development, Alternative 3 would generate less total greenhouse gases from motor vehicle emissions, energy use, and other sources. However, the standard of significance for GHG emissions is a ratio of 4.6 metric tons of CO<sub>2e</sub> per service population (residents + employees) per year. Because Alternative 3 would generate residents and employees at similar rates to the Specific Plan, the overall ratio of GHG emissions to service population under Alternative 3 would be similar to the 5.8 ratio of the Specific Plan, which would still be a significant and unavoidable impact.

### ***Noise***

Alternative 3 would add fewer daily trips (11,703) than the Specific Plan (13,385). However, the additional traffic would still generate noise increases on streets where the noise levels already exceed those permitted by the Menlo Park Municipal Code (60 dBA L<sub>eq</sub>) as well as on streets where noise levels exceed 70 dBA, L<sub>dn</sub>, which is considered “normally unacceptable” under the General Plan. Because Alternative 3 would cumulative contribute to increased noise levels on roadways where noise levels are currently in excess of standards and where mitigations (such as sound walls) are not feasible, this impact would be lessened in intensity relative to the Specific Plan but still considered significant and unavoidable.

### ***Transportation, Circulation and Parking***

The following discussion is based on the detailed traffic impact analysis that was prepared for this EIR and provided in Appendix E of this report.

#### **Intersection Impacts**

**Middlefield Road and Glenwood Avenue/Linden Avenue (Intersection Number 20).** As with the Specific Plan (and all alternatives), the reduced commercial/retail space alternative would maintain the unacceptable intersection operating condition at the Middlefield Road and Glenwood Avenue/Linden Avenue intersection and approach. This intersection currently operates at a level-of-service (LOS) F, which is below the LOS threshold of D.

At full build out of the Specific Plan, the average intersection delay would be an increase of approximately 2.6 seconds during the morning peak-hour traffic and an increase of approximately 9.1 seconds in the evening peak hour traffic. However, mitigation measures that could be

implemented under the Specific Plan propose signalization of the Middlefield Road and Glenwood Avenue/Linden Avenue intersection, which would improve the level of service to LOS B during the morning peak-hour traffic and LOS C during the evening peak-hour traffic. These mitigation measures would apply to this alternative as well, improving level of service conditions and resulting in a less-than-significant impact at this intersection. However, without a funding mechanism, this impact is considered to be significant and unavoidable under the Specific Plan. Under Alternative 3, this impact would similarly remain significant and unavoidable.

**Other Intersections.** The reduced commercial/retail space alternative would generate fewer morning and evening peak-hour trips than with the Specific Plan. These reductions in vehicle trips would be approximately 10 to 15 percent less during the AM and PM peak hours than under the Specific Plan as shown in Table 5-2, and therefore, would not result in substantial reductions in traffic congestion. Impacts to the following intersections and roadway segments would be similar to those identified under the Specific Plan, as described in Section 4.13, *Transportation, Circulation, and Parking*.

Intersection Number	Impact
3	El Camino Real and Valparaiso Avenue/Glenwood Avenue intersection in the PM peak hour under cumulative plus the Specific Plan;
19	Middlefield Road and Encinal Avenue intersection in the PM peak hour under the Specific Plan;
29	Bay Road and Willow Road intersection in the AM peak hour under cumulative plus the Specific Plan; and
33	Santa Cruz Avenue and Orange Avenue/Avy Avenue intersection in the PM peak hour under the Specific Plan;

  

Segment Number	Impact
7	Oak Grove Avenue roadway segment between El Camino Real and Crane Avenue under the Specific Plan;
13	Santa Cruz Avenue roadway segment between Orange Avenue/Avy Avenue and Alameda de las Pulgas under the Specific Plan; and
16	Ravenswood Avenue roadway segment between Middlefield Road and Laurel Street under the Specific Plan.

Similar to the Specific Plan, because some of the proposed mitigation measures may not be feasible due to right-of-way acquisition needs and collection of fees, the impacts to these intersections under the reduced commercial/retail space alternative would be significant and unavoidable.

The Specific Plan proposes implementation of a Transportation Demand Management (TDM) program that would reduce the number of vehicle trips, although specific reductions cannot be

quantified. The benefits of the TDM program include bicycle storage and use facilities, subsidies for alternate transportation methods, and car share and vanpool programs. This TDM program would be implemented under the reduced commercial/retail space alternative.

### **Cumulative Impacts**

The reduced commercial/retail space alternative would result in fewer new trips than under the Specific Plan, but would still add traffic to the cumulative scenario, resulting in significant cumulative effects.

Overall, the reduced commercial/retail space alternative would result in slightly fewer intersection impacts, as listed above, to transportation, circulation and parking compared to the Specific Plan. However, impacts would be significant and unavoidable as with the Specific Plan.

## **Alternative 4—Reduced Residential**

### ***Air Quality***

As with the Specific Plan, this alternative is likely to have significant and unavoidable impacts during construction, as the scale of development proposed under this alternative would be comparable to the Specific Plan. The mitigation measures discussed for the Specific Plan would also apply to this alternative; however, even with mitigation, the residual impact is expected to be significant and unavoidable. The reduced residential alternative would result in similar air quality impacts as for the Specific Plan, particularly those associated with construction and exposure of air pollutants to sensitive receptors.

Operational air quality impacts under this alternative would be less than those under the Specific Plan because this alternative would generate fewer daily traffic trips over existing conditions (approximately 12,479 net added vehicle trips as opposed to 13,385 at full build out of the Specific Plan). In addition, this alternative would generate fewer operational air quality impacts than the Specific Plan that are associated with natural gas combustion for space and water heating, landscaping, and the use of consumer products due to the smaller amount of building space and small population that would be located within the Plan area under this alternative. Overall, the reduced residential alternative would result in fewer air quality impacts than the Specific Plan. However, the rate of increase in vehicle miles traveled under this alternative would remain greater than the rate of increase in population and, therefore, similar to the proposed Specific Plan, this alternative would also have a significant and unavoidable impact with regard to consistency with the assumptions of the Clean Air Plan.

### ***Greenhouse Gases and Climate Change***

By consisting of less overall development, Alternative 4 would generate less total greenhouse gases from motor vehicle emissions, energy use, and other sources. However, the standard of significance for GHG emissions is a ratio of 4.6 metric tons of CO<sub>2</sub>e per service population (residents + employees) per year. Because Alternative 4 would generate residents and employees at similar rates to the Specific Plan, the overall ratio of GHG emissions to service population

under Alternative 4 would be similar to the 5.8 ratio of the Specific Plan, which would still be a significant and unavoidable impact.

### **Noise**

Alternative 4 would add fewer daily trips (12,479) than the Specific Plan (13,385). However, the additional traffic would still generate noise increases on streets where the noise levels already exceed those permitted by the Menlo Park Municipal Code (60 dBA  $L_{eq}$ ) as well as on streets where noise levels exceed 70 dBA,  $L_{dn}$ , which is considered “normally unacceptable” under the General Plan. Because Alternative 4 would cumulative contribute to increased noise levels on roadways where noise levels are currently in excess of standards and where mitigations (such as sound walls) are not feasible, this impact would be lessened in intensity relative to the Specific Plan but still considered significant and unavoidable.

### **Transportation, Circulation and Parking**

The following discussion is based on the detailed traffic impact analysis that was prepared for this EIR and provided in Appendix E of this report.

#### **Intersection Impacts**

**Middlefield Road and Glenwood Avenue/Linden Avenue (Intersection Number 20).** As with the Specific Plan (and all alternatives), the reduced residential alternative would maintain the unacceptable intersection operating condition at the Middlefield Road and Glenwood Avenue/Linden Avenue intersection and approach. This intersection currently operates at a level-of-service (LOS) F, which is below the LOS threshold of D.

At full build out of the Specific Plan (existing plus project conditions), the average intersection delay would be an increase of approximately 2.6 seconds during the morning peak-hour traffic and an increase of approximately 9.1 seconds in the evening peak hour traffic. However, mitigation measures that could be implemented under the Specific Plan propose signalization of the Middlefield Road and Glenwood Avenue/Linden Avenue intersection, which would improve the level of service to LOS B during the morning peak-hour traffic and LOS C during the evening peak-hour traffic. These mitigation measures would apply to this alternative as well, improving level of service conditions and resulting in a less-than-significant impact at this intersection. However, without a funding mechanism, this impact is considered to be significant and unavoidable under both the Specific Plan and Alternative 4.

**Other Intersections.** The reduced residential alternative would generate fewer morning and evening peak-hour trips than with the Specific Plan. These reductions in vehicle trips would be approximately 5 to 15 percent less during AM and PM peak hours as shown in Table 5-2, than under the Specific Plan and therefore, would not result in substantial reductions in traffic congestion. Impacts to the following intersections and roadway segments would be similar to those identified under the Specific Plan, as described in Section 4.13, Transportation, Circulation, and Parking.

<b>Intersection Number</b>	<b>Impact</b>
3	El Camino Real and Valparaiso Avenue/Glenwood Avenue intersection in the PM peak hour under cumulative plus the Specific Plan;
19	Middlefield Road and Encinal Avenue intersection in the PM peak hour under the Specific Plan;
29	Bay Road and Willow Road intersection in the AM peak hour under cumulative plus the Specific Plan; and
33	Santa Cruz Avenue and Orange Avenue/Avy Avenue intersection in the PM peak hour under the Specific Plan.

  

<b>Segment Number</b>	<b>Impact</b>
7	Oak Grove Avenue roadway segment between El Camino Real and Crane Avenue under the Specific Plan;
13	Santa Cruz Avenue roadway segment between Orange Avenue/Avy Avenue and Alameda de las Pulgas under the Specific Plan; and
16	Ravenswood Avenue roadway segment between Middlefield Road and Laurel Street under the Specific Plan.

Similar to the Specific Plan, because some of the proposed mitigation measures may not be feasible due to right-of-way acquisition needs and collection of fees, the impacts to these intersections under the reduced residential alternative would be significant and unavoidable.

The Specific Plan proposes implementation of a Transportation Demand Management (TDM) program that would reduce the number of vehicle trips, although specific reductions cannot be quantified. The benefits of the TDM program include bicycle storage and use facilities, subsidies for alternate transportation methods, and car share and vanpool programs. This TDM program would be implemented under the reduced residential alternative.

### **Cumulative Impacts**

The reduced residential alternative would result in fewer new trips than under the Specific Plan, but would still add traffic to the cumulative scenario resulting in significant cumulative effects.

Overall, the reduced residential alternative would result in slightly fewer intersection impacts, as listed above, to transportation, circulation and parking compared to the Specific Plan. However, impacts would be significant and unavoidable as with the Specific Plan.

## **5.2.6 Conclusions**

### **Alternative 1—No Project**

The no project alternative would result in the continuation of existing conditions in the Plan area. Compared to the Specific Plan, the potential environmental impacts from the no project

alternative would be of lesser or similar intensity than the Specific Plan in the areas of aesthetic resources, air quality, hazardous materials and hazards, noise, transportation, biological resources, cultural resources, geology, soils and seismicity, and public services and utilities. The no project alternative could have slightly greater intensity of impacts than the Specific Plan in the areas of greenhouse gases and climate change, hydrology and water quality, land use plans and policies, and population and housing, although these would not increase so much as to exceed a standard of significance.

Compared to the other alternatives, the no project alternative has several impacts at a lesser intensity than the Specific Plan. This alternative also has four resource areas that have a greater intensity of impact compared to the Specific Plan, and is the only alternative to have greater impacts than the Specific Plan. However, this is the only alternative that would avoid the significant and unavoidable traffic intersection impacts as indicated above. In addition, this alternative would generate the smallest number of daily, morning, and evening peak hour trips.

The no project alternative would not realize many of the benefits proposed by the Specific Plan that directly relate to the Vision Plan for the City. These improvements include the proposed facilitation of development that would result in housing opportunities, employment opportunities and an expanded tax base; by enhancing retail uses through the introduction of facilities that would bring more residents and visitors to the downtown, and providing adequate residential housing. Overall, the no project alternative would achieve the fewest project objectives, such as revitalizing underutilized parcels, adding transit and pedestrian-friendly features, and improving east-west connection across the railroad tracks and El Camino Real.

## **Alternative 2—Reduced Project**

The reduced project alternative would result in a land use plan similar to the Specific Plan, but with a reduced amount of total development. Compared to the Specific Plan, the potential impacts from the reduced project alternative would be less substantial than those of the Specific Plan in the areas of aesthetic resources, air quality, geology, soils, and seismicity, greenhouse gases and climate change, hydrology and water quality, noise, population and housing, public services and utilities, and transportation, circulation and parking. The reduced project alternative would have the same or similar impacts with regard to biological and cultural resources, hazards and hazardous materials and land use plans and policies. This alternative would not result in any impacts that would be greater in intensity than those of the Specific Plan. The reduced project alternative would have fewer environmental impacts than the Specific Plan and would meet many of the Specific Plan objectives summarized above, although not to the same degree as the Specific Plan, due to the lack of impact fees and other opportunities for public improvements.

Compared to the other alternatives, the reduced project alternative has nine resource area impacts at a lesser intensity than the Specific Plan and four resource areas with the same or similar impacts as the Specific Plan. The impacts under this reduced project alternative are similar to Alternative 4, the reduced residential alternative. This alternative would generate more vehicle trips than the no project alternative, and fewer trips than Alternative 4, the reduced residential

alternative. The number of trips generated would be similar to Alternative 3, the reduced commercial/retail space alternative, as shown in Table 5-2.

### **Alternative 3—Reduced Commercial/Retail Space**

The reduced commercial/retail space alternative would result in a land use plan similar to the Specific Plan, but with a reduced amount of commercial/retail development. Compared to the Specific Plan, the potential impacts from the reduced commercial/retail space alternative would be less substantial than those of the Specific Plan in the areas of aesthetic resources, air quality, geology, soils, and seismicity, greenhouse gases and climate change, hydrology and water quality, noise, and transportation, circulation and parking. The reduced commercial/retail space alternative would have the same or similar impacts with regard to biological and cultural resources, hazards and hazardous materials, land use plans and policies, population and housing, and public services and utilities. This alternative would not result in any impacts that would be greater in intensity than those of the Specific Plan. The reduced commercial/retail space alternative would have fewer environmental impacts than the Specific Plan and would meet many of the Specific Plan objectives, although not to the same degree as the Specific Plan, due to the lack of impact fees and other opportunities for public improvements.

Compared to the other alternatives, the reduced commercial/retail space project alternative has seven resource area impacts at a lesser intensity than the Specific Plan and six resource areas with the same or similar impacts as the Specific Plan. This alternative would generate more vehicle trips than the no project alternative, and fewer trips than Alternative 4, the reduced residential alternative. The number of trips generated would be similar to Alternative 2, the reduced project alternative, as shown in Table 5-2.

### **Alternative 4—Reduced Residential**

The reduced residential alternative would result in a land use plan similar to the Specific Plan, but with a reduced amount of residential development. Compared to the Specific Plan, the potential impacts from the reduced residential alternative would be less substantial than those of the Specific Plan in the areas of aesthetic resources, air quality, geology, soils, and seismicity, greenhouse gases and climate change, hydrology and water quality, noise, population and housing, public services and utilities, and transportation, circulation and parking. The reduced residential alternative would have the same or similar impacts with regard to biological and cultural resources, hazards and hazardous materials, and land use plans and policies. This alternative would not result in any impacts that would be greater in intensity than those of the Specific Plan. The reduced residential alternative would have fewer environmental impacts than the Specific Plan and would meet many of the Specific Plan objectives summarized above, although not to the same degree as the Specific Plan, due to the lack of impact fees and other opportunities for public improvements.

Compared to the other alternatives, the reduced residential alternative is similar to Alternative 2, the reduced project alternative. It has nine resource area impacts at a lesser intensity than the Specific Plan and four resource areas with the same or similar impacts as the Specific Plan. This

alternative would generate the most daily, morning, and evening peak hour vehicle trips of all the alternatives, as shown in Table 5-2.

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## 5.3 Environmentally Superior Alternative

As shown in the summary **Table 5-3** below, and in the analysis above, of the alternatives analyzed in this EIR, Alternative 1, the no project alternative, is the only alternative that would reduce a specific components of a significant and unavoidable impact to a less-than-significant level (namely, the elimination of some but not all intersection delay impacts) and is the alternative that is projected to generate the least number of vehicle trips. However, this alternative would not meet the objectives of the Specific Plan in that it would not create the pedestrian-friendly community gathering places and improved east-west connections as envisioned for the revitalization of the Plan area.

Alternative 3, the reduced commercial/retail space alternative, has the least number of resource areas that would be reduced to a lesser level of intensity than the Specific Plan, and several of the impacts would remain at the same level as the Specific Plan. Alternative 3, similar to Alternative 2 (reduced project), is projected to generate more trips than the no project alternative, but fewer than Alternative 4 (reduced residential). However, Alternative 3, similar to Alternatives 2 and 4, would meet many of the objectives of the Specific Plan.

Alternative 2, the reduced project alternative, and Alternative 4, the reduced residential alternative, have similar reductions in impacts compared to the Specific Plan. Both these alternatives would also meet the objectives of the Specific Plan. However, Alternative 2 is projected to generate fewer vehicle trips than Alternative 4. Therefore, Alternative 2 is considered the environmentally superior alternative as it would reduce the most number of impacts of the Specific Plan while still meeting many of the objectives of the Specific Plan.

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## 5.4 Non-CEQA Alternative

### 5.4.1 Alternate Locations for Specific Plan Components

The objective of the Specific Plan is to revitalize the El Camino Real corridor and downtown area as well as create a connection with the Caltrain station. In order to achieve this objective, the Specific Plan identifies several gathering places and destinations such as the marketplace, pocket parks, and improved walkways (Specific Plan components) to bring residents and visitors to the downtown area. The concept for these components was culled from the input received from residents at community workshops. The components of the Specific Plan, such as the marketplace and pocket parks, could be located most anywhere within the downtown subarea without significant changes to the impacts as analyzed in this Draft EIR. For the marketplace, feasible

locations would likely be limited to streets perpendicular to Santa Cruz Avenue—such as the proposed Chestnut Street location—for a concept that would be comparable to that currently envisioned in the Plan. Because there are a limited number of such locations, and because they are all proximate to, and within easy walking distance of, one another, an alternative location within the downtown subarea would not likely result in any substantial changes in traffic, air quality, or noise impacts, or changes in land use impacts. Regarding pocket parks, there is also a limited number of potential locations for such parks, which are proposed to be created by converting small areas of surface parking to open space. Because a pocket park would typically be used by persons already in the areas (i.e., would not be a destination in itself), the precise location of pocket parks within the downtown subarea would not substantially change the physical environmental effects of the project as analyzed pursuant to CEQA. Therefore, specific alternate locations for individual components are not analyzed in this Draft EIR.

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## **5.5 Alternatives Considered, but not Analyzed in Detail because they are Infeasible**

The City considered the option of constructing a parking structure at or near the Caltrain station. The location would be outside the downtown area but close enough to be within easy walking distance of the downtown. Several constraints were identified: the shape of the Caltrain lots, which are narrow and long, do not lend themselves to a cost effective parking structure with easy ingress and egress; these lots are owned by the Caltrain Joint Powers Board which would result in complicated agreements regarding use and collection of fees; the High Speed Rail project, the alignment, construction, and timing of which is unknown at this time; and the cost of non-City owned parcels in the vicinity. In light of these constraints, this alternative was considered infeasible and is not analyzed in detail here. Moreover, relocating the parking garage to this location would not change, reduce, or avoid any significant environmental impact identified for the Specific Plan.

**TABLE 5-3  
SUMMARY COMPARISON OF IMPACTS: PROJECT AND ALTERNATIVES**

<b>NOTE: Significance levels shown in the table reflect levels of significance after mitigation and indicate maximum impact during buildout and operation, unless otherwise specified.</b>	<b>Proposed Specific Plan</b>	<b>ALT 1: No Project</b>	<b>ALT 2: Reduced Project</b>	<b>ALT 3: Reduced Commercial/ Retail Space</b>	<b>ALT 4: Reduced Residential</b>
<b>4.1 Aesthetic Resources</b>					
<b>Impact AES-1:</b> Implementation of the Specific Plan would alter views along certain corridors, but these changes would not be substantially adverse and so would be less than significant. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AES-2:</b> Implementation of the Menlo Park El Camino Real/Downtown Specific Plan would not result in substantial adverse impacts to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within state scenic highways. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AES-3:</b> Consistent with the objectives of the Specific Plan, implementation of the Plan would change the visual character of the Plan area, but would not substantially degrade the existing visual character or quality of the Plan area and its surroundings. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AES-4:</b> Implementation of the Specific Plan would not result in shading of outdoor recreation facilities, other public open spaces, historic buildings, or a substantial number of properties to an extent that would substantially affect, in an adverse manner, their use. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AES-5:</b> Construction of new buildings and street lighting within the Specific Plan area could increase light and glare. Adherence to the guidelines of the Specific Plan would reduce any light and glare impacts to less-than-significant levels. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AES-6:</b> Implementation of the Menlo Park El Camino Real/ and Downtown Specific Plan, in combination with other past, present, and reasonably foreseeable future plans and projects, would not result in cumulatively considerable impacts to aesthetic resources. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.2 Air Quality</b>					
<b>Impact AIR-1:</b> Implementation of the Specific Plan would result in increased long-term emissions of criteria pollutants associated with construction activities that could contribute substantially to an air quality violation. (Significant)	SU	SU↓	SU↓	SU↓	SU↓

**Legend**

LS Less than significant or negligible impact; no mitigation required

LSM Less than significant impact, after mitigation

SU Significant and unavoidable adverse impact, after mitigation

N No impact

↑↓ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

**TABLE 5-3 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS: PROJECT AND ALTERNATIVES**

<b>NOTE: Significance levels shown in the table reflect levels of significance after mitigation and indicate maximum impact during buildout and operation, unless otherwise specified.</b>	<b>Proposed Specific Plan</b>	<b>ALT 1: No Project</b>	<b>ALT 2: Reduced Project</b>	<b>ALT 3: Reduced Commercial/Retail Space</b>	<b>ALT 4: Reduced Residential</b>
<b>4.2 Air Quality (cont.)</b>					
<b>Impact AIR-2:</b> Implementation of the Specific Plan would result in increased long-term emissions of criteria pollutants from increased vehicle traffic and on-site area sources that would contribute substantially to an air quality violation. (Significant)	SU	SU↓	SU↓	SU↓	SU↓
<b>Impact AIR-3:</b> Implementation of the Specific Plan would increase levels of project generated toxic air contaminants (TACs) which may lead to adverse health effects. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AIR-4:</b> Implementation of the Specific Plan would expose persons to increased levels of project generated PM <sub>2.5</sub> which may lead to adverse health effects. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AIR-5:</b> Implementation of the Specific Plan would locate sensitive receptors in an area of elevated concentrations of toxic air contaminants associated with roadway traffic which may lead to considerable adverse health effects. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact AIR-6:</b> Implementation of the Specific Plan would locate new sensitive receptors in an area of elevated concentrations of PM <sub>2.5</sub> associated with roadway traffic which may lead to considerable adverse health effects. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact AIR-7:</b> Implementation of the Specific Plan would expose sensitive receptors to elevated concentrations of Toxic Air Contaminants (TACs) associated with Caltrain operations which may lead to considerable adverse health effects. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact AIR-8:</b> Implementation of the Specific Plan would expose new sensitive receptors to elevated concentrations of PM <sub>2.5</sub> associated with Caltrain operations which may lead to considerable adverse health effects. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AIR-9:</b> The Specific Plan is fundamentally consistent with the growth assumptions of the <i>Bay Area 2010 Clean Air Plan</i> . (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

**Legend**

LS Less than significant or negligible impact; no mitigation required

LSM Less than significant impact, after mitigation

SU Significant and unavoidable adverse impact, after mitigation

N No impact

↑↓ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

**TABLE 5-3 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS: PROJECT AND ALTERNATIVES**

<b>NOTE: Significance levels shown in the table reflect levels of significance after mitigation and indicate maximum impact during buildout and operation, unless otherwise specified.</b>	<b>Proposed Specific Plan</b>	<b>ALT 1: No Project</b>	<b>ALT 2: Reduced Project</b>	<b>ALT 3: Reduced Commercial/Retail Space</b>	<b>ALT 4: Reduced Residential</b>
<b>4.2 Air Quality (cont.)</b>					
<b>Impact AIR-10:</b> Implementation of the Specific Plan would locate new sensitive receptors near sources of toxic air contaminants which may lead to cumulatively considerable adverse health effects. (Potentially Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact AIR-11:</b> Implementation of the Specific Plan would locate new sensitive receptors near sources of PM <sub>2.5</sub> which may lead to cumulatively considerable adverse health effects. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.3 Biological Resources</b>					
<b>Impact BIO-1:</b> The Specific Plan could result in the take of special-status birds or their nests. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact BIO-2:</b> Project construction and operations, as well as the final building structures, have the potential to affect migratory and breeding special-status birds through building collisions. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact BIO-3:</b> Impacts to migratory or breeding special-status birds and other special-status species due to lighting conditions. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact BIO-4:</b> Noise from project construction and operational activities could affect migrating and breeding special-status birds, and other special-status species, but not to a degree that would be considered substantial or adverse. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact BIO-5:</b> The Specific Plan could result in the take of special-status bat species. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact BIO-6:</b> The Specific Plan could result in the take of special-status amphibians and reptiles; California red-legged frog, California tiger salamander, and western pond turtle. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact BIO-7:</b> The Specific Plan may result in damage to, or removal of, protected trees that are within or adjacent to the Plan area. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

**Legend**

LS Less than significant or negligible impact; no mitigation required

LSM Less than significant impact, after mitigation

SU Significant and unavoidable adverse impact, after mitigation

N No impact

↑↓ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

**TABLE 5-3 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS: PROJECT AND ALTERNATIVES**

<b>NOTE: Significance levels shown in the table reflect levels of significance after mitigation and indicate maximum impact during buildout and operation, unless otherwise specified.</b>	<b>Proposed Specific Plan</b>	<b>ALT 1: No Project</b>	<b>ALT 2: Reduced Project</b>	<b>ALT 3: Reduced Commercial/Retail Space</b>	<b>ALT 4: Reduced Residential</b>
<b>4.3 Biological Resources (cont.)</b>					
<b>Impact BIO-8:</b> Construction activities could impact creeks and riparian areas but impacts would be limited by existing statutes and permitting requirements, as well as distance from the creek to likely development sites. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact BIO-9:</b> Project construction activity and operations, in conjunction with other past, current, or foreseeable development in similar urbanized areas in eastern San Mateo County, could result in impacts on special-status species, habitats, wetlands, and other waters of the U.S. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.4 Cultural Resources</b>					
<b>Impact CUL-1:</b> The proposed Specific Plan could have a significant impact on historic architectural resources. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact CUL-2:</b> The proposed Specific Plan could impact currently unknown archaeological resources. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact CUL-3:</b> The proposed Specific Plan may adversely affect unidentifiable paleontological resources. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact CUL-4:</b> Implementation of the Plan may cause disturbance of human remains including those interred outside of formal cemeteries. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact CUL-5:</b> The Specific Plan, in combination with past, present, existing, approved, pending, and reasonably foreseeable future development in the vicinity of the Plan area that would involve demolition of historical resources, could form a significant cumulative impact to historical resources. (Cumulative Impact: Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact CUL-6:</b> Construction under the Specific Plan in combination with construction from other past, present, existing, approved, pending, and reasonably foreseeable future development in the vicinity could cause a significant cumulative impact to currently unknown cultural resources at the site, potentially including an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or CEQA Section 21083.2(g), or the disturbance of any human remains, including those interred outside of formal cemeteries, as well as paleontological resources. ( Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

**Legend**

LS Less than significant or negligible impact; no mitigation required

LSM Less than significant impact, after mitigation

SU Significant and unavoidable adverse impact, after mitigation

N No impact

↑↓ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

**TABLE 5-3 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS: PROJECT AND ALTERNATIVES**

<b>NOTE: Significance levels shown in the table reflect levels of significance after mitigation and indicate maximum impact during buildout and operation, unless otherwise specified.</b>	<b>Proposed Specific Plan</b>	<b>ALT 1: No Project</b>	<b>ALT 2: Reduced Project</b>	<b>ALT 3: Reduced Commercial/Retail Space</b>	<b>ALT 4: Reduced Residential</b>
<b>4.5 Geology, Soils, and Seismicity</b>					
<b>Impact GEO-1:</b> In the event of a major earthquake in the region, surface fault rupture, ground shaking, localized liquefaction, and/or seismic-related landsliding could cause damage, destruction or injury to development anticipated under the proposed Specific Plan. (Less than Significant)	LS	LS↑	LS↓	LS↓	LS↓
<b>Impact GEO-2:</b> New development or redevelopment anticipated under the proposed Specific Plan would involve grading and other ground disturbing construction activities which could expose soils to erosion and loss of topsoil. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact GEO-3:</b> New development or redevelopment anticipated under the proposed Specific Plan could be located on unstable soils or become unstable resulting in landslides, lateral spreading, subsidence or collapse. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact GEO-4:</b> New development or redevelopment anticipated under the proposed Specific Plan could be located on expansive soils creating substantial risks to life or property. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact GEO-5:</b> Implementation of the proposed Specific Plan along with potential development in the surrounding region would result in cumulative impacts to geologic and seismic hazards. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.6 Greenhouse Gases and Climate Change</b>					
<b>Impact GHG-1:</b> The Specific Plan would generate GHG emissions, both directly and indirectly, that would have a significant impact on the environment. (Significant)	SU	SU↑	SU	SU	SU
<b>Impact GHG-2:</b> The Specific Plan could conflict with applicable plans, policies or regulations of an agency with jurisdiction over the Specific Plan adopted for the purpose of reducing the emissions of GHGs. (Significant)	SU	SU↑	SU	SU	SU
<b>4.7 Hazardous Materials and Hazards</b>					
<b>Impact HAZ-1:</b> Disturbance and release of contaminated soil during demolition and construction phases of the project, or transportation of excavated material, or contaminated groundwater could expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓

**Legend**

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**TABLE 5-3 (Continued)**  
**SUMMARY COMPARISON OF IMPACTS: PROJECT AND ALTERNATIVES**

<b>NOTE: Significance levels shown in the table reflect levels of significance after mitigation and indicate maximum impact during buildout and operation, unless otherwise specified.</b>	<b>Proposed Specific Plan</b>	<b>ALT 1: No Project</b>	<b>ALT 2: Reduced Project</b>	<b>ALT 3: Reduced Commercial/Retail Space</b>	<b>ALT 4: Reduced Residential</b>
<b>4.7 Hazardous Materials and Hazards (cont.)</b>					
<b>Impact HAZ-2:</b> Disturbance and release of hazardous structural and building components (i.e., asbestos, lead, PCBs, underground storage tanks, and above ground storage tanks) during demolition and construction phases of development or transport of these materials could expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact HAZ-3:</b> Hazardous materials used on any individual site during construction activities (i.e., fuels, lubricants, solvents) could be released to the environment through improper handling or storage. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact HAZ-4:</b> Future development would include land uses that would handle various commercial, transportation and household hazardous materials in a range of quantities, and could cause an adverse effect on the environment through accidental upset. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.8 Hydrology and Water Quality</b>					
<b>Impact HYD-1:</b> Construction associated with the proposed Specific Plan projects could adversely affect water quality and drainage patterns in the short term due to erosion and sedimentation. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact HYD-2:</b> Implementation of the Specific Plan could adversely affect water resources in the long term by reducing permeable surfaces, which could degrade water quality in receiving waters, increase runoff volume and associated downstream flood potential, decrease groundwater recharge, or alter drainage patterns. (Less than Significant)	LS	LS↑	LS↓	LS↓	LS↓
<b>Impact HYD-3:</b> Implementation of the Specific Plan would not place housing or other structures that would impede or redirect floodflows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map (Less than Significant)	LS	LS↑	LS↓	LS↓	LS↓

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<b>4.8 Hydrology and Water Quality (cont.)</b>					
<b>Impact HYD-4:</b> Implementation of the Specific Plan would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact HYD-5:</b> Concurrent implementation of the proposed Specific Plan and projected regional development could contribute to degradation of regional water quality, reduction of groundwater recharge, or result in increased flooding hazards. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.9 Land Use</b>					
<b>Impact LU-1:</b> Implementation of the Menlo Park El Camino Real and Downtown Specific Plan would not physically divide an established community. (Less than Significant)	LS	LS↑	LS	LS	LS
<b>Impact LU-2:</b> Implementation of the Specific Plan would alter the type and intensity of land uses in the Plan area, but not in a manner that would cause them to be substantially incompatible with surrounding land uses or neighborhood character. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact LU-3:</b> Implementation of the Menlo Park El Camino Real and Downtown Specific Plan would not substantially conflict with the General Plan, Zoning Ordinance, or other land use plans or policies adopted for the purpose of mitigating an environmental effect. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact LU-4:</b> Implementation of the Menlo Park El Camino Real and Downtown Specific Plan, in combination with other past, present, and reasonably foreseeable future plans and projects, would not result in cumulatively considerable impacts to land use. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

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<b>4.10 Noise</b>					
<b>Impact NOI-1:</b> Construction activities associated with implementation of the Specific Plan would result in substantial temporary or periodic increases in ambient noise levels in the Specific Plan area above levels existing without the Specific Plan and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact NOI-2:</b> Increased traffic from implementation of the Specific Plan would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact NOI-3:</b> The Specific Plan would introduce sensitive receptors to a noise environment with noise levels in excess of standards considered acceptable under the City of Menlo Park Municipal Code. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact NOI-4:</b> The Specific Plan would expose sensitive receptors to substantial levels of groundborne vibration. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>Impact NOI-5:</b> Implementation of the Specific Plan, together with anticipated future development in the area in general, would not result in a significant increase in noise levels in the area. (Significant)	SU	SU↓	SU↓	SU↓	SU↓
<b>Impact NOI-6:</b> Anticipated future development of California's High Speed Rail Project would have the potential to expose sensitive receptors within the Specific Plan area to excessive noise levels and groundborne vibration. (Potentially Significant)	LSM	LSM↓	LSM↓	LSM↓	LSM↓
<b>4.11 Population and Housing</b>					
<b>Impact POP-1:</b> The project would not displace existing housing or people such that construction of replacement facilities elsewhere would be required. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact POP-2:</b> The project would not induce substantial population growth, either directly by proposing new housing, or indirectly through infrastructure improvements and job growth. (Less than Significant)	LS	LS↑	LS↓	LS↓	LS↓

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<b>4.11 Population and Housing (cont.)</b>					
<b>Impact POP-3:</b> Implementation of the Menlo Park El Camino Real/Downtown Specific Plan, in combination with other past, present, and reasonably foreseeable future plans and projects, would not result in cumulatively considerable impacts to population and housing. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.12 Public Services and Utilities</b>					
<b>Impact PUB-1:</b> Implementation of the Specific Plan would not result in the need for new or physically altered police facilities. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-2:</b> Implementation of the Specific Plan would not result in the need for new or physically altered fire and emergency service facilities. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-3:</b> Implementation of the Specific Plan would increase public school enrollment. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-4:</b> Implementation of the Specific Plan would increase the use of parks. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-5:</b> Implementation of the Specific Plan would increase the demand for water supply. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-6:</b> Implementation of the Specific Plan would not require or result in the construction of new water treatment facilities or expansion of existing facilities. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-7:</b> Implementation of the Specific Plan would not exceed wastewater treatment requirements or require construction of new wastewater facilities or expansion of existing facilities. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-8:</b> The Specific Plan would be served by a landfill with sufficient permitted capacity to accommodate the Specific Plan's solid waste disposal needs, and would comply with federal, State, and local statutes and regulations related to solid waste. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

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<b>4.12 Public Services and Utilities (cont.)</b>					
<b>Impact PUB-9:</b> The Specific Plan would not exceed existing gas and electric supplies. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-10:</b> Implementation of the Specific Plan in combination with other past, present, and reasonably foreseeable plans and projects would not result in cumulative impacts with respect to public services or utility service systems. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-11:</b> The proposed project, in combination with other development within the City of Menlo Park, could have insufficient water supplies available to serve the project from existing entitlements under normal, dry and multiple dry years. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact PUB-12:</b> The proposed project, in combination with other development within the City of Menlo Park, would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, which could cause significant environmental effects. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>4.13 Transportation, Circulation and Parking</b>					
<b>Impact TR-1:</b> Traffic from future development in the Plan area would adversely affect operation of area intersections. (Significant)	SU	SU↓	SU↓	SU↓	SU↓
<b>Impact TR-2:</b> Traffic from future development in the Plan area would adversely affect operation of local roadway segments. (Significant)	SU	SU↓	SU↓	SU↓	SU↓
<b>Impact TR-3:</b> Traffic from future development in the Plan area would increase traffic volumes on local freeway segments. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact TR-4:</b> Transit ridership generated by future development in the Plan area would affect transit operations. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact TR-5:</b> Future development in the Plan area would affect pedestrian and bicycle operations and safety. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

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<b>4.13 Transportation, Circulation and Parking (cont.)</b>					
<b>Impact TR-6:</b> Development under the Plan area would affect parking supply in the downtown, but would not result in inadequate parking capacity. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓
<b>Impact TR-7:</b> Cumulative development, along with development in the Plan area, would adversely affect operation of local intersections. (Significant)	SU	SU↓	SU↓	SU↓	SU↓
<b>Impact TR-8:</b> Cumulative development, along with development in the Plan area would adversely affect operation of local roadway segments. (Significant)	SU	SU↓	SU↓	SU↓	SU↓
<b>Impact TR-9:</b> Cumulative development, along with development in the Plan area would increase traffic volumes on local freeway segments. (Less than Significant)	LS	LS↓	LS↓	LS↓	LS↓

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