

**555 Glenwood Avenue Project (Marriott Residence Inn)
El Camino Real/Downtown Specific Plan Program EIR – Conformance Checklist
Attachment H**

Introduction

The City of Menlo Park (City) has developed the El Camino Real/Downtown Specific Plan (Specific Plan) to establish a framework for private and public improvements in the Specific Plan area for the next 30 years. The Specific Plan addresses approximately 130 acres and focuses on the character and density of private infill development, the character and extent of enhanced public spaces, and circulation and connectivity improvements. The primary goal of the Specific Plan is to “enhance the community life, character and vitality through mixed use infill projects sensitive to the small-town character of Menlo Park, an expanded public realm, and improved connections across El Camino Real.” The Specific Plan includes objectives, policies, development standards, and design guidelines intended to guide new private development and public space and transportation improvements in the Specific Plan area over the next 30 years. The Plan builds upon the El Camino Real/Downtown Vision Plan that was unanimously accepted by the Menlo Park City Council on July 15, 2008.

On June 5, 2012, the City Council certified the Menlo Park El Camino Real and Downtown Specific Plan Program EIR (Program EIR). According to the Program EIR, the Specific Plan does not propose specific private developments, but establishes a maximum development capacity of 474,000 square feet of non-residential development (inclusive of retail, hotel, and commercial development), and 680 new residential units.

Sand Hill Property Company has submitted an application for a 138-room Marriott Residence Inn (the project). The project site is located at 555 Glenwood Avenue and currently consists of an age-restricted, independent living facility for seniors. The proposed project would renovate this existing independent living facility into a Marriott Residence Inn hotel. The property is part of the Specific Plan area, and as such may be covered by the Program EIR analysis. The intent of this Environmental Conformity Analysis is to determine: 1) whether the proposed project does or does not exceed the environmental impacts analyzed in the Program EIR, 2) whether new impacts have or have not been identified, and 3) whether new mitigation measures are or are not required.

Existing Condition

The subject property is located at 555 Glenwood Avenue, at the corner of Glenwood Avenue and Garwood Way, which is part of the SP-ECR/D (El Camino Real/Downtown Specific Plan) zoning district. Glenwood Avenue is the property’s primary functional frontage, and this report’s references to site orientation use it as the “front.” The adjacent properties are occupied by a variety of commercial uses, including a language school, restaurants, and offices. In addition, the property is adjacent to a large vacant

multi-parcel site addressed 1300 El Camino Real, which has approved plans for a mixed-use retail-office development, although construction has not yet commenced and the property owners have indicated interest in possibly pursuing a revised project. The adjacent parcels are all likewise part of the SP-ECR/D zoning district. Garwood Way in this location is a dead-end street that extends the length of the subject property and the 1300 El Camino Real property. The City has an adopted plan line to extend Garwood Way to Oak Grove Avenue, although there are no immediately-pending plans to implement this extension. Garwood Way is directly adjacent to the Caltrain rail corridor.

The project site consists of one parcel (Assessor's Parcel Number: 061-430-430) of approximately 2.25 acres. The site is currently developed with an age-restricted, independent living facility for seniors, originally approved and constructed with 138 rooms. The development consists of a central one-story building containing public spaces (such as the lobby, dining, and office areas), surrounded by three-story buildings that contain the residential rooms. The square footage totals 113,803 square feet.

As reported by the applicant, the owners of the property have conducted revisions over time, such that the number of units is now 125 (due to some single-bedroom units being combined into two-bedroom units), and the number of on-site parking spaces is 72. The east side of Garwood Way, next to the Caltrain tracks, features 30 perpendicular parking spaces in the public right-of-way, which currently have signage stating they may only be used by the 555 Glenwood Avenue facility. The west side of Garwood Way provides nine parallel parking spaces, which do not feature any signage regarding their use. No parking is permitted on Glenwood Avenue in the immediate vicinity of the development; this street features bicycle lanes on both sides of the roadway, and there does not appear to be room to add any on-street parking.

Proposed Project

The applicant is proposing to convert the existing senior citizens retirement living center into a limited-service, business-oriented hotel. As part of this conversion, the applicant would conduct interior, exterior, and landscaping improvements. In particular, the paint scheme would be updated to subtly accentuate the existing projections and recessed areas, and new natural wood fencing would replace existing painted trellises at the ground level. However, the project would not include the construction of any new floor area. The interior public spaces, located in the central one-story building, would be reconfigured to support the hotel use, with dining, meeting, and computer rooms. The three-story residential buildings would be renovated to provide 138 hotel suites, within the outlines of the 138 rooms that were originally approved.

The project requires architectural control review and approval to conduct the exterior improvements. The architectural control action includes consideration of a Public Benefit Bonus for a Floor Area Ratio (FAR) of 1.16, where 1.10 is the Base level FAR maximum and 1.50 is the Public Benefit Bonus level FAR maximum. The proposal includes the application of the Transportation Manager's discretion to approve a parking rate for a use type not listed in Specific Plan Table F2. The proposal also includes the

provision of some required parking on the Garwood Way public right-of-way through a license agreement and encroachment permit. In addition, the proposal includes the removal of three heritage trees: two ash trees located in courtyards at the middle and right-rear corner of the parcel, and one palm tree located at the rear-left corner of the parcel.

The Planning Commission will act as a recommending body for this proposal, in particular for the architectural control component. The City Council will act comprehensively on all requests associated with the proposal.

Environmental Analysis

As discussed in the Introduction, this comparative analysis has been undertaken to analyze whether the project would have any significant environmental impacts that are not addressed in the Program EIR. The comparative analysis discusses whether impacts are increased, decreased, or unchanged from the conclusions discussed in the Program EIR. The comparative analysis also addresses whether any changes to mitigation measures are required.

As noted previously, the proposal would not create any new square footage in order to convert the existing senior citizens retirement living center into a new 138-room hotel, and for many of the impact categories below, this lack of physical change is of primary relevance. However, the net new vehicle trips (589) associated with the conversion can be considered equivalent to a new 87-room hotel, which can be approximated as a net increase of 71,921 square feet of commercial square footage. This square footage equivalency is applied to traffic-related impact categories below to account for the project's share of the Specific Plan development program. If the project is approved and implemented, this amount would be deducted from the Maximum Allowable Development in the Plan area.

Environmental Analysis

Aesthetic Resources

Impacts would be the same as the Specific Plan. The Program EIR concluded that the project would not have a substantial adverse effect on a scenic view, vista, or designated state scenic highway, nor would the project have significant impacts to the degradation of character/quality, light and glare, or shadows.

Implementation of the proposed project would result in the renovation of the existing structures. The proposed massing and scale of the structures (and associated shadows) would be unchanged relative to the existing condition, as the project would not be increasing the existing lot coverage or floor area and the building heights would remain the same. Further, the existing character of the site would remain similar to existing conditions, as the project would not significantly alter the exterior of the structures and lighting would be similar to the existing lighting experienced at the site.

The modest exterior changes that are proposed would generally be consistent with provisions of the Specific Plan encouraging façade modulation and the use of interesting building materials at the ground level.

As was the case with the Specific Plan, the proposed project would not have a substantial adverse effect on a scenic view or vista, a state scenic highway, character/quality, or light and glare impacts. Therefore, no new impacts have been identified and no new mitigation measures are required for the proposed project.

Agriculture Resources

Impacts would be the same as the Specific Plan. The Program EIR concluded that no impacts would result with regard to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or any area zoned for agricultural use or forest land.

As was the case with the Program EIR, the proposed project would not result in any impacts to farmland, agricultural uses, or forest land. Therefore, no new impacts have been identified and no new mitigation measures are required for the proposed project.

Air Quality

Impacts would be the same as the Specific Plan.

AIR-1: The Program EIR determined that emissions of criteria pollutants associated with construction would be significant, and established Mitigation Measures AIR-1a and AIR-1b to address such impacts. However, the Program EIR concluded that impacts could still be significant and unavoidable even with implementation of such mitigations. The proposed project, primarily involving interior renovations, would not involve the type of large-scale construction activities that would create such impacts, and the proposed project would be well below the 554-room construction screening threshold adopted by the Bay Area Air Quality Management District. As a result, implementation of Mitigation Measures AIR-1a and AIR-1b is not required for this project.

AIR-2: The Program EIR determined that the Specific Plan would have long-term emissions of criteria pollutants from increased vehicle traffic and on-site area sources that would contribute to an air quality violation (due to being inconsistent with an element of the *2010 Clean Air Plan*), and established Mitigation Measure AIR-2 requiring implementation of Mitigation Measure TR-2 regarding Transportation Demand Management (TDM) strategies to address this impact. However, the Program EIR noted that TDM effectiveness cannot be guaranteed, and concluded that the impact would be significant and unavoidable. The proposed project would be consistent with the Program EIR analysis, and as such would be required to implement Mitigation Measure AIR-2.

AIR-3: The Program EIR determined that the Specific Plan would increase levels of Toxic Air Contaminants (TACs) due to increased heavy duty truck traffic, but that the impacts would be less than significant. The proposed hotel use would not generate an

unusual amount of heavy truck traffic relative to other commercial or multi-family developments due to the limited nature of the construction, and the proposed project's share of overall Specific Plan development (estimated as being equivalent to 71,921 square feet of commercial square footage) would be accounted for through deduction of this total from the Specific Plan Maximum Allowable Development.

AIR-4: The Program EIR concluded that the Specific Plan would not have a substantial adverse effect pertaining to Particulate Matter (PM_{2.5}). The proposed project is consistent with the assumptions of this analysis.

AIR-5, AIR-6, AIR-7, AIR-8, AIR-10, and AIR-11: The Specific Plan determined that the introduction of sensitive receptors, specifically new residences, to an environment (near El Camino Real and the Caltrain tracks) with elevated concentrations of TACs and PM_{2.5} could result in significant or potentially significant impacts (including in the cumulative scenario), and established Mitigation Measures AIR-5, AIR-7, and AIR-10 to bring impacts to less than significant levels. Although the project site is in proximity to the Caltrain tracks and El Camino Real, the proposed project's conversion of a retirement living center to a hotel, within existing structures, would not represent the introduction of new sensitive receptors in this location, and as such application of these Mitigation Measures is not required for the project.

AIR-9: The Program EIR determined that the Specific Plan is fundamentally consistent with the growth projections of the Bay Area 2010 Clean Air Plan, particularly with regard to residential development. As the proposed project is a commercial development, it does not directly relate to this impact analysis.

No new Air Quality impacts have been identified and no new mitigation measures are required for the proposed project.

Biological Resources

Impacts would be the same as the Specific Plan. The Program EIR determined that less than significant impacts would result with regard to special status plant and wildlife species, sensitive natural communities, migratory birds, and jurisdictional waters and wetlands upon implementation of the recommended Mitigation Measures BIO-1a, BIO-1b, BIO-3a, BIO-3b, BIO-5a through BIO-5c, and BIO-6a. The analysis also found that the Specific Plan would not conflict with local policies, ordinances, or plans. With regard to the project site, none of these potentially significant impacts considered as part of the Program EIR are applicable to the project site, as the project site is developed with an existing independent living facility and no known biological resources are present on-site.

With implementation of the proposed project, renovation activities would occur over the same development footprint. Therefore, as with the Program EIR, the proposed project would result in less than significant impacts to biological resources and no Mitigation Measures would be required. The proposed project would also not conflict with local

policies, ordinances, or plans, similar to the Program EIR. No new impacts have been identified and no new mitigation measures are required for the proposed project.

Cultural Resources

Impacts would be the same as the Specific Plan. The Program EIR determined that no significant impacts to a historic resource would result with implementation of Mitigation Measure CUL-1. The analysis also concluded that the Specific Plan would result in less than significant impacts to archeological resources, paleontological resources, and burial sites with implementation of Mitigation Measures CUL-2a, CUL-2b, CUL-3, and CUL-4. With regard to the project site, none of these potentially significant impacts considered as part of the Program EIR are applicable to the project site, as the project site is developed with an existing independent living facility and no known cultural resources are present on-site.

With implementation of the proposed project, renovation activities would occur over the same development footprint as that considered in the Program EIR. As the existing structures are not 50 years old nor listed on a list of historical resources, the existing on-site structures are not eligible for designation as historical resources. Further, as no grading activities would occur as part of the proposed project (as the project would only consist of renovation activities), the project would not disturb any archeological resources, paleontological resources, or burial sites. Thus, no Mitigation Measures (considered as part of the Program EIR) would be applicable to the proposed project. No new impacts have been identified and no new mitigation measures are required.

Geology and Soils

Impacts would be the same as the Specific Plan. The Program EIR found that no significant impacts pertaining to earthquake faults, seismic ground shaking, seismically induced hazards (e.g., liquefaction, lateral spreading, landsliding, settlement, and ground lurching), unstable geologic units, expansive soils, corrosive soils, landslides, and soil erosion would result. No Mitigation Measures are required.

As the proposed renovation activities would occur over the same development footprint and no grading activities are proposed, the project would result in the same impacts regarding geology and soils. Thus, the project would result in less than significant impacts, no new impacts have been identified, and no new mitigation measures are required.

Greenhouse Gas Emissions

Impacts would be the same as the Specific Plan.

GHG-1: The Program EIR determined that the Specific Plan would generate Greenhouse Gas (GHG) emissions, both directly and indirectly, that would have a significant impact on the environment. Specifically, the operational GHG using the Bay

Area Air Quality District (BAAQMD) GHG Model, measured on a “GHG:service population” ratio, were determined to exceed the BAAQMD threshold. The proposed project’s share of this development (estimated as being equivalent to 71,921 square feet of commercial square footage) and associated GHG emissions and service population, would be accounted for through deduction of this total from the Specific Plan Maximum Allowable Development, and as such is consistent with the Program EIR analysis. The Program EIR established Mitigation Measure GHG-1, although it was determined that the impact would remain significant and unavoidable even with this mitigation. For the proposed project, implementation of Mitigation Measure GHG-1 is not necessary as the BAAQMD-identified GHG Mitigation Measures are primarily relevant to City-wide plans and policies, and also because the City’s CALGreen Amendments have since been adopted and are applied to all projects, including the proposed project.

GHG-2: The Program EIR determined that the Specific Plan could conflict with AB 32 and its Climate Change Scoping Plan by virtue of exceeding the per-capita threshold cited in GHG-1. Again, the proposed project’s share of this development (estimated as being equivalent to 71,921 square feet of commercial square footage) and associated GHG emissions and service population, would be accounted for through deduction of this total from the Specific Plan Maximum Allowable Development, and as such is consistent with the Program EIR analysis. The Program EIR established Mitigation Measure GHG-2, although it was determined that the impact would remain significant and unavoidable even with this mitigation. The specific elements of GHG-2 are applicable to residential (or mixed-use with residential) projects and City programs, and as such are not applicable to the proposed project.

No new impacts have been identified and no new mitigation measures are required for the proposed project.

Hazards and Hazardous Materials

Impacts would be the same as the Specific Plan. The Program EIR determined that a less than significant impact would result in regards to the handling, transport, use, or disposal of hazardous materials during construction operations. The analysis also concluded that the project site is not included on a list of hazardous materials sites, is not within the vicinity of an airport or private airstrip, would not conflict with an emergency response plan, and would not be located in an area at risk for wildfires. The Specific Plan analysis determined that with implementation of Mitigation Measures HAZ-1 and HAZ-3, impacts related to short-term construction activities, and the potential handling of and accidental release of hazardous materials would be reduced to less than significant levels.

The proposed project would involve minimal ground-disturbance activities, and as such implementation of Mitigation Measures HAZ-1 and HAZ-3 would not be required. Project operations would result in a hotel use rather than the existing independent living facility. The proposed hotel use would not handle, store, or transport hazardous materials in

quantities that would be required to be regulated. Thus, project operations would result in similar impacts as that analyzed for the Specific Plan. No new impacts have been identified and no new mitigation measures are required for the proposed project.

Hydrology and Water Quality

Impacts would be the same as the Specific Plan. The Program EIR found that no significant impacts pertaining to construction-related impacts (i.e., water quality and drainage patterns due to erosion and sedimentation), or operational-related impacts to water quality, groundwater recharge, the alteration of drainage patterns, or flooding would result. No Mitigation Measures are required.

As the proposed renovation activities would occur over the same development footprint and no grading activities or changes to the amount of existing impervious areas are proposed, the project would result in the same impacts regarding hydrology and water quality. Thus, the proposed project would result in less than significant impacts, no new impacts have been identified, and no new mitigation measures are required.

Land Use and Planning

Impacts would be the same as the Specific Plan.

LU-1: The Program EIR determined that the Specific Plan would not divide an established community. The proposed project would involve the reuse of an existing developed property, and would not modify the street grid or increase the height of the existing buildings on site. Although Garwood Way on-street parking would be dedicated for the use of the subject property through a license agreement and encroachment permit, this street could still be used for vehicle, bicycle, and pedestrian access. Although Garwood Way is currently a dead-end street, which effectively limits the amount of such use, the City has an adopted plan line to extend it to Oak Grove Avenue, and the proposed project would not itself modify these plans. No mitigation is required for this impact, which is less than significant.

LU-2: The Program EIR determined that the Specific Plan would not alter the type and intensity of land uses in a manner that would cause them to be substantially incompatible with surrounding land uses or neighborhood character. The FAR of the buildings on site would not change, and applicable design guidelines would be followed for the proposed modest exterior changes. No mitigation is required for this impact, which is less than significant.

LU-3: The Program EIR determined that the Specific Plan would not conflict with the City's General Plan, Zoning Ordinance, or other land use plans or policies adopted for the purpose of mitigating an environmental effect. The General Plan and Zoning Ordinance were amended concurrent with the Specific Plan adoption, and the proposed project would comply with all relevant regulations. No mitigation is required for this impact, which is less than significant.

LU-4: The Program EIR determined that the Specific Plan, in combination with other plans and projects, would not result in cumulatively considerable impacts to land use. The proposed project, being a part of the Specific Plan area and accounted for as part of the Maximum Allowable Development, is consistent with this determination. No mitigation is required for this impact, which is less than significant.

No new impacts have been identified and no new mitigation measures are required for the proposed project.

Mineral Resources

Impacts would be the same as the Specific Plan. The Program EIR noted that the project site is not located within an area of known mineral resources, either of regional or local value.

As was the case with the Specific Plan, the proposed project would not result in the loss of availability of a known mineral resource or mineral resources recovery site. No new impacts have been identified and no new mitigation measures are required for the proposed project.

Noise

Impacts would be the same as the Specific Plan.

NOI-1: The Program EIR determined that construction noise, in particular exterior sources such as jackhammering and pile driving, could result in a potentially significant impact, and established Mitigation Measures NOI-1a through NOI-1c to address such impacts. However, the proposed project primarily involves interior tenant improvements and minor exterior changes, and would not involve grading, soil import/export, or the use of heavy construction equipment. Therefore construction noise impacts of the proposed project would be less than significant, and these mitigation measures would not apply.

NOI-2: The Program EIR determined that impacts to ambient noise and traffic-related noise levels as a result of the Specific Plan would be less than significant. The proposed project's share of this development (estimated as being equivalent to 71,921 square feet of commercial square footage) would be accounted for through deduction of this total from the Specific Plan Maximum Allowable Development.

NOI-3 and NOI-4: The Program EIR determined that the Specific Plan could include the introduction of sensitive receptors, specifically new residences, to a noise environment (near the Caltrain tracks) with noise levels in excess of standards considered acceptable under the City of Menlo Park Municipal Code, as well as the introduction of sensitive receptors to substantial levels of groundborne vibration from the Caltrain tracks. Although the project site is in direct proximity to the Caltrain tracks, the proposed

project's conversion of a retirement living center to a hotel, within existing structures, would not represent the introduction of new sensitive receptors, and as such application of Mitigation Measures NOI-3 or NOI-4 is not required for the project.

NOI-5: The Program EIR determined that 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. The Program EIR established Mitigation Measure NOI-5 to require the City to use rubberized asphalt in future paving projects within the Plan area if it determines that it will significantly reduce noise levels and is feasible given cost and durability, but determined that due to uncertainties regarding Caltrans approval and cost/feasibility factors, the cumulative impact of increased traffic noise on existing sensitive receptors is significant and unavoidable. The proposed project's share of this development (estimated as being equivalent to 71,921 square feet of commercial square footage) would be accounted for through deduction of this total from the Specific Plan Maximum Allowable Development.

No new Noise impacts have been identified and no new mitigation measures are required for the proposed project.

Population and Housing

Impacts would be similar from that analyzed in the Program EIR.

POP-1: The Program EIR determined that the implementation of the Specific Plan would not cause the displacement of existing residents to the extent that the construction of replacement facilities outside of the Plan area would be required. Although the existing, market-rate facility provides a type of group housing, the individual rooms themselves do not have full kitchens and have not been considered by the City to be individual dwelling units. However, it is recognized that residents would be displaced by the proposed hotel use. In general, implementation of the Specific Plan would likely include new residential development that would replace any lost units and add additional housing opportunities in the Plan area, although the timing of individual residential projects would vary based on market conditions. As a result, the Program EIR determined that since the Specific Plan allows for more residential units to be constructed than would be demolished in the Plan area, the construction of replacement housing outside the Specific Plan area would not be required. Additionally, prior to and since information on the hotel proposal has been made public, many of the former residents have voluntarily relocated to other market-rate senior housing facilities, such that the recent occupancy rate has been reduced to approximately 13 percent limiting the number of residents needing to find alternative housing. The proposed project would assist in the relocation of remaining residents at the project site to other residential locations in the City or region, as required by existing law. No mitigation is required for this impact, which is less than significant.

POP-2: The Program EIR determined that the implementation of the Specific Plan would not be expected to induce growth in excess of current projections, either directly

or indirectly. The Program EIR found that full build-out under the Specific Plan would result in 1,537 new residents, well within the Association of Bay Area Governments (ABAG) projection of 5,400 new residents between 2010 and 2030 in Menlo Park and its sphere of influence. Additionally, the Program EIR projected the new job growth associated with the new retail, commercial and hotel development to be 1,357 new jobs. The ABAG projection for job growth within Menlo Park and its sphere of influence is an increase of 7,240 jobs between 2010 and 2030. The Program EIR further determines that based on the ratio of new residents to new jobs, the Specific Plan would result in a jobs-housing ratio of 1.56, below the projected overall ratio for Menlo Park and its sphere of influence of 1.70 in 2030 and below the existing ratio of 1.78.

The proposed project would not directly result in population growth, as the project would not construct new housing. The project may result in a slight increase in population indirectly as a result of an increase in employees at the project site. Based on the Limited Economic Benefit Review (Conley Consulting Group, October 19, 2012), the project would result in a total of 47 net new jobs in the local economy, above the existing senior facility in 2011. It is anticipated that most of the new jobs created would be sustained by the region's existing population. Only 25 new jobs would directly result from project implementation. Assuming that all 25 new jobs result in employees relocating to the City (a conservative assumption), this would result in a population increase of 60 people based on a household size of 2.38 persons per household utilized in the Program EIR. The resultant 60 persons (0.17 percent of the total population analyzed in the Program EIR) would not be considered a substantial increase, would continue to be within all projections and impacts in this regard would be considered less than significant. Thus, no new impacts have been identified and no new mitigation measures are required for the proposed project.

POP-3: The Program EIR determined that implementation of the Specific Plan, in combination with other plans and projects would not result in cumulatively considerable impacts to population and housing. The EIR identified an additional 959 new residents and 4,126 new jobs as a result of other pending projects. These combined with the projection for residents and jobs from the Specific Plan equate to 2,496 new residents and 5,483 new jobs, both within ABAG projections for Menlo Park and its sphere of influence in 2030. The estimated additional 25 jobs and 60 persons associated with the proposed hotel conversion would not be considered a substantial increase, would continue to be within all projections and impacts in this regard would be considered less than significant. Thus, no new impacts have been identified and no new mitigation measures are required for the proposed project.

No new Population and Housing impacts have been identified and no new mitigation measures are required for the proposed project.

Public Services and Utilities

Impacts would be the same as the Specific Plan. The Program EIR concluded that less than significant impacts to public services, including fire protection, police protection,

schools, parks, and other public facilities would result. In addition, the Program EIR concluded that the project would result in less than significant impacts to utilities and service systems, including water services, wastewater services, and solid waste. No mitigation measures were required under the Program EIR for Public Services and Utilities impacts.

The proposed project would result in similar demands on public services compared to the existing uses at the site. It is anticipated that the elimination of the senior living facility would likely involve a reduction in ambulance and fire calls to the site compared to the proposed hotel use. Neither the existing retirement living center nor the proposed hotel use would affect school enrollment. The proposed project's business hotel users are not expected to substantially increase the use of parks, relative to the existing site occupants. The existing water, wastewater, electric, gas, and solid waste infrastructure is adequate to support the proposed project, as the number of proposed hotel rooms would not exceed 138 rooms, which the current site was developed to support.

No new Public Services and Utilities impacts have been identified and no new mitigation measures are required for the proposed project.

Transportation, Circulation and Parking

This analysis is informed by a Traffic Impact Analysis (TIA) prepared by TJKM on behalf of the applicant (Exhibit 1) and associated independent City peer review (Exhibit 2).

TR-1 and TR-7: The Program EIR concluded that the Specific Plan would result in significant and unavoidable traffic impacts related to operation of area intersections and local roadway segments, in both the short-term and cumulative scenarios, even after implementation of Mitigation Measures TR-1a through TRA-1d, TR-2, TR-7a through TR-7n, and TR-8.

As part of the TIA, the following intersections were analyzed:

- 1) El Camino Real/Valparaiso Avenue/Glenwood Avenue;
- 2) Glenwood Avenue/San Antonio Avenue
- 3) Glenwood Avenue/Garwood Way;
- 4) Glenwood Avenue/Laurel Street; and
- 5) Glenwood Avenue/Middlefield Road.

Intersections #1 and #5 were analyzed as part of the Program EIR. In both the near-term and cumulative scenarios, the project would not result in impacts in excess of City standards for intersections #1-4. For intersection #5, which has no controls (stop signs or signals) for Middlefield Road movements, but which has stop signs on the approach streets of Glenwood and Linden Avenues, the project would result in significant impacts in both the near-term and cumulative scenarios. However, the Program EIR likewise determined that this intersection would see a significant impact, so the proposed project would be consistent. The Program EIR established Mitigation Measure TR-1b (also TR-

7f), requiring fair-share funding towards signalization of this intersection, which would be applied as a requirement of this project through the Mitigation Monitoring and Reporting Program. However, the implementation of this improvement, which is in the Town of Atherton, cannot be guaranteed, so the impact remains significant and unavoidable, for both the Specific Plan and the proposed project.

TR-2 and TR-8: The Program EIR determined that the Specific Plan would adversely affect operation of certain local roadway segments, in both the near-term and cumulative scenarios. The proposed project, by creating 539 projected net new daily trips, would contribute to this impact. However, the proposed project's share of the overall Specific Plan development (estimated as being equivalent to 71,921 square feet of commercial square footage) would be accounted for through deduction of this total from the Specific Plan Maximum Allowable Development, and as such is consistent with the Program EIR analysis. In addition, the proposed project would be required through the MMRP to implement Mitigation Measure TR-2, requiring submittal and City approval of a Transportation Demand Management (TDM) program prior to project occupancy. However, this mitigation (which is also implemented through Mitigation Measure AIR-2) cannot have its effectiveness guaranteed, as noted by the Program EIR, so the impact remains significant and unavoidable.

TR-3, TR-4, TR-5, and TR-6: The Program EIR determined that the Specific Plan would not result in impacts to freeway segment operations, transit ridership, pedestrian and bicycle safety, or parking in the downtown. The proposed project's reuse of an existing site, using a parking rate supported by appropriate data and analysis, would be consistent with this analysis, and no new impacts or mitigation measures would be projected.

No new impacts have been identified and no new mitigation measures are required for the proposed project.

Conclusion

As discussed, the Conformance Checklist is to confirm that 1) the proposed project does not exceed the environmental impacts analyzed in the Program EIR, 2) that no new impacts have been identified, and 3) no new mitigation measures are required. As detailed in the analysis presented above, the proposed project would not result in greater impacts than were identified for the Program EIR. No new impacts have been identified and no new mitigation measures are required for the proposed project.

Exhibit 1 – Preliminary Parking and Traffic Impact Analysis - TJKM

Exhibit 2 – Review of 555 Glenwood Avenue Traffic Analysis - W-Trans