

## ES.1 Project Overview

Greenheart Land Company (Project Sponsor) is proposing to redevelop 11 assessor's parcels of land between El Camino Real and the Caltrain right-of-way into a mixed-use development. The Project site includes the former Derry Lane site (3.5 acres), the former 1300 El Camino Real site (3.4 acres), and 1258 El Camino Real (0.3 acres), which add up to approximately 7.2 acres in their current state. These parcels generally consist of vacant, previously developed land in the northern area and commercial buildings along Derry Lane and Oak Grove Avenue in the southern area. The Derry Lane site and the 1300 El Camino Real site were subject to previous development proposals that would have included development of residential, office, and community-serving<sup>1</sup> uses at the two project sites. Both of these proposals obtained environmental impact report (EIR) certification, although the Derry Lane site never received overall project approvals, having been subject to a referendum. The 1300 El Camino Real site's approvals were valid at the point of the Project Sponsor's submittal of the revised application, thus constituting an extension under the City of Menlo Park's (City's) practice.

The Project would demolish the existing structures in the southern portion of the site and construct approximately 420,000 square feet (sf) of mixed uses. In total, the Project would include three mixed-use buildings, a surface parking lot, an underground parking garage, onsite linkages, and landscaping. The uses at the Project site would include approximately 188,900 to 199,300 sf of non-medical office space in two buildings, approximately 202,100 sf of residential space (up to 202 housing units) in one building, and up to 29,000 sf of community-serving space throughout the proposed office and residential buildings. The Project would provide approximately 1,000 parking spaces within parking garage and a surface parking lot. After street abandonment and dedication actions under the Project, the total site area would be approximately 6.4 acres.

The entire Project site is in the El Camino Real/Downtown Specific Plan (Specific Plan) area and the El Camino Real Northeast – Residential (ECR NE-R) District. The Project site is zoned SP-ECR/D. The ECR NE-R District is on the east side of El Camino Real between Oak Grove and Glenwood Avenues and currently characterized by a mix of retail, personal service, office, and residential uses. The ECR NE-R District is in an area with the general plan land use designation of El Camino Real Mixed-Use – Residential, which supports a variety of retail uses, personal services, business and professional offices, and residential uses. The ECR NE-R District provides for higher intensities, with a focus on residential development, given its location near a train station and downtown. The Specific Plan outlines the maximum amount of building intensity permitted in the ECR NE-R District.

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<sup>1</sup> Community-serving uses include the following categories of uses, as defined in the Specific Plan and permitted in the ECR NE-R District: banks/other financial institutions, business services, eating/drinking establishments, office/business/professional services (limited to a single real estate office of no more than 2,500 square feet), personal improvement services, and retail sales.

With a Public Benefit Bonus,<sup>2</sup> the Project would be consistent with allowed development in the ECR NE-R District. The permitted floor-area ratio (FAR) is 1.10, but with a Public Benefit Bonus, the FAR can increase to 1.50. In either scenario, a non-medical office is limited to no more than one-half the maximum FAR. In general, maximum heights are permitted to 38 feet. Although 48 feet is permitted with a Public Benefit Bonus, building façades cannot exceed a height of 38 feet. The Project would be constructed at the maximum FAR and height permitted with a Public Benefit Bonus. Up to 32 dwelling units per acre are allowed at the Project site, and up to 50 units per acre are permitted with a Public Benefit Bonus. Therefore, because the Project would develop at an intensity of approximately 31.6 units per acre, a Public Benefit Bonus would not be required for dwelling unit density. All uses proposed under the Project are permitted in the ECR NE-R District.

## ES.2 Infill Environmental Checklist

As discussed above, the Project site is within the Specific Plan area. Because the Project's site plan and development parameters are consistent with development anticipated by the Specific Plan, a programmatic Specific Plan EIR is applicable to this Project. Therefore, an Infill Environmental Checklist was prepared for the Project by the City, in conformance with Section 15183.3 of the California Environmental Quality Act (CEQA) Guidelines and Section 21094.5 of the Public Resources Code (PRC), adopted per Senate Bill (SB) 226 (Appendix 1-1). SB 226 was developed by the California legislature to eliminate repetitive analysis of effects of a project that were previously analyzed in a programmatic EIR for a planning-level decision or substantially mitigated by uniformly applied development policies. The checklist was used to limit the scope of the EIR to effects that were determined to be significant, identical to the function of an initial study, as defined in Section 15063 of the CEQA Guidelines.

The Infill Environmental Checklist determined that the Project would have effects that either have not been analyzed in the prior Specific Plan EIR or are more significant than described in the prior EIR and no uniformly applicable development policies would substantially mitigate such effects. Therefore, because the impacts could be significant, this Draft Infill EIR is required to analyze the effects.

## ES.3 Areas of Controversy

CEQA Guidelines Section 15123 specifies that a draft EIR summary must identify "areas of controversy" known to the lead agency, including issues raised by agencies and the public, and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

The Project's Infill Environmental Checklist (Appendix 1-1) and Notice of Preparation (NOP) (Appendix 1-2) were released on July 14, 2014, for a 30-day public review period. A public scoping meeting was held on August 4, 2014, before the Planning Commission. The NOP noted that the Project may have a significant effect

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<sup>2</sup> The Specific Plan outlines the maximum amount of building intensity permitted in the ECR NE-R District. However, the maximum may be increased with a Public Benefit Bonus, which allows additional development beyond the base intensity and height in exchange for extra public benefits. The Public Benefit Bonus would be expected to increase profits from development in exchange for providing additional benefits to the public. Public Benefit Bonuses require case-by-case discretionary review, and if the Planning Commission and City Council ultimately does not find that the proposed benefits are appropriate, a project can be required to be revised to the base-level development standards.

on the environment and that an EIR would be prepared. Letters received from agencies and members of the public in response to the NOP are included in Appendix 1-2. Major areas of controversy include those listed below.

## Transportation

- Requirements of a transportation impact analysis.
- Role of lead agency in implementing mitigation measures.
- Additional vehicle trip reductions.
- Encroachment permits for work within public rights-of-way.
- Consideration of the City's Circulation System Assessment document.
- Avoidance of neighborhood cut-throughs.
- Consideration of improvements to El Camino Real as part of the Project.
- Consideration of traffic from all land uses.
- Explanation of metrics to be used for vehicle miles traveled.
- Queuing analysis and capacity for car storage.
- Changes to the traffic patterns as a result of the opening of Garwood Way.
- Additional intersection and roadway segments to be studied in the EIR.
- Transportation demand management plan for the Project site.
- Consideration of parking spillover into neighborhoods.

## Noise

- Placement of proposed sensitive receptors adjacent to noise associated with rail operations on the Caltrain tracks.

## Population and Housing

- Jobs/housing balance as a result of the Project.

## Alternatives

- Analysis of an alternative that includes more and/or less office and residential use.

## ES.4 Project Alternatives

Chapter 5 of this Draft Infill EIR, *Alternatives*, analyzes the following reasonable alternatives to the Project:

- **No-Project Alternative.** Under the No-Project Alternative, existing parcels would remain as is. The six buildings and associated parking areas would remain at the Derry Lane site. It is assumed that the vacant buildings would not be retained because of their deteriorated nature. There are no existing buildings at the 1300 El Camino Real site, but the foundations of demolished buildings and associated parking surfaces remain. It is assumed this site would

remain vacant and the building foundations and paved surfaces would not be removed. There is one building on the 1258 El Camino Real site that was vacated in 2010. It is assumed that this vacant building would not be retenanted because of its deteriorated nature.

- **Base Level Maximum Office Alternative.** This alternative allows for a 1.10 FAR, which meets the base density standards of the Specific Plan for the El Camino Real Northeast zoning district. The development standards stipulate that general office space shall not exceed one-half of the base FAR or public bonus FAR. This alternative does not exceed half of the base FAR. More specifically, this alternative would reduce proposed office square footage by 34,900 sf, from 188,900 sf to 154,000 sf, and reduce residential square footage by 63,100 sf, from 202,100 sf to 139,000 sf (from 202 units to 139 units). The community-serving area would be reduced by 14,000 sf, from 29,000 sf to 15,000 sf. The general layout, as well as ingress and egress, would be the same as that of the Project.
- **Base Level Maximum Residential Alternative.** This alternative allows for a 1.10 FAR, which meets the development standards of the Specific Plan, with 32 dwelling units per acre, for the zoning district El Camino Real Northeast – Residential. The Maximum Residential Alternative would increase residential square footage by only 3,900 sf, from 202,100 sf to 206,000 sf (from 202 units to 206 units), and reduce office square footage by 101,900 sf, from 188,900 sf to 87,000 sf. The community-serving area would be reduced by 14,000 sf, from 29,000 sf to 15,000 sf. The general layout, as well as ingress and egress, would be the same as that of the Project.

## ES.5 Impacts and Mitigation Measures

Table ES-1 presents a summary of the impacts of the Project, proposed mitigation and improvement measures, and each impact's level of significance after mitigation. The environmental impacts are identified and classified as "Significant," "Less than Significant," or "No Impact." According to the CEQA Guidelines Section 15382, a significant impact is "... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project..." CEQA Guidelines Section 15126.4(a)(1) also states that an EIR "... shall describe feasible mitigation measures that could minimize significant adverse impacts..."

## ES.6 Draft EIR Conclusions

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

The Draft Infill EIR identifies impacts that will remain significant and unavoidable, even after implementation of the proposed mitigation measures. Consequently, the City will need to determine

whether to approve the Project as proposed and, if so, provide its rationale in a Statement of Overriding Considerations.

As outlined above, Chapter 5, *Alternatives*, presents alternatives to the Project. Although the Reduced-Intensity Alternatives would meet some Project objectives, none of the alternatives would avoid all the significant and unavoidable impacts of the Project. The City will need to determine whether these options, or others that have not been considered, are preferable from an environmental and community perspective compared with the Project.

## ES.7 How to Comment on This Draft EIR

This Draft Infill EIR is considered a draft under CEQA because it must be reviewed and commented upon by public agencies, organizations, and individuals before being finalized. This document is being distributed for a 45-day (minimum) public review and comment period. Readers are invited to submit written comments on the document. Comments are most helpful when they suggest specific alternatives or measures that better mitigate significant environmental effects.

Written comments should be submitted to:

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To consider oral comments on the Draft Infill EIR, a public hearing will be held before the Planning Commission on March 21, 2016. Hearing notices will be mailed to responsible agencies and interested individuals.

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<b>3.1 Transportation</b>			
<p><b>Impact TRA-1: Impacts on Intersections under Near-Term 2020 plus-Project Conditions.</b> Increases in traffic associated with the Project under near-term 2020 plus-Project conditions would result in increased peak-hour delays at five intersections. Intersection impacts at the four of the five intersections would remain significant and unavoidable because improvements would require obtaining additional rights-of-way, would violate existing City/town policies, or would be outside the City’s jurisdiction.</p>	S	<p><b>TRA-1.1: Implement Intersection Improvements to Address Near-Term 2020 plus-Project Effects.</b> Operations at Ravenswood Avenue/Laurel Street (#11) could be improved by modifying the intersection geometry to provide additional capacity. Impacts on this intersection were noted in the Specific Plan’s Environmental Impact Report (EIR). Acceptable operations could be achieved at the intersection of Ravenswood Avenue/Laurel Street by reconfiguring the southbound Laurel Street approach to have a left-turn lane and a shared through/right-turn lane. This mitigation measure was not specified in the Specific Plan EIR. Conceptual schematics of the recommended feasible mitigation measures are provided in Appendix 3.1-G. A summary of the intersection analysis with mitigation measures is provided in Table 3.1-13. It may be possible to implement this mitigation measure within the existing right-of-way while maintaining the bicycle lanes, but it would require removal of on-street parking and 10-foot-wide travel lanes. With this mitigation measure, the impact would be reduced to a less-than-significant level.</p> <p><b>TRA-1.2: Implement Intersection Improvements to Address Near-Term 2020 plus-Project Effects.</b> Operations at four intersections could be improved by modifying intersection geometry to provide additional capacity. Some of these modifications may require additional rights-of-way to add travel lanes. Conceptual schematics of the recommended feasible mitigation measures are provided in Appendix 3.1-G. A summary of the intersection analysis with mitigation measures is provided in Table 3.1-13.</p> <p>a. Middlefield Road/Glenwood Avenue-Linden Avenue (#3)                      Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at Middlefield Road/Glenwood Avenue-Linden Avenue with signalization of the intersection. This mitigation measure would be consistent with the mitigation measure noted in the Specific Plan EIR. No additional mitigation measures beyond those identified in the Specific Plan EIR</p>	SU

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Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>would be required to achieve acceptable operations at this intersection. This mitigation measure is specified in the Supplemental Transportation Impact Fee.</p> <p>Although traffic volumes at this intersection would not satisfy peak-hour traffic signal warrant criteria, as discussed in the Traffic Signal Warrants section, the impact would be reduced to a less-than-significant level with implementation of this mitigation measure. However, this mitigation measure may require the acquisition of additional rights-of-way to install traffic signal equipment and modify the Glenwood Gate, a physical gate at the east Linden Avenue leg of the intersection that restricts the Linden Avenue approach to a two-way, one-lane road. Additionally, because the measure would require approval from the Town of Atherton, its implementation cannot be guaranteed; therefore, the impact would be significant and unavoidable. The Project is required to contribute a fair share financial contribution toward a traffic signal at this location, based the percentage of project-generated trips compared to the total number of trips passing through the intersection. The funds would be available to the Town of Atherton for a 5-year period. The Project’s fair share contribution would be 3.7 percent of the cost of the improvement, as shown in Appendix 3.1-H.</p> <p>b. Oak Grove Avenue/Alma Street (#13)</p> <p>Acceptable operations would be achieved at the intersection of Oak Grove Avenue/Alma Street with implementation of Mitigation Measure TRA-1.2.c at Oak Grove Avenue/Derry Lane (Garwood Way)-Merrill Street. The mitigation measure includes a southbound peak-hour left-turn restriction at Oak Grove Avenue/Derry Lane (Garwood Way)-Merrill Street, which would reduce the amount of traffic entering eastbound Oak Grove Avenue at Alma Street. However, the City’s experience has found that turn restrictions are ineffective because turn restrictions are ignored by drivers. Consequently, they would not mitigate the impact. Installation of a traffic signal at this intersection was not considered because traffic volumes at this intersection would not satisfy peak-hour signal warrant criteria, as discussed in the Traffic Signal Warrants section. Additionally, a traffic</p>	

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Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>signal at this intersection is infeasible because of the immediate proximity of the Caltrain railroad tracks to the east and the potential for queuing to extend onto the tracks. Grade separation for the railroad tracks and Oak Grove Avenue would modify the Alma Street intersection and may mitigate this impact. However, grade separation is a large-scale, long-term project. It is not expected that it would be funded by one development. In addition, a design is still to be completed. Therefore, this impact would remain significant and unavoidable.</p> <p>A partial mitigation measure to reduce the impact on this intersection would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and the east city limits. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue. The Project is required to implement the Class II bicycle lanes on Oak Grove Avenue as a partial mitigation measure.</p> <p>c. Oak Grove Avenue/Derry Lane (Garwood Way)-Merrill Street (#15)</p> <p>Although traffic volumes at this intersection would satisfy peak-hour signal warrant criteria, as discussed in the Traffic Signal Warrants section, a traffic signal is not recommended. It is infeasible because of the immediate proximity of the Caltrain railroad tracks to the east and the potential for queuing to extend onto the tracks. Acceptable operations could be achieved at the intersection of Oak Grove Avenue/Derry Lane (Garwood Way)-Merrill Street with implementation of southbound left-turn restrictions during the morning peak period (7:00–9:00 a.m.) and the afternoon peak period (4:00–6:00 p.m.). The City’s experience has found that turn restrictions are ineffective because turn restrictions are ignored by drivers, and they would not mitigate the impact. As part of the Garwood Way extension, the Project would provide a two-lane approach at the Oak Grove Avenue intersection. While this widening would reduce the delay expected at this intersection, the impact would remain significant.</p> <p>As discussed in TRA-1.2b, although it may mitigate this impact, grade separation is considered a large-scale, long-term project. It is not</p>	

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Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>expected that it would be funded by one development. Therefore, the impact would remain significant and unavoidable.</p> <p>A partial mitigation measure to reduce the impact on this intersection would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and the east city limits. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue. As noted in TRA 1.2b, the Project is required to implement the Class II bicycle lanes on Oak Grove Avenue as a partial mitigation measure.</p> <p>d. El Camino Real/Ravenswood Avenue-Menlo Avenue (#20)</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at El Camino Real/Ravenswood Avenue-Menlo Avenue with the addition of a third northbound through travel lane along El Camino Real; this mitigation measure is consistent with the mitigation measure noted in the Specific Plan EIR. This improvement is specified in the City’s Transportation Impact Fee (TIF) program. The measure is consistent with one of the alternatives that is currently being considered in the El Camino Real Corridor Study and would not preclude implementation of potential alternatives. However, widening would likely require removal of some of the trees located at the southeast corner and affect access to the 1000 El Camino Real property.</p> <p>This measure would have potentially significant secondary effects on bicyclists because they would be required to cross additional lanes of traffic to make a left turn or proceed through the intersection. This improvement would also affect pedestrians by increasing the crossing distance, exacerbating the multiple-threat scenario (where vehicles block sight lines between drivers in adjacent lanes and crossing pedestrians), and increasing their exposure time to vehicles.</p> <p>Because the intersection is controlled by Caltrans, this measure would require coordination with and approval by Caltrans, which cannot be guaranteed. Furthermore, because of the mitigation measures’ secondary and access impacts, it is considered infeasible. There are no other feasible mitigation measures that would fully mitigate the</p>	

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Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>impact on the intersection of El Camino Real/Ravenswood Avenue-Menlo Avenue.</p> <p><b><i>TRA-1.3: Implement Transportation Demand Management Program to Partially Reduce Near-Term 2020 plus Project Effects.</i></b>                      Several intersections would experience a significant and unavoidable impact under Near-Term 2020 plus-Project conditions.</p> <p>To partially alleviate the effects of the Project, the applicant would be required to implement a TDM program, as required by the Specific Plan. A partial mitigation measure, to reduce the impacts of the Project at several intersections under the Near-Term 2020 plus-Project conditions, would be to implement a TDM program, as required by the Specific Plan. The proposed TDM program could reduce peak-hour and daily trip generation. However, although the TDM program could reduce the number of vehicular trips by 2 to 30 percent and reduce the intersection impacts, the effectiveness of the TDM program cannot be reliably predicted. Furthermore, the maximum 30 percent would not be enough to reduce impacts to a less-than-significant level. Therefore, the impacts would remain significant and unavoidable.</p> <p>a. Oak Grove Avenue between El Camino Real and Laurel Street (#10)                      A partial mitigation measure to reduce the impact on this roadway segment would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and Laurel Street. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue.</p> <p>b. Oak Grove Avenue between Laurel Street and Middlefield Road (#11)                      A partial mitigation measure to reduce the impact on this roadway segment would be to construct Class II bicycle lanes on Oak Grove Avenue between Laurel Street and the east city limits. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue.</p> <p>c. Garwood Way between Glenwood Avenue and Oak Grove Avenue (#13)                      A partial mitigation measure to reduce the impact on this roadway</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact TRA-2: Impacts on Roadway Segments under Near-Term 2020 plus-Project Conditions.</b> Increases in traffic associated with the Project under near-term 2020 plus-Project conditions would result in increased ADT volumes on area roadway segments.</p>	S	<p>segment would be to sign a Class III bicycle route on Garwood Way between Glenwood Avenue and Oak Grove Avenue. This improvement was identified in the City’s Specific Plan.</p> <p>d. Transportation Demand Management</p> <p>Impacts on roadway segments would be partially reduced by implementing the trip reduction measures proposed in the Project’s TDM program, as required by the Specific Plan. The TDM program could reduce the number of vehicular trips by 2 to 30 percent, but even at the maximum of 30 percent, impacts on the four segments, although reduced, would still remain significant and unavoidable.</p> <p><b>TRA-2.1: Implement Roadway Segment Improvements to Address Near-Term 2020 plus-Project Effects.</b> The mitigation measures below are recommended to reduce potentially significant impacts on study area roadway segments.</p> <p>a. Oak Grove Avenue between El Camino Real and Laurel Street (#10)</p> <p>A partial mitigation measure to reduce the impact on this roadway segment would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and Laurel Street. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue.</p> <p>b. Oak Grove Avenue between Laurel Street and Middlefield Road (#11)</p> <p>A partial mitigation measure to reduce the impact on this roadway segment would be to construct Class II bicycle lanes on Oak Grove Avenue between Laurel Street and the east city limits. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue.</p> <p>c. Garwood Way between Glenwood Avenue and Oak Grove Avenue (#13)</p> <p>A partial mitigation measure to reduce the impact on this roadway segment would be to sign a Class III bicycle route on Garwood Way between Glenwood Avenue and Oak Grove Avenue. This improvement was identified in the City’s Specific Plan.</p>	SU

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact TRA-3: Impacts on Routes of Regional Significance under Near-Term 2020 plus-Project Conditions.</b> Increases in traffic associated with the Project under near-term 2020 plus-Project conditions would result in significant impacts on several Routes of Regional Significance.</p>	S	<p>d. Transportation Demand Management</p> <p>Impacts on roadway segments would be partially reduced by implementing the trip reduction measures proposed in the Project’s TDM program, as required by the Specific Plan. The TDM program could reduce the number of vehicular trips by 2 to 30 percent, but even at the maximum of 30 percent, impacts on the four segments, although reduced, would still remain significant and unavoidable.</p> <p><b><i>TRA-3.1: Implement Routes of Regional Significance Improvements to Address Near-Term 2020 plus-Project Effects.</i></b> The mitigation measures below were considered to reduce potentially significant impacts on Regional Routes of Significance.</p> <p>Routes of Regional Significance could be widened to add travel lanes; however, the routes are under the jurisdiction of Caltrans. Although adding a travel lane would increase capacity, constructing additional lanes is not a feasible mitigation measure because of right-of-way constraints. Therefore, impacts at the following locations would remain significant and unavoidable:</p> <ul style="list-style-type: none"> <li>• Willow Road – US 101 to Bayfront Expressway (northbound)</li> <li>• Willow Road – Bayfront Expressway to US 101 (southbound)</li> <li>• Bayfront Expressway – University Avenue to Willow Road (westbound)</li> <li>• Bayfront Expressway – Willow Road to University Avenue (eastbound)</li> </ul> <p>Partial mitigation measures are identified to reduce impacts of the Project on Routes of Regional Significance under near-term 2020 plus-Project conditions. The Project includes a TDM program that could reduce its peak-hour and daily trip totals. Impacts on Routes of Regional Significance would be partially reduced by implementing the trip reduction measures proposed in the Project’s TDM program, as required by the Specific Plan. The TDM program could reduce the number of vehicular trips by 2 to 30 percent, but even at the maximum of 30 percent, impacts on three of the four segments, although reduced, would still remain significant. With a full 30 percent</p>	SU

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact C-TRA-4: Impacts on Intersections under Cumulative 2040 plus-Project Conditions.</b> Increases in traffic associated with the Project under cumulative 2040 plus-Project conditions would result in increased peak-hour delays at 13 intersections. Intersection impacts at nine of the intersections would be significant and unavoidable because improvements would require obtaining additional rights-of-way, would violate existing City/town policies, or would be outside the City’s jurisdiction.</p>	S	<p>trip reduction, the TDM program would reduce the impact on northbound Willow Road between US 101 and Bayfront Expressway to a less-than-significant level. However, because the reduction cannot be quantified and the effectiveness of the TDM program is uncertain, impacts to all four of the roadway segments would remain significant and unavoidable, as described below.</p> <p><b>C-TRA-4.1: Implement Intersection Improvements to Mitigate Cumulative 2040 plus-Project Effects.</b> Operations at several intersections could be improved by modifying intersection geometry to provide additional capacity. Some of these modifications may be made by restriping the existing roadway. Conceptual schematics of the recommended feasible mitigation measures are provided in Appendix 3.1-G. A summary of the intersection analysis with mitigation measures is provided in Table 3.1-21.</p> <p>a. Oak Grove Avenue/University Drive (#25)                      Acceptable operations could be achieved at the intersection of Oak Grove Avenue/University Drive by reconfiguring the westbound Oak Grove approach to have one exclusive left-turn lane and one exclusive right-turn lane. It may be possible to implement this mitigation measure within the existing right-of-way, but it would require removing on-street parking. This mitigation measure would not affect planned bike lanes along Oak Grove Avenue. However, removal of several parking spaces on the south side of Oak Grove Avenue would be required to incorporate both this mitigation measure and planned bike lanes at the Oak Grove Avenue approach to this intersection. With this mitigation measure, the impact would be reduced to a less-than-significant level. The Project would be required to contribute a fair share toward lane reconfigurations at this location. The Project’s fair share would be 16.3 percent of the total cost of improvements, as determined in Appendix 3.1-H.</p> <p>b. Santa Cruz Avenue/University Drive (North) (#26)                      Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations would be achieved at Santa Cruz Avenue/University Drive (North) with signalization of the</p>	SU

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		<p>intersection. This mitigation measure is consistent with the mitigation measure noted in the Specific Plan EIR. No additional mitigation measures beyond those identified in the Specific Plan EIR would be required to achieve acceptable operations at this intersection. This mitigation measure is also specified in the Supplemental Transportation Impact Fee.</p> <p>It is noted that traffic volumes at this intersection would satisfy peak-hour traffic signal warrant criteria, as discussed in the Traffic Signal Warrants section. Because of the proximity of the nearby traffic signal at Santa Cruz Avenue/University Drive (South), the two signals should be interconnected, and coordinated timing should be implemented.</p> <p>It may be possible to implement this mitigation measure within the existing right-of-way. The design locations for signal equipment, such as poles and controller cabinets, cannot be determined until the intersection has been potholed, which would typically occur during the preliminary engineering phase of the Project. However, the City's recent traffic signal installation and modification projects did not require additional rights-of-way, were built within the public right-of-way, and were not restricted by underground utilities. Therefore, it may reasonably be concluded that the experience would be similar at this location. With this mitigation measure, the impact would be reduced to a less-than-significant level. The Project is required to contribute a fair share toward a traffic signal at this location. The Project's fair share would be 32.6 percent of the total cost of improvements, as determined in Appendix 3.1-H.</p> <p><b><i>C-TRA-4.2: Implement Intersection Improvements to Reduce Cumulative 2040 plus-Project Effects.</i></b> Operations at several intersections could be improved by modifying intersection geometry to provide additional capacity. Some of these modifications may require additional rights-of-way to add travel lanes. However, impacts would remain significant and unavoidable because the improvements would require obtaining additional rights-of-way, and some intersections are not under the City's jurisdiction. Conceptual schematics of the recommended feasible mitigation measures are provided in Appendix 3.1-G. A summary of the intersection analysis</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>with mitigation measures is provided in Table 3.1-21.</p> <p>a. Middlefield Road/Encinal Avenue (#2)</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at the intersection of Middlefield Road/Encinal Avenue with an additional right-turn lane on the southbound Middlefield Road and eastbound Encinal Avenue approaches. The additional right-turn lane on the eastbound Encinal Avenue approach is consistent with the mitigation measure noted in the Specific Plan EIR. However, the additional right-turn lane on southbound Middlefield Road is beyond what was identified in the Specific Plan EIR as necessary to maintain acceptable operations. Although the impact would be reduced to a less-than-significant level with implementation of this intersection improvement, acquisition of additional rights-of-way would be required. Furthermore, because construction of the improvement would require approval from the Town of Atherton, its implementation cannot be guaranteed; therefore, the impact remains significant and unavoidable. The Project is required to pay the Supplemental Transportation Impact Fee and contribute a fair share toward the additional right-turn lanes on the southbound Middlefield Road and approach at this location which was not identified in the Specific Plan EIR mitigation measure. The funds would be available to the Town of Atherton for a 5-year period. The Project's fair share contribution would be 1.6 percent of the cost of the improvement, as shown in Appendix 3.1-H.</p> <p>b. Middlefield Road/Glenwood Avenue-Linden Avenue (#3)</p> <p>It is noted that, for this scenario, traffic volumes at this intersection satisfy peak-hour traffic signal warrant criteria, as discussed in the Traffic Signal Warrants section. The peak-hour warrant would not be satisfied under near-term 2020 plus-Project conditions (see TRA-1.1.a, which is paraphrased below for reference).</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at the intersection with signalization. This mitigation measure is consistent with the mitigation measure noted in the Specific Plan EIR. No additional</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>mitigation measures beyond those identified in the Specific Plan EIR are required to achieve acceptable operations at this intersection. This mitigation measure is also specified in the Supplemental Transportation Impact Fee.</p> <p>Although signalization would reduce the impact to a less-than-significant level, this mitigation measure may require the acquisition of additional rights-of-way to install traffic signal equipment and modify the Glenwood Gate. Additionally, because the measure would require approval from the Town of Atherton, its implementation cannot be guaranteed; therefore, the impact would be significant and unavoidable. The Project is required to contribute a fair share toward a traffic signal at this location. The funds would be available to the Town of Atherton for a 5-year period. The Project’s fair share contribution would be 3.7 percent of the cost of the improvement, as noted in TRA-1.2.a and as shown in Appendix 3.1-H.</p> <p>c. Middlefield Road/Ravenswood Avenue (#5)</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at Middlefield Road/Ravenswood Avenue with the addition of a second northbound left-turn lane and a corresponding receiving lane on the west leg. This measure would require coordination with the Town of Atherton. Although this mitigation measure differs from the mitigation measures noted in the Specific Plan EIR, this measure is specified in the City’s TIF program. The applicant should pay traffic impact fees per the current TIF schedule.</p> <p>This measure has potentially significant secondary effects on bicyclists because it would require them to cross additional lanes of traffic to make a left turn or proceed through the intersection. This improvement would also affect pedestrians by increasing the crossing distance, exacerbating the multiple-threat scenario (where vehicles block sight lines between drivers in adjacent lanes and crossing pedestrians), and increasing their exposure time to vehicles. This improvement would therefore be required to include enhancements to bicycle and pedestrian infrastructure. These enhancements would include adding a “jughandle” left turn for bikes on the east side of the</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>intersection, adding a bicycle signal for crossing Middlefield Road, and making modifications to signal timing to provide adequate time for crossings. The modifications would also include warning signs and markings to comply with the CA-MUTCD. The Project is required to contribute a fair share toward enhancements to bicycle and pedestrian infrastructure noted above, which are not included in the City’s TIF program. The Project’s fair share contribution would be 12 percent of the cost of the improvement, as shown in Appendix 3.1-H. The impact would be reduced to a less-than-significant level with this measure. However, this measure would require coordination with and approval by the Town of Atherton, which cannot be guaranteed. Therefore, this intersection would experience a significant and unavoidable impact.</p>	
		<p>d. Middlefield Road/Willow Road (#7)</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at Middlefield Road/Willow Road with the following improvements:</p> <ul style="list-style-type: none"> <li>• Widening the eastbound Willow Road approach to provide an additional through lane.</li> <li>• Widening the westbound Willow Road approach to provide an additional left-turn lane and re-striping the existing shared through/left-turn lane to a through-only lane.</li> <li>• Widening the southbound Middlefield Road approach to include an exclusive through lane and re-striping the existing shared through/left-turn lane to a through-only lane.</li> </ul> <p>This mitigation measure is consistent with the mitigation measure noted in the Specific Plan EIR. Although the improvements to the westbound and eastbound approaches are beyond the scope of the mitigation measures identified in the Specific Plan, these improvements are specified in the City’s TIF program. The applicant should pay traffic impact fees per the current TIF schedule.</p> <p>This measure would have potentially significant secondary effects on bicyclists because it would require them to cross additional lanes of traffic to make a left turn or proceed through the intersection. This</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>improvement would also affect pedestrians by increasing the crossing distance, exacerbating the multiple-threat scenario (where vehicles block sight lines between drivers in adjacent lanes and crossing pedestrians), and increasing their exposure time to vehicles. This improvement would therefore be required to include enhancements to bicycle and pedestrian infrastructure. These enhancements would include modifications to signal timing to provide adequate time for crossings as well as the installation of warning signs and markings to comply with the CA-MUTCD.</p> <p>e. Laurel Street/Glenwood Avenue (#9)</p> <p>Acceptable operations would be achieved at Laurel Street/Glenwood Avenue by signaling the intersection. It is noted that traffic volumes at this intersection would satisfy peak-hour traffic signal warrant criteria, as discussed in the Traffic Signal Warrants section. The Project is required to provide a fair-share contribution toward a traffic signal at this location. The Project’s fair share contribution would be 1.4 percent of the cost of the improvement, as shown in Appendix 3.1-H. Because this measure would require coordination with and approval by Town of Atherton, its implementation cannot be guaranteed. No other mitigation measure was identified that would fully mitigate the impact. Therefore, this impact would be significant and unavoidable.</p> <p>f. Ravenswood Avenue/Laurel Street (#11)</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Improvements noted in TRA-1.1, which include reconfiguring the southbound Laurel Street approach to have a left-turn lane and a shared through/right-turn lane, would only partially mitigate the impact at Ravenswood Avenue/Laurel Street. No feasible mitigations would fully mitigate the impact. Therefore, this impact would be significant and unavoidable.</p> <p>g. Oak Grove Avenue/Alma Street (#13)</p> <p>(See TRA-1.2.b, which is paraphrased below for reference).</p> <p>It is noted that, for the cumulative 2040 plus-Project scenario, traffic volumes at this intersection would satisfy peak-hour traffic signal</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>warrant criteria, as discussed in the Traffic Signal Warrants section. However, the peak-hour warrant would not be satisfied at this intersection under near-term 2020 plus-Project conditions</p> <p>Although traffic volumes at this intersection would satisfy peak-hour signal warrant criteria, as discussed in the Traffic Signal Warrants section, a traffic signal is not recommended because it is infeasible given the immediate proximity of the Caltrain railroad tracks to the west and potential for queuing to extend onto the tracks. Acceptable operations could be achieved at the intersection of Oak Grove Avenue/Alma Street with the implementation of peak-hour left-turn restrictions on northbound Alma Street from 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m. (as is currently being done on a trial basis along Ravenswood Avenue with use of a temporary median). However, as noted in TRA-1.2b, the City’s experience has found that turn restrictions are ineffective because turn restrictions are ignored by drivers. Consequently, they would not mitigate the impact. Grade separation for the railroad tracks and Oak Grove Avenue would modify the Alma Street intersection and may mitigate this impact. However, grade separation is a large-scale, long-term project. It is not expected to be funded by one development. In addition, a design is still to be completed. No other feasible mitigation measures were identified that would fully mitigate the impact. Therefore, this impact would remain significant and unavoidable.</p> <p>A partial mitigation measure to reduce the impact on this intersection would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and the east city limits. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue.</p> <p>h. Oak Grove Avenue/Garwood Way-Merrill Street (#15)</p> <p>Although traffic volumes at this intersection would satisfy peak-hour signal warrant criteria, as discussed in the Traffic Signal Warrants section, a traffic signal is not recommended because it is infeasible given the immediate proximity of Caltrain railroad tracks 90 feet to the east and potential for queuing to extend onto the tracks.</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>Acceptable operations could be achieved at the intersection of Oak Grove Avenue/Garwood Way-Merrill Street with implementation of southbound left-turn restrictions on Garwood Way at Oak Grove Avenue, as noted in Mitigation Measure TRA-1-1.c. However, the City has found turn restrictions to be ineffective because turn restrictions are ignored by drivers. Additionally, the mitigation measure is not recommended under cumulative 2040 conditions because the increase in vehicular traffic that would be turning right at southbound Garwood Way would result in additional traffic at nearby intersections on El Camino Real. These intersections are expected to operate unacceptably under cumulative 2040 plus Project conditions. As discussed in TRA-1.2c, the Garwood Way extension would have a two-lane approach at the Oak Grove Avenue intersection. While this widening would reduce the delays at this intersection, the impact would not be reduced to less than significant.</p> <p>As discussed in TRA-1.2c, although it may mitigate this impact, grade separation is a large-scale, long-term project. It is not expected that it would be funded by one development. No other feasible mitigation measures were identified that would fully mitigate the impact. Therefore, this impact would be significant and unavoidable.</p> <p>A partial mitigation measure to reduce the impact on this intersection would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and the east city limits. This improvement was identified in the City’s Specific Plan. It could require parking spaces to be removed along Oak Grove Avenue.</p> <p>i. El Camino Real/Glenwood Avenue-Valparaiso Avenue (#17)</p> <p>Impacts to this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at El Camino Real/Glenwood Avenue-Valparaiso Avenue with the following improvements:</p> <ul style="list-style-type: none"> <li>• Widening the westbound Glenwood Avenue approach to provide an exclusive right-turn lane,</li> <li>• Changing the northbound and southbound right-turn lanes to shared through/right-turn lanes, and</li> <li>• Widening El Camino Real to provide additional receiving lanes in</li> </ul>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>both the northbound and southbound directions.</p> <p>This improvement would conflict with the Specific Plan goals to provide enhanced pedestrian crossing and sidewalks along El Camino Real by increasing the crossing distance, exacerbating the multiple threat scenario (where vehicles block sight lines between drivers in adjacent lanes and crossing pedestrians), increasing exposure time to vehicle traffic, and placing pedestrians closer to moving vehicle traffic. These improvements would have secondary effects on bicyclists because they would be required to cross additional lanes of traffic to make a left-turn or proceed through the intersection. The improvements would also preclude a future bicycle lane on El Camino Real.</p> <p>Improvements that would partially mitigate the impact at El Camino Real/Glenwood Avenue-Valparaiso Avenue include widening the westbound Glenwood Avenue approach to provide an exclusive right-turn lane. This improvement is identified in the City’s TIF program and payment of the TIF would be used for construction. Because the intersection is controlled by Caltrans, this measure would require coordination with and approval by Caltrans, which cannot be guaranteed. Therefore, this intersection would experience a significant and unavoidable impact.</p> <p>j. El Camino Real/Oak Grove Avenue (#18)</p> <p>Acceptable operations could be achieved at the intersection of El Camino Real/Oak Grove Avenue by reconfiguring the northbound right-turn lane into a shared through/right-turn lane and adding a corresponding receiving lane. Although the impact would be reduced to a less than significant level with the implementation of this improvement, this measure would have secondary impacts to bicyclists by increasing the crossing distance and precluding a future bicycle lane on El Camino Real. In addition, this measure would conflict with the Specific Plan goals to provide enhanced pedestrian crossings and sidewalks along El Camino Real. Furthermore, the measure would require coordination with and approval from Caltrans, which cannot be guaranteed. No other feasible mitigation measures were identified that would fully mitigate the impact. Therefore, the</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>impact would be significant and unavoidable.</p> <p>k. El Camino Real/Ravenswood Avenue-Menlo Avenue (#17)</p> <p>Impacts on this intersection were noted in the Specific Plan EIR. Acceptable operations could be achieved at El Camino Real/Ravenswood Avenue-Menlo Avenue with the following improvements:</p> <ul style="list-style-type: none"> <li>• Widening the eastbound Menlo Avenue approach to provide an exclusive left-turn lane,</li> <li>• Widening the northbound El Camino Real approach to provide an additional through lane,</li> <li>• Widening the northbound El Camino Real approach to provide an additional left-turn lane and widening Menlo Avenue to provide an additional receiving lane,</li> <li>• Widening the southbound El Camino Real approach to provide an additional left-turn lane, and</li> <li>• Re-striping the existing southbound El Camino Real right-turn lane to become a through/right-turn lane.</li> </ul> <p>Although the additional northbound left-turn lane and corresponding receiving lane is not identified as part of the mitigation measure noted in the Specific Plan EIR, the improvement was identified in the City’s TIF program as required in order to achieve acceptable operation, but is not feasible due to right-of-way constraints on northbound El Camino Real and eastbound Menlo Avenue. All other improvements listed above are consistent with the mitigation measure noted in the Specific Plan EIR and specified in the City’s TIF program. The applicant is required to pay fees per the current TIF schedule.</p> <p>These measures would have potentially significant secondary effects on bicyclists because they would be required to cross additional lanes of traffic to make a left turn or proceed through the intersection and also preclude a future bicycle lane on El Camino Real. This improvement conflicts with the Specific Plan goals to provide enhanced crossings and sidewalks along El Camino Real by increasing the crossing distance, exacerbating the multiple-threat scenario</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact C-TRA-5: Impacts on Roadway Segments under Cumulative 2040 plus-Project Conditions.</b> Increases in traffic associated with the Project under the cumulative 2040 plus-Project conditions would result in increased daily traffic volumes on area roadway segments.</p>	S	<p>(where vehicles block sight lines between drivers in adjacent lanes and crossing pedestrians), increasing their exposure time to vehicles, and placing pedestrians closer to moving vehicle traffic.</p> <p>In addition, significantly widening the northbound El Camino Real approach would likely require removal of the trees located at the southeast corner of the intersection and affect access to the 1000 El Camino Real property.</p> <p>Because the intersection is controlled by Caltrans, this measure would require coordination with and approval by Caltrans, which cannot be guaranteed. Furthermore, because of the mitigation measures' secondary impacts and right-of-way acquisition needs, it is considered infeasible. There are no other feasible mitigation measures that would fully mitigate the impact on the intersection of El Camino Real/Ravenswood Avenue-Menlo Avenue, and this impact remains significant and unavoidable.</p> <p><b><i>C-TRA-4.3: Implement Transportation Demand Management Program to Partially Reduce Cumulative 2040 plus Project Effects.</i></b>                      A partial mitigation measure, to reduce the impacts of the Project at several intersections under the Cumulative 2040 plus-Project conditions, would be to implement a TDM program, as required by the Specific Plan. The proposed TDM program could reduce peak-hour and daily trip generation. However, although the TDM program could reduce the number of vehicular trips by 2 to 30 percent and reduce the intersection impacts, the effectiveness of the TDM program cannot be reliably predicted. Furthermore, the maximum 30 percent would not be enough to reduce impacts to a less-than-significant level. Therefore, the impacts would remain significant and unavoidable.</p> <p><b><i>C-TRA-5.1: Implement Roadway Segment Improvements to Address Cumulative 2040 plus-Project Effects.</i></b> The mitigation measures below are recommended to reduce potentially significant impacts on study area roadway segments.</p> <p>a. Oak Grove Avenue between El Camino Real and Laurel Street (#10) (See TRA-2.1.a, which is paraphrased below for reference).</p> <p>A partial mitigation measure to reduce the impact on this roadway</p>	SU

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact C-TRA-6: Impacts on Routes of Regional Significance under Cumulative 2040 plus-Project Conditions.</b> Increases in traffic associated with the Project under cumulative 2040 plus-Project conditions would result in significant impacts on several Routes of Regional Significance.</p>	S	<p>segment would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and Laurel Street. This improvement was identified in the City’s Specific Plan. However, it could require on-street parking spaces to be removed along Oak Grove Avenue</p> <p>b. Oak Grove Avenue between Laurel Street and Middlefield Road (#11) (See TRA-2.1.b, which is paraphrased below for reference) A partial mitigation measure to reduce the impact on this roadway segment would be to construct Class II bicycle lanes on Oak Grove Avenue between Laurel Street and the east city limits. This improvement was identified in the City’s Specific Plan. However, it could require on-street parking spaces to be removed along Oak Grove Avenue.</p> <p>c. Garwood Way between Glenwood Avenue and Oak Grove Avenue (#13) (See TRA-2.1.c, which is paraphrased below for reference). A partial mitigation measure to reduce the impact on this roadway segment would be to sign a Class III bicycle route on Garwood Way between Glenwood Avenue and Oak Grove Avenue. This improvement was identified in the City’s Specific Plan</p> <p>d. Transportation Demand Management Implementation of the trip reduction measures proposed in the Project’s TDM program would partially reduce impacts on the roadway segments. The TDM program could reduce the number of vehicular trips by 2 to 30 percent. At the maximum of 30 percent, the impacts on the four local roadway segments, although reduced, would still remain significant.</p> <p><b><i>C-TRA-6.1: Implement Routes of Regional Significance Improvements to Address Cumulative 2040 plus-Project Effects.</i></b> The mitigation measures below were considered to reduce potentially significant impacts on Regional Routes of Significance. Routes of Regional Significance could be widened to add travel lanes; however, the routes are under the jurisdiction of Caltrans. Adding a</p>	SU

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact TRA-7: Impacts on Bicycle and Pedestrian Facilities.</b> Increased bicycle and pedestrian traffic in the vicinity of the Project would result in added demand for additional bicycle and pedestrian facilities.</p>	S	<p>travel lane would increase capacity, but such projects are considered infeasible due to right-of-way constraints. Therefore, the impacts on the following Routes of Regional Significance would remain significant and unavoidable:</p> <ul style="list-style-type: none"> <li>• Willow Road – US 101 to Bayfront Expressway (northbound)</li> <li>• Willow Road – Bayfront Expressway to US 101 (southbound)</li> <li>• Bayfront Expressway – University Avenue to Willow Road (westbound)</li> <li>• Bayfront Expressway – Willow Road to University Avenue (eastbound)</li> </ul> <p>Partial mitigation measures have been identified to reduce the impacts of the Project on Routes of Regional Significance under cumulative 2040 plus-Project conditions. The Project includes a TDM program that could reduce the number of trips generated during the peak periods and on a daily basis. To partially reduce impacts on Routes of Regional Significance, implementation of the trip reduction measures proposed in the Project’s TDM program is recommended. The TDM program could reduce the number of vehicular trips by 2 to 30 percent. At the maximum of 30 percent, impacts on three of the four segments would be reduced but still significant. The TDM program at the maximum range of effectiveness could reduce the impact on northbound Willow Road from US 101 to Bayfront Expressway to a less-than-significant level. However, because the reduction cannot be quantified, and it is not anticipated that this would fully mitigate impacts on these segments, the impacts are considered significant and unavoidable.</p> <p><b>TRA-7.1: Implement Improvements to Address Impacts on Bicycle Facilities.</b> Gaps in bicycle infrastructure should be closed on Oak Grove Avenue and Garwood Way by constructing bike lanes along Oak Grove Avenue between University Drive and the east city limits as well as a bicycle route along Garwood Way between Glenwood Avenue and Oak Grove Avenue. This mitigation measure is consistent with Mitigation Measures TRA-2.1.a, TRA-2.1.b, and TRA-2.1.c.</p>	LTS

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact TRA-8: Consistency with Existing Bicycle and Pedestrian Policies.</b> The Project would be consistent with established policies pertaining to bicycle and pedestrian facilities.</p>	LTS	None Required.	N/A
<p><b>Impact TRA-9: Impacts on Transit Facilities.</b> The Project would result in added demand to transit facilities; however, it is expected that existing transit services would adequately serve the Project’s demand.</p>	LTS	None Required.	N/A
<p><b>Impact TRA-10: Impacts on Railroad Crossings.</b> The Project would add traffic to a railroad crossing which would result conflicts and safety concerns.</p>	S	<p>TRA-10.1: <i>Implement railroad crossing improvements to address Near-Term 2020 plus-Project and Cumulative 2040 plus-Project Effects.</i> The mitigation measures below are recommended to reduce potential significant impacts on the railroad crossings.</p> <p>a. Ravenswood Avenue railroad crossing                      Partial mitigations to reduce the impact at the Ravenswood Avenue crossing include:</p> <ul style="list-style-type: none"> <li>• Extension of time-of-day turn restrictions on the northbound and southbound Alma Street approaches to Ravenswood Avenue.</li> <li>• Roadway improvements to improve the visibility of “keep clear” zones when approaching the railroad tracks. The Project shall maintain the “keep clear” visibility zone.</li> </ul> <p>It is worth noting that a median along Ravenswood Avenue, which restricts left turns on the northbound and southbound Alma Street approaches to Ravenswood Avenue, is currently installed as a trial project. Upon analysis of the effects of the median, the City shall determine whether the median along Ravenswood Avenue should remain.</p> <p>b. Oak Grove Avenue and Glenwood Avenue railroad crossings.                      Partial mitigations to reduce the impact at the Oak Grove Avenue and Glenwood Avenue railroad crossings, include maintaining the visibility of the “keep clear” zones, including roadway striping, lighting, and landscape maintenance. The Project shall maintain the “keep clear” visibility zone.</p>	SU

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<b>3.2 Air Quality</b>			
<p><b>Impact AQ-1: Exposure of Sensitive Receptors to Adverse Health Risks in Excess of BAAQMD Thresholds Associated with Localized DPM Concentrations during Construction.</b> The Project would expose sensitive receptors to adverse health risks associated with localized DPM concentrations during construction.</p>	S	<p><b>AQ-1.1: Utilize Clean Diesel-Powered Off-Road Equipment during Construction to Control Off-Road Construction-Related PM2.5 and PM10 Emissions.</b> The Project Sponsor shall ensure that all off-road diesel-powered equipment used during construction between 2016 and 2018 shall be equipped with EPA Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. This requirement shall ensure construction equipment remains cleaner than the fleet-wide average. The analysis assumes emission reductions compared to a fleet-wide average Tier 2 engine between 2016 and 2018. The Project Sponsor shall also ensure that all off-road, diesel-powered equipment used during construction shall be equipped with a Level 3 Diesel Particulate Filter (DPF).</p> <p><b>AQ-1.2: Use Modern Fleet for On-Road Material Delivery and Haul Trucks during Construction.</b> The Project Sponsor shall ensure that all on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the Project site shall comply with EPA 2007 on-road emission standards for PM10 (0.01 grams per brake horsepower-hour). These PM10 standards were phased in through the 2007 and 2010 model years on a percent of sales basis (50 percent of sales in 2007 to 2009 and 100 percent of sales in 2010). This mitigation measure assumes that all on-road heavy-duty diesel trucks shall be model year 2010 and newer, with all trucks compliant with EPA 2007 on-road emission standards. While project impacts are associated with PM2.5 concentrations and the EPA 2007 on-road emission standards address PM10 emission, the newer engine technologies that are required to meet the PM10 emission standards shall also reduce PM2.5 concentrations.</p>	LTS
<p><b>Impact AQ-2: Exposure of Sensitive Receptors to Localized PM2.5 Concentrations during Construction.</b> The Project would not expose sensitive receptors to localized PM2.5 concentrations in excess of BAAQMD thresholds during construction.</p>	LTS	None Required.	N/A

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact C-AQ-1: Exposure of Sensitive Receptors to Cumulative Health Risks during Construction.</b> Cumulative development in the Project vicinity would not expose sensitive receptors to substantial health risks during construction</p>	S	Mitigation Measures AQ-1.1, AQ-2.1, and AQ-2.2.	LTS
<b>3.3 Noise</b>			
<p><b>Impact NOI-1: Exposure of Offsite Noise Sensitive Land Uses to Increased Traffic Noise.</b> The Project would not result in a substantial permanent increase in ambient noise levels at existing noise sensitive uses in the project vicinity above levels existing without the project.</p>	LTS	None Required.	N/A
<b>3.4 Hazardous Materials</b>			
<p><b>Impact HAZ-1: Routine Hazardous Materials Use.</b> The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	S	<p><b>HAZ-1.1: Prepare and Implement a Spill Prevention, Control, and Countermeasure Program for Construction Activities.</b> The contractors will develop and implement a Spill Prevention, Control, and Countermeasure Program (SPCCP) to minimize the potential for and effects from spills of hazardous, toxic, or petroleum substances during construction and demolition activities. The SPCCP will be completed before any construction or demolition activities begin. Implementation of this measure will comply with state and federal water quality regulations.</p> <p>The Project Sponsor will review and approve the SPCCP before the onset of construction activities. The Project Sponsor will routinely inspect the construction area to verify that the measures specified in the SPCCP are properly implemented and maintained. The Project Sponsor will notify its contractors immediately if there is a noncompliance issue and will require compliance.</p> <p>The federal reportable spill quantity for petroleum products, as defined in 40 CFR 110, is any oil spill that includes any of the following:</p> <ul style="list-style-type: none"> <li>• Violates applicable water quality standards,</li> <li>• Causes a film or sheen on or discoloration of the water surface or adjoining shoreline, or</li> </ul>	LTS

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
<p><b>Impact HAZ-2: Accidental Release of Hazardous Materials.</b> The Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	S	<ul style="list-style-type: none"> <li>Causes a sludge or emulsion to be deposited beneath the surface of the water or adjoining shorelines.</li> </ul> <p>If a spill is reportable, the contractors’ superintendents will notify the Project Sponsor, and the Project Sponsor will take action to contact the appropriate safety and cleanup crews and ensure that the SPCCP is followed. A written description of reportable releases must be submitted to the San Francisco Bay Regional Water Quality Control Board. This submittal must contain a description of the spill, including the type of material and an estimate of the amount spilled, the date of the release, an explanation of why the spill occurred, and a description of the steps taken to prevent and control future releases. The releases will be documented on a spill report form.</p> <p>If a reportable spill has occurred and Project activities have adversely affected surface water or groundwater quality, a detailed analysis will be performed by a registered environmental assessor to identify the likely cause of contamination. This analysis will conform to American Society for Testing and Materials (ASTM) standards and will include recommendations for reducing or eliminating the source or mechanisms of contamination. Based on this analysis, the Project Sponsor and its contractors will select and implement measures to control contamination, with a performance standard that groundwater quality must be returned to baseline conditions. These measures will be subject to approval by the Project Sponsor.</p> <p><b>HAZ-2.1: Hazardous Materials Characterization at 1258 and 1300 El Camino Real and Derry Lane.</b> Prior to construction, the following characterization activities shall be conducted by a qualified environmental consultant in areas of the Project site where the likelihood of contaminated media exists. If contaminants are discovered, the consultant shall provide recommendations for the proper treatment and/or removal and disposal of the contaminated media.</p> <p>The following characterization activities are based on the recommendations included in the Phase I ESAs.</p> <ul style="list-style-type: none"> <li>Remaining components of the 21 hydraulic lifts located on the</li> </ul>	LTS

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>1300 El Camino Real site shall be removed by a qualified contractor, with soil samples collected at the bottom of each hole for laboratory analyses for total petroleum hydrocarbons as hydraulic oil and PCBs.</p> <ul style="list-style-type: none"> <li>• Soil samples shall be collected at the 1300 El Camino Real site in locations of former automotive painting and detailing operations, sumps, and trenches for laboratory analyses for total extractable and purgeable petroleum hydrocarbons and volatile organic compounds (VOCs).</li> <li>• Groundwater, soil, and soil vapor sampling for VOCs shall be conducted in the eastern portion of the 1300 El Camino Real site to determine the significance and extent of the on-site impact from the off-site PCE release.</li> <li>• Fill soils on the 1300 El Camino Real site shall be sampled for chemicals of potential concern associated with an unknown source of fill.</li> <li>• Soil at the location of a former transformer on the 1300 El Camino Real site shall be sampled for PCBs.</li> <li>• The cause of the depressed asphalt area on the 1258 El Camino Real shall be investigated and remedied.</li> <li>• Construction materials shall be surveyed for ACMs and lead-based paint by a certified consultant on the 1258 El Camino Real site, 1300 El Camino Real site, and Derry Lane site to comply with applicable BAAQMD and Cal/OSHA regulations.</li> </ul> <p>If contaminants are discovered during testing, the Project Sponsor will report the contamination to SMCEHD to determine how the contamination is to be addressed and update the HMBP within 30 days of discovering the contamination to reflect the new understanding of hazardous materials at the Project site.</p> <p><b><i>HAZ-2.2: Implementation of Remedial Action Recommendations included in the Derry Lane RAW.</i></b> Upon approval by the DTSC and prior to construction; site-specific remedial action recommendations contained in the RAW shall be conducted at the Derry Lane site as</p>	

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Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		<p>required by the Imminent and Substantial Endangerment Determination and Order and Remedial Action Order issued by the DTSC in May 2011. As detailed in the Environmental Setting, remedial actions proposed in the RAW may include; soil excavation and disposal, ISCO injections, well monitoring and implementation of institutional controls.</p> <p><b>HAZ-2.3: Implement Engineering Controls and Best Management Practices during Construction.</b> During construction activities conducted on all sites, the contractor shall employ engineering controls and BMPs to minimize human exposure to potential contaminants and potential negative effects from an accidental release to groundwater and soils. Engineering controls and construction BMPs shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Contractor employees working on-site shall be certified in OSHA’s 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training program.</li> <li>• Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation.</li> <li>• Contractor shall water/mist soil as it is being excavated and loaded onto trucks.</li> <li>• Contractor shall place any stockpiled soil in areas that are shielded from prevailing winds.</li> <li>• Contractor shall cover the bottom of excavated areas with sheeting when work is not being performed.</li> </ul> <p>All materials will be handled consistent with the HMBP developed for the Project.</p> <p><b>HAZ-2.4: Develop Construction Activity Dust Control Plan (DCP) and Asbestos Dust Management Plan (ADMP).</b> Prior to commencement of site grading on all sites, the Project Sponsor shall retain a qualified professional to prepare a DCP/ADMP. The DCP shall incorporate the applicable BAAQMD standards pertaining to fugitive dust control. The ADMP will be prepared if ACMs are identified onsite</p>	

**Table ES-1. Summary of Impacts and Mitigation Measures**

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		and shall be submitted to and approved by BAAQMD prior to the beginning of construction. The Project Sponsor will ensure implementation of all specified dust control measures throughout construction of the Project. The ADMP shall require compliance with specific control measures to the extent deemed necessary by BAAQMD to meet its standard.	
<p><b>Impact HAZ-3: Proximity to Sensitive Receptors at Schools.</b> The Project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.</p>	LTS	None Required.	N/A
<p><b>Impact C-HAZ-1: Cumulative Hazardous Materials Use.</b> The Project, in combination with other foreseeable development in the surrounding area, would not have a significant cumulative impact resulting from hazardous materials usage.</p>	LTS	None Required.	N/A
<p><b>Impact C-HAZ-2: Cumulative Soil and Groundwater Contamination.</b> Development of the Project site and other foreseeable development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases.</p>	LTS	None Required.	N/A
<p><b>Impact C-HAZ-3: Cumulative Hazardous Materials in Building Components.</b> Development of the Project and other foreseeable development could expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases.</p>	LTS	None Required.	N/A
<p><b>Impact C-HAZ-4: Cumulative Impairment of Emergency Access or Emergency Plan Impacts.</b> Development of the Project and other foreseeable development would not impair implementation of or interfere with an adopted emergency response or evacuation plan.</p>	LTS	None Required.	N/A