



## Memorandum

**To:** Kaitie Meador, Senior Planner  
City of Menlo Park Community Development Department  
701 Laurel Street  
Menlo Park, CA 94025

**From:** Kirsten Chapman, Project Manager  
Erin Efner, Project Director

**Date:** December 19, 2019

**Re:** **Facebook Campus Expansion Project Final Environmental Impact Report – Second Addendum**

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Dear Ms. Meador:

Enclosed please find the Second Addendum to the certified Facebook Campus Expansion Project (Approved Project) Final Environmental Impact Report (Final EIR). The Revised Hotel Project, as proposed by the Hotel Project Sponsor, involves modifying the design of the hotel, increasing the room count, and decreasing parking. The Revised Hotel Project is the subject of this Second Addendum. Because this Second Addendum includes changes to only the hotel, this document focuses on a comparison between the previously approved hotel (referred to in this document as the Approved Hotel Project) and the Revised Hotel Project. The Hotel Project Sponsor is not seeking any other changes to the Approved Project; therefore, no other components of the Facebook Campus Expansion Project are discussed in this memorandum.

This Second Addendum has been prepared to satisfy requirements of the California Environmental Quality Act (CEQA). Because of the minor changes proposed for the Revised Hotel Project, this Second Addendum is presented as a memorandum. Based on the analysis and discussion presented in this document, no supplemental or subsequent environmental analysis is needed, pursuant to CEQA Guidelines Sections 15162 and 15163. It is concluded that the analysis conducted as well as the conclusions reached in the Final EIR certified on November 1, 2016, along with the conclusions in the First Addendum, remain valid. Therefore, no supplemental environmental review is required beyond this addendum.

Sincerely,

Kirsten Chapman

Erin Efner



## Background

In November 2016, the City Council of the City of Menlo Park (City) approved the land use entitlements and agreements for the Facebook Campus Expansion Project (Approved Project), certified the Final Environmental Impact Report (Final EIR), and introduced ordinances to rezone the property and approve the Development Agreement. The Approved Project included two office buildings (Buildings 21 and 22), a 200-room hotel, a bicycle and pedestrian bridge across Bayfront Expressway/State Route (SR) 84, and a new, approximately 2-acre publicly accessible plaza and open space. The 200-room hotel was approved with a maximum height of 75 feet, approximately 174,800 gross square feet (gsf) of space, 245 parking spaces, and an estimated 150 employees (Approved Hotel Project).

In 2017, the City approved amendments to the Approved Project to modify the design of Building 22, add a parking garage, modify the open space, and add recharging facilities for future electric shuttle buses and trams. These amendments did not include any changes to the Approved Hotel Project. The City prepared the First Addendum to the Final EIR (First Addendum) to analyze potential impacts, under the California Environmental Quality Act (CEQA), associated with these amendments.

The Revised Hotel Project involves modifying the design of the hotel, increasing the room count, and decreasing parking and is the subject of this Second Addendum to the Final EIR (Second Addendum). Because this Second Addendum includes changes to only the hotel, this document focuses on a comparison between the Approved Hotel Project and the Revised Hotel Project. The Hotel Project Sponsor (citizenM) is not seeking any other changes to the Approved Project; therefore, no other components of the Facebook Campus Expansion Project are discussed in this document. For the Revised Hotel Project, the Hotel Project Sponsor proposes a 240-room, approximately 90,900 gsf hotel with approximately 118 onsite surface parking spaces. The proposed building would be approximately 62.17 feet high (five stories). The hotel and an onsite restaurant would be open to the public. Rooms would be available to the public by reservation.

This Second Addendum has been prepared to satisfy requirements of CEQA. It will be used by decision-makers in their consideration of whether to approve the proposal for the Revised Hotel Project.

## Previously Certified EIR

The Final EIR included the Draft EIR, published in May 2016, and responses to comments on the Draft EIR, published in August 2016. The Final EIR was certified in November 2016. In 2017, the City prepared the First Addendum to the Final EIR. Major conclusions for each environmental topic in the Final EIR and, as applicable, the First Addendum are summarized in the *Environmental Analysis* section of this document. A summary of the Approved Hotel Project is provided in the *Project Description* section of this document. For ease of reference, this Second Addendum incorporates significant discussions from the certified Final EIR as well as the First Addendum regarding the impacts evaluated for the Approved Hotel Project. This approach has contributed to the length of this Second Addendum, but the discussion provided allows the reader to compare the differences between the Approved Hotel Project and the proposed Revised Hotel Project more easily, as well as any differences in impacts, by minimizing the need to cross reference between the certified Final EIR, the First Addendum and this Second Addendum.

The only discretionary approval required from the City for the Revised Hotel Project is approval of an amendment to the approved Second Amended and Restated Conditional Development Permit (CDP). The City may require an amendment to the approved Development Agreement; however, if such an amendment is required, it would not impact the analysis contained in this Second Addendum.

## CEQA Review of the Revised Hotel Project

When revisions are proposed to a project after an EIR has been certified, an agency must determine whether an addendum or a supplemental EIR is the appropriate document to analyze the potential impacts of the revised project. Per CEQA Guidelines Section 15162(a), a supplemental EIR is required if:

- 1) Substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives, which are considerably different from those analyzed in the previous EIR, would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If none of the above conditions apply, then an addendum is the appropriate environmental document to analyze a revised project. Pursuant to CEQA Guidelines Section 15164(e), the addendum must provide a brief explanation regarding the decision to not prepare a supplemental EIR. The necessary explanation is set forth below.

As described in the *Project Description* section of this document, the proposed amendments to the CDP requested for the proposed Revised Hotel Project include an increase in the number of hotel rooms and a reduction in the number of onsite parking spaces associated with the hotel. At full build out, the Revised Hotel Project would maintain the uses proposed under the Approved Hotel Project, continue to be subject to the trip cap for the Project site, have less building area than the Approved Hotel Project, employ a similar (or smaller) number of people, and reduce the overall building height and massing. Based on these considerations, for the reasons set forth in this Second Addendum, no new significant impacts or increases in the severity of previously identified significant impacts are expected to result from the Revised Hotel Project, thereby rendering a supplemental EIR unnecessary.

As demonstrated throughout this Second Addendum, the Revised Hotel Project would not trigger the need for new or considerably different mitigation measures that were not identified in the certified Final EIR

or the First Addendum. Since the Final EIR was certified on November 1, 2016 and the First Addendum prepared in 2017, there have been changes to background conditions in the area and portions of the Approved Project have been constructed. However, because the changes are not substantial, the changed circumstances would not require major revisions to the Final EIR. For the foregoing reasons, no supplemental EIR is necessary. Finally, although the City adopted a new general plan after approval of the Approved Project, approval of the City's new general plan would not result in any new significant impacts from the Revised Hotel Project or new or considerably different mitigation measures compared to those of the Approved Hotel Project. Accordingly, as described further in this document, an addendum is the appropriate mechanism for CEQA review of the Revised Hotel Project.

## Addendum Organization

Because of the minor changes proposed for the Revised Hotel Project, this Second Addendum is presented as a memorandum. This first section of the memorandum provides an overview of this Second Addendum, the previous environmental review for the Approved Project, and the organization of this Second Addendum. The *Project Description* provides a description of the Approved Hotel Project and the proposed Revised Hotel Project as well as a comparison of both. The *Environmental Analysis* summarizes the conclusions in the certified Final EIR and, as applicable, the First Addendum and presents the potential impacts of the Revised Hotel Project relative to the impacts of the Approved Hotel Project.

# Project Description

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## Project Location

The existing Facebook Campus consists of the Classic Campus (East Campus), encompassing Buildings 10–19, located north of SR 84 on the former Sun Microsystems Campus, and the West Campus, encompassing Buildings 20, 21, 22 (expected to be operational by early 2020), and 23, located west of Willow Road on the former TE Connectivity (TE) Campus. The Project site for the Revised Hotel Project would continue to be located on the northwest portion of the West Campus at 301 Constitution Drive. The 2.6-acre hotel site is currently a surface parking lot, bounded by Bayfront Expressway/SR 84 to the north, the under-construction Building 22 parking structure to the east, Constitution Drive and Building 23 to the south, and Chilco Street to the west.

## Approved Hotel Project

### Project Features

The Approved Hotel Project included a 200-room, limited-service hotel with approximately 174,800 gsf of space. As summarized in Table 1, the total building area of the Approved Hotel Project comprised approximately 73,200 gsf of hotel and support space, approximately 1,800 gsf of office space, approximately 13,700 gsf of amenity space, and 86,100 gsf for circulation, walls, other structures, and stairs, etc. Included in the amenities would be food and beverage areas for the public, a multi-function space, fitness room, pool, and deck areas. The certified Final EIR assumed that the Approved Hotel Project would employ approximately 150 workers.

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**Table 1**  
**Approved Hotel Project Summary**

Use	Area (gsf)
Office	1,800
Support Rooms	11,500
Amenities	13,700
Hotel	61,700
Circulation, Walls, Other Structures, Stairs, etc.	86,100
Total	174,800

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Source: Hibiscus Properties, LLC, 2015.

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## Site and Building Design

With implementation of the Approved Hotel Project, the western and northern boundaries of the Project site, along Chilco Street and Bayfront Expressway/SR 84, would be improved and landscaped, consistent with the rest of the West Campus. A mixture of pedestrian paths, understory landscape plantings, and trees would be included. The design of the perimeter landscape would integrate with the planned bicycle and pedestrian improvements to Chilco Street. The Final EIR assumed that landscape improvements

within the hotel site would be developed in the future to support hotel functions while maintaining consistency with the overall West Campus character and native climate-adapted plantings. The Final EIR did not include the specific design of the hotel; however, the height of the hotel was assumed to be approximately 75 feet.

## Parking and Trip Cap

The Approved Hotel Project included approximately 245 parking spaces, designated for hotel uses in a surface parking lot under the podium of the hotel. As part of the Facebook Campus Expansion Project, an updated trip cap for the entire Project site was proposed to limit the number of daily and AM/PM Peak-Hour trips and reduce traffic impacts. Upon City Council approval of the land use entitlements, the trip cap became effective and applicable to all buildings at the Project site, including the hotel site. The trip cap limits the entire Project site to 26,440 daily trips, with 2,250 trips during each hour in the AM Peak Period and 2,255 trips during each hour in the PM Peak Period. The hotel was estimated to generate 1,784 total weekday trips, with 134 trips in the AM Peak Period and 140 trips in the PM Peak Period. Because the trip cap is not broken out by use, the Approved Hotel Project would be subject to the trip cap that applies to the entire Project site.

## Construction

Construction of the Approved Hotel Project was expected to occur during Phase 3 of construction of the Facebook Campus Expansion Project. This construction would occur after construction of Building 22 in Phase 2. Phase 3 would begin with demolition of Building 305, which would take place in the year subsequent to TE vacating the building. TE would vacate the building, at the latest, in September 2022. The First Addendum included two possible scenarios for Phase 3 construction. The first scenario included construction of the hotel beginning in late 2020, with construction occurring over 16 months. Full build out would occur by mid-2022. The second scenario analyzed construction of the hotel beginning in late 2022, with completion in mid-2024 (an 18-month construction period). However, the analysis in the First Addendum assumed that TE would vacate and Building 305 demolition and hotel construction would begin in 2020 (the first scenario) because this provided a more conservative scenario for the air quality, greenhouse gas, and noise resource impact analyses.

The First Addendum assumed that the number of construction workers associated with construction of the entire Project would range from 50 to 250 per day, with workers obtained from Bay Area sources. The maximum number of workers would be onsite during construction of Building 22 and the parking structure. Parking for construction workers' vehicles would be provided onsite. Grading for the hotel could require the import of 5,000 cubic yards (cy) of material to the site and the export of 3,000 cy from the site.

## Revised Hotel Project

### Project Features

In 2019, the new Hotel Project Sponsor (citizenM) applied for a modification of the Approved Hotel Project. Under the proposed Revised Hotel Project, the existing surface parking lot would be developed with a 240-room, approximately 90,900 gsf limited-service hotel that would be approximately 62.17 feet high (five stories). The hotel and proposed onsite restaurant would be open to the public. Rooms

would be available to the public by reservation. The Hotel Project Sponsor anticipates that approximately 90 workers would be employed at the hotel and restaurant. If, however, the same employment generation rate that was used in the certified Final EIR for the Approved Hotel Project is used to calculate the anticipated number of employees for the Revised Hotel Project, there could be approximately 180 workers (an increase of 30 compared with the 150 for the Approved Hotel Project).

Under the Revised Hotel Project, the hotel building would be organized around a lobby with a bar and canteen. The lobby would extend to an outdoor terrace. Meeting rooms would be located on the ground floor and available to the public by daily rental. The hotel rooms would be on the second, third, fourth, and fifth floors, with 50 to 58 rooms per floor. A fitness center on the fifth floor would be available to hotel guests. The ground floor of the building would also include approximately 4,900 gsf of restaurant space, which would be sub-leased to Facebook. Facebook would appoint a local group to operate the restaurant space. The restaurant would be open to the public for lunch and dinner service.

## Site and Building Design

The proposed hotel building would include three modules over the ground-floor lobby, restaurant, and other amenities. The building would be surrounded by surface parking, terraces, and landscaping. The vehicular entry and exit area would be on Constitution Drive, north of Building 23, and the guest drop-off area would be at the southern façade of the building. An entry plaza, walkways, and planted areas would complement the entrance to the hotel. A stucco garden wall would separate the building entrance from the outdoor hotel and restaurant amenities in the southeast corner of the site for the Revised Hotel Project. These amenities would include terraces, seating areas, recreational spaces/courts, cultivated gardens, and outdoor food services. The enclosed outdoor area would also include a large rain garden for stormwater retention.

The parking and vehicular circulation areas north and west of the proposed building would provide additional stormwater gardens, walkways, planting areas, enhanced paving, and property-line fencing. In total, the hotel site, which is currently almost entirely impervious surfaces, would include 17,400 square feet (sf) (15 percent) of pervious surfaces and 96,300 sf (85 percent) of impervious surfaces. Lighting in the outdoor areas would include mounted and in-ground luminaires, tree illumination, integrated LED strip lighting, recessed ceiling downlights, string party lights, and pole-mounted lights.

The proposed building would have a unique façade and massing, providing views of the bay from many of the guestrooms. The design would also complement the similar architectural language of the immediately adjacent Buildings 20, 21, and 22 as well as the Menlo Gateway Campus to the west. Building materials would include fiber cement paneling, an anodized aluminum façade system, vision glazing, and fritted glass windows. The ground floor would include concrete columns, the lobby entrance, and aluminum storefronts, with hotel rooms above. A five-level steel staircase and illuminated art would be located on the eastern façade of the building. Wall artwork would be located in multiple areas on the exterior of the building and would be approximately five stories high. Interior room lighting, which would have the ability to change color, would be visible from areas surrounding the hotel building. The Project would be designed to meet Leadership in Energy and Environmental Design (LEED) Gold building standards.

## Parking and Trip Cap

As part of the Revised Hotel Project, parking for the hotel and restaurant would be provided in a surface parking lot with 118 spaces. Valet service would be available for the restaurant and the hotel. It is anticipated that many of the hotel guests would be Facebook visitors and guests who would already be

present on the Facebook Campus and therefore, after initial arrival, would be able to access the hotel by foot, bicycle, or Campus tram. Based on information provided by Fehr & Peers, consultant for the Hotel Project Sponsor, peak parking demand is expected to be in the overnight hours, resulting in low overlap with Facebook's peak demand in the daytime.

Hotel guests and restaurant patrons would be given priority for use of the surface parking lot on the hotel site. In the event that there is a need for additional parking, overflow parking demand during peak periods would be accommodated in the adjacent Facebook parking garage using valet parking. It is anticipated that the Building 22 parking structure would have unused parking spaces at the times when the hotel and restaurant would have the highest parking demand (i.e., evenings and overnight). Hotel and restaurant employees would be allowed to park in office parking spaces provided in the parking structure adjacent to Building 22. Hotel and restaurant employees would be issued the appropriate identification, allowing them to use the Facebook office parking areas. The hotel vendor and Facebook would enter into a shared parking agreement to ensure that there would be adequate parking for the hotel/restaurant employees, hotel guests, and restaurant patrons.

The Revised Hotel Project would be subject to the trip cap, which applies to the entire Project site. No modifications to the trip cap are being sought with the Revised Hotel Project; therefore, no increase in the number of net new trips is assumed in this document.

## Construction

Construction of the hotel would commence after TE, a current tenant at the Project site, fully vacates Building 305, ensuring that the floor area ratio (FAR) will not exceed the permitted FAR of 0.55. Facebook currently anticipates that TE will vacate the site by early 2020 and that Building 305 will be demolished by mid-2020, after which the Hotel Project Sponsor would commence construction. As analyzed in the First Addendum, construction of the Revised Hotel Project would occur during its own phase of construction (Phase 3).

Construction of the Revised Hotel Project is anticipated to start mid-2020, upon completion of demolition at Building 305. The first phase of construction for the proposed Revised Hotel Project would involve removal of the paved surface parking area, along with grading and utility work. Foundation work and construction of the core and shell would start in late-2020, with tenant improvements and landscaping starting in mid-2021. Construction of the hotel would continue over approximately 16 months (approximately 300 work days), with full build out by late 2021 or early 2022. If modular construction is used, which is currently anticipated, the above assumptions regarding construction time would be conservative. Construction staging for the hotel would occur near the northernmost portion of the Project site. The number of construction workers would range from 15 to 150 per day, with workers obtained from Bay Area sources. Parking for construction workers' vehicles would be provided onsite. Grading for the hotel may require the import of approximately 19,600 cy of material to the site and the export of up to 2,200 cy from the site.

## Comparison of the Approved and Revised Hotel Project

The approved CDP for the entire Project, including the Approved Hotel Project, allowed construction of a 200-room hotel with a maximum height of 75 feet; approximately 174,800 gsf of space and, at a minimum, 245 parking spaces. For the Revised Hotel Project, the proposed CDP amendments requested are an increase in the number of hotel rooms and a reduction in the number of onsite parking spaces associated with the hotel.

## Hotel Rooms and Employment

The Approved Hotel Project included 200 rooms. To determine the number of anticipated employees, the certified Final EIR used a generation rate of 0.75 job per hotel room. For a 200-room hotel, the certified Final EIR anticipated 150 employees.<sup>1</sup> The proposed Revised Hotel Project would increase the room count by 40, for a total of 240 rooms. Using the same generation rate as the Approved Hotel Project, the Revised Hotel Project would employ approximately 180 workers.<sup>2</sup> However, based on staffing at similar hotels operated by the Hotel Project Sponsor, the proposed Revised Hotel Project is anticipated to require approximately 90 total workers at the hotel and restaurant.<sup>3</sup> This document will therefore consider a range of potential employees (i.e., 90 to 180 employees).

## Parking

The Approved Hotel Project included 245 parking spaces. Under the Revised Hotel Project, the number of parking spaces would be reduced by 127, from 245 to approximately 118 spaces. The Hotel Project Sponsor expects significantly less demand for parking because it anticipates that many guests will arrive at and depart from the hotel by ride-share services or shuttles and that, after initial arrival, hotel guests who are visiting the Facebook Campus will access the facility primarily by foot, bicycle, or Campus tram. In addition, the Hotel Project Sponsor points to site constraints and a desire to provide amenity space on the ground floor as the basis for the reduction. The Revised Hotel Project would require an amendment to the CDP to allow approximately 118 surface parking spaces, 127 fewer spaces than the previously approved 245 spaces.

## Overall Comparison

Table 2 summarizes the main differences between the Approved Hotel Project and the Revised Hotel Project. Some of the differences, not discussed in detail above, include a reduction in height and gsf compared with the Approved Hotel Project. Other differences between the Approved Hotel Project and the Revised Hotel Project are considered minor and, therefore, are not analyzed further in this document.

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<sup>1</sup> 0.75 job per hotel room x 200 hotel rooms = 150 employees

<sup>2</sup> 0.75 job per hotel room x 240 hotel rooms = 180 employees

<sup>3</sup> Brion Economics Incorporated. 2019. *Jobs Estimates for citizenM Hotel in Menlo Park*. BEI #2551. Memorandum. June 6.

**Table 2**  
**Comparison of Approved Hotel Project vs. Revised Hotel Project**

	<b>Approved Hotel Project</b>	<b>Revised Hotel Project</b>	<b>Comparison</b>
Hotel Rooms (rooms)	200 rooms	240 rooms	Increase of 40 rooms
Total Hotel (gsf)	174,800 gsf	90,900 gsf	Decrease of 83,900 gsf
Height	75 feet	62 feet, 2 inches	Decrease of ~13 feet
Parking Spaces	245 parking spaces	118 parking spaces <sup>a</sup>	Decrease of 127 spaces
Employee Count	150 employees	90 to 180 employees	Decrease of 60 employees Increase of 30 employees
Construction Period	16 months	16 months	No change

Source: Hibiscus Properties, LLC, 2015; citizenM, 2019.

Notes:

<sup>a</sup>. Plus shared parking in the MPK 22 parking structure.

As noted above, the First Addendum included two possible scenarios for Phase 3 construction. The first scenario included construction of the hotel beginning in late 2020, with construction occurring over 16 months. The second scenario analyzed construction of the hotel beginning in late 2022, with completion in mid-2024 (an 18-month construction period). The construction schedule for the Revised Hotel Project is consistent with the first construction scenario analyzed in the First Addendum, with a duration of approximately 16 months. The First Addendum analyzed the first construction scenario in detail because there would be more concurrent construction activity, providing a more conservative scenario for the air quality, greenhouse gas, and noise resource areas. In addition, the First Addendum did not assume modular construction, as proposed for the Revised Hotel Project, which generally would reduce construction durations and onsite construction impacts. Therefore, for the purposes of this Second Addendum, all construction assumptions for the Revised Hotel Project are either consistent with the analysis provided in the First Addendum or less than the previous assumptions.

In addition, because the construction assumptions are the same or less than the previous assumptions, plus the hotel footprint is slightly less than what was previously analyzed, ground disturbances (such as grading and excavation) are assumed to be the same under the Revised Hotel Project as under the Approved Hotel Project. This Second Addendum does not rely on the modular construction to determine consistency with the construction schedule and analysis of the First Addendum, which is a conservative analysis as modular construction would likely reduce potential construction impacts.

### Organization of This Section

For each environmental topic, this environmental analysis section provides a brief summary of impacts associated with the Approved Project as discussed in the Final EIR certified on November 1, 2016 and, as applicable, the First Addendum. The Final EIR evaluated the Approved Hotel Project as part of the Approved Project; thus, in most cases, impacts presented in the Final EIR reflect the aggregated effects of the entire Approved Project and effects from various components are not specifically called out. Where the Final EIR made conclusions specific to the Approved Hotel Project, however, those are included in the brief summary. In all other cases, the conclusions made regarding the overall Approved Project are included in the brief summary.

This section provides a discussion of the potential impacts under the Revised Hotel Project. Because this Second Addendum addresses changes to only the hotel component, this document focuses on a comparison of the Approved Hotel Project with the Revised Hotel Project. In instances where the Final EIR does not specifically describe the impacts from the Approved Hotel Project, this document compares the impacts of the Revised Hotel Project with the overall conclusions made regarding the Approved Project. The Hotel Project Sponsor is not seeking any other changes to the Approved Project beyond the hotel, and therefore, no other components of the Facebook Campus Expansion Project are explicitly discussed in this analysis.

### Summary of Environmental Impacts

Table 3 summarizes the main conclusions for each environmental topic under both the Approved Hotel Project and the proposed Revised Hotel Project. As indicated in the table, all conclusions in the certified Final EIR and the First Addendum would remain the same for the Revised Hotel Project. Although some impacts would be slightly less than or slightly greater than those of the Approved Project, these changes would be minor and would not affect the significance conclusions in the Final EIR or the First Addendum.

### Topics Found to Have No Impact

Based on knowledge of the Project site and surrounding areas, it was determined in the certified Final EIR that there would be no Project-related impacts on agriculture and forestry resources or mineral resources because these resources are not present in the Project vicinity. The same conclusion of “no impact” applies to the Revised Hotel Project.

### Environmental Analysis

This section includes a summary of the findings in the certified Final EIR and, as applicable, the First Addendum and explains why these impacts have not changed as a result of the Revised Hotel Project.

**Table 3**  
**Comparison of Impacts**

<b>Environmental Issue</b>	<b>Approved Project</b>	<b>Revised Hotel Project</b>	<b>Change in Impact</b>
Land Use	LTS	LTS	0
Aesthetics	LTS/M	LTS/M	0
Transportation	SU	SU	0
Air Quality	LTS/M	LTS/M	0
Greenhouse Gas Emissions	SU	SU	0
Noise	LTS/M	LTS/M	0
Cultural Resources	LTS/M	LTS/M	0
Biological Resources	LTS/M	LTS/M	0
Geology and Soils	LTS	LTS	0
Hydrology and Water Quality	LTS/M	LTS/M	0
Hazards and Hazardous Materials	LTS/M	LTS/M	0
Population and Housing	LTS	LTS	0
Public Services	LTS	LTS	0
Utilities and Service Systems	LTS	LTS	0

## Land Use and Planning

**Summary of Approved Hotel Project.** The Approved Project, which includes the Approved Hotel Project, was required to be consistent with the land use designations, as well as the goals and policies, described in the City's general plan. Although the Final EIR found that the proposed 200-room hotel was not directly permitted within the Limited Industry designation, the Approved Project included an amendment to the zoning ordinance to conditionally permit the hotel use in the M-2 zoning district. In addition, the Approved Hotel Project included rezoning (from an M-2 zoning district to an M-2-X zoning district) to establish a new height limit and allow buildings in excess of 35 feet in height. The Approved Hotel Project was determined to be generally consistent with the goals and policies contained in the City's general plan and zoning ordinance as well as the General Plan and M-2 Area Zoning Update (ConnectMenlo). With the amendments to the zoning ordinance, rezoning, and CDP, it was determined that the Approved Hotel Project would not be in conflict with existing land use designations, resulting in less-than-significant impacts. (LTS)

**Impacts of the Revised Hotel Project.** The City Council adopted the land use and circulation element updates and certified the EIR prepared for ConnectMenlo after certifying the Final EIR for the Approved Project. Because the Final EIR for the Approved Project considered ConnectMenlo's goals, policies, and programs prior to adoption, there would be no additional impacts beyond those identified in the Final EIR as a result of ConnectMenlo. ConnectMenlo rezoned the Project site as O (Office), which permits hotels with a maximum of 1.75 FAR. The Revised Hotel Project would be consistent with this zoning.

The proposed amendments to the CDP requested for the Revised Hotel Project include an increase in the number of hotel rooms and a reduction in the number of onsite parking spaces associated with the hotel. As with the Approved Hotel Project, the Revised Hotel Project would be generally consistent with both the previous general plan and ConnectMenlo. The Revised Hotel Project would include the same uses, but

the height of the hotel would be slightly less than what was previously approved. Similar to the Approved Hotel Project, the Revised Hotel Project would not divide an established community or conflict with an adopted habitat conservation plan, resulting in less-than-significant land use impacts. Overall, the Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to land use and planning beyond what was evaluated in the Final EIR. (LTS)

## Aesthetics

**Summary of Approved Hotel Project.** The Final EIR found that the Approved Project, which includes the Approved Hotel Project, would result in additional height, bulk, and massing. With implementation of the Approved Hotel Project, the western and northern boundaries of the Project site, along Chilco Street and Bayfront Expressway/SR 84, would be improved and landscaped, consistent with the rest of the West Campus. A mixture of pedestrian paths, understory landscape plantings, and trees would be included. The design of the perimeter landscape would integrate with the planned bicycle and pedestrian improvements on Chilco Street. The Final EIR assumed that landscape improvements within the hotel site would be developed in the future to support hotel functions while maintaining consistency with the overall Campus character and native climate-adapted plantings. The Final EIR did not include the specific design of the hotel; however, the height of the hotel was assumed to be approximately 75 feet. Although height, bulk, and massing would increase significantly at the corner of Chilco Street and Bayfront Expressway/SR 84, it was determined that this would not change overall views or the visual quality of the area. The Approved Project, including the Approved Hotel Project, was found to result in less-than-significant impacts on scenic vistas, visual character, and visual quality. However, the Final EIR concluded that the building heights, building surfaces, and on-site activity under the entirety of the Approved Project, including the Approved Hotel Project, would result in potentially significant impacts related to an increase in lighting in the area. Therefore, the impact of the Approved Hotel Project related to light and glare was found to be potentially significant. The Final EIR identified the following mitigation measures to reduce this impact to a less-than-significant level:

**MITIGATION MEASURES:** Mitigation Measure AES-3.1 (Design Lighting to Meet Minimum Safety and Security Standards) and Mitigation Measure AES-3.2 (Treat Reflective Surfaces).

The hotel Project site would include surface parking lots. Light and glare from vehicle headlights and windshields at these locations could be a nuisance for motorists and adjacent uses. However, the Final EIR found that dense perimeter landscaping would block light from vehicle headlights that might spill onto adjacent areas. (PS/LTS)

**Impacts of the Revised Hotel Project.** As discussed above, the Approved Hotel Project did not include specific design features; the aesthetics analysis was based on height, bulk, and massing assumptions. The Revised Hotel Project has since been designed. The Revised Hotel Project would include three modules surrounded by surface parking, terraces, and landscaping. An entry plaza, walkways, and planted areas would complement the entrance to the hotel. The parking and vehicular circulation areas north and west of the proposed building would provide additional stormwater gardens, walkways, planting areas, enhanced paving, and property-line fencing. A five-level steel staircase and illuminated art would be located on the eastern façade of the building. Wall artwork would be located in multiple areas on the exterior of the building and be approximately five stories high. The proposed building would have a unique façade and massing; however, the design would complement the similar architectural styles of the immediately adjacent Buildings 20, 21, and 22 as well as the Menlo Gateway Campus to the west. This would provide a consistent development pattern throughout the area. Although the height, bulk, and

massing of the Revised Hotel Project would increase compared with existing conditions, the Revised Hotel Project would be reduced in size compared to the Approved Hotel Project. Therefore, the Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to visual character or quality beyond what was evaluated in the Final EIR. (LTS)

Lighting in the outdoor areas of the Revised Hotel Project would include illuminated art, mounted and in-ground luminaires, tree illumination, integrated LED strip lighting, recessed ceiling downlights, string party lights, and pole-mounted lights. Interior room lighting, which would have the ability to change color, would be visible from the areas surrounding the hotel building. Due to the reduction in building size, a similar reduction in building lighting is anticipated. However, because of the above described proposed outdoor lighting, there may be somewhat more light than anticipated in the Final EIR for the Approved Hotel Project. However, in compliance with Mitigation Measure AES-3.1 and CDP Section 9.33, the Hotel Project Sponsor shall submit a lighting plan to the satisfaction of the City to ensure that the light and glare do not spillover to neighboring properties, ensuring that potential light and glare impacts are mitigated to a less-than-significant level. The following mitigation measures would apply to the Revised Hotel Project, reducing potential light and glare impacts to a less-than-significant level:

**MITIGATION MEASURES:** Mitigation Measure AES-3.1 (Design Lighting to Meet Minimum Safety and Security Standards) and Mitigation Measure AES-3.2 (Treat Reflective Surfaces).

The Revised Hotel Project would construct fewer parking spaces than the Approved Hotel Project. However, the Approved Hotel Project would include more above-ground parking spaces, with the potential to cause light and glare impacts from vehicle headlights and windshields, which could be a nuisance for motorists and adjacent uses. Like the Approved Hotel Project, the Revised Hotel Project would block light from vehicle headlights that might spill onto adjacent areas, resulting in a less-than-significant impact. The Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to light and glare beyond what was evaluated in the Final EIR. (LTS/M)

## Transportation

**Summary of Approved Hotel Project.** The Final EIR concluded that the Approved Project would experience significant level-of-service (LOS) impacts during the AM and PM Peak Hour, significant impacts on routes of regional significance, and significant impacts on daily traffic volumes. Even with implementation of the required mitigation measures (summarized below), vehicle trips generated by the Approved Project, including vehicle trips generated by the Approved Hotel Project, would result in significant and unavoidable impacts on peak-hour traffic, routes of regional significance, and daily traffic volumes. (SU)

**MITIGATION MEASURES:** Mitigation Measure TRA-1.1 (Provide Increased Traffic Capacity to Address Project Impacts on Peak-Hour LOS under Background Plus-Project Conditions), Mitigation Measure TRA-1.2 (Reduce the Peak-Hour Share of Vehicle Trips Allowed under the Trip Cap for Both the Project Site and Buildings 10–19 to No More than 50 Percent of the Allowable Vehicle Trips during Each 2-Hour Peak Commute Period), Mitigation Measures TRA-3.1 (Provide Measures to Reduce Cut-Through Traffic in the Belle Haven Neighborhood via Chilco Street [South of the Dumbarton Rail Corridor], Newbridge Street, and Ivy Drive), and TRA-3.2 (Provide Multi-Modal Improvements on Study Segments that Could Be Affected by Increased Average Daily Traffic [ADT]).

The Final EIR determined that the Approved Project could result in potentially significant impacts related to bicycle connections, pedestrian connections, and pedestrian and/or bicycle/vehicle conflicts. The following mitigation measures would reduce the impacts of the Approved Project to less than significant. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure TRA-4.1 (Provide External Pedestrian Connections to the Area Circulation System and Adjacent Land Uses), Mitigation Measure TRA-5.1 (Provide Bicycle Connections to the Area Circulation System and Adjacent Land Uses), and Mitigation Measure TRA-6.1 (Refine the Project Design to Minimize Conflicting Movements between Bicycles, Pedestrians, and Other Travel Modes within the Project Site).

The Final EIR found that impacts from increased demand for transit services would be less than significant because of the Approved Project. In addition, the Final EIR found that impacts on vehicle miles traveled (VMT) would be less than significant. However, the Final EIR found that potential impacts on AC Transit's Dumbarton bus service would occur because of the potential for increased approach delays. Because the provision of measures to reduce delay cannot be guaranteed, this impact would be significant and unavoidable for the Approved Project. (SU)

The Final EIR found that the Approved Project would result in a significant and unavoidable cumulative impact on peak-hour traffic and routes of regional significance, even after implementation of the mitigation measures below. (SU)

**MITIGATION MEASURES:** Mitigation Measure TRA-1.2, (Reduce the Peak-Hour Share of Vehicle Trips Allowed under the Trip Cap for Both the Project Site and Buildings 10–19 to No More than 50 Percent of the Allowable Vehicle Trips during Each 2-Hour Peak Commute Period), Mitigation Measure TRA-10.1 (Provide Increased Traffic Capacity to Address Project Impacts on Peak-Hour LOS under Cumulative 2040 Existing General Plan plus-Project Conditions), Mitigation Measure TRA-13.1 (Increase Traffic Capacity to Address Impacts on Peak-Hour LOS under Cumulative 2040 Proposed General Plan Conditions), Mitigation Measure TRA-3.1, (Provide Measures to Reduce Cut-Through Traffic in the Belle Haven Neighborhood via Chilco Street [South of the Dumbarton Rail Corridor], Newbridge Street, and Ivy Drive), and Mitigation Measure TRA-3.2, (Provide Multi-Modal Improvements on Study Segments that Could Be Affected by Increased Average Daily Traffic [ADT]).

**Impacts of the Revised Hotel Project.** Trip generation for the proposed Revised Hotel Project<sup>4</sup> was determined to include 130 AM Peak-Hour trips and 117 PM Peak-Hour trips.<sup>5</sup> This would be slightly less than the trip generation estimates identified in the Final EIR for the Approved Hotel Project, with 134 AM Peak-Hour trips and 140 PM Peak-Hour trips. Nonetheless, as with the Approved Project, the Revised Hotel Project would be subject to the same approved vehicle trip cap that applies to the entire Project site, with no modifications, and the same ongoing monitoring program that is currently conducted to ensure compliance. The Revised Hotel Project would, therefore, not create net new AM Peak-Hour trips, PM Peak-Hour trips, or daily vehicle trips relative to the analysis contained in the Final EIR.

<sup>4</sup> Trip generation estimates for the Revised Hotel Project were updated with the Institute of Transportation Engineers (ITE) tenth-edition trip generation rates, while the Approved Hotel Project used ITE ninth-edition trip generation rates.

<sup>5</sup> Fehr & Peers. 2019. *Facebook Bayfront Hotel Trip Generation and Parking Analysis*. Memorandum to Kaitie Meador, City of Menlo Park. June 26, 2019.

Using an analysis regarding shared parking, parking rates from local hotel surveys, and the City's parking requirements, maximum parking demand was estimated and compared to the onsite parking supply proposed by the Revised Hotel Project (118 parking spaces). It was estimated that there could be a shortfall of 15 to 36 parking spaces in the daytime (6:00 a.m. to 6:00 p.m.) and 50 to 76 parking spaces in the evening (6:00 p.m. to 6:00 a.m.). Therefore, a parking management plan<sup>6</sup> (included in Appendix A) has been proposed for the Revised Hotel Project. In the event that there is a need for additional parking (e.g., up to 76 spaces during the evening), under the parking management plan, guests, patrons, and employees of the hotel and restaurant would use the office parking structure adjacent to Building 22. Hotel guests and patrons would be given priority with respect to use of the surface parking lot on the hotel site; if additional parking is needed, hotel and restaurant employees would park in the parking structure adjacent to Building 22. If parking demand from hotel guests and restaurant patrons exceeds the number of available onsite parking spaces, hotel valets would park vehicles in the Building 22 parking structure during periods of peak parking demand at the hotel and restaurant (i.e., evenings and overnight). Therefore, although the number of parking spaces would be less under the Revised Hotel Project compared with the Approved Hotel Project because of the parking management plan, the Revised Hotel Project would not result in any additional issues from a lack of parking, such as vehicle circling.

Because of the existing site-wide trip cap, and because there would be no additional impacts from the reduction in parking due to the shared parking approach, the impacts identified for the Approved Project would be the same with implementation of the Revised Hotel Project. As with the Approved Project, implementation of the Revised Hotel Project would be subject to the same approved vehicle trip cap, with no modifications, and the same ongoing monitoring program that is currently conducted to ensure compliance for final build out. The Revised Hotel Project would, therefore, not create net new AM Peak-Hour trips, PM Peak-Hour trips, or daily vehicle trips beyond the level that was previously analyzed. Impacts on peak-hour traffic, routes of regional significance, and daily traffic volumes would be the same as under the Approved Project. (SU)

The mitigation measures for the Approved Project, listed below, apply to the Approved Project as a whole and are not the sole responsibility of the Revised Hotel Project. Nevertheless, the Hotel Project Sponsor would be required to comply with the mitigation measures and participate in their implementation to the extent possible and appropriate. Therefore, for reference, the mitigation measures are listed below.

**MITIGATION MEASURES:** Mitigation Measure TRA-1.2 (Reduce the Peak-Hour Share of Vehicle Trips Allowed under the Trip Cap for Both the Project Site and Buildings 10–19 to No More than 50 Percent of the Allowable Vehicle Trips during Each 2-Hour Peak Commute Period), Mitigation Measure TRA-3.1 (Provide Measures to Reduce Cut-Through Traffic in the Belle Haven Neighborhood via Chilco Street [South of the Dumbarton Rail Corridor], Newbridge Street, and Ivy Drive), Mitigation Measure TRA-3.2 (Provide Multi-Modal Improvements on Study Segments that Could Be Affected by Increased Average Daily Traffic [ADT]), Mitigation Measure TRA-4.1 (Provide External Pedestrian Connections to the Area Circulation System and Adjacent Land Uses), Mitigation Measure TRA-5.1 (Provide Bicycle Connections to the Area Circulation System and Adjacent Land Uses), Mitigation Measure TRA-6.1 (Refine the Project Design to Minimize Conflicting Movements between Bicycles, Pedestrians, and Other Travel Modes within the Project Site), Mitigation Measure TRA-10.1 (Provide Increased Traffic Capacity to Address Project Impacts on Peak-Hour LOS under Cumulative 2040 Existing General Plan plus-Project Conditions), and Mitigation Measure TRA-13.1

<sup>6</sup> Fehr & Peers, *Facebook Bayfront Hotel Trip Generation and Parking Analysis*, memorandum to Kaitie Meador, City of Menlo Park, June 26, 2019.

(Increase Traffic Capacity to Address Impacts on Peak-Hour LOS under Cumulative 2040 Proposed General Plan Conditions).

Overall, the Revised Hotel Project would not result in new significant impacts on transportation or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Air Quality

**Summary of Approved Hotel Project.** The Final EIR concluded that the Approved Project would be consistent with the City's general plan land use designations and Association of Bay Area Governments (ABAG) population and housing growth projections and, therefore, would not conflict with implementation of the applicable air quality plan, resulting in a less-than-significant impact. (LTS)

The Final EIR and the First Addendum found that construction and operation of the Approved Project could result in potentially significant impacts on criteria air pollutants, including cumulative criteria air pollutants (fugitive dust during construction and oxides of nitrogen [NO<sub>x</sub>] during operation). Implementation of the following mitigation measures would reduce the impact related to criteria air pollutants to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure AQ-2.1 (Implement BAAQMD Basic Construction Mitigation Measures to Reduce Construction-Related Dust) and Mitigation Measure AQ-2.2 (Offset NO<sub>x</sub> Emissions Generated during Project Operation that Are above the BAAQMD NO<sub>x</sub> Average Daily Emission Threshold).

The Final EIR determined that construction and operation of the Approved Project would result in less-than-significant impacts related to exposing sensitive receptors to substantial pollutant concentrations. During construction, the increase in concentrations of particulate matter 2.5 microns in diameter or less (PM<sub>2.5</sub>) from Approved Project construction would be substantially below the Bay Area Air Quality Management District's (BAAQMD's) threshold, the hazard index and cancer risk would not exceed the applicable thresholds, and exposure to asbestos would be minimized by complying with BAAQMD Regulation 11, Rule 2. During operation, it was anticipated that generators would not contribute cancer risks in excess of the BAAQMD's threshold, there would not be a substantial source of diesel particulate matter, and carbon monoxide concentrations due to traffic volumes would not exceed thresholds. The Final EIR also found that the Approved Project would not create objectionable odors that would affect a substantial number of people. In addition, the Final EIR found that the Approved Project would result in less-than-significant cumulative impacts related to conflicts with the 2010 Clean Air Plan, criteria air pollutant emissions, and health impacts. (LTS)

**Impacts of the Revised Hotel Project.** Construction activities for the Revised Hotel Project would be substantially the same as or, because of modular construction, less than the construction activities (i.e., schedule, demolition, construction equipment) identified for the Approved Hotel Project in the First Addendum. Likewise, even though the Revised Hotel Project would be slightly different compared with the Approved Hotel Project (e.g., additional hotel rooms, smaller building footprint, modular construction), operations would largely be the same. Operation of the Revised Hotel Project would not generate any new vehicle trips due to the trip cap, and the operation of emergency generators would be largely the same as under the Approved Hotel Project. Therefore, the Revised Hotel Project would result in the same air quality impacts as the Approved Project, including less-than-significant impacts related to conflicts with implementation of the applicable air quality plan and exposure of sensitive receptors to substantial pollutant concentrations and objectionable odors. As with the Approved Project, the Revised

Hotel Project could result in potentially significant impacts related to criteria air pollutants, including cumulative criteria air pollutants, which would be mitigated to a less-than-significant level with implementation of the mitigation measures below. The Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to air quality beyond what was evaluated in the Final EIR and the First Addendum. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure AQ-2.1 (Implement BAAQMD Basic Construction Mitigation Measures to Reduce Construction-Related Dust) and Mitigation Measure AQ-2.2 (Offset NO<sub>x</sub> Emissions Generated during Project Operation that Are above the BAAQMD NO<sub>x</sub> Average Daily Emission Threshold).

Overall, the Revised Hotel Project would not result in new significant impacts regarding air quality or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR or the First Addendum.

## Greenhouse Gas Emissions

**Summary of Approved Hotel Project.** The Final EIR found that construction associated with full build out of the full Approved Project, including the hotel, would generate 231 metric tons (MT) of carbon dioxide equivalent per year (when amortized over 30 years) from the exhaust of mobile and stationary construction equipment, employee vehicles, and haul trucks as well as indirect emissions from water use and electricity use. The First Addendum found that construction emissions would be equivalent to 268 MT of carbon dioxide equivalent per year (when amortized over 30 years) or 37 MT of CO<sub>2</sub>e per year more than identified in the Final EIR. The Final EIR and the First Addendum found that the Approved Project, as a whole, could result in potentially significant greenhouse gas emissions impacts during construction and that the mitigation measure below would reduce impacts related to construction greenhouse gas emissions to less than significant. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure GHG-1.1 (Implement BAAQMD Best Management Practices for Construction).

The Final EIR found that operation of the entire Facebook Campus Expansion Project<sup>7</sup> would generate direct greenhouse gas emissions from vehicle trips, natural gas combustion, and landscaping activities and indirect greenhouse gas emissions from electricity consumption, waste and wastewater generation, and water use. Because the Approved Project's level of emissions in 2020 and 2040 would be below BAAQMD thresholds and the 2030 "substantial progress" efficiency metric, operational greenhouse gas impacts were found to be less than significant. (LTS)

The Final EIR found that the Approved Project would be consistent with the Assembly Bill 32 Scoping Plan and the City's Climate Action Plan. However, the Approved Project was found to be inconsistent with the long-term 2050 reduction target of Executive Order S-3-05 because it is not possible to determine what federal or state actions will be implemented to achieve the statewide goal by 2050. Therefore, with respect to Executive Order S-3-05, this impact was found to be significant and unavoidable. (SU)

**Impacts of the Revised Hotel Project.** Construction and operation of the Revised Hotel Project would be substantially the same as construction and operation of the Approved Hotel Project or less because the Hotel Project Sponsor is proposing modular construction and a more efficient building design. The Revised Hotel Project would result in the same greenhouse gas impacts as the Approved Project, including

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<sup>7</sup> Greenhouse gas emissions were analyzed in the Final EIR for the entire Project site rather than each Project component.

less-than-significant impacts from operational greenhouse gas emissions, significant and unavoidable impacts from consistency with Executive Order S-3-05, and potentially significant impacts related to construction greenhouse gas emissions, which would be mitigated to a less-than-significant level with implementation of the mitigation measure below. The Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to greenhouse gas emissions beyond what was evaluated in the Final EIR.

**MITIGATION MEASURE:** Mitigation Measure GHG-1.1 (Implement BAAQMD Best Management Practices for Construction).

Overall, the Revised Hotel Project would not result in new significant impacts pertaining to greenhouse gases or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Noise

**Summary of Approved Hotel Project.** The Final EIR found that construction activities associated with the Approved Project, including the Approved Hotel Project, would result in noise that would exceed the City of Menlo Park limits. However, the Final EIR identified the mitigation measure below to reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure NOI-1.1 (Implement Noise Control Measures to Reduce Construction Noise during Project Construction).

The Final EIR found that noise impacts from operating the Approved Project, including the Approved Hotel Project, due to traffic, human activity, parking structures and parking lot (e.g., speech, vehicle doors slamming, cars starting, tires squealing, accidental car alarm incidents, other automotive noise), and truck deliveries would be less than significant. However, noise impacts associated with heating, ventilation, and air-conditioning (HVAC) systems and generators were determined to be potentially significant, exceeding thresholds regarding Menlo Park noise levels and permanent ambient noise levels. The Final EIR identified the mitigation measures below to reduce the impacts to a less-than-significant level. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure NOI-1.2 (Implement Noise Control Measures to Reduce HVAC Noise during Project Operation), Mitigation Measures NOI-1.3 (Install Sound Enclosures around Emergency Generators), Mitigation Measure NOI-1.4 (Limit Generator Testing to Daytime Hours).

The Final EIR concluded that vibration during construction of the Approved Project, including the Approved Hotel Project, would not be expected to damage buildings or be perceptible to people, resulting in less-than-significant impacts.

**Impacts of the Revised Hotel Project.** Because the proposed Revised Hotel Project would be located on the same site as the Approved Hotel Project, no construction activity under the Revised Hotel Project would occur closer to existing offsite noise-sensitive land uses than the distance identified in the Final EIR. As such, the construction analysis included in the Final EIR applies to the analysis of the Revised Hotel Project, and impacts would be comparable. The Final EIR identified the mitigation measure below to reduce potential impacts related to construction noise to a less-than-significant level. This mitigation measure also applies to the Revised Hotel Project. Similar to the Approved Hotel Project, this mitigation measure would reduce impacts to a less-than-significant level.

**MITIGATION MEASURE:** Mitigation Measure NOI-1.1 (Implement Noise Control Measures to Reduce Construction Noise during Project Construction).

Operation of the Revised Hotel Project would be the same as operation of the Approved Hotel Project and would not move the hotel any closer to a sensitive receptor. Therefore, the noise that would be generated from the Revised Hotel Project would be the same as noise from the Approved Hotel Project. For example, traffic noise (due to the trip cap), noise from human activity and the parking areas, and noise from building equipment would be comparable to similar noises from the Approved Project. Therefore, the Revised Hotel Project could result in a potentially significant impact by exceeding thresholds regarding Menlo Park noise levels and permanent ambient noise levels. Nonetheless, as with the Approved Project, implementation of the mitigation measures below would reduce these impacts to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure NOI-1.2 (Implement Noise Control Measures to Reduce HVAC Noise during Project Operation), Mitigation Measures NOI-1.3 (Install Sound Enclosures around Emergency Generators), and Mitigation Measure NOI-1.4 (Limit Generator Testing to Daytime Hours).

The vibration levels from construction of the Revised Hotel Project would be the same as vibration levels from construction of the Approved Hotel Project because the same equipment would be used for a similar duration. Therefore, as with the Approved Project, vibration during construction of the Revised Hotel Project would not be expected to damage buildings or be perceptible to people. The impact would be less than significant.

Overall, the Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to noise beyond what was evaluated in the Final EIR.

## Cultural Resources

**Summary of Approved Hotel Project.** The Final EIR concluded that the Approved Project, including the Approved Hotel Project, would result in a less-than-significant impact on historic resources. The Final EIR found that the Project site is located on former marshland and artificial fill. As such, there is low probability for encountering previously undiscovered archaeological resources during construction, and paleontological sensitivity is low for artificial fill. However, the Final EIR found that the surficial clay soils and older underlying deposits have high or undetermined paleontological sensitivity and that the potential exists for human remains to be encountered. The Final EIR concluded that the Approved Project, including the Approved Hotel Project, would result in a potentially significant impact on archaeological and paleontological resources, including human remains. The Final EIR identified the mitigation measures below to reduce impacts to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure CUL-2.1 (Perform Construction Monitoring, Evaluate Uncovered Archaeological Features, and Mitigate Potential Disturbance of Identified Significant Resources at the Project Site), Mitigation Measure CUL-3.1 (Conduct Protocol and Procedures for Encountering Paleontological Resources), and Mitigation Measure CUL-4.1 (Comply with State Regulations Regarding the Discovery of Human Remains at the Project Site).

**Impacts of the Revised Hotel Project.** The Revised Hotel Project would be located on the same site as the Approved Hotel Project and require demolition of Building 305. As identified in the Final EIR, this building is not considered to be historically significant. Therefore, impacts on historic buildings would be less than significant. The Revised Hotel Project would involve a similar amount of ground disturbance compared with

the Approved Hotel Project. Therefore, the Revised Hotel Project would have the same likelihood for unearthing archaeological resources, paleontological resources, and human remains as the Approved Hotel Project. As with the Approved Hotel Project, the Revised Hotel Project could damage archaeological resources, paleontological resources, and human remains, resulting in potentially significant impacts. The mitigation measures below, which were required to be implemented for the Approved Hotel Project, would reduce the impacts of the Revised Hotel Project to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure CUL-2.1 (Perform Construction Monitoring, Evaluate Uncovered Archaeological Features, and Mitigate Potential Disturbance of Identified Significant Resources at the Project Site), Mitigation Measure CUL-3.1 (Conduct Protocol and Procedures for Encountering Paleontological Resources), and Mitigation Measure CUL-4.1 (Comply with State Regulations Regarding the Discovery of Human Remains at the Project Site).

Overall, the Revised Hotel Project would not result in new significant impacts on cultural resources or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Biological Resources

**Summary of Approved Hotel Project.** The Final EIR concluded that new buildings, including the Approved Hotel Project, could provide perch sites from which raptors and other avian predators could prey on special-status species in the adjacent refuge. Therefore, this indirect impact of the Approved Project related to special-status species was found to be potentially significant. The Final EIR identified the mitigation measure below to reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure BIO-2.1 (Install Bird Perching Deterrents on All New Buildings and Other Elevated Structures, Including the Bicycle/Pedestrian Bridge)

The Final EIR found that if the Approved Project were to be constructed during the nesting season (February 1 to September 14), tree and shrub removal could result in the direct mortality of adult or young birds, the destruction of active nests, and/or disturbance of nesting adults, causing nest abandonment and/or loss of reproductive effort. Any disturbance of nesting birds that results in the abandonment of active nests or litters or the loss of active nests through vegetation or structure removal would be a potentially significant impact. In addition, the Final EIR found that new lighting associated with new buildings, including the Approved Hotel Project, could disrupt natural behavioral patterns and cause injury or death from exhaustion or colliding with buildings. In compliance with Mitigation Measure BIO-3.2, the Hotel Project Sponsor shall submit a lighting plan to the satisfaction of the City that the lighting fixtures will minimize light pollution and use bird-friendly colors for lighting when possible. The Final EIR identified the mitigation measures below to reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure BIO-2.1 (Install Bird Perching Deterrents on All New Buildings and Other Elevated Structures, Including the Bicycle/Pedestrian Bridge), Mitigation Measure BIO-3.1 (Conduct Pre-construction Surveys for Nesting Migratory Birds), and Mitigation Measure BIO-3.2 (Implement Bird-Safe Design Standards into Project Buildings and Lighting Design).

The Approved Project would result in the removal of onsite heritage trees. Because compliance with the Heritage Tree Ordinance is mandatory, this impact was found to be less than significant. In addition, the Approved Project would be required to adhere to Chapter 13.24 of the City's municipal code. (LTS)

**Impacts of the Revised Hotel Project.** The proposed Revised Hotel Project would reduce the overall footprint of the building, as well as the height of the hotel, compared with the Approved Hotel Project. Nonetheless, the building associated with the Revised Hotel Project could provide perch sites for raptors and other avian predators, creating a vantage point from which predators could prey on special-status species in the refuge. As with the Approved Project, the mitigation measure below would be applied to reduce potential impacts on special-status species to a less-than-significant level. The Revised Hotel Project would not result in new significant impacts on special-status species or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure BIO-2.1 (Install Bird Perching Deterrents on All New Buildings and Other Elevated Structures, Including the Bicycle/Pedestrian Bridge).

Construction activities associated with the Revised Hotel Project, including tree and shrub removal, would be the same as construction activities associated with the Approved Hotel Project. The same amount of vegetation and the same number of trees would be removed under the Approved Hotel Project and the Revised Hotel Project. Therefore, similar to the Approved Project, any disturbance of nesting birds that results in the abandonment of active nests or the loss of active nests through vegetation or structure removal would be a potentially significant impact for the Revised Hotel Project. Due to the reduction in building size, it is anticipated the Revised Hotel Project would not increase the amount of new lighting or the use of reflective material compared to the Approved Hotel Project. Nonetheless, lighting and reflective material under the Revised Hotel Project could increase the number of bird collisions with structures on the Project site compared with existing conditions. As noted above, in compliance with Mitigation Measure BIO-3.2, the Hotel Project Sponsor shall submit a lighting plan to the satisfaction of the City that the lighting fixtures will minimize light pollution and use bird-friendly colors for lighting when possible. As with the Approved Project, the mitigation measures below would be implemented for the Revised Hotel Project to reduce potential impacts on native wildlife nursery sites to a less-than-significant level. The Revised Hotel Project would not result in new significant impacts on native wildlife nursery sites or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measures BIO-2.1 (Install Bird Perching Deterrents on All New Buildings and Other Elevated Structures, Including the Bicycle/Pedestrian Bridge), Mitigation Measure BIO-3.1 (Conduct Pre-construction Surveys for Nesting Migratory Birds), and Mitigation Measure BIO-3.2 (Implement Bird-Safe Design Standards into Project Buildings and Lighting Design).

The Revised Hotel Project would have a smaller footprint than the Approved Hotel Project and would not result in a loss of heritage trees beyond that identified in the Final EIR for the Approved Project. Therefore, through compliance with the Heritage Tree Ordinance, the impacts of the Revised Hotel Project related to a loss of heritage trees would be less than significant. The Revised Hotel Project would not result in new significant impacts related to biological resources or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Geology and Soils

**Summary of Approved Hotel Project.** The Final EIR found that the Approved Project, including the Approved Hotel Project, would be located in an area where strong seismic ground shaking can be expected to occur. The area is also subject to liquefaction-related phenomena and hazards associated with unstable soil conditions. Potential hazards would be reduced through implementation of standard designs and construction methods and use of the 2013 California Building Standards Code or the Building Standards Code in effect at time of building permit submittal (i.e., for Seismic Zone D and soil and foundation support parameters) and the guidelines set by California Geological Survey Special Publication 117. The City would monitor design and construction and enforce laws through its building permit process. Therefore, the Approved Project was found to have a less-than-significant impact with regard to the exposure of people or structures to seismic ground shaking, liquefaction-related hazards, and hazards related to unstable and expansive soils. (LTS)

The Final EIR found that the Approved Project, including the Approved Hotel Project, would involve construction activities, including grading, that could temporarily expose soils to erosive effects from stormwater runoff. Furthermore, imported fill stockpiled at the Project site could be eroded by wind or water. The Approved Project would be required to comply with City requirements (i.e., stormwater pollution prevention plan [SWPPP] and best management practices [BMPs]) and the 2013 California Building Standards Code (or the current Building Standards Code in effect at time of building permit application submittal), which are within the authority of the City to enforce and monitor, ensuring maximum protection from erosion during construction of the Approved Project. Furthermore, after construction, stormwater runoff on the Project site would be managed and collected by new stormwater drainage and management systems that would connect to the City's stormwater system. As a result of the Approved Project, the impervious area would decrease compared with existing conditions, thereby keeping more water onsite and allowing percolation to groundwater reserves. The impact related to erosion under the Approved Project, including the Approved Hotel Project, was found to be less than significant. (LTS)

**Impacts of the Revised Hotel Project.** The seismic and soil hazards associated with the Approved Hotel Project would also apply to the proposed Revised Hotel Project because the improvements would occur on the same site. Ground-disturbance activities during construction (such as grading and excavation) would be substantially similar. As with the Approved Hotel Project, seismic hazards and soil hazards associated with the Revised Hotel Project would be mitigated to the extent required by law and would be subject to the criteria and guidelines set forth in the 2013 California Building Standards Code (or current Building Standards Code in effect at time of building permit submittal) and California Geological Survey Special Publication 117. The erosion potential under the Revised Hotel Project would be the same as the potential under the Approved Hotel Project because of the similar ground-disturbance activities. The Revised Hotel Project would be required to adhere to the same requirements as the Approved Hotel Project (e.g., SWPPP, BMPs, 2013 California Building Standards Code). Adherence to these requirements would ensure maximum protection from erosion resulting from construction of the Revised Hotel Project. Overall, the proposed Revised Hotel Project would result in a slightly smaller building footprint than the Approved Hotel Project and a reduction in the area of impervious surfaces compared with existing conditions. Therefore, similar to the Approved Hotel Project, the erosion impacts of the Revised Hotel Project would be less than significant. (LTS)

Overall, the Revised Hotel Project would not result in new significant impacts related to geology and soils or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Hydrology and Water Quality

**Summary of Approved Hotel Project.** Construction of the Approved Project would be subject to existing regulatory requirements, such as the stipulations of the Construction General Permit, which call for preparation of a SWPPP and BMPs. In addition, per the City's municipal code (Chapter 7.42) and the permit review process, the Hotel Project Sponsor would be required to prepare and implement a grading and drainage plan, incorporating low-impact development features, source controls, and BMPs to reduce the amount of stormwater runoff and prevent the entry of sediment and pollutants into the City's storm drain system and surface waters during construction activities and post-construction. Nonetheless, because the Project site is a Department of Toxic Substances Control cleanup site and has historical contamination, dewatered groundwater may be contaminated, which could result in a potentially significant impact on water quality. The Final EIR identified the mitigation measure below to reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure WQ-1.1 (Implement Construction Dewatering Treatment [if necessary]).

Construction of the Approved Project would result in a less-than-significant impact on groundwater and groundwater recharge. With adherence to existing regulations, the impacts on existing drainage patterns and changes to stormwater runoff would also be less than significant. The area of impervious surfaces at the Project site would be reduced when the Approved Project is operational. In addition, the Project Sponsor would, under the Approved Project, upsize existing pipes and provide new pipes to the entire Project site, ensuring that the onsite system would be adequate with respect to conveying stormwater in the event of a 100-year storm. The Approved Project would be required to adhere to the design requirements in the Construction General Permit, municipal separate storm sewer system, and San Mateo Countywide Water Pollution Prevention Program. Therefore, operation of the Approved Project would result in a less-than significant impact on groundwater supplies and recharge, changes to existing drainage patterns, and changes to stormwater runoff. (LTS)

The Final EIR found that the Project site is within a Special Flood-Hazard Area, Flood Zone AE, which is a 100-year floodplain that is subject to tidal flooding. The Approved Project includes features to minimize flooding impacts, including features that would raise the Project site; however, the impact from flooding could be potentially significant because roadways and the underground parking area could be inundated. The Final EIR identified the mitigation measures below to reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure WQ-5.1 (Flood-Proofing of Project Underground Infrastructure) and Mitigation Measure WQ-5.2 (Provide Adequate Stormflow Conveyance Capacity for Sea-Level Rise Conditions at the Project Site).

**Impacts of the Revised Hotel Project.** Because the proposed Revised Hotel Project would be on the same site as the Approved Hotel Project, the Revised Hotel Project would be subject to the same potentially significant flooding impacts on underground and ground-level infrastructure, including parking areas. However, unlike the Approved Hotel Project, underground parking is not proposed as part of the Revised Hotel Project. Nonetheless, as with the Approved Hotel Project, the impact for the Revised Hotel Project would be reduced to a less-than-significant level with application of the same mitigation measure proposed under the Approved Project. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure WQ-5.1 (Flood-Proofing of Project Underground Infrastructure) and Mitigation Measure WQ-5.2 (Provide Adequate Stormflow Conveyance Capacity for Sea-Level Rise Conditions at the Project Site).

Overall, construction of the Revised Hotel Project would be similar to or less than construction of the Approved Project. As with the Approved Project, the Revised Hotel Project would have a less-than-significant impact on groundwater and groundwater recharge. In addition, the Project Sponsor would be required to adhere to the same regulations for construction of the Revised Hotel Project as the regulations for construction of the Approved Project. As part of the Approved Project, the storm drain lines will be sized as appropriate and the entire system will be designed to convey stormwater in the event of a 100-year storm. Therefore, the Revised Hotel Project's impact on stormwater runoff would be less than significant. However, as with the Approved Hotel Project, construction of the Revised Hotel Project could result in dewatering groundwater that could be contaminated, which could result in a potentially significant impact on water quality. Implementation of the mitigation measure below would reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURE:** Mitigation Measure WQ-1.1 (Implement Construction Dewatering Treatment [if necessary]).

The proposed Revised Hotel Project would have a slightly smaller footprint than the Approved Hotel Project and, therefore, would result in a decrease in the area of impervious surfaces. In addition, the Revised Hotel Project would be required to adhere to the same design requirements (i.e., Construction General Permit, municipal separate storm sewer system, Chapter 7.42 of the City's municipal code, San Mateo Countywide Water Pollution Prevention Program) as the Approved Project. Therefore, operation of the Revised Hotel Project would result in the same less-than-significant impacts on groundwater supplies and recharge, changes to existing drainage patterns, and changes to stormwater runoff as the Approved Project. (LTS)

Overall, the Revised Hotel Project would not result in new significant impacts related to hydrology and water quality or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Hazards and Hazardous Materials

**Summary of Approved Hotel Project.** The Final EIR found that, through mandatory compliance with existing laws, regulations, and Certified Unified Program Agency programs, impacts related to the routine transport, use, or disposal of hazardous materials during Approved Project construction and operation would be less than significant. In addition, the Final EIR concluded that existing hazardous materials found on the Project site could be upset during construction, including asbestos-containing materials (ACMs), lead-based paints (LBPs), naturally occurring asbestos, contaminated soils, and contaminated groundwater. The Final EIR found that compliance with existing federal and state regulations (e.g., Occupational Safety and Health Administration, California Division of Occupational Safety and Health (Cal/OSHA), Resource Conservation and Recovery Act, U.S. Department of Transportation, California Air Resources Board regulations) would minimize impacts from releasing ACMs, LBPs, and naturally occurring asbestos during construction to a less-than-significant level. Because the Project site was found to have contaminated groundwater and soil, the Final EIR found that the Approved Project would have a potentially significant impact with respect to the health of construction workers. The Final EIR identified the mitigation measures below to reduce this impact to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure HAZ-2.1 (Soil and Groundwater Management), Mitigation Measure HAZ-2.2 (Additional Site Investigation), and Mitigation Measure HAZ-2.3 (Remedial Action)

The Final EIR also concluded that the impacts from soil contamination would be less than significant during operations because the Approved Project would include design features that would ventilate potential vapors into the atmosphere and not into the overlaying structure. The Final EIR found that hazardous or acutely hazardous materials handled or emitted during construction or operation of the Approved Project would have a less-than-significant impact on nearby schools. Although the Final EIR found that the Approved Project could result in an increase in traffic, access to the Project site, including emergency access, would be improved and therefore would not interfere with emergency response and evacuation plans in the Project vicinity. As a result, impacts on emergency response or evacuation plans were found to be less than significant. (LTS)

**Impacts of the Revised Hotel Project.** The Revised Hotel Project would be located on the same site as the Approved Hotel Project and therefore could be affected by the same hazardous materials identified for the Approved Project. Similarly, the Revised Hotel Project would transport, use, or dispose of the same hazardous materials as the Approved Hotel Project and be subject to the same federal and state regulations related to hazardous materials. Therefore, the Revised Hotel Project would result in the same less-than-significant impacts as the Approved Project related to the routine transport, use, or disposal of hazardous materials; a release of ACMs, LBPs, or naturally occurring asbestos during construction; a release of hazardous materials during operation; or exposure to hazardous materials near schools. Furthermore, because of the trip cap, the Revised Hotel Project would generate the same amount of traffic as the Approved Hotel Project, and access to the site would be similar to access under the Approved Hotel Project. Therefore, the Revised Hotel Project would result in the same less-than-significant impact on emergency response or evacuation plans as the Approved Hotel Project.

Because the Revised Hotel Project is located on the same site as the Approved Hotel Project, the Revised Hotel Project would be subject to the same groundwater and soil contamination, which has been documented on the Project site. As with the Approved Hotel Project, implementation of the mitigation measures below would reduce this potentially significant impact related to releasing hazardous materials to a less-than-significant level. (LTS/M)

**MITIGATION MEASURES:** Mitigation Measure HAZ-2.1 (Soil and Groundwater Management), Mitigation Measure HAZ-2.2 (Additional Site Investigation), and Mitigation Measure HAZ-2.3 (Remedial Action).

Overall, the Revised Hotel Project would not result in new significant impacts related to hazards and hazardous materials or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Population and Housing

**Summary of Approved Hotel Project.** The Final EIR concluded that there could be an indirect population increase associated with new employment during construction and operation of the Approved Project, which included the Approved Hotel Project. The Final EIR determined that operation of the Approved Project would generate up to 6,550 new jobs at full build out and occupancy. The Approved Project could increase the number of new residents in the city by approximately 457. The addition of 457 new residents in the city as a result of the Approved Project would represent approximately 46 percent of the anticipated population growth within the city between 2015 and 2020. Of the 6,550 new jobs at the Project site, it was anticipated that approximately 150 of the jobs would be for employees at the hotel. This would equate to approximately 11 of the hotel employees also living in Menlo Park, with a demand for approximately six

housing units in the city and the generation of 17 additional Menlo Park residents.<sup>8</sup> The Final EIR determined that the Approved Project as a whole would not create a significant impact related to indirect population growth. Therefore, impacts on population and housing were found to be less than significant. (LTS)

**Impacts of the Revised Hotel Project.** Although the overall building area of the hotel would decrease, the Revised Hotel Project would increase the number of hotel rooms (from 200 rooms to 240 rooms). Depending on whether the employee generation rate from the certified Final EIR is used or the employment projection provided by the Hotel Project Sponsor, the Revised Hotel Project could employ anywhere between 180 workers (Scenario 1) and 90 workers (Scenario 2). Table 4 summarizes the population and housing assumptions in the Final EIR for the Approved Hotel Project and both scenarios for the Revised Hotel Project.

**Table 4**  
**Comparison Approved Hotel Project vs. Revised Hotel Project**

	<b>Approved Hotel Project</b>	<b>Revised Hotel Project (Scenario 1)<sup>a</sup></b>	<b>Revised Hotel Project (Scenario 2)<sup>b</sup></b>
Hotel Rooms (rooms)	200 rooms	240 rooms	240 rooms
Total Hotel Employees	150 employees	180 employees	90 employees
Employees Living in Menlo Park	11 residents	14 residents	7 residents
Demand for Housing Units	6 housing units	8 housing units	4 housing units
New Menlo Park Residents	17 residents	20 residents	10 residents

Sources: <sup>a</sup> Hibiscus Properties, LLC, 2015; <sup>b</sup> citizenM, 2019.

To determine the number of anticipated employees, the Final EIR used a generation rate of 0.75 job per hotel room. The Revised Hotel Project would increase the room count by 40 rooms, for a total of 240 rooms. Using the same generation rate provided in the Final EIR, the Revised Hotel Project would employ approximately 180 workers (including restaurant employees).<sup>9</sup> This employment scenario (Scenario 1) would equate to approximately 14 of the hotel employees living in Menlo Park,<sup>10</sup> with a demand for approximately eight housing units in the city<sup>11</sup> (compared with six housing units under the Approved Hotel Project) and 20 additional Menlo Park residents<sup>12</sup> (compared with 17 residents under the Approved Hotel Project). Therefore, Scenario 1 of the Revised Hotel Project would result in a slight increase in employment and population compared with the Approved Hotel Project.

The ABAG's *Projections 2040*<sup>13</sup> estimates that the total population in Menlo Park will increase by approximately 3,960 from 2020 to 2025 (when the Revised Hotel Project would be fully operational). Under Scenario 1, the Revised Hotel Project would result in three additional Menlo Park residents and demand for two additional housing units compared with the Approved Hotel Project. The three additional

<sup>8</sup> Refer to pages 3.12-9 through 3.12-11 (Impact POP-1) of the Draft EIR for a discussion on how these numbers were calculated.

<sup>9</sup> 0.75 jobs per hotel room x 240 hotel rooms = 180 employees

<sup>10</sup> Using a generation rate of 7.6 percent of Menlo Park employees who also live in Menlo Park.

<sup>11</sup> Using a generation rate of 1.8 workers per household in Menlo Park.

<sup>12</sup> Using a generation rate of 2.61 persons per household (pph).

<sup>13</sup> Association of Bay Area Governments. 2019. *Projections 2040*. Projections 2040 by Jurisdiction. Available: <https://data.bayareametro.gov/Demography/Projections-2040-by-Jurisdiction/grqz-amra>. Accessed: October 21, 2019.

Menlo Park residents as a result of the Revised Hotel Project would represent approximately 0.08 percent of the overall population growth in the city. In addition, the number of households is expected to increase by approximately 825 between 2020 and 2025. The two additional households as a result of the Revised Hotel Project (compared with the Approved Hotel Project) would represent approximately 0.2 percent of the overall household growth in the city during the 5-year period. Therefore, the Revised Hotel Project, similar to the Approved Hotel Project, would result in less-than-significant population and housing impacts. However, it is important to note that details about the Approved Hotel Project were unknown at the time when the Final EIR was certified. Therefore, the Final EIR used a generic hotel employee generation rate to determine the number of hotel and restaurant jobs. Since certification of the Final EIR, the new Hotel Project Sponsor (citizenM) has been retained and the specific design, operational characteristics, and hotel brand have been proposed. Based on staffing at similar hotels operated by the Hotel Project Sponsor, the Hotel Project Sponsor anticipates that the Revised Hotel Project would require approximately 90 total workers at the hotel and restaurant.<sup>14</sup> Using the same population and housing generation rates as the Final EIR, this employment scenario (Scenario 2) would equate to approximately seven of the hotel employees also living in Menlo Park,<sup>15</sup> with a demand for approximately four housing units in the city<sup>16</sup> and 10 additional Menlo Park residents.<sup>17</sup> Therefore, Scenario 2 of the Revised Hotel Project would result in a slight decrease in employment and population compared to the Approved Hotel Project.

There would be no additional impacts beyond those identified in the Final EIR prepared for the Approved Project as a result of the Revised Hotel Project with respect to direct impacts on population growth, displacement of housing, or displacement of people. Therefore, the Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts, resulting in a less-than-significant impact. (LTS)

## Public Services

**Summary of Approved Hotel Project.** The Final EIR concluded that, as a result of the new employee and residential population induced by the Approved Project, additional Menlo Park Fire Protection District (MPFPD) employees would be needed to maintain the current ratio of fire safety personnel to residents. The additional personnel could be accommodated within the expanded Station 2 and Station 6 or other MPFPD stations. In addition, the Approved Project would not degrade service ratios for the Menlo Park Police Department (MPPD) beyond established goals, and school impact fees would be paid per Section 65996 of the State Government Code to mitigate school impacts from development. The use of existing recreational facilities would most likely increase as a result of the Approved Project; however, the use of recreational facilities is expected to be spread out among several parks and recreational facilities in the area. Finally, the existing libraries in the city would be able to accommodate the increase in employment at the Project site and the associated increase in the number of residents. The Final EIR evaluated the Approved Project's potential impacts on public services and determined that it would not trigger a need for the construction of new fire, police, school, park, or library facilities. Therefore, impacts on public services were found to be less than significant. (LTS)

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<sup>14</sup> Brion Economics Incorporated. 2019. *Jobs Estimates for citizenM Hotel in Menlo Park; BEI #2551*. Memorandum. June 6.

<sup>15</sup> Using a generation rate of 7.6 percent of Menlo Park employees who also live in Menlo Park.

<sup>16</sup> Using a generation rate of 1.8 workers per household in Menlo Park.

<sup>17</sup> Using a generation rate of 2.61 persons per household (pph).

**Impacts of the Revised Hotel Project.** This analysis considers two scenarios, one in which the Revised Hotel Project would employ up to 180 workers (Scenario 1) and another in which the Revised Hotel Project would employ approximately 90 workers (Scenario 2). As shown in Table 4, employment under Scenario 2 would result in a decrease in the number of employees and residents generated in Menlo Park compared with the Approved Hotel Project. Therefore, the impacts on public services from Scenario 2 would be less than the impacts from the Approved Hotel Project and are not discussed further.

Under Scenario 1, the Revised Hotel Project would generate 30 additional employees and three additional Menlo Park residents compared with what was considered for the Approved Hotel Project. The increase in employees and residents due to the Revised Hotel Project would not result in a change in the MPFPD or MPPD staffing ratios identified for the Approved Project in the Final EIR. Therefore, the impact on fire and police services from increased employment due to the Revised Hotel Project would be similar to the less-than-significant impact of the Approved Hotel Project. (LTS)

Because the Revised Hotel Project would increase the number of households in Menlo Park by two compared with the Approved Hotel Project, the number of school-aged children would not be substantially different from the number assumed in the Final EIR. In addition, as with the Approved Project, the proposed Revised Hotel Project would be subject to Senate Bill 50 school impact fees, which represent full and complete mitigation for the impact of commercial development. The impact of the Revised Hotel Project on school facilities would be similar to the less-than-significant impact of the Approved Project. Furthermore, the 30 additional employees under the Revised Hotel Project would not result in a change in the park, recreation, or library service ratio identified for the Approved Project in the Final EIR. Therefore, the impact of the Revised Hotel Project on park, recreational, and library facilities would be the similar to the less-than-significant impact of the Approved Project. (LTS)

Overall, the Revised Hotel Project would not result in new significant impacts on public services or a substantial increase in the severity of previously analyzed impacts beyond what was evaluated in the Final EIR.

## Utilities and Service Systems

**Summary of Approved Hotel Project.** The Final EIR found that the Approved Project would increase water and wastewater demand by 30 million gallons (mg)<sup>18</sup> during operation; generate approximately 16,050 tons of recycled material during construction, of which 12,545 tons would be used onsite or at a nearby construction project (the rest would be disposed of at a landfill); generate 16 tons of solid waste per day during operation; reduce the area of impervious surfaces; and reduce the amount of electricity and natural gas used during operation compared with existing demand at the Project site. The Final EIR determined that the Approved Project would not require existing water entitlements to be expanded, require expansion or construction of new water treatment facilities, exceed the wastewater treatment requirements of the Regional Water Quality Control Board, contribute to a need to expand existing solid waste disposal facilities or construct new facilities, create or contribute to runoff that would exceed the capacity of existing or planned stormwater drainage systems, or result in an inefficient, wasteful, or unnecessary consumption of energy. Therefore, impacts on utilities and service systems were found to be less than significant. (LTS)

**Impacts of the Revised Hotel Project.** The existing CDP for the Approved Project imposes a cap on water usage at the Project site. The Revised Hotel Project would not modify the limits on water usage identified

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<sup>18</sup> This is a conservative estimate in which 100 percent of the Approved Project's indoor water use would become wastewater. The Final EIR does note that an onsite wastewater treatment system could process up to 23 mg of water annually.

in the Water Supply Assessment. Accordingly, although 40 rooms would be added to the hotel, compared with the Approved Project, the cap on water use would not be exceeded. Therefore, the Revised Hotel Project's demand for water, as well as wastewater treatment, would be comparable to the water usage anticipated for the Approved Hotel Project. As with the Approved Hotel Project, implementation of the Revised Hotel Project would reduce the amount of impervious surfaces compared with existing conditions and incorporate an improved drainage system, resulting in less-than-significant impacts on stormwater systems. (LTS)

Overall, construction activities would be similar or less between the proposed Revised Hotel Project and the Approved Hotel Project. Therefore, it is expected that the Revised Hotel Project would generate the same amount of demolition and construction debris as the Approved Hotel Project. The calculation of the amount of solid waste that would be generated during operation of the Approved Project was based on the number of onsite employees. The number of employees could increase by 30 under Scenario 1 (the conservative scenario); as a result, the amount of solid waste that would be generated during operation of the Revised Hotel Project could be slightly more than the amount under the Approved Project. However, solid waste generation was analyzed in the Final EIR for the Project site as a whole, and it was determined that the Approved Project, with a total of 6,550 employees, would result in a less-than-significant impact on solid waste facilities. Therefore, because the increase in the number of hotel employees would be minimal compared to the number analyzed for the entire Project site in the Final EIR, solid waste generation under the Revised Hotel Project would be similar to that of the Approved Hotel Project. Solid waste generated by the Revised Hotel Project would be within the limits of Ox Mountain Landfill's permitted capacity, resulting in less-than-significant impacts. (LTS)

The proposed Revised Hotel Project would result in a reduced building area but an increase in the number of hotel rooms and employees (under Scenario 1). Therefore, the potential exists that the energy used for operation of the Project site could be slightly greater under the Revised Hotel Project compared with the Approved Hotel Project. However, as discussed above, the Approved Hotel Project did not include specific design features because they were unknown at the time of analysis. Therefore, conservative assumptions were applied to the energy analysis. The Revised Hotel Project would be designed to meet LEED Gold standards, resulting in greater energy efficiency compared with the design analyzed in the Final EIR. With implementation of the Revised Hotel Project, impacts related to the amount of energy used on the Project site would be less than significant, similar to the Approved Project.

Based on the information above, the Revised Hotel Project would not require existing entitlements to be expanded, require expansion or construction of new water treatment facilities, exceed the wastewater treatment requirements of the Regional Water Quality Control Board, contribute to a need to expand existing solid waste disposal facilities or construct new facilities, create or contribute to runoff that would exceed the capacity of existing or planned stormwater drainage systems, or result in an inefficient, wasteful, or unnecessary consumption of energy. Therefore, impacts related to utilities and service systems for the Revised Hotel Project were found to be less than significant. Overall, the Revised Hotel Project would not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts related to utilities and service systems beyond what was evaluated in the Final EIR.

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## Conclusions

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### CEQA Conclusion

Based on the analysis and discussion presented in this document, no supplemental or subsequent environmental analysis is needed, pursuant to CEQA Guidelines Sections 15162 and 15163. It is concluded that the analysis conducted, as well as the conclusions reached, in the EIR certified on November 1, 2016, along with the conclusions in the First Addendum, remain valid. The Revised Hotel Project would not cause any new significant impacts or any substantial increases in the severity of previously identified significant effects. No changes have occurred with respect to circumstances surrounding the Approved Hotel Project that would cause significant environmental impacts to which the Revised Hotel Project would contribute considerably. In addition, no new information has become available that shows that the Approved Hotel Project or the Revised Hotel Project would cause significant new environmental impacts or result in new mitigation measures. Therefore, no new mitigation measures are needed, and no supplemental environmental review is required beyond this addendum.

12/19/19

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Date of Determination

I do hereby certify that the above determination has been made pursuant to state and local requirements.



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Kaitie Meador

Senior Planner, Community Development Department

City of Menlo Park



Appendix A

**Facebook Bayfront Hotel Trip Generation & Parking Analysis**

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## MEMORANDUM

Date: June 26, 2019  
To: Kaitie Meador, City of Menlo Park  
From: Robert H. Eckols, P.E.  
Sara Sadeghi  
Subject: **Facebook Bayfront Hotel Trip Generation & Parking Analysis**

*SJ19-1912*

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This memorandum summarizes the results of the trip generation and parking analysis for the proposed hotel project on the Facebook Bayfront Campus in Menlo Park, California. The hotel project site was included in the traffic impact analysis presented in the Facebook Campus Expansion Project Environmental Impact Report (EIR) certified in September 2016. The EIR and approvals for the Campus Expansion project assumed that the hotel would be a 200 room hotel with on-site dining facilities and 245 parking spaces. It is our understanding that the hotel developer is proposing to modify the room count from 200 to 240 rooms and reduce the on-site parking supply to 120 parking spaces, which will require an amendment to the CDP that applies to the entire Campus Expansion site and a shared parking agreement between Facebook and the hotel operator to address the parking shortfall. In addition, the project would include 4,140 square feet of leased restaurant space. Due to the proximity of the project to Facebook's campus, it is projected that Facebook visitors and employees will generate a large portion of the demand for the hotel and restaurant. The hotel project will also be subject to the trip cap that applies to the entire Campus Expansion site. No modifications to the trip cap will be sought, and therefore no increase in net new trips is assumed; the analysis that follows related to trip generation is therefore provided only for informational purposes.

This memorandum includes the following:

- Trip Generation
- Parking Demand Analysis
- Parking Management Plan



## Trip Generation

Vehicle trip generation for the proposed Bayfront Hotel was estimated using the standard rates developed by the *Institute of Transportation Engineers* (ITE). The project vehicle trip generation in the Facebook Campus Expansion Project EIR, was calculated using the *ITE Trip Generation Manual* (9<sup>th</sup> Edition) assuming the Hotel land use (code 310). The description of Hotel land use includes overnight lodging and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms, convention facilities, swimming pools and fitness centers. The current proposal would be for a hotel design and operation that is more similar to the ITE Business Hotel which is primarily for overnight lodging with a pool and fitness center (without a restaurant, banquet room, or convention space), since the CDP does not allow the approved hotel to include conference or banquet facilities. While there will be a restaurant in the hotel project, the trip generation for the restaurant was estimated separately and added to the hotel trips.

We compared the vehicle trip generation rates for hotel uses as presented in both the 9<sup>th</sup> and 10<sup>th</sup> editions of the ITE trip generation manual. We also updated the vehicle trip generation estimate for the project based on a combination of hotel and restaurant land uses. **Table 1** summarizes the vehicle trip generation estimates for the following conditions:

- Trip generation from the EIR using ITE 9<sup>th</sup> Edition Hotel rate and 200 rooms
- Trip generation using ITE 10<sup>th</sup> Edition Hotel rate and 240 rooms
- Trip generation using ITE 10<sup>th</sup> Edition Business Hotel rate for 240 rooms plus a 4,140 square foot restaurant (referred to in Table 1 as "ITE 10<sup>th</sup> Generation with Modified Land Use Assumption")

The updated trip generation estimates show that the trip generation would be similar to the original assumptions in the EIR analysis. The increase in the number of rooms is offset when applying more appropriate trip generation rates based on the planned hotel operation (i.e., ITE rates for a business hotel vs. a full-service hotel).

Using the ITE 10<sup>th</sup> Edition trip generation manual, the proposed Bayfront hotel with 240 rooms and 4,140 square feet of restaurant space would generate approximately 130 AM peak hour vehicle trips (60 inbound and 70 outbound) and 117 PM peak hour vehicle trips (67 inbound and 50 outbound) which is slightly less than the trip generation estimates presented in the EIR assuming a 200-room hotel (134 AM peak hour trips and 140 PM peak hour trips).



**Table 1: Vehicle Trip Generation Comparison**

Source	Land Use	Unit	ITE Land Use Code	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
<b>ITE 9<sup>th</sup> Edition used in DEIR (A)</b>	<b>Hotel</b>	<b>200 Room</b>	<b>310</b>	<b>78</b>	<b>56</b>	<b>134</b>	<b>69</b>	<b>71</b>	<b>140</b>
ITE 10 <sup>th</sup> Edition	Hotel	240 Room	310	68	47	115	79	75	154
<b>ITE 10<sup>th</sup> Edition with Modified Land Use Assumption (B)</b>	Business Hotel	240 Room	312	37	51	88	42	35	77
	Restaurant (Quality High Turn Over)	4,140 Sq. ft.	932	23	19	41	25	15	40
	<b>Total</b>			60	70	130	67	50	117
<b>B-A</b>				<b>-18</b>	<b>14</b>	<b>-4</b>	<b>-2</b>	<b>-21</b>	<b>-23</b>

Source: Fehr & Peers.

There are two factors that make the trip generation estimates conservative. First, we did not adjust for any internalization of trips between the hotel and restaurant uses. Some of the restaurant patrons will likely be hotel guests. In addition, the trip generation estimates are conservative since many of the hotel guests and restaurant patrons will be generated by the surrounding Facebook offices. Due to the proximity of the Facebook campus and Belle Haven neighborhood to the project site, many of the hotel and restaurant trips will use alternative modes such as walking, biking, or Facebook campus trams. Therefore, the actual vehicle trip generation of the project should be lower.

## Parking Demand Analysis

The following section summarizes the results of the parking demand evaluations for the proposed project using the shared parking methodology.

### Shared Parking Methodology

The Urban Land Institute (ULI) sponsored a national study in 1984 that established a basic methodology for analyzing parking demand in mixed-use developments and developed averages for parking rates by land use. Fehr & Peers staff was involved in the 2004 update of this national study sponsored by ULI<sup>1</sup>. In the shared parking methodology, the base parking rate and

<sup>1</sup> *Shared Parking, Second Edition*, Urban Land Institute, Washington D.C., 2004



daily/hourly/seasonal patterns for each land use are established, and then the overall parking demand is calculated by taking into account the unique travel characteristics of the project being analyzed.

For the purpose of this analysis, the project land use assumptions were used in to the shared parking model to determine most appropriate parking rates and determine the parking demand throughout the day. The model estimates the maximum parking demand for the project based on the number of vehicles parked for each of the project uses by hour.

## Parking Demand Evaluation

For the purpose of this study, we reviewed and evaluated different parking rates including the rates within the Institute of Transportation Engineers (ITE) *Parking Generation 5th Edition*, City of Menlo Park parking requirements, Urban Land Institute (ULI) rates, and local hotel surveys prepared for the City of Mountain View. We selected the most appropriate parking rates and, using the ULI shared parking methodology, we developed maximum parking demand estimates for the project considering the demands throughout the day.

To estimate the total parking demand, we utilized ULI parking rates for the proposed high turn-over restaurant and the City of Menlo Park parking requirement rate and local hotel survey rates<sup>2</sup> for the proposed business hotel. **Table 2** presents the parking rates and the maximum total parking demand for the proposed project for the mid-day and evening/night; Alternative 1 identifies parking rates and demand based on the City of Menlo Park's code requirements, while Alternative 2 identifies the parking rates and demand based on actual local hotel surveys. **Figures 1** and **2** show the project daily parking demand distribution and the maximum parking demand (100% peak demand for both alternatives) and compares them to the proposed on-site parking supply (120 parking spaces).

**Table 3** shows the project total parking demand and the estimated parking shortfall based on the proposed on-site parking supply during both day time and evening time. As shown in **Figures 1** and **2**, the maximum day time parking shortfall occurs between 6:00 AM to 8:00 AM when most of the hotel guests are still at the hotel. The maximum evening shortfall occurs after 10:00 PM.

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<sup>2</sup> Local rate survey rates are presented in three memorandums prepared for the City of Mountain View by Fehr & Peers, Hexagon, and TJKM for business hotels located in Menlo Park, California.



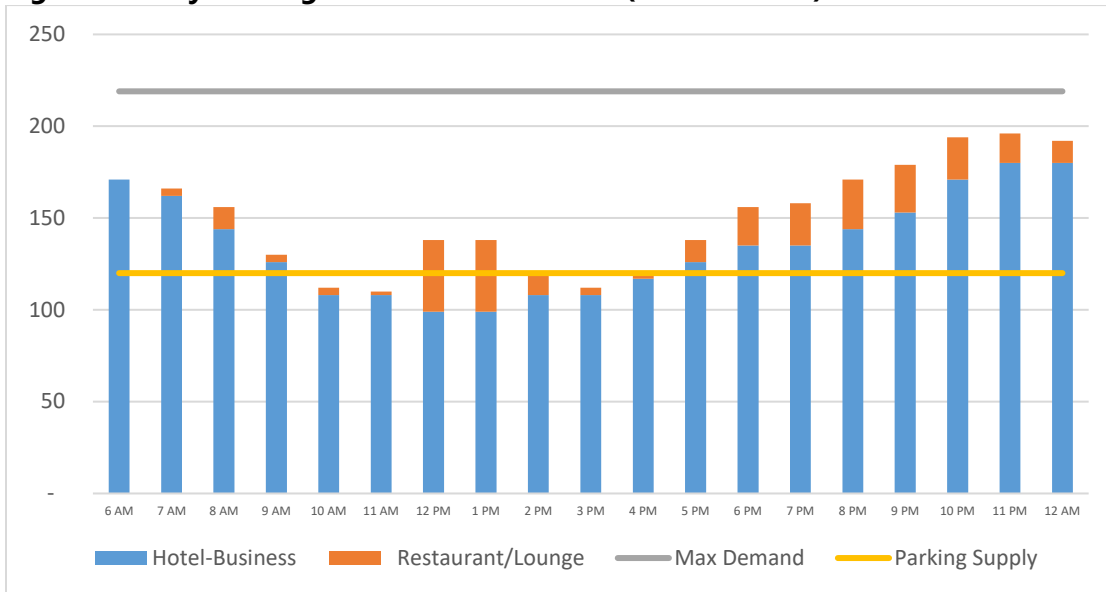
**Table 2: Parking Demand Estimates**

Land Use	Rate Source	Unit	Rate <sup>1</sup>	Day Time Max Demand	Night Time Max Demand
Alternative 1					
High Turn-Over Restaurant	ULI	4,140 Sq. ft.	10	156	196
Business Hotel	City of Menlo Park	240 room	0.75		
Alternative 2					
High Turn-Over Restaurant	ULI	4,140 Sq. ft.	10	135	170
Business Hotel	Local Hotel Surveys	240 room	0.64		

Source: Fehr & Peers.

1. The ULI weekday and weekend rates for high turn-over restaurants are the same which would result in the same total number of parking demand during both weekdays and weekends.

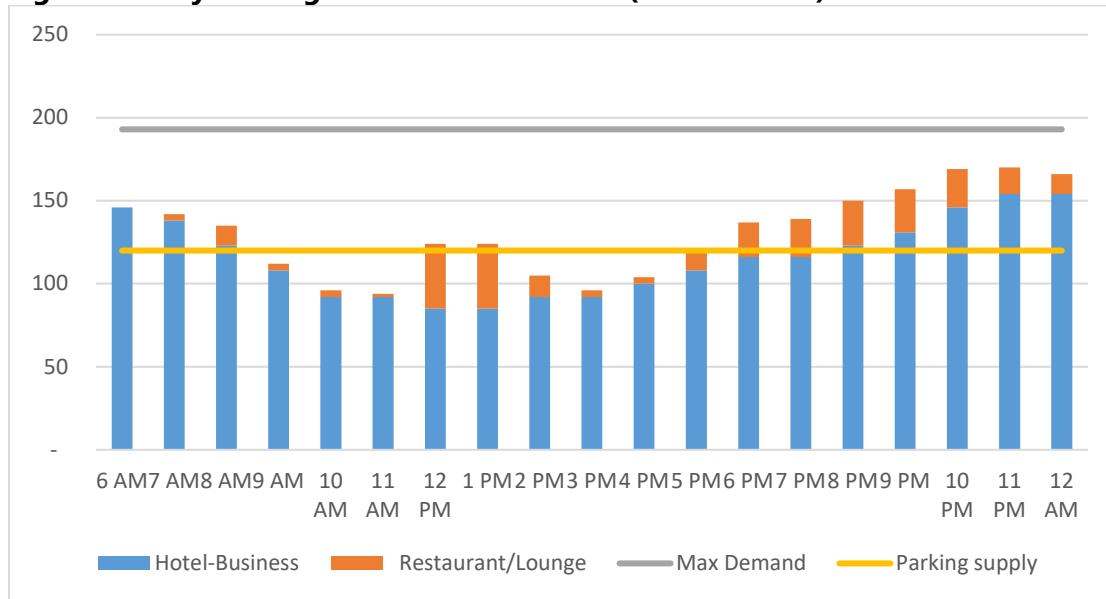
**Figure 1: Daily Parking Demand Distribution (Alternative 1)**



Note: Maximum parking demand (grey line) is the sum of maximum parking demand for each land use separately regardless of shared parking assumptions.



**Figure 2: Daily Parking Demand Distribution (Alternative 2)**



Note: Maximum parking demand (grey line) is the sum of maximum parking demand for each land use separately regardless of shared parking assumptions.

**Table 3** summarizes the day time parking shortfall (6:00 AM to 6:00 PM) that ranges between 15 to 36 parking spaces and the evening shortfall (6:00 PM to 6:00 AM) of 50 to 76 parking spaces.

**Table 3: On-Site Parking Shortfall**

Land Use	Parking Supply	Day Time Max Demand	Day Time Parking Shortfall	Evening Time Max Demand	Evening Time Parking shortfall
Alternative 1					
ULI High Turn-Over Restaurant	120	156	36	196	76
City of Menlo Park Hotel					
Alternative 2					
ULI High Turn-Over Restaurant	120	135	15	170	50
Fehr & Peers Rate					

Source: Fehr & Peers.



## Parking Management Plan

For the purpose of our shared parking analysis we did not consider the office parking located adjacent to the proposed project, but rather projected the parking needs of the hotel and restaurant uses only. We also did not make any parking adjustments to account for the interaction between the hotel guests, restaurant patrons and the office employees and visitors, and our analysis is therefore conservative. Initial estimates are that between 65 – 75 percent of the hotel rooms may be used by Facebook visitors and/or traveling employees. This relationship between the hotel, restaurant, and office activities will reduce the parking demand for the hotel site, since hotel guests will not need a vehicle during their stay.

In addition, a portion of the restaurant patrons will be Facebook employees or visitors that are either parked in the office parking and/or have arrived at the campus by other modes of travel such as employee shuttles. Similarly, Belle Haven residents will be able to safely walk or bike to the restaurant. Therefore, we anticipate that the parking demand presented represents a worst case condition.

In the event that there is a need for additional parking (estimated at 50-76 spaces during the evening), the hotel operators and Facebook are in discussions regarding a parking management plan based on the following parameters.

- Hotel guests and restaurant patrons will be given priority to use the parking on the hotel site.
- If additional parking is needed, hotel and restaurant employees will be allowed to park in the office parking provided in the parking structure adjacent to Building 22. Hotel and restaurant employees would be issued the appropriate identification to allow them to use the Facebook office parking areas. While the total hotel employment is estimated to be 60 – 65 employees, the hotel operator provided the following estimates of the number of employees per shift:

○ Morning shift	7:00 AM to 3:00 PM	25
○ Afternoon shift	3:00 PM to 11:00 PM	13
○ Evening shift	11:00 PM to 7:00 AM	4

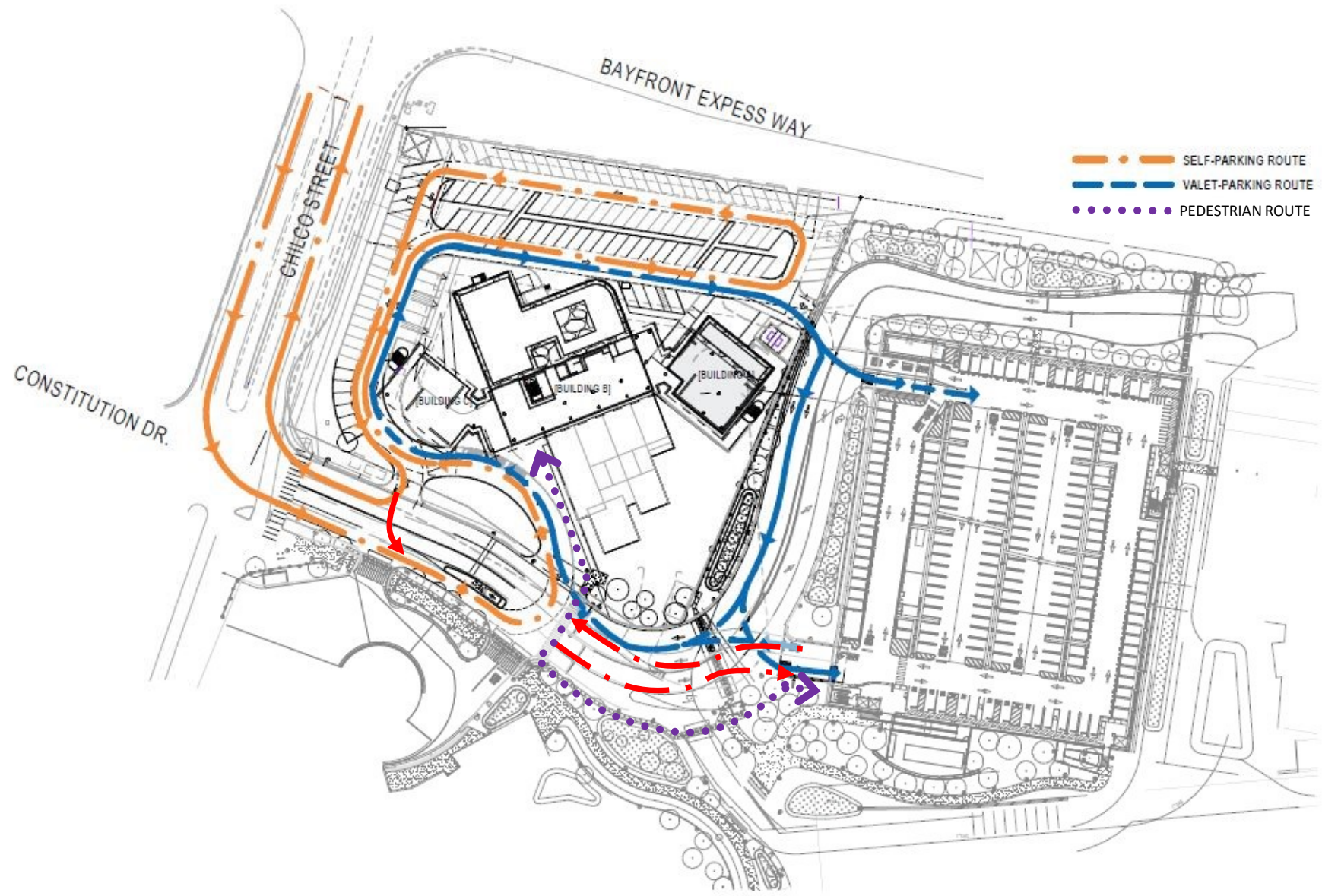


The number of restaurant employees has not been identified. Both the hotel and restaurant operators will encourage employees to use alternative travel modes for their commute to work and avoiding driving alone to the site, which will further reduce parking demand.

- If the hotel guest or restaurant patron parking demand exceeds the available on-site parking, Facebook will allow hotel valets or guests to park vehicles in the Building 22 parking structure, which is anticipated to contain unused parking during the times when the hotel and restaurant will generate the highest parking demand in the evenings and overnight.
- **Figure 3** shows the travel paths of valets and guests using the Building 22 parking structure. Guests would circulate within the hotel site and, if needed, use the Constitution driveway to access the Building 22 parking. Guests would need to check into the hotel prior to accessing the Building 22 parking structure. Valets would use the Constitution driveway to access the Building 22 parking structure. During the evening peak period valets could also use the service exit when the Constitution driveway was congested.

The hotel management and Facebook will enter into a shared parking agreement to ensure that there will be sufficient parking for the hotel/restaurant employees, hotel guests and restaurant patrons. The agreement will specify the following operational items:

- Number of parking spaces for the hotel/restaurant employees, guests, and patrons
- Location of parking spaces, if designated
- Potential time restrictions related to parking access
- Security procedures for accessing the parking by employees, guests and patrons



## **Local Hotel Parking Studies**



## MEMORANDUM

Date: December 22, 2016

To: Brian Froelich, Shashi Group LLC

From: Jane Bierstedt and Allen Wang, Fehr & Peers

**Subject: Mountain View Hilton Garden Inn Parking Study**

SJ16-1700

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## INTRODUCTION

This memorandum presents the results of the parking analysis conducted by Fehr & Peers to determine whether the planned parking supply for the Hilton Garden Inn is adequate to serve the parking demand generated by the proposed hotel expansion. The hotel is located at 840 E. El Camino Real in Mountain View, California. Currently, the hotel includes 160 guest rooms, 250 square feet of meeting space, and 3,800 square feet of restaurant space (located in the lobby area). All existing uses are served by the 152 parking spaces at the site, of which six are handicapped spaces. The proposed expansion will add 40 guest rooms and replace the existing restaurant with a new 4,300-square foot restaurant on the ground floor. It will remove the meeting space and three handicapped parking spaces to provide room for the building addition.

This analysis estimated the parking demand for the proposed expansion using parking data collected at the project site in October 2016 and recommended parking rates in Urban Land Institute's (ULI) *Shared Parking*, Second Edition (2005). The projected demand was compared with the proposed parking supply, City of Mountain View's Municipal Code requirements, and estimates based on rates in the Institute of Traffic Engineers (ITE) *Parking Generation*, Fourth Edition (2010).

## SUMMARY OF FINDINGS

Based on the analysis presented in this memorandum, the peak parking demand for the proposed hotel expansion with full occupancy is estimated to be 141 spaces, occurring between 9:00 pm to 10:00 pm on a weekday. Therefore, this parking study demonstrates that the planned parking supply of 149 spaces would be sufficient to support the peak parking demand generated by the proposed hotel expansion.

## EXISTING PARKING UTILIZATION

This section describes the existing parking conditions and presents the parking utilization data collected at the hotel site. The hotel provides 152 off-street parking spaces to support the hotel guests and visitors, employees as well as the demand generated by the complementary uses, including the ground floor restaurant and the meeting space.

### EXISTING PARKING SURVEY

To better understand the existing parking demand and estimate parking rates for the hotel rooms, parking space utilization counts were collected at the site on four days, including two weekdays and two days on the weekend. Per conversations with the hotel management, higher occupancy is typically observed during the mid-week and on Fridays. This observation is consistent with the weekly parking demand pattern for the hotel land use category (Land Use 310) in ITE *Parking Generation*. Therefore, Wednesday and Friday were selected as the two weekdays for parking data collection. Counts were also conducted on a Saturday and a Sunday to observe the weekend parking demand. On each day, parking data was collected for 14 hours, from 11:00 am to 12:00 am (midnight), to ensure the peak parking demand and the time-of-day variations were captured. Additionally, hotel occupancy data for the survey days were obtained from the hotel management. **Table 1** presents the parking utilization survey results and the corresponding hotel occupancies. Detailed parking counts are presented in **Appendix A**.

As presented in **Table 1**, the peak parking demand for the existing hotel was 110 spaces. It was observed at 11:00 pm on Wednesday when all 160 hotel rooms were occupied. On all four days of data collection, peak demand occurred between 10:00 pm and midnight.

**TABLE 1: EXISTING PARKING COUNTS (PARKED VEHICLES) AND HOTEL OCCUPANCY**

Time	Wednesday (October 26, 2016)	Friday (October 28, 2016)	Saturday (October 29, 2016)	Sunday (October 30, 2016)
11:00 AM	31	36	30	41
12:00 PM	29	26	21	27
1:00 PM	28	25	13	19
2:00 PM	27	25	15	17
3:00 PM	27	29	20	21
4:00 PM	26	30	21	25
5:00 PM	36	27	28	27
6:00 PM	37	30	27	26
7:00 PM	57	36	27	32
8:00 PM	70	40	37	39
9:00 PM	88	53	41	47
10:00 PM	104	60	<u>53</u>	52
11:00 PM	<u>110</u>	<u>62</u>	50	49
12:00 AM	109	61	49	<u>53</u>
Occupancy Rate	100%	65%	58%	60%
Occupied Rooms	160	104	93	96

Note:

Underlined text highlights the highest parking demand of the day.

Source: Fehr & Peers, 2016.

## EXISTING PARKING RATES FOR HOTEL ROOMS

As described in the previous section, the observed parking counts are comprised of demand generated by hotel guests, employees, as well as the demand generated by the restaurant and meeting space. Based on field observations and conversations primarily with the hotel management, it is our understanding that the existing restaurant and meeting space primarily serves hotel guests. Therefore, this study assumed that the parking demand generated by the existing restaurant and meeting space from external traffic (non-hotel guests) is negligible.

To further understand the parking rates for hotel guests/visitors versus the rates for employees, the parking demand for employees was separated from the total parking counts. With the employee shift schedule provided by the hotel management, the employee parking demand was estimated using the recommended parking rate (0.25 space/employee) for hotel employees in ULI *Shared Parking*. **Table 2** presents the hourly employee count and the associated parking demand.

**TABLE 2: EXISTING EMPLOYEE COUNT AND PARKING DEMAND**

Time	Employee Count <sup>1</sup>		Employee Parking Demand <sup>2</sup>	
	Weekday	Weekend	Weekday	Weekend
11:00 AM	16	16	4	4
12:00 PM	14	14	4	4
1:00 PM	14	15	4	4
2:00 PM	12	13	3	4
3:00 PM	12	13	3	4
4:00 PM	10	11	3	3
5:00 PM	10	11	3	3
6:00 PM	4	5	1	2
7:00 PM	3	4	1	1
8:00 PM	3	4	1	1
9:00 PM	3	4	1	1
10:00 PM	1	2	1	1
11:00 PM	1	2	1	1
12:00 AM	1	2	1	1

Note:

<sup>1</sup>Hourly employee count is the sum of housekeeping, front desk, maintenance, and food & beverage employees.

<sup>2</sup>Employee parking demand was estimated using the parking rate of 0.25 space/employee for hotel employees in *ULI Shared Parking, Second Edition* (2005).

Source: Fehr & Peers, 2016.

The hourly parking demand for hotel guests and visitors was estimated to be the difference between the total observed parking demand (Table 1) and employee parking demand (Table 2). Subsequently, the peak parking demand for each occupied hotel room was calculated using the equation below:

$$\text{Peak Parking Rate} = \frac{\text{Peak Hotel Guest \& Visitor Parking Demand}}{\text{Number of Occupied Rooms}}$$

**Table 3** summarizes the calculated peak parking rates for hotel rooms and the time-of-day variations. The highest parking rate for hotel guests and visitors is 0.68 space per occupied room, derived from the parking counts collected on Wednesday, October 26, 2016.

**TABLE 3: EXISTING HOTEL ROOM PARKING RATES AND TIME-OF-DAY VARIATIONS**

<b>Time</b>	<b>Wednesday</b> (October 26, 2016)	<b>Friday</b> (October 28, 2016)	<b>Saturday</b> (October 29, 2016)	<b>Sunday</b> (October 30, 2016)
11:00 AM	25%	52%	50%	71%
12:00 PM	23%	36%	33%	44%
1:00 PM	22%	34%	17%	29%
2:00 PM	22%	36%	21%	25%
3:00 PM	22%	43%	31%	33%
4:00 PM	21%	44%	35%	42%
5:00 PM	30%	39%	48%	46%
6:00 PM	33%	48%	48%	46%
7:00 PM	51%	57%	50%	60%
8:00 PM	63%	64%	69%	73%
9:00 PM	80%	85%	77%	88%
10:00 PM	94%	97%	<u>100%</u>	98%
11:00 PM	<u>100%</u>	<u>100%</u>	94%	92%
12:00 AM	99%	98%	92%	<u>100%</u>
<b>Peak Parking Rate</b> (space/occupied room)	<b>0.68</b>	<b>0.59</b>	<b>0.56</b>	<b>0.54</b>

Note:

Time-of-day variation is presented as a percentage of the peak parking rate.

Source: Fehr &amp; Peers, 2016.



# HEXAGON TRANSPORTATION CONSULTANTS, INC.

## Memorandum

**Date:** July 19, 2016  
**To:** Mr. Brian Froelich, Shashi Group, LLC  
**From:** Michelle Hunt  
**Subject:** Parking Study for the Proposed Hilton Garden Inn Expansion in Mountain View

Hexagon Transportation Consultants, Inc. has completed a parking study for the proposed Hilton Garden Inn expansion at 840 E. El Camino Real in Mountain View, California. The existing Hilton Garden Inn has 160 hotel rooms. The proposed expansion includes an addition of 40 hotel rooms and 4,500 square feet of ground floor restaurant/café space. The proposed expansion will result in a small reduction in the existing on-site parking from 152 to 149 spaces. Therefore, the purpose of this parking study is to estimate the parking needs of the hotel including the ancillary uses and to determine whether the proposed parking supply is adequate. The analysis is based on the City of Mountain View hotel parking requirements, published hotel parking rates, and surveys conducted at the Hilton Garden Inn. The parking study also included a redesign of the existing parking lot to maximize the number of spaces on site based on the City of Mountain View's off-street parking requirements.

### City of Mountain View Parking Code Requirements

According to the City of Mountain View Zoning Code Sec 36.37.040, hotels are required to provide one parking space per room, plus one parking space for every two employees, plus as required for ancillary uses. The parking requirement for employees was calculated based on the maximum number of employees per shift (20). The proposed new restaurant/café space is the only ancillary use that may draw outside patrons that are not hotel guests. The parking requirement for this use was calculated based on the City's code requirement for restaurants, one parking space per 100 square feet of gross floor area. The other amenities included in the proposed hotel are assumed to be used by hotel guests only and would generate no additional parking demand. In total, based on the City's code requirements, the project would be required to provide a total of 255 parking spaces (200 spaces for hotel guests, 10 spaces for employees, and 45 spaces for the restaurant/café use). It should be noted however, that the City's parking code requirements do not take into account the fact that parking demands for different uses peak at different times of the day such that the overall total peak parking demand is usually less than the sum of the peak demand generated by each individual use.

### Parking Estimates based on Published Rates

The Institute of Transportation Engineers (ITE) publication *Parking Generation*, 4<sup>th</sup> Edition (2010) provides the results of parking surveys conducted throughout the country for numerous popular land uses. ITE *Parking Generation* rates for land use 310, hotel in a suburban area, were used to estimate the peak parking demand generated by the proposed hotel expansion. The ITE parking rates are based on the number of occupied hotel rooms. While hotel occupancy typically averages between 51 and 72 percent based on the ITE manual, the parking demand for the proposed hotel was calculated assuming 100 percent occupancy. The ITE parking rates for hotels include ancillary uses such as restaurants and meeting/conference space. Based on the ITE data, the project is

estimated to potentially experience its peak parking demand of 240 spaces on Saturdays. On weekdays, the peak parking demand is estimated to be only 161 spaces.

## Parking Estimates based on Survey Data

Hexagon conducted a survey of the parking demand at the existing Hilton Garden Inn on Thursday, April 30, 2015 and Saturday, May 2, 2015. Table 1 presents the parking survey results for the existing Hilton Garden Inn and the projected parking demand by hour with the proposed expansion of the Hilton Garden Inn. The actual observed overall peak parking demand at the existing hotel occurred at midnight with a peak of 0.74 parking spaces per occupied room on weekdays and 0.80 parking spaces per occupied room on Saturdays. The parking demand generated by the hotel component of the proposed project was estimated using these peak parking ratios observed at the existing Hilton Garden Inn. Based on these rates, the proposed 200-room hotel is estimated to generate a peak parking demand of 148 parking spaces on weekdays and 160 parking spaces on weekends when fully occupied. The hotel parking demand at other hours earlier in the evening was estimated based on the time of day variations in parking accumulation observed at the Hilton Garden Inn and other similar hotels. While hotel occupancy typically averages between 51 and 72 percent, the parking demand for the proposed hotel was calculated assuming 100 percent occupancy.

The parking survey indicates that the Garden Grille & Bar found in the existing Hilton Garden Inn is patronized primarily by hotel guests. The parking survey found no evidence that the existing restaurant generates any additional parking demand from outside traffic (non-hotel guests). Parking surveys at many other similar hotels show the same pattern, with a negligible number of parked vehicles attributable to restaurant use by non-hotel guests. However, this parking study conservatively assumes that the new restaurant/café space would have its own identity separate from the hotel. Considering its prime location on El Camino Real, the proposed restaurant/café may indeed generate outside business separate from the hotel.

To estimate the parking demand for the proposed new restaurant, Hexagon conducted parking counts at the following two similar hotels with a restaurant: the Sheraton Inn (located at 1100 North Mathilda Avenue, Sunnyvale), and the Four Points by Sheraton (located at 5115 Hopyard Road, Pleasanton). Both hotels are located on major arterials and have some meeting/conference space, a Faz restaurant and bar/lounge area, and free parking. The Faz restaurants at both hotels are independently owned and operated full-service restaurants. Two of five similarly named restaurants owned by renowned executive chef, Faz Pouroushi, the Faz Sunnyvale and Faz Pleasanton have prominent signage both adjacent to the street and on the building that is separate from the hotel signage. The Faz restaurants attract patrons who are not hotel guests. While the tenant/operator of the proposed new restaurant and café space within the Hilton Garden Inn has not been determined, the Faz restaurants are thought to be comparable to the type of restaurant that may be found at the Hilton Garden Inn with the proposed expansion.

**Table 1**  
**Observed and Projected Hotel Parking Usage**

Survey Date	Hilton Garden Inn Mt. View		Expanded Hilton Garden Inn Mt. View					
	Thurs. 4/30/15	Sat. 5/2/15	Projected Weekday Parking Demand			Projected Saturday Parking Demand		
	Total	Total	Total	Hotel <sup>a</sup>	Restaurant <sup>b</sup>	Total	Hotel <sup>a</sup>	Restaurant <sup>b</sup>
Time								
6:00 PM	69	64	129	89	40	124	82	42
6:30 PM	66	69	124	85	39	129	88	40
7:00 PM	62	65	125	80	45	126	83	43
7:30 PM	60	67	119	77	42	127	86	41
8:00 PM	75	72	125	97	28	132	92	40
8:30 PM	76	74	135	98	37	140	95	45
9:00 PM	87	77	137	112	24	142	99	44
9:30 PM	102	82	140	132	9	142	105	37
10:00 PM	109	91	147	141	6	144	117	27
10:30 PM	112	117	149	145	4	160	150	10
11:00 PM	113	117	149	146	3	158	150	8
11:30 PM	114	122	148	147	1	160	156	4
12:00 AM	115	125	148	148	0	160	160	0
Total Rooms	160	160	200			200		
Occupied Rooms	155	156	200			200		
Restaurant Size	3,842 s.f.		4,500 s.f.					
Meeting/Conference Space	2,112 s.f.		1,890 s.f.					
Total Parking Spaces	152	152	149			149		
Peak Parking Demand (spaces)	115	125	149			160		
Peak Parking Ratio (occupied parking spaces/occupied rooms)								
Combined Hotel & Restaurant	0.74	0.80	0.74			0.80		
Restaurant Peak Parking Ratio (occupied parking spaces/1,000 s.f. for restaurant use)								
Restaurant Only					10.00			10.00
Parking Ratio at 12:00 AM midnight (occupied parking spaces/occupied room for hotel use; restaurant is closed)								
Hotel Only	0.74	0.80		0.74			0.80	
<sup>a</sup> The peak hotel parking demand was estimated based on the observed peak parking ratios at the existing Hilton Garden Inn. The number of parking spaces required each hour was projected based on the time-of-day variation in parking demand observed at the existing Hilton Garden Inn.								
<sup>b</sup> The peak restaurant parking demand was estimated based on the City of Mountain View's requirement for restaurant parking at 1 space per 100 square feet. Parking occupancy each hour was estimated based on the time-of-day variation in parking demand observed at Faz restaurants at the Four Points by Sheraton in Pleasanton and at the Sheraton Inn in Sunnyvale.								

The peak hotel parking demand at midnight was used along with the time of day parking patterns observed at other hotels in order to differentiate the parking demand generated by the Faz restaurant from the parking demand generated by the adjoining hotel. The peak parking rates generated by the Faz restaurant in Sunnyvale (11.09 spaces per 1,000 s.f. on a weekday and 8.77 spaces per 1,000 s.f. on a Saturday) are very close to the City of Mountain View parking requirement for restaurants (10 parking spaces per 1,000 s.f.). The Faz restaurant in Pleasanton generated substantially lower parking demand that is less than half the rate observed at the Faz Sunnyvale site. It is unclear if the Faz Pleasanton did a lower volume of business or if a significant portion of the Pleasanton restaurant patrons were captured trips from hotel guests. To be conservative, the parking demand generated by the proposed new restaurant and cafe space at the expanded Hilton Garden Inn was estimated using the City of Mountain View parking requirement for restaurants (10 parking spaces per 1,000 s.f.) and time of day variations observed at the two Faz restaurants. Based on the City's required parking ratios, the proposed restaurant at the Hilton Garden Inn is expected to generate a peak of 45 occupied parking spaces. Based on the hourly variation in parking demand observed at two Faz restaurants, the peak restaurant parking demand is expected to occur at 7:00 PM on a weekday and at 8:30 PM on a Saturday.

The overall total parking demand for both hotel and restaurant uses at the expanded Hilton Garden Inn is expected to peak after 10:00 PM on weekdays when 149 parking spaces would be occupied. Note that most restaurants (including the Faz restaurant) are closed by that time so the peak parking demand on weekdays would primarily be dictated by the hotel's parking needs with few or no additional spaces needed for the proposed new restaurant. The hotel parking demand would be substantially lower earlier in the evening during the restaurant's peak period such that the overall total parking demand while the restaurant is open is projected to be less than parking demand late at night. Similarly, on Saturdays the overall total parking demand is expected to peak after 10:00 PM when 160 parking spaces would be needed. This matches the peak parking demand generated by the hotel, and demonstrates that the hotel and restaurant would be able to effectively share parking earlier in the evening while the restaurant is open and the hotel parking demand is lower. The shared parking analysis presented in this report is based on a traditional sit-down restaurant without late-night dining hours. Additional analysis may be required if the proposed new hotel restaurant differs from this model.

The projected total peak weekday parking demand projected at full occupancy (149 spaces) could be accommodated in the existing parking lot, which would be reduced from 152 to 149 parking spaces after the proposed hotel expansion. However, the parking study shows that the total peak parking demand on a Saturday with full occupancy (160 spaces) would exceed the available on-site parking supply. Shashi plans to implement valet parking on weekends when the hotel occupancy is expected to be high to accommodate any excess parking demand above the normal parking lot capacity.

## Parking Lot Design

To maximize the number of parking spaces on site, Hexagon recommends that the Hilton Garden Inn modify the parking lot configuration. Hexagon designed a revised parking lot layout based on the City of Mountain View off-street parking requirements regarding parking islands, landscaping, aisle widths, parking space dimensions, and allowable compact spaces. Hexagon also examined various characteristics of the project site as they relate to existing and potential new parking designs. Because the parking lot may operate as a valet lot during certain hours and as a self-park lot during other times, the site was evaluated to identify feasible modifications that would maximize the number of parking spaces under both parking options.

Overall the existing parking layout and circulation are efficient except for at the southwest corner of the parking lot. Based on the City of Mountain View parking requirements, Hexagon recommends

changes to the existing site plan that will increase the on-site parking supply to 152 spaces with the proposed hotel expansion. Figure 1 shows a scaled plan of the recommended new layout of the parking areas when operated as a self-parking lot. A second plan was developed that shows valet parking usage of the proposed new parking layout to quantify the maximum parking capacity with valet parking. Figure 2 shows that up to 178 vehicles could be parked in the lot when valet parking is implemented.

It should be noted, however, that the total parking demand is expected to exceed the self-park lot capacity of 152 spaces only on weekend dates with occupancy of at least 95 percent. Historical occupancy data for the Hilton Garden Inn provided by the Shashi Group shows that over the past 22 months (between August 2014 and May 2016), the hotel was nearly full (at or above 95 percent occupancy) only about one of every five days on weekends. Therefore, it is expected that valet parking would be needed only occasionally on weekends.

## Conclusions

The parking supply with the recommended new parking layout (152 spaces) would be less than the City of Mountain View's Zoning Code requirements outside the North Bayshore Precise Plan Area (255 spaces). Based on national average hotel parking rates published by ITE, a 200-room hotel could be expected to have a peak parking demand of 240 spaces. However, based on surveys at the existing Hilton Garden Inn and the City's parking requirements for restaurants, it is estimated that the total peak parking demand would be only 149 spaces on weekdays and 160 spaces on Saturdays. These are conservative (high) estimates as they assume new hotel restaurant would attract its own clientele who are not hotel guests.

The previous estimates assume 100 percent occupancy of the expanded hotel. However, the total parking demand is expected to exceed the parking lot capacity of 152 spaces only on weekends with occupancy at or above 95 percent. Shashi plans to implement valet parking on weekend nights when the hotel occupancy is expected to be high in order to accommodate any excess parking demand above the normal parking lot capacity. Based on historical hotel occupancy data provided by the Shashi Group, it is expected that valet parking would be needed only occasionally on weekends. With valet parking, the parking lot could accommodate up to 178 vehicles, which would be more than sufficient to accommodate the projected overall parking demand for the proposed hotel and a traditional fine-dining type restaurant. The shared parking analysis presented in this report is based on a traditional sit-down restaurant without late-night dining hours. Additional analysis may be required if the proposed new hotel restaurant differs from this model.

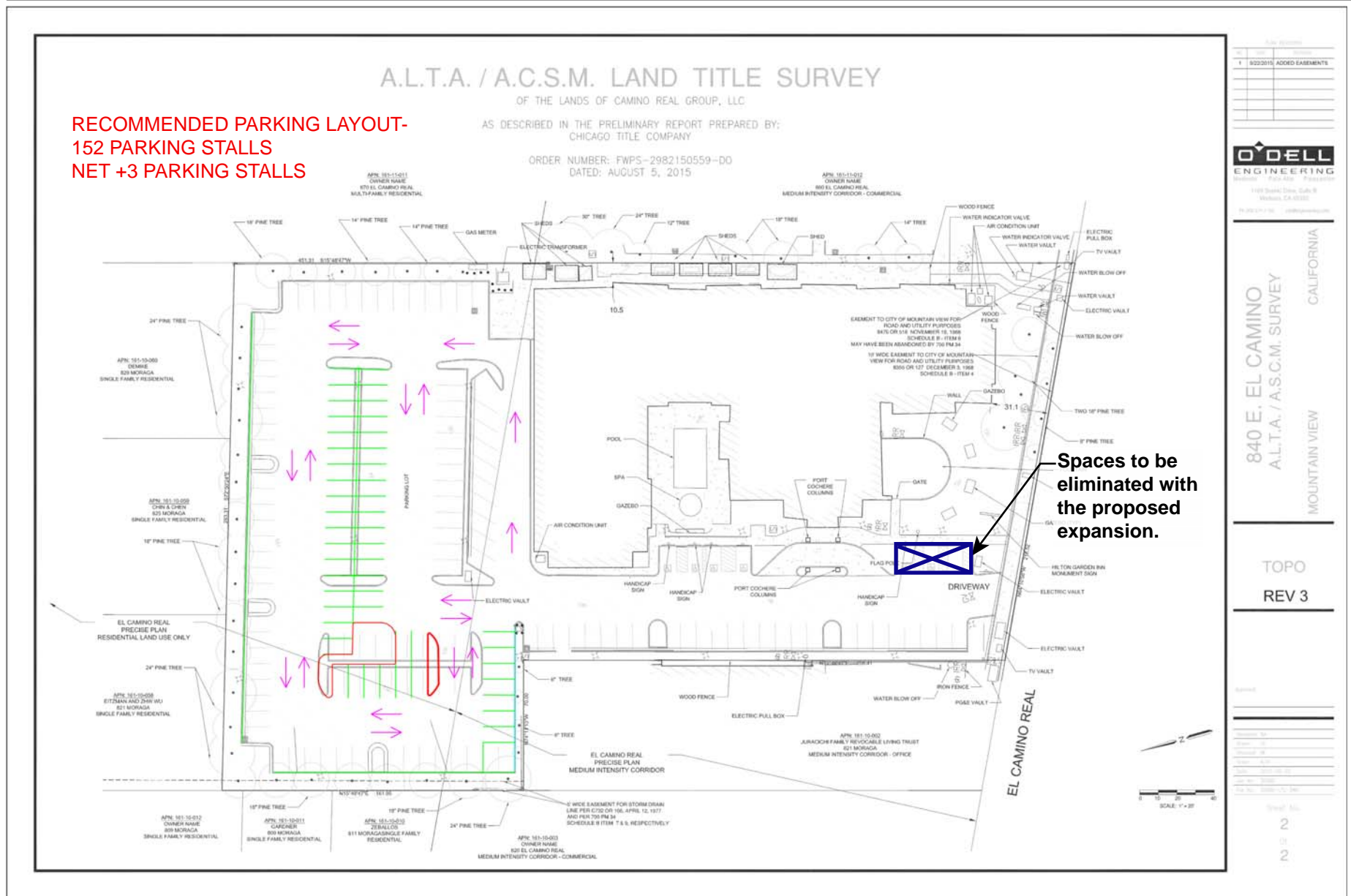


Figure 1  
Recommended New Parking Layout for Self-Parking Lot



## PARKING DEMAND ESTIMATES FOR THE PROPOSED EXPANSION

This section outlines the process for estimating the parking demand for the proposed hotel expansion. Estimates for each of the individual components of the parking demand are described below, and the total estimated peak demand is summarized in **Table 4**.

### EMPLOYEES

The number of hotel employees was assumed to increase proportionally to the hotel expansion – existing housekeeping and front desk employees were factored up by 25 percent when estimating future employee parking demand. Additionally, the number of food and beverage employees was assumed to increase from two per shift to eight per shift to account for the increased restaurant capacity. The hourly variation of employees on-site is shown in **Table 4**. The detailed composition of employees is documented in **Appendix B**.

#### Parking Rates

Consistent with the existing parking calculation, a parking rate of 0.25 spaces per employee was used to estimate the future parking demand for hotel and restaurant employees.

#### Estimated Parking Demand

Parking demand for hotel and restaurant employees was estimated using the assumptions described above. The peak parking demand for employee parking would be seven spaces, and would occur in the morning when the most employees are present.

### HOTEL ROOMS (GUESTS AND VISITORS)

The proposed hotel expansion would add 40 guest rooms to the existing 160 rooms, yielding a total of 200 hotel rooms. According to the proposed site plan, the expansion would mainly occur in the building addition at the existing patio area. With the expansion, the types of hotel guests are expected to be similar to their existing guests.

#### Parking Rates and Time-of-Day Variations

Since the expanded hotel is anticipated to host similar types of guests and visitors as current conditions, it is assumed that the travel and parking pattern would also remain the same. Therefore, the existing parking rates for hotel rooms were used to develop estimates for the proposed 200-room hotel. Based on information shown in **Table 3**, the peak parking rate would be 0.68 spaces per occupied room. (The rates calculated from the counts on the other three days are all less than 0.60 spaces per occupied room.) To be

conservative, this study used the highest observed parking rate of 0.68 to estimate the parking demand generated by guests and visitors of the expanded 200-room hotel.

### Estimated Parking Demand

Using the peak rate and time-of-day variations in **Table 3**, the peak parking demand for the expanded hotel with full occupancy was estimated to be 137 spaces, occurring between 11:00 pm and midnight. Detailed hourly demand estimates are presented in **Table 4**.

## RESTAURANT PATRONS

The proposed expansion would replace the existing restaurant that mainly serves internal hotel guests with a new 4,300-square foot restaurant that is envisioned to carry its own identity and brand. The proposed site plan shows that the new restaurant would be located in the building addition at the existing outdoor patio area on El Camino Real; and restaurant patrons would have access from El Camino Real and through the hotel lobby. Based on the envisioned identity and proposed site plan, it is anticipated that the proposed restaurant would generate external (non-hotel guests) parking demand during its operating hours.

### Parking Rates and Time-of-Day Variations

This study used the parking rates and time-of-day variations for Restaurant/Lounge under the broader Hotel land use category in ULI's *Shared Parking*, to estimate the parking demand generated by restaurant patrons. The recommended peak parking rate for this land use category is 10 spaces per thousand square feet (ksf), which is consistent with the parking requirement specified in the City of Mountain View Municipal Code. The time-of-day variation factors in ULI's *Shared Parking* indicate that the parking demand would peak around noon and reach approximately 70 percent between 6:00 pm to 8:00 pm. This analysis further increased the parking demand factor for the evening peak (6:00 pm to 8:00 pm) from 70 percent to 100 percent to account for the most conservative operating scenario (with highest parking demand) for the proposed restaurant. Based on information provided by the hotel management, the restaurant is expected to be closed after 10:00 pm; therefore this analysis assumed no demand would be generated by the restaurant patrons after 10:00 pm.

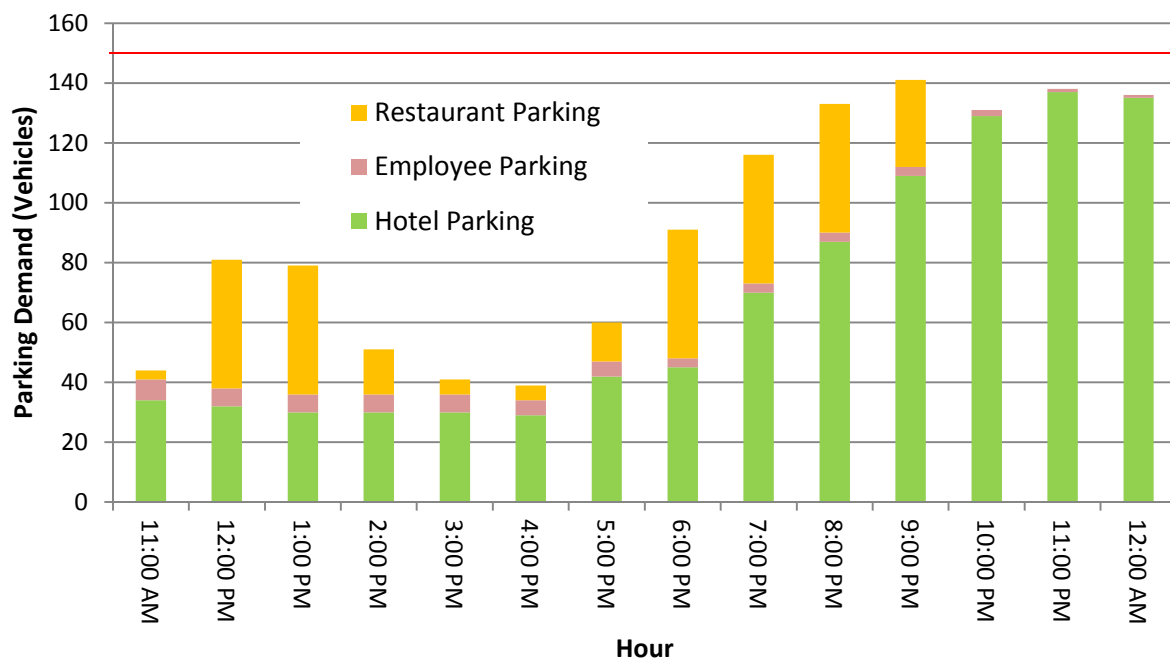
### Estimated Parking Demand

Using the proposed square footage and the ULI parking rates, it is estimated that that peak parking demand generated by the restaurant-only patrons would occur at around noon (12:00 pm to 1:00 pm) and evening peak (6:00 pm to 8:00 pm), with 43 spaces ( $10 \text{ spaces/ksf} \times 4.3 \text{ ksf} = 43$ ). The peak parking demand for the restaurant would not overlap with the peak parking demand for the hotel guests and visitors.

## SUMMARY OF ESTIMATED PARKING DEMAND

Based on demand rates and estimates for each of the individual components described above, the total estimated peak parking demand with full occupancy at the expanded Hilton Garden Inn is 141 spaces. The peak demand period is expected to occur on a weekday between 9:00 pm to 10:00 pm. **Table 4** and **Figure 1** present the summary of the aforementioned three components of the Hotel that generate parking demand and the time-of-day pattern of the parking demand. The peak parking demand for weekends was also calculated and presented in **Appendix C**.

**Figure 1 Estimated Parking Demand for the Proposed Hotel Expansion  
(at Full Occupancy)**



**TABLE 4: ESTIMATED PARKING DEMAND FOR THE EXPANDED HILTON GARDEN INN**

	Employees (ULI Shared Parking)		Hotel Guests/Visitors (Observed Rates)		Restaurant (ULI Shared Parking)		Total Parking Demand
	Base Rate <sup>1</sup>		Base Rate <sup>2</sup>	Rooms	Base Rate <sup>3</sup>	KSF	
	0.25		0.68	200	10.0	4.3	
Time	Employees	Employee Parking (A)	Hourly Variations	Hotel Parking (B)	Hourly Variations	Restaurant Parking (C)	A+B+C
11:00 AM	26	<u>7</u>	25%	34	5%	3	44
12:00 PM	24	6	23%	32	100%	<u>43</u>	81
1:00 PM	24	6	22%	30	100%	<u>43</u>	79
2:00 PM	21	6	22%	30	33%	15	51
3:00 PM	21	6	22%	30	10%	5	41
4:00 PM	19	5	21%	29	10%	5	39
5:00 PM	19	5	30%	42	30%	13	60
6:00 PM	11	3	33%	45	100% <sup>4</sup>	<u>43</u>	91
7:00 PM	10	3	51%	70	100% <sup>4</sup>	<u>43</u>	116
8:00 PM	10	3	63%	87	100% <sup>4</sup>	<u>43</u>	133
9:00 PM	10	3	80%	109	67%	29	<u>141</u>
10:00 PM	6	2	94%	129	0%	0	131
11:00 PM	2	1	100%	<u>137</u>	0%	0	138
12:00 AM	2	1	99%	135	0%	0	136
<b>Peak Parking Demand (9:00 pm - 10:00 pm)</b>							<b><u>141</u></b>

Note:

<sup>1</sup>Unit for employee parking rate is spaces/employee

<sup>2</sup>Unit for hotel guest/visitor parking rate is spaces/occupied room

<sup>3</sup>Unit for restaurant parking rate is spaces/ksf

<sup>4</sup>Hourly variations were increased from approximately 60-70 percent to 100 percent during the evening peak (6PM to 8PM) to account for highest demand

Underlined text highlights the peak parking demand for each component

Source: Fehr & Peers, 2016.

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**Technical Memorandum***Date:* August 7, 2017*To:* Carly Panos  
Assistant Planner/Community Development  
City of Mountain View  
Email: Carly.Panos@mountainview.gov*Project No.:* 138-053*From:* Nayan Amin, T.E.  
Project Manager*Jurisdiction:* Mountain View*Subject:* ***Parking Demand and Trip Generation Study for Proposed Hotel Expansion located at 840 East El Camino Real in the City of Mountain View***

The purpose of this memorandum is to present the analysis results for parking demand and trip generation at the proposed hotel expansion located at 840 East El Camino Real in the City of Mountain View. The project proposes to expand the existing 160-room hotel to add approximately 18,748 square feet, including 40 guest rooms and 4,421 square feet of leasable restaurant space. The restaurant space would be for a standalone full service restaurant. Projected parking demand for the project is based on parking demand at similar hotel uses and the City of Mountain View zoning ordinance. Parking demand estimates were used to determine whether the proposed project will require more parking than the current supply of 149 spaces. Trip generation for the proposed project was also calculated for use in a future transportation impact study.

***Parking Occupancy Survey***

TJKM surveyed parking demand at three hotel/retail/restaurant locations with a similar mix of uses and shared, free parking supply, along El Camino Real in Mountain View. Two of the three hotels surveyed were mixed use, including one (Hotel Strata) with a freestanding full-service restaurant serving breakfast, lunch, and dinner. Parking surveys were conducted near Independence Day, on Sunday, July 2, Monday, July 3, and Wednesday, July 5, 2017. Hotels tend to be busier during holiday weekends, leading to more conservative estimates of parking demand. In addition, parking demand was calculated based on total available rooms, rather than occupied rooms exclusively, to better account for local and seasonal variations in hotel occupancy. The maximum parking demand observed for each hotel is presented in **Table 1**, and raw survey results are attached in **Appendix A**. Findings from this study will assist in determining the expected parking demand for the proposed mixed-use expansion at the project site.

The following sites were selected for survey:

- Crestview Hotel, 901 E. El Camino Real, Mountain View – mixed use with adjacent small shopping center
- Hotel Strata, 93 W. El Camino Real, Mountain View – mixed use with adjacent stand-alone restaurant
- Residence Inn by Marriott Palo Alto Mountain View, 1854 W. El Camino Real, Mountain View – hotel only

**Table 1. Parking Survey Results, Maximum Parking Demand vs. ITE Rates**

Hotel	Total Rooms	Observation Period	Occupied Spaces	Parking Demand (spaces/room)
Crestview Hotel	64	11:00 PM	27	0.42
Hotel Strata	58	11:00 PM	38	0.66
Residence Inn	140	6:00 AM	90	0.65
Maximum				0.66
ITE: Hotel, weekday	-	-	-	0.89 / occupied room

The parking surveys conducted at nearby hotels indicate a maximum peak parking demand of 0.66 spaces per room, with the highest demand on Sunday night, generally in the late evening. Based on the maximum peak parking demand, it is estimated that the expanded Hilton Garden Inn would require 26 additional parking spaces for the 40 new guest rooms and restaurant space. The completed expansion would bring the total number of guest rooms to 200, for a total parking demand of 132 parking spaces. Since holiday weekends, such as Independence Day weekend, tend to result in higher hotel occupancy, parking demand will also tend to be higher. Parking demand estimates based on counts conducted on July 2 will therefore be more conservative than those conducted at less busy times of the year.

Based on rates published by ITE in *Parking Generation (4<sup>th</sup> Edition)*, the average peak period parking demand for suburban hotels is 0.89 spaces per occupied room on a weekday (Hotel, ITE Code 310). Based on ITE rates, the peak parking demand for the project would be 178 spaces at 100 percent occupancy, compared with the 149 currently proposed. Based on the proposed site plan, which indicates a total of 149 spaces, the proposed parking supply would serve an occupancy of 84 percent. TJKM understands that typical maximum average occupancy is in the range of 80 to 85 percent.

The City of Mountain View zoning ordinance requires that hotels provide one space per room, one space per two employees, and any parking required for ancillary uses. This would be one space for each 100 square feet of gross floor area for restaurants. The zoning ordinance would

require 40 new spaces for the expanded hotel (assuming no additional hotel staff) and 44 additional parking spaces (i.e.,  $4,421/100 = 44$ ) for the attached restaurant use, for a total of 84 new spaces. This requirement is higher than the hotel parking demand rate above would generally indicate. Depending on the number of restaurant trips made by hotel guests, the actual parking demand of the project may be significantly lower than the zoning ordinance would require.

The experience of TJKM is that many parking ordinances do not account for the fact that different functions within a hotel peak at different times of the day. For example, most employees are on duty during mid-day periods such as 9 a.m. to 4 p.m., when the majority of guests are off site. Also, hotels experience their peak occupancy between 11 p.m. and 6 a.m. when most guests are present. However, during this time, there are usually no restaurant patrons, either from hotel guests or even from off the premises. Therefore, there is no reason to consider separate parking for most restaurants since they can utilize the spaces that guests will occupy after the restaurant is closed. Many hotel guests are business people who have arrived from out of town, frequently by air or transit. Recent trends are for hotel guests to arrive either by carpool in rented cars or utilize taxicabs or Uber or Lyft. These trends reduce the need for parking demand.

### ***Trip Generation***

Project trips were estimated based on *Trip Generation (9<sup>th</sup> Edition)*, published by the Institute of Transportation Engineers (ITE) and the City of Mountain View TDM Trip Reduction Summary (2030 General Plan, table IV.C-1). Trips were estimated using trip generation rates for Hotel (ITE Code 310) and High-Turnover (Sit-Down) Restaurant (ITE Code 932) land uses. Trip generation rates will be used as part of the transportation impact study (TIS) to be completed in the future. Trip reductions were calculated to account for the planned TDM program and passer by trip discount as per ITE. To be conservative, TJKM assumed that no restaurant trips are made by hotel guests. The proposed project is expected to generate 858 net additional daily trips, including 66 net additional trips during the a.m. peak hour and 47 net additional trips during the p.m. peak hour. Trip generation calculations are presented in **Table 2** below.

The City has made the implementation of a TDM program a condition of approval for the proposed project. City staff will review the TDM program to determine if it is adequate to meet the 3.9% trip reduction included in this trip generation.

### ***Conclusion***

Parking surveys of nearby hotels on El Camino Real indicate that the parking requirements outlined in the City of Mountain View zoning ordinance are higher than parking demand would warrant for the project location. TJKM concludes that the required parking supply for the



proposed project should be based ITE parking demand rates rather than zoning requirements or observations of other hotels. Based on ITE parking demand rates, the proposed parking supply would serve an occupancy of 84 percent. TJKM understands that typical maximum average occupancy is in the range of 80 to 85 percent. Based on ITE trip generation rates, the proposed project is expected to generate 858 net additional daily trips, including 66 in the a.m. peak hour and 47 in the p.m. peak hour.

**Table 2. Proposed Project Trip Generation**

Proposed Land Uses (ITE Code)	Building Area	Units	Daily		AM Peak						PM Peak					
			Rate	Trips	Rate	In %	Out %	In	Out	Total	Rate	In %	Out %	In	Out	Total
Hotel (310)	40	rooms	8.17	327	0.53	59	41	13	9	21	0.60	51	49	12	12	24
High Turnover (Sit-Down) Restaurant (ITE Code 932)	4.4	k.s.f	127.15	559	10.81	55	45	26	21	48	9.85	60	40	26	17	43
<b>Grand Total</b>				<b>886</b>				<b>39</b>	<b>30</b>	<b>69</b>				<b>38</b>	<b>29</b>	<b>68</b>
<b>TDM Measure Reduction, 3.9%<sup>1</sup></b>				10				2	1	3				1	1	2
<b>Peak Hour Pass by Trip Reduction (ITE), 43%<sup>2</sup></b>				19										11	8	19
<b>Net Total Trips</b>				<b>858</b>				<b>37</b>	<b>29</b>	<b>66</b>				<b>26</b>	<b>21</b>	<b>47</b>

**Notes:**

Source - ITE Trip Generation Manual, 9th Edition (2012).

Rates per room for hotel use; per 1,000 s.f for restaurant use.

<sup>1</sup>TDM Measure Reduction, 3.9% peak hour/1.1% daily based on City of Mountain View TDM Trip Reduction Summary.

<sup>2</sup>ITE Pass-by reduction rate of 43% for High Turnover (Sit-Down) Restaurant (ITE Code 932).



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## **Appendix A**

### **Parking Demand Survey Results**

**Crestview Hotel - 901 E El Camino Real, Mountain View, CA 94040**

Sunday 07/02/2017		Monday 07/03/2017		Wednesday 07/05/2017	
Time	Parking Occupied	Time	Parking Occupied	Time	Parking Occupied
6:00 AM	25	6:00 AM	9	6:00 AM	19
7:00 AM	23	7:00 AM	9	7:00 AM	16
8:00 AM	21	8:00 AM	11	8:00 AM	15
6:00 PM	18	6:00 PM	15	6:00 PM	22
7:00 PM	19	7:00 PM	18	7:00 PM	20
8:00 PM	14	8:00 PM	20	8:00 PM	18
10:00 PM	21	10:00 AM	23	10:00 AM	16
<b>11:00 PM</b>	<b>27</b>	11:00 AM	21	11:00 AM	21
Maximum	<b>27</b>		23		22

**Hotel Strata - 93 W El Camino Real, Mountain View, CA 94040**

Sunday 07/02/2017		Monday 07/03/2017		Wednesday 07/05/2017	
Time	Parking Occupied	Time	Parking Occupied	Time	Parking Occupied
6:00 AM	20	6:00 AM	20	6:00 AM	19
7:00 AM	23	7:00 AM	20	7:00 AM	18
8:00 AM	21	8:00 AM	22	8:00 AM	21
6:00 PM	24	6:00 PM	33	6:00 PM	15
7:00 PM	21	7:00 PM	35	7:00 PM	18
8:00 PM	28	8:00 PM	29	8:00 PM	21
10:00 PM	35	10:00 AM	26	10:00 AM	22
<b>11:00 PM</b>	<b>38</b>	11:00 AM	25	11:00 AM	24
Maximum	<b>38</b>		35		24

**Residence Inn by Marriott - 1854 W El Camino Real, Mountain View, CA 94040**

Sunday 07/02/2017		Monday 07/03/2017		Wednesday 07/05/2017	
Time	Parking Occupied	Time	Parking Occupied	Time	Parking Occupied
<b>6:00 AM</b>	<b>90</b>	6:00 AM	70	6:00 AM	72
7:00 AM	85	7:00 AM	67	7:00 AM	65
8:00 AM	81	8:00 AM	60	8:00 AM	59
6:00 PM	33	6:00 PM	35	6:00 PM	36
7:00 PM	35	7:00 PM	45	7:00 PM	45
8:00 PM	39	8:00 PM	55	8:00 PM	51
10:00 PM	71	10:00 AM	62	10:00 AM	70
11:00 PM	86	11:00 AM	70	11:00 AM	78
Maximum	<b>90</b>		70		78

## CITY OF MOUNTAIN VIEW MUNICIPAL CODE REQUIREMENTS

The City of Mountain View Municipal Code lists the number of required parking spaces for different types of development which are summarized in Chapter 36.32.50. **Table 5** presents the number of parking spaces required per the City of Mountain View Municipal Code. As shown in the table, the proposed 149 spaces for the expanded hotel would be 107 spaces less than the required 256 spaces (if no shared reduction is applied).

**TABLE 5: PARKING SPACE REQUIREMENT PER CITY OF MOUNTAIN VIEW MUNICIPAL CODE**

Land Use	Quantity	Unit	Parking Ratio	Unit	Parking Requirement
Hotel - Rooms	200	Rooms	1.00	space/room	200
Hotel - Employees	26	Employees	0.50	space/employee	13
Restaurant	4.3	KSF	10.00	space/ksf	43
<b>Total Parking Demand</b>					<b>256</b>

Source: Fehr & Peers, 2016.

It should be noted that the code requirements do not account for site-specific parking characteristics as those measured during the parking surveys. Chapter 36.32.70 also specifies that for parking facilities that are established and operated by multiple uses, parking requirements may be reduced upon determination by the planning commission if justified by an independent parking demand study such as the shared parking analysis detailed in this memorandum.

## INSTITUTE OF TRANSPORTATION ENGINEERS (ITE)

Institute of Transportation Engineers (ITE) has also published an information report, *Parking Generation, Fourth Edition (2010)* that can be used to estimate parking demand of a development. The documents is based on parking demand studies submitted to ITE by public agencies, consulting firms, universities, and colleges; developers, associations, etc.

The parking demand for the proposed expansion estimated using the Hotel – Suburban land use category (Land Use 310) is 161 spaces on a weekday and 240 spaces on Saturday. Studies for this land use category in ITE include the parking demand generated by the supporting facilities including restaurants, meeting/banquet space and retail space. However, all previous study sites submitted to ITE did not specify the presence or the level of activities of the supporting facilities. Therefore, it would be difficult to determine the actual demand associated with hotel rooms separated from the demand generated by the supporting facilities.

## SUMMARY AND CONCLUSION

The estimated peak parking demand generated by the proposed hotel expansion and the new restaurant, using a conservative set of assumptions, would occur on weekday evening between 9:00 pm and 10:00 pm and would be 141 spaces. The hotel would provide sufficient parking for all proposed uses on the site with 149 spaces.

If a shortfall would occur during special occasions (i.e. events, holidays, etc.), the hotel management could consider implementing valet parking service. Valet parking would utilize the aisle space between parking stalls. Assuming that each valet parking space is 20 feet long and 9 feet wide, the 230-foot aisle on the northern end of the parking lot can accommodate 11 valet parking spaces; the 129-foot parking aisle on the west side of the parking lot can accommodate six (6) valet parking spaces; the 114-ft parking aisle on the east side of the parking lot can accommodate five (5) valet parking spaces; and the center parking area can accommodate an additional six (6) spaces in the east-west direction and four (4) spaces in the north-south direction. As a result, the implementation of valet service would add up to 32 parking spaces to the proposed parking supply of 149 spaces and increase the parking supply to 181 spaces. A recommended valet parking layout is shown in **Figure 2**.

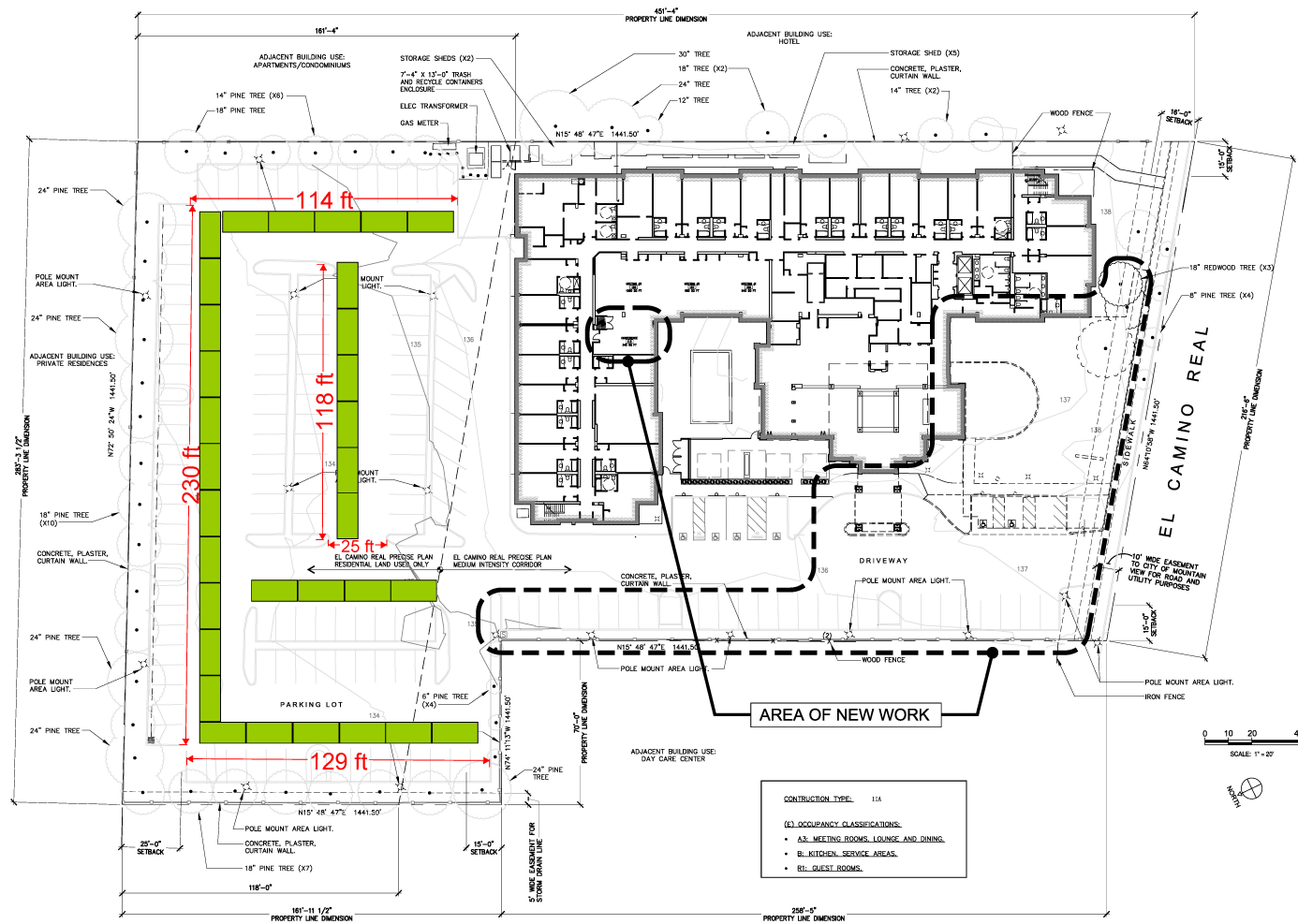


Figure 2  
Recommended Valet Parking Layout