7 Alternatives

7.1 Introduction

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, environmental impact reports (EIRs) are required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (14 CCR 15126.6[a]). This alternatives analysis is prepared in support of CEQA's goals to foster informed decision making and public participation (14 CCR 15126.6[a]). An EIR is not required to evaluate the environmental impacts of alternatives at the same level of detail as the proposed project, but it must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project.

The alternatives analysis is required even if the alternatives "would impede to some degree the attainment of the project objectives or would be more costly" (14 CCR 15126.6[b]). An EIR must evaluate "only those alternatives necessary to permit a reasoned choice" (14 CCR 15126.6[f]) and does not need to consider "every conceivable alternative" to a project (14 CCR 15126.6[a]). The alternatives evaluated should be "potentially feasible" (14 CCR 15126.6[a]), but inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision makers for a given project who must make the necessary findings addressing the feasibility of alternatives for avoiding or substantially reducing a project's significant environmental effects (California Public Resources Code, Section 21081; see also 14 CCR 15091).

This chapter describes the project alternatives selected for analysis, evaluates the environmental impacts associated with them, and compares the impacts with those of the 123 Independence Drive Residential Project (proposed project). This chapter also identifies those alternatives considered by the City of Menlo Park (City) but not carried forward for detailed analysis and the basis for the City's decision to omit those alternatives from the detailed analysis.

In conformity with CEQA, the purpose of this analysis is to focus on alternatives that are potentially feasible, and that would avoid or substantially lessen any of the significant effects of the project. The analysis in the Environmental Analysis, Sections 4.1 through 4.15, finds that the proposed project would not result in any significant and unavoidable impacts. Thus, this analysis discusses whether the project alternatives could reduce any of the project's impacts that require mitigation to bring the impact to a less than significant level.

7.2 Project Objectives

As described in Chapter 3, Project Description, the overarching intention of the proposed project is to deliver a mix of housing types that would enhance the environment of the Bayfront Area and balance the existing office uses as set forth in the City's General Plan. More specifically, the objectives for the proposed project are to do the following:

- Provide a mix of housing types.
- Help the City and region achieve a better jobs/housing ratio by replacing office space with housing.

- Provide a pedestrian connection between Constitution Drive and Independence Drive to improve pedestrian circulation in the area.
- Alleviate traffic by providing housing close to a jobs center and public transit such as buses and shuttles.
- Develop the site at a sufficient density and intensity to provide the City with community benefits, including affordable housing.
- Provide enough market-rate residential units to have an economically viable and feasible project.
- Provide for-rent and for-sale affordable housing, where the for-sale affordable housing is organized to permit the use of tax-exempt bond financing.
- Support the City's sustainability goals by complying with the Building Energy Efficiency Standards in the California Building Code (Title 24, Parts 6 and 11) and local energy efficiency requirements and contributing to reduced mobile emissions by siting residential uses in a job-rich area.
- Provide residential and recreational uses in the Bayfront area consistent with the City's General Plan policies that promote residential development in the area.

7.3 Summary of Project Alternatives

7.3.1 Development of Project Alternatives

In developing the project alternatives evaluated in this EIR, the EIR preparers worked with city staff to explore various modifications to the project that could reduce environmental effects while responding to the project objectives and reflecting any suggestions for project alternatives that were provided in the public comments received in response to the Notice of Preparation. The analysis throughout this EIR does not identify any significant and unavoidable impacts that would result from the proposed project. Thus, the effort to develop project alternatives focused on reducing the project's impacts that would be reduced to a less than significant level through implementation of mitigation measures.

7.3.2 Alternatives Considered but Rejected

In addition to the alternatives selected for additional analysis, the following alternatives were initially considered but rejected from further consideration. The CEQA Guidelines provide reasons to eliminate potential alternatives from detailed consideration in an EIR can include (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts. Factors that may be considered to determine if an alternative is feasible include site suitability, economic viability, and general plan consistency. The following alternatives were preliminarily considered but rejected from further evaluation for the reasons described below.

1. **Off-site Alternative:** Under this potential alternative, the proposed project would be developed on another site within the city. If the project were located outside of the Bayfront Area, the Off-site Alternative would not meet the goals of the ConnectMenlo General Plan Update of redeveloping much of the Bayfront Area to support new mixed-uses and increase available housing within the City of Menlo Park. If the project were located on another site within the Bayfront Area, the Off-site Alternative would provide the same contribution to achievement of the ConnectMenlo goals for redevelopment of the Bayfront Area, but would not be expected to reduce or avoid any of the project's potentially significant effects because this alternative would result in similar amount of air pollution and noise within the same general area as the proposed project, would be developed in an area considered sensitive for cultural resources and with

similar geologic (including grounwater) and paleontological conditions as the project site, and would likely require demolition of existing structures which could contain hazardous materials. Additionally, if the proposed project were to be developed at an alternative site, the existing site office and industrial buildings onsite would remain in place which would further not contribute to the ConnectMenlo goals for redevelopment of the Bayfront Area. Therefore, this alternative was not further considered or evaluated in this EIR.

2. **All Commercial Option Alternative:** Under this alternative, the project site would be constructed entirely with commercial land uses. This alternative was rejected from further consideration because this alternative would not achieve the basic project objectives related to developing a residential project, would not be consistent with the ConnectMenlo goals to increase residential uses within the Bayfront Area, would result in greater environmental effects than the proposed project because it would not contribute to a better jobs/housing balance and increases in affordable housing that could help reduce vehicle miles traveled (VMT), would result in greater air pollutant emissions, greenhouse gas emissions, and noise associated with VMT, and would not reduce impacts associated with biological resources, cultural resources, and hazards and hazardous materials.
3. **Reduced Parking Alternative:** This alternative would consist of redeveloping the project site with the same amount of apartments and townhomes as under the proposed project but with 137 fewer parking spaces. This alternative was initially considered to evaluate whether it could achieve a greater reduction in VMT than is realized under the proposed project. The VMT reduction for reduced parking is calculated using the following California Air Pollution Control Officers Association (CAPCOA) equation to compare the proposed parking ratio against the ITE parking demand rate:

$$\% \text{ VMT Reduction} = \left| \frac{\text{Actual Parking Provision} - \text{ITE Parking Generation Rate}}{\text{ITE Parking Generation Rate}} \right| \times 0.5$$

The ITE Parking Generation rate for multi-family housing (mid-rise) uses is 1.31 spaces per dwelling unit, while the rate for multi-family housing (low-rise) is 1.21 spaces per dwelling unit. The proposed project includes a total of 552 parking spaces (including guest spaces and tandem spaces), which is 1.28 spaces per dwelling unit. This is in-between the ITE estimated demand for these uses, however the average of the ITE rates is 1.26 spaces per dwelling unit, which is slightly less than the proposed parking ratio.

CAPCOA identifies that at maximum a 12 percent VMT reduction can be realized by limiting vehicle parking on site. To achieve this, the parking rate would have to be lowered to a rate of 0.96 spaces per dwelling unit, and therefore the number of residential parking spaces would need to be reduced by 137 spaces to provide a total of 415 spaces. However, CAPCOA also notes that reducing onsite parking is more effective in areas where high quality alternative modes of travel are available. The project site is not within walking distance of a rail station and has somewhat limited bus service in terms of being able to rapidly access locations outside of the Bayfront Area.

Further, as discussed in Section 4.14, the proposed project would include implementation of a Transportation Demand Management (TDM) plan that would reduce per capita VMT for project site residents to 20.63 percent below the current average per capita VMT in the project site's transportation analysis zone. When multiple TDM measures are layered together, the effectiveness of each additional measure tends to decrease. The proposed TDM plan includes a requirement that parking for the apartment building be 'unbundled,' meaning that apartment leases would not automatically include a designated parking space. Residents who desire to lease a parking space would select to have the parking space added to their lease. Unbundling of parking encourages residents to forego a

second car or to have no car at all. Thus, a reduction in parking would not lead to substantial additional reductions in VMT compared to the proposed TDM plan.This alternative was rejected from further consideration because it would not reduce any of the project's significant impacts. As discussed in Section 4.14, implementation of the proposed Transportation Demand Management (TDM) Plan would reduce per capita VMT for project site residents to 20.63 percent below the current average per capita VMT in the project site's transportation analysis zone. Thus, the project complies with the City's threshold of reducing VMT 20 percent below the current average and the project would not result in a significant impact related to VMT. As discussed above, a parking reduction is unlikely to achieve greater reductions in VMT because the TDM plan includes unbundled parking for the apartment buildings and because there is limited access to high quality alternative modes of travel in the project area. Additionally, as discussed in Section 4.7, Greenhouse Gas Emissions, the proposed project would have a less than significant impact associated with greenhouse gas emissions. Thus, the Reduced Parking Alternative would not reduce the greenhouse gas or transportation impacts associated with the proposed project.

It is also important to consider that the City's zoning ordinance requires that new residential development provide a minimum of one parking space per dwelling unit. As stated above, the reduced parking alternative would require a maximum parking ratio of 0.96 parking spaces per dwelling unit to potentially achieve any additional reductions in VMT. A project alternative that includes a parking reduction such that the zoning ordinance requirements are not met would require the City to approve a variance from the City's development standards, which the City has no authority to require. Thus, this alternative would not be feasible within the regulatory framework under which the project is proposed.

7.4 Project Alternatives Selected for Analysis

This section provides an evaluation of the environmental effects of each alternative relative to the environmental effects of the proposed project. These conclusions are listed in the alternatives summary matrix provided at the end of this discussion.

A brief overview of each alternative selected for analysis is provided below while subsequent sections provide additional description of the alternative and present analysis comparing the impacts of each alternative to those of the proposed project.

1. **Alternative 1: No Project/No Development Alternative.** This alternative assumes no development would occur, and the site would remain in its current condition. The existing commercial buildings would remain untouched and multi-use residential buildings would not be constructed.
2. **Alternative 2: Mixed-Use Alternative.** The Mixed-Use Alternative (Alternative 2) would be similar to the originally proposed project design, but would modify the original project design to introduce a retail land use component within the project site and increase the number of dwelling units. This alternative would include demolishing existing site buildings and constructing 316 rental apartments within one 5-story building, 67 3-story townhomes, approximately 81,500 square feet of office space and 8,500 square feet of retail, a neighborhood park, common areas, and associated parking.
3. **Alternative 3: Base-level Development Alternative.** The Base-level Development Alternative would involve reduced development compared to the proposed project. This alternative would include demolition of existing site buildings, and construction of both residential apartments and townhomes, with reduced number of residential units. With less developed building space, this alternative would also allow for increased open space compared to the proposed project.

7.4.1 No Project/No Development Alternative (Alternative 1)

CEQA requires that an EIR consider a No Project/No Development (No Project) alternative, which could be one in which no development occurs within the project site or could be one in which development consistent with the General Plan and zoning designations occurs. Given that the project site is already developed, the No Project alternative assumes the site would remain in its current condition and that no demolition or redevelopment would occur.

Aesthetics

The proposed project would not result in any significant impacts related to scenic views, visual character and compatibility with surrounding land uses, or light and glare and no mitigation measures would be required. Construction activities related to the proposed project would adhere to the regulations outlined in the City's design standards and Municipal Code, which are described in Table 4.1-1 of Section 4.1, Aesthetics.

Under the No Project Alternative, there would be no change in the land uses of the project site and no changes to existing visual conditions and visual character of the site. Thus, the No Project/No Development Alternative would avoid all changes to visual resources and the visual character of the project site relative to the existing conditions. Both the proposed project and the No Project Alternative would result in no significant adverse aesthetic effects. Thus, this alternative would have *similar* impacts as the proposed project.

However, it is noted the proposed project would replace buildings that were constructed in the 1960s with more modern architecture that meets the City's current design standards. The visual character of the project site under the proposed project would be more compatible with the surrounding properties that have already been or are in the process of being redeveloped compared to the existing conditions.

Air Quality

The proposed project would implement Mitigation Measures (MMs) 4.2a and 4.2b to reduce potentially significant impacts related to construction emissions (toxic air contaminants and particulate matter) to a less than significant level. The proposed project would result in less-than-significant impacts related to conflicts with applicable air quality plans, increases in criteria air pollutants, other emissions (including odors), and cumulative air quality impacts.

Under the No Project Alternative, no construction would occur, there would be no increase or decrease in air pollutant emissions, and there would be no change in the potential for people in the project vicinity to be exposed to toxic air contaminants. Thus, the No Project Alternative would result in no impacts to air quality and no mitigation measures would be needed. Impacts would be *less* than the proposed project.

Biological Resources

The proposed project could result in potentially significant impacts to biological resources associated with potential disturbance of bat habitat and roosting and potential disturbance to nesting birds. Implementation of MMs 4.3a and 4.3b would reduce potentially significant impacts to less-than-significant levels by requiring pre-construction surveys for bats and nesting birds as well as measures to ensure that disturbance of bat roosts is avoided. The project would require removal of all 29 Heritage Trees within the project site. These would be replaced at a 1:1 ratio as required by the City's Heritage Tree Ordinance in effect at the time that the project's Preliminary Application was submitted. Thus the project would have a less than significant impact related to consistency with local ordinances for the protection of biological resources.

No construction would occur under the No Project Alternative and therefore no adverse effects to biological resources would occur. There would be no potential for nesting birds or bat habitat to be disturbed and no heritage trees would be removed. Therefore, the No Project Alternative would result in *fewer* biological resources impacts compared to the proposed project.

Cultural Resources

The proposed project site is in the Bayfront Area which has been identified as archaeologically sensitive. While there are no archaeological resources, historic resources, or human remains known to be present within or adjacent to the project site, it is possible that resources could be discovered below the ground surface during project construction. If that were to occur, a significant impact to cultural resources could occur and the project could contribute to the cumulative loss of cultural resources in the project region. Through implementation of MMs 4.4a and 4.4b any resources that may be uncovered during construction would be required to be evaluated for significance and any recommended treatment measures would be required to be implemented, and therefore the impact to cultural resources would be reduced to a less-than significant level.

Under the No Project Alternative, there would be no change in the project site, no ground-disturbance associated with project construction would occur, and the current structures would remain untouched. This alternative would result in no impacts to cultural resources and would not create a potential for discovery of subsurface resources. Impacts to cultural resources would be *less* than under the proposed project.

Energy

The proposed project would increase consumption of electricity as well as petroleum-based fuels during construction and operation but would comply with all state and local energy laws, resulting in less than significant impacts to energy consumption during construction and operation. The proposed project would not contribute to wasteful or inefficient use of energy, significant additional demand on energy resources or services, or conflict with current energy-related plans, therefore no mitigation is necessary.

Under the No Project Alternative, there would be no change in the project site's existing uses and associated energy consumption. Development under the proposed project would be subject to current building code standards, which require much greater energy efficiency than the existing buildings on site. Thus, while the No Project Alternative would not alter existing conditions, the proposed site redevelopment would result in improved energy efficiency and reduced wasteful energy consumption compared to the No Project Alternative. Because this alternative would not realize energy savings resulting from new building development, the No Project Alternative would result in *greater* impacts associated with energy usage than the proposed project.

Geology, Soils, Seismicity, and Paleontological Resources

The proposed project would not exacerbate the potential for seismic ground shaking or seismic-related ground failure to occur at the project site or in the vicinity and thus would result in no impacts associated with seismic activity. The project could result in potentially significant impacts associated with subsidence on nearby properties to occur during dewatering activities to support excavation, construction of below-grade parking, and installation of the foundation for the apartment building. The project could also result in potentially significant impacts associated with geological and soil stability associated with placement of fill material at the site. MMs 4.6a and 4.6b would lessen these potential impacts to less-than-significant levels by ensuring that design of the dewatering system avoids offsite subsidence, and that fill placement occurs sufficiently prior to construction to allow for settlement.

Although no paleontological resources are known to be present at the project site, such resources could be encountered during excavation activities. MM 4.6c which is the same as MM CULT-3 in the ConnectMenlo EIR, would lessen this potential impact to a less-than-significant level by ensuring that any potential paleontological resources encountered during construction are appropriately evaluated and recovered when necessary to avoid significant impacts. Would

The No Project Alternative would involve no construction activities at the project site which would avoid all potential impacts to geology, soil, or paleontological resources that are present. Impacts related to subsidence on offsite properties, soil settlement, and paleontological resources would be *l*ess under the No Project Alternative because no construction/earth-moving activities within the project site would take place, which would avoid the potential for adverse geologic and soil impacts or discovery of paleontological resources to occur. Overall, impacts under the No Project Alternative are considered to be *l*ess compared to the proposed project.

However, it is noted that existing buildings within the project site were constructed between 1961 and 1968 are not compliant with the current California Building Code (CBC), which includes construction requirements and standards for earthquake/seismic safety. The proposed project would develop new site structures in compliance with the current CBC, which would reduce the potential for geologic hazards to adversely affect occupants of site buildings.

Greenhouse Gas Emissions

The proposed project would result in less than significant impacts related to greenhouse gas (GHG) emissions during project construction and operation. As discussed in Section 4.7, Greenhouse Gas Emissions, the project incorporates green building and sustainability measures to minimize GHG emissions consistent with applicable regulatory requirements.

Under the No Project Alternative, no construction would occur, and the No Project Alternative would neither increase nor decrease emissions of GHGs. The existing buildings, which are not as energy efficient as the project, would remain and would continue to use natural gas. In addition, no housing would be added to a jobs-rich area and no TDM plan would be implemented; thus the reductions in VMT associated with the proposed project would not be realized under the No Project Alternative. The No Project Alternative would result in *greater* GHG-related impacts compared to the proposed project.

Hazards and Hazardous Materials

The proposed project would result in potentially significant impacts related to release of hazardous materials and conditions as well as handling of hazardous materials within proximity of existing schools. Implementation of MMs 4.8a, 4.8b, 4.8c, as described in Section 4.8, Hazardous and Hazardous Materials, as well as MM 4.2a, would reduce impacts to a less-than-significant level.

The No Project Alternative would not demolish any site buildings or construct new buildings. As such, the No Project Alternative does not have the potential to change the existing use, handling, and/or transport of hazardous materials nor would it have the potential to release any hazardous materials within the project site. Impacts under the No Project Alternative would therefore be *l*ess than the proposed project.

Hydrology and Water Quality

The proposed project would redevelop the project site but would have a less than significant effect on surface and groundwater quality. Compliance with federal, state, and San Mateo County regulations for pollutant control and use of Best Management Practices (BMPs) to protect water quality, the project would not result in a significant degradation of water quality during project construction or long-term operation. The proposed project would reduce the amount of impervious surface at the project site compared to existing conditions and result in less than significant impacts to groundwater supply, stormwater infrastructure, and potential increases in sediment and erosion on local waterways during construction.

Under the No Project Alternative there would be no impacts to hydrology, drainage, or water quality related to an increase in stormwater, loss of groundwater, or inadequate stormwater infrastructure because there would be no ground-disturbance or increase in pollutants at the project site. However, the proposed project would reduce the amount of impervious surfaces at the project site and implement low impact development (LID) features, which would allow for more on-site water quality treatment and groundwater recharge. Therefore, the proposed project would result in a beneficial impact to hydrology and water quality that could not be achieved under the No Project Alternative. As a result, hydrology and water quality impacts may be *greater* under the No Project Alternative because no improvements to hydrology and water quality would be achieved.

Land Use and Planning

As described in Section 4.10, Land Use and Planning, the proposed project would result in less than significant impacts related to division of an established community and conflicts with existing land use plans, policies, or regulations. Under the No Project Alternative, the project site would remain in its current condition with five single-story office/light industrial buildings. Under the ConnectMenlo General Plan Update, the project site is designated for Mixed-Use Residential land use. While administration and professional offices are allowed under the Mixed-Use Residential land use designation, light industrial uses are not permitted. As such, the No Project alternative would not be consistent with the current land use designation at the project site. Impacts under this alternative would therefore be *greater* than the proposed project, which proposes to develop the site with both for-sale and for-rent residential units.

Noise

As described in Section 4.11, Noise, a potentially significant noise impact could occur during project construction, particularly when construction activities occur outside of daytime hours. MM 4.11a identifies management practices to ensure that the construction noise is minimized, and MM 4.11b requires preparation of a construction noise control plan that includes specific noise-reducing construction practices to ensure that all of the City's construction noise performance standards are met. Section 4.11 also demonstrates that construction would not result in excessive groundborne noise or vibration, and that project operation would not generate a substantial temporary or permanent increase in ambient noise levels. Under the No Project Alternative, the project site would remain in its current condition and there would be no changes in the ambient noise environment. Impacts under this alternative would therefore be *less* than the proposed project.

Population, Employment, and Housing

As described in Section 4.12, Population and Housing, the proposed project would result in less than significant impacts related to unplanned population growth and displacement of people and housing. Under the No Project

Alternative, no new residences would be developed at the project site and existing office/light industrial uses would remain in place. This alternative would not result in any impacts associated with unplanned growth and displacement of people/housing, thus the No Project Alternative would result in *similar* impacts to the proposed project. However, it is noted that the No Project Alternative would not further the ConnectMenlo goals for redevelopment of the Bayfront Area with mixed-uses, including planned growth and residences within the project area.

Public Services and Recreation

As discussed in Section 4.13, Public Services and Recreation, the proposed project would result in less than significant impacts related to the provision of new or physically altered police, fire, school, parks, or other public facilities as well as recreational resources. Under the No Project Alternative, no new uses would be introduced at the project site and the current uses would continue to operate under existing conditions, which are already served by public services and recreational resources within the City. Compared to the proposed project, which would increase public service demands through the introduction of new residences in the project area, the No Project Alternative would result in *l*ess impacts.

Transportation

Project impacts related to transportation would be less than significant. As described in Section 4.14, Transportation, the project would include a TDM plan that would reduce project-generated VMT per resident by 20.63 percent compared to the current average VMT for the project site transportation analysis zone. Thus, the project would comply with the City's VMT threshold of reducing VMT by at least 15 percent per capita compared to the current average.

Under the No Project Alternative, the project site would remain in its existing condition and there would be no change in the average per capita VMT in this transportation analysis zone. The proposed project would generate 870 new daily trips compared to the existing uses at the project site, thus while the total VMT would increase as a result of the project, the threshold of significance for this impact is the VMT per capita, which would decrease under the proposed project. Under the No Project Alternative, no TDM plan would be implemented and there would be no change in the per capita VMT. The No Project Alternative would not result any new impacts, but it would also not realize the benefit of the VMT per capita reduction achieved under the proposed project.

Similar to the proposed project, the No Project Alternative would also result in less-than-significant impacts related to conflicts with existing circulation system plans/policies, transportation hazards, and emergency access. However, because this alternative would not achieve VMT reductions to the project site, which would be accomplished under the proposed project, the No Project Alternative would result in *greater* transportation impacts compared to the proposed project.

Tribal Cultural Resources

The proposed project site is in the Bayfront Area which has been identified as archaeologically sensitive. While there are no known tribal cultural resources within or adjacent to the project site, and no tribal consultation was requested for this project, there is a known tribal cultural resource approximately 1.5 miles away from the site, and it is possible that resources could be discovered below the ground surface during project construction. If that were to occur, a significant impact to tribal cultural resources could occur and the project could contribute to the cumulative loss of tribal cultural resources in the project region. Through implementation of MMs 4.4a, 4.4b, 4.4c and 4.15a and compliance with Health and Safety Code Section 7050.5, any resources that may be uncovered during construction

would be evaluated for significance and any recommended treatment measures would be required to be implemented, and therefore the impact to tribal cultural resources would be reduced to a less-than significant level.

Under the No Project Alternative, there would be no change in the project site; no ground-disturbance associated with project construction would occur; and the current structures would remain untouched. This alternative would result in no impacts to tribal cultural resources and would not create a potential for discovery of subsurface resources. Impacts to tribal cultural resources would be *less* than under the proposed project.

Utilities and Service Systems

The proposed project would result in an increase in demand for utilities and service systems in the Bayfront Area, however, the impacts related to water usage and infrastructure, wastewater infrastructure, stormwater management, solid waste, electrical service infrastructure, and telecommunications infrastructure would be less than significant, and no mitigation would be required. New construction would utilize the existing infrastructure and service systems, and the service providers would have capacity to meet the increased demands for service, as discussed in Section 4.15, Utilities and Service Systems.

The No Project Alternative would avoid all increases in demands for public services and utilities at the project site because no change in the current use of the site would occur. Thus, the No Project Alternative would have no impacts to utilities and service systems and impacts would be *less* than those of the proposed project.

7.4.2 Mixed Use Alternative (Alternative 2)

As previously described, the Mixed-Use Alternative would be similar to the originally proposed project design which considered demolition of existing site buildings, construction of 316 rental apartments within one 5-story building, 67 3-story townhomes, approximately 90,000 square feet of office space, a neighborhood park, common areas, and associated parking.

The Mixed-Use Alternative would modify the original project design to introduce a retail land use component within the project site and increase the number of dwelling units. This alternative would continue to include demolition of existing site buildings, construction of 316 rental apartments within one 5-story building, a neighborhood park, common areas, and associated parking. The increase in the number of residential townhomes within the project site (compared to the originally proposed project design) would be achieved by increasing building height for some of the townhome buildings. This would allow for placement of an additional single-story condominium unit above some pairs of the proposed 3-story townhomes. As a result, the Mixed-Use Alternative would provide a variety of both 3- and 4-story residential townhome/condominium buildings and construction of a total of 90 townhome/condominium for-sale units. The proportion of 1-, 2-, 3-, and 4-bedroom units would remain the same as in the proposed project, with the smaller units (1 and 2 bedrooms) located in the 4-story buildings. This alternative would also include a 90,000 square-foot building in the eastern portion of the site that supports retail land uses within the first level (approximately 8,500 square feet) together with the office lobby and approximately 81,500 square feet of office uses in the second through fourth levels. With the increased parking requirements for the additional townhomes and the retail component, a reduction in the size of the park would be required.

Aesthetics

The proposed project would not result in any significant aesthetics impacts related to scenic views, visual character and compatibility with surrounding land uses, or light and glare. Construction activities related to the proposed

project would adhere to the regulations outlined in the City's design standards and Municipal Code, which are described in Table 4.1-1 of Section 4.1, Aesthetics.

Under the Mixed-Use Alternative, proposed townhomes would include a mix of 3- to 4- level structures to accommodate an increase in available residential uses within the project site as well as an approximately 90,000 square foot building to house both retail and office space under. This option also includes a 5-story building with 316 residential apartment units.

Under the Mixed-Use Alternative, the site development would be more intense than under the proposed project because there would be increased building height in the townhome portion of the site and the eastern portion of the site would contain a single large building rather than the townhomes that would be located on that portion of the site under the proposed project, and the amount of park space and other open space would be reduced. However, each building and site landscaping would be subject to the City's design standards. Thus, the additional building intensity would not significantly alter the character of the project site and would not result in visual incompatibilities with surrounding properties. The potential for new light and glare associated with this alternative would also be similar to the proposed project. Therefore, the Mixed-Use Alternative would not result in any new aesthetic-related affects because there would be no substantial changes in the general character and compatibility of the site with the City's design standards and with surrounding properties. Impacts under this alternative would be *similar* to the proposed project.

Air Quality

The proposed project would implement MMs 4.2a and 4.2b to reduce potentially significant impacts related to air pollutant emissions during construction to a less than significant level. The proposed project would result in less-than-significant impacts related to conflicts with applicable air quality plans, increases in criteria air pollutants, other emissions (including odors), and cumulative air quality impacts.

The Mixed-Use Alternative would somewhat increase the building intensity on the project site which could increase air pollutant emissions during construction. Implementation of MMs 4.2a and 4.2b would reduce construction emissions associated with the proposed project as well as this alternative to a less than significant level.

Additionally, the Mixed-Use Alternative would add non-residential uses to the site which would increase the total daily traffic and associated air pollutant emissions during project operation. However, under either the proposed project or the Mixed-Use Alternative, the development would be consistent with the existing land use and zoning designations for the project site and would be required to project include applicable control measures from the 2017 Clean Air Plan. This would include implementing a TDM Plan and incorporating green building and sustainability measures into the building design, such as improving water and wastewater efficiency, providing electric vehicle charging stations, and constructing all-electric residential buildings per the City's Municipal Code Chapter 12.16. Since the Mixed-Use Alternative would comply with all applicable Bay Area Qir Quality Management District rules and would meet or exceed state and federal standards and/or local building codes, this alternative would not conflict with any applicable control measures from the 2017 Clean Air Plan, consistent with the proposed project. Thus, the Mixed-Use Alternative would result in *similar* air quality-related impacts compared to the proposed project.

Currently, the project area consists predominantly of office and light industrial uses with very little retail. The Mixed-Use Alternative would provide residents with the ability to walk to retail opportunities rather than drive.

Biological Resources

The proposed project could result in potentially significant impacts related to biological resources associated with bat habitat disturbance and nesting birds. Implementation of MMs 4.3a and 4.3b would reduce potentially significant impacts to a less-than-significant level by requiring pre-construction surveys for bats and nesting birds as well as measure to ensure avoidance of bat roosts.

Under the Mixed-Use Alternative as well as the proposed project, the project would demolish existing site structures and construct new buildings. As described above, the level of development between the Mixed-Use Alternative and the proposed project would generally be similar. As a result, biological resource impacts would also be expected to occur under the Mixed-Use Alternative. Implementation of MMs 4.3a and 4.3b would continue to ensure that impacts related to roosting bats and nesting birds would remain less than significant through requiring pre-construction surveys and measures to avoid disturbance of roosting bats during demolition and construction activities. Thus, the Mixed-Use Alternative, would result in *similar* biological resource impacts compared to the proposed project.

Cultural Resources

The project would result in potentially significant impacts associated with cultural resources. The project includes MMs 4.4a and 4.4b which would require completion of an Extended Phase 1 Assessment to evaluate subsurface conditions at the project site, as well as protocols to be implemented in the event of any discovery of cultural resources during project construction activities. MMs 4.4a and 4.4b would reduce potentially significant cultural resource impacts to a less-than-significant level.

Under the Mixed-Use Alternative, as well as the proposed project, the existing structures on site would be demolished and replaced with new buildings. As described above, the level of development between the Mixed-Use Alternative and the proposed project would generally be similar and would include ground-moving activities, including excavation, during construction. As a result, cultural resource impacts would also be expected to occur under the Mixed-Use Alternative. Implementation of MMs 4.4a and 4.4b would continue to ensure that impacts related to site specific and cumulative archaeological resources would remain less than significant. Thus, the Mixed-Use Alternative would result in *similar* cultural resource impacts as the proposed project.

Energy

The proposed project was determined to result in less than significant impacts with regard to energy consumption and conservation. The Mixed-Use Alternative would somewhat increase the building intensity on the project site. Compared to the proposed project, this option would reduce the residential uses by approximately six percent but would add a 90,000 square foot retail and office building to the project. The increased building intensity could increase the total amount of energy consumption during construction and operation compared to the proposed project. However, this alternative would be required to include green building and sustainability measures to ensure that energy is used efficiently. As a result, the Mixed-Use Alternative would result in *similar* energy-related impacts as the proposed project.

Geology, Soils, Seismicity, and Paleontological Resources

The proposed project would not exacerbate the potential for seismic ground shaking or seismic-related ground failure to occur at the project site or in the vicinity and thus would result in no impacts associated with seismic activity. The project could result in potentially significant impacts associated with subsidence on nearby properties to occur during dewatering

activities in support of excavation, construction of below-grade parking, and installation of the foundation for the apartment building. The project could also result in potentially significant impacts associated with geological and soil stability associated with placement of fill material at the site. MMs 4.6a and 4.6b would lessen these potential impacts to less-than-significant levels by ensuring that design of the dewatering system avoids offsite subsidence, and that fill placement occurs sufficiently prior to construction to allow for settlement.

Although no paleontological resources are known to be present at the project site, such resources could be encountered during excavation activities. MM 4.6c which is the same as MM CULT-3 in the ConnectMenlo EIR, would lessen this potential impact to a less-than-significant level by ensuring that any potential paleontological resources encountered during construction are appropriately evaluated and recovered when necessary to avoid significant impacts.

The Mixed-Use Alternative would also result in no impacts associated with seismic hazards because it would not exacerbate the potential for the project site and other properties in the vicinity to be exposed to seismic activity. Construction of the Mixed-Use Alternative would require similar amounts of ground-disturbance and excavation as the proposed project and thus this alternative would result in the same potentially significant impacts from potential subsidence on nearby properties and changes in geological and soil stability after placement of fill material at the site. Further construction of the Mixed-Use Alternative would have the same potential as the proposed project to encounter paleontological resources within the project site. Implementation of MMs 4.6a, 4.6b, and 4.6cwould ensure that impacts would be reduced to a less-than-significant level. As a result, the Mixed-Use Alternative is expected to result in *similar* geology-related impacts as the proposed project.

Greenhouse Gas Emissions

The proposed project would result in less than significant impacts related to GHG emissions. Mixed-Use Alternative would somewhat increase the building intensity on the project site. Compared to the proposed project, these options would reduce the residential uses by approximately six percent but would add a 90,000 square foot retail and office building to the project. As discussed in Section 4.7, GHG emissions from project construction would not result in a conflict with adopted GHG reduction targets and programs and would not result in an exceedance of the applicable GHG emissions thresholds. Specifically, in compliance with the City, regional, and state regulations, the proposed project would reduce landfill waste from construction debris, use low-carbon construction equipment fuel, minimize engine idling time, and plant new trees and landscaping. In addition, as required by MM 4.2b, construction vehicles of 50 horsepower or greater would be required to use Tier 4 engines to minimize diesel particulate matter emissions. These elements would serve to reduce GHG emissions during construction in compliance with adopted GHG reduction plans and strategies. Further, implementation of the TDM Plan and incorporation of green building and sustainability measures in the building design, as discussed previously, would serve to minimize GHG emissions during project operation.

Under the Mixed-Use Alternative the same or similar GHG reduction strategies would be required to be implemented. Thus, the Mixed-Use Alternative is expected to result in *similar* GHG-related impacts as the proposed project.

Hazards and Hazardous Materials

The proposed project would result in potentially significant impacts related to release of hazardous materials, the presence of hazardous conditions, and handling hazardous materials within proximity to existing schools. The project includes implementation of MMs 4.8a, 4.8b, 4.8c, further described in Section 4.8, and MM 4.2a, which would reduce impacts to a less-than-significant level.

The Mixed-Use Alternative would result in demolition of existing site structures and construction of new buildings within the project site. As such, the potential to release hazardous materials and handle hazardous materials within proximity to schools exists under the proposed project and this alternative. Implementation of MMs 4.8a, 4.8b, 4.8c, and 4.2a would be required to ensure that impacts would be reduced to a less-than-significant level by requiring surveys to identify the presence of hazardous materials/conditions and by implementing minimum specifications for construction equipment to reduce TAC emissions. Therefore, the Mixed-Use Alternative is expected to result in *similar* hazardous material-related impacts as the proposed project.

Hydrology and Water Quality

The proposed project would result in less than significant impacts to groundwater supply, stormwater infrastructure, and potential increases in sediment and erosion on local waterways during construction. Mixed-Use Alternative would somewhat increase the building intensity on the project site. Compared to the proposed project, this option would reduce the residential uses by approximately six percent but would add a 90,000 square foot commercial building to the project. With this increased building intensity, there would be a decrease in the amount of open space within the project site, thus this alternative would result in an increase in impervious surface compared to the proposed project. However, with the use of bioretention ponds and flow-through planters as described for the proposed project, water quality and stormwater impacts would remain less than significant. Thus, the Mixed-Use Alternative is expected to result in *similar* impacts related to groundwater supply, stormwater infrastructure, and potential increases in sediment and erosion on local waterways during construction.

Land Use and Planning

As described in Section 4.10, the proposed project would result in less than significant impacts related to division of an established community and conflicts with existing land use plans, policies, or regulations. Under this alternative, the project site would be developed with a mix of residential, office, and retail uses. The land use and zoning designations assigned to the project site are Mixed Use Residential . These designations provide for higher density housing to meet the needs of all income levels and allows mixed use developments with integrated or stand-alone supportive sales and service uses and uses that are consistent with the Office Designation. Therefore, the Mixed-Use Alternative would continue to be consistent with land use and zoning designations established for the project site. Further, the Mixed-Use Alternative would not physically divide any existing communities. As a result, the Mixed-Use Alternative would result in *similar* land use impacts as the proposed project.

Noise

As described in Section 4.11, MMs 4.11a and 4.11b would be implemented to reduce the potentially significant noise impact associated with construction of the proposed project to a less-than-significant level. The Mixed-Use Alternative would require construction activities with a similar intensity and duration as the proposed project and thus would have the same potential for significant construction period noise impacts, requiring implementation of MMs 4.11a and 4.11b. The Mixed-Use Alternative would also not cause significant groundborne noise or vibration. As discussed in the Transportation section below, the Mixed-Use Alternative would generate approximately 936 more daily traffic trips than the proposed project, which could slightly increase roadway noise in the project area compared to the proposed project. However, the impacts would be expected to remain less than significant because these additional trips would not be substantial in relation to existing traffic levels. The Mixed-Use Alternative would result in similar noise levels associated with heating and air conditioning equipment for the onsite buildings. Rooftop mechanical equipment would be shielded to ensure that the associated noise levels comply with the Menlo

Park Municipal Code threshold of 50 dBA L_{eq} at 50 feet. Operational noise impacts under the Mixed-Use Alternative would therefore be *similar* to the proposed project.

Population, Employment, and Housing

As described in Section 4.12, the proposed project would result in less than significant impacts related to unplanned population growth and displacement of people and housing.

Under the Mixed-Use Alternative, the project site would be developed with approximately 90 townhome units in a mixture of 3- and 4-story buildings, a 316-unit apartment building, and an approximately 90,000 square foot building that would support office and retail uses. This alternative would slightly reduce the number of dwelling units constructed onsite while providing additional employment and retail opportunities compared to the proposed project. The employment opportunities would increase the potential for the project to result in indirect growth, however the Mixed-Use Alternative would be consistent with the land use and zoning designations applied to the project site and thus would not result in unplanned population growth. There are no existing residential units within the project site and the Mixed-Use Alternative would not result in displacement of people and/or housing. This alternative would be expected to result in *similar* population, employment, and housing impacts as the proposed project.

Public Services and Recreation

The proposed project would result in less than significant impacts related to the provision of new or physically altered police, fire, school, parks, or other public facilities. As described above, the Mixed-Use Alternative would slightly reduce the number of new residential units within the Bayfront Area and would allow for increased office and retail uses to support employment and commercial opportunities. Overall there would a higher intensity use at the site and an increase in the number of people (residents, employees, and visitors) within the project site. This would increase the demand for public services. However, the ConnectMenlo General Plan Update anticipated buildout of up to 2.3 million square feet of non-residential space in the Bayfront Area, and the Mixed-Use Alternative would be consistent with the project site's land use and zoning designations. Thus this alternative would be consistent with the assumptions in the ConnectMenlo EIR, which found that there is sufficient facilities, staffing, and funding to meet the public services and recreation demands associated with buildout of the General Plan. Therefore, the public service and recreation impacts under the Mixed Use Alternative would be *similar* to those of the proposed project.

Transportation

Project impacts related to transportation would be less than significant. As described in Section 4.14, the project would include a TDM plan that would reduce project-generated VMT per resident by 20.63 percent compared to the average VMT for the project site transportation analysis zone.

. Under the Mixed-Use Alternative, the project site would be developed with approximately 90 townhome units, 316 apartments, and a 90,000 square foot office and retail building. The retail uses would be expected to be local-serving given the small size of the retail space, which would contribute to VMT reductions by making it possible for residents and employees in the area to bicycle or walk to the retail, and to make a pass-by stop at the retail location while already driving to another destination. Under the Menlo Park Municipal Code, a TDM plan demonstrating that the project would attain a minimum 20percent reduction in daily trips and VMT would be required. Thus, it is expected that the Mixed-Use Alternative would have *similar* impacts associated with VMT as the proposed project.

The reduction in residential units and addition of non-residential space to the project site would alter the daily trip generation as well as AM and PM peak trip volumes compared to the proposed project, as shown in Table 7-1.The Mixed-Use Alternative would result in more than twice as many total daily trips, almost four times as many AM peak hour trips, and more than three times as many PM peak hour trips. However, the additional trips associated with this alternative would not be expected to cause additional vehicle queuing or emergency access deficiencies and impacts would remain *similar* to those of the proposed project.

Table 7-1. Mixed-Use Alternative Project Trip Generation

Land Use	ITE Code	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
Research and Development Center	760	per TSF	11.08	0.84	0.19	1.03	0.16	0.82	0.98
Manufacturing	140	per TSF	4.75	0.52	0.16	0.68	0.23	0.51	0.74
Multifamily Housing (Mid-Rise) - buildings 4 to 10 stories in height	221	per DU	4.54	0.09	0.28	0.37	0.24	0.15	0.39
Multifamily Housing (Low-Rise) - buildings 3 stories or less in height	220	per DU	6.74	0.10	0.30	0.40	0.32	0.19	0.51
Strip Retail Plaza (<40k)	822	per TSF	54.45	1.42	0.94	2.36	3.30	3.30	6.59
General Office Building	710	per TSF	10.84	1.34	0.18	1.52	0.24	1.20	1.44
Trip Generation of Existing Uses									
119 Independence Drive - Tree Care	760	12.996 TSF	144	10	2	12	2	11	13
123-25 Independence Drive - Defense Contractor	760	12.335 TSF	137	10	2	12	2	10	12
127 Independence Drive - Medical Device R&D	760	13.822 TSF	153	12	3	15	3	11	14
130 Constitution Drive - Defense Contractor	760	25.528 TSF	283	22	5	27	4	21	25
1205 Chrysler Drive - Energy Company	140	39.302 TSF	187	20	7	27	9	20	29
		Existing Uses Subtotal	904	74	19	93	20	73	93
Trip Generation of Mixed-Use Alternative									
Residential - Multifamily (Apartments) - 5 stories in height	221	316 DU	1,435	27	90	117	75	48	123
Residential - Multifamily (Townhomes) - 3 stories in height	220	90 DU	607	9	27	36	29	17	46
Retail Uses	822	8.500 TSF	463	12	8	20	28	28	56

Table 7-1. Mixed-Use Alternative Project Trip Generation

Land Use	ITE Code	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Office Uses	710	81.500 TSF	883	109	15	124	20	97	117
Proposed Project Subtotal			*3,388*	*157*	*140*	*297*	*152*	*190*	*343*
TDM Plan: 20 percent Reduction[2]			*-678*	*-31*	*-28*	*-59*	*-30*	*-38*	*-69*
Proposed Project Total			*2,710*	*126*	*112*	*238*	*122*	*152*	*274*
Total Net Trip Generation (Alternative – Existing)			**1,806**	**52**	**93**	**145**	**102**	**79**	**181**
Total Net Proposed Project Trip Generation (Proposed – Existing) per Table 4.14-2			**870**	**-43**	**81**	**38**	**70**	**-17**	**53**

Source: ITE 2021
Notes: TSF = thousand square feet; DU = dwelling unit
1 Trip rates from Trip Generation, 11th Edition, Institute of Transportation Engineers, 2021.
2 Consistent with the City of Menlo Park City Ordinance 1026, a 20 percent reduction was applied to account for the proposed TDM plan that the project would be required to provide. The TDM would be expected to achieve the required minimum of 20 percent reduction of daily and peak hour vehicle trips.

Tribal Cultural Resources

The proposed project site is in the Bayfront Area, which has been identified as archaeologically sensitive. While there are no known tribal cultural resources within or adjacent to the project site and no tribal consultation was requested for this project, there is a known tribal cultural resource approximately 1.5 miles away from the site and it is possible that resources could be discovered below the ground surface during project construction. If that were to occur, a significant impact to tribal cultural resources could occur and the project could contribute to the cumulative loss of tribal cultural resources in the project region. Through implementation of MMs 4.4a, 4.4b, and 4.15a and compliance with Health and Safety Code Section 7050.5, any resources that may be uncovered during construction would be evaluated for significance and any recommended treatment measures would be required to be implemented, and therefore the impact to tribal cultural resources would be reduced to a less-than significant level.

Under the Mixed-Use Alternative, as well as the proposed project, the existing site structures would be demolished and replaced with new buildings. As described above, the level of development between the Mixed-Use Alternative and the proposed project would generally be similar and would include ground-moving activities, including excavation, during construction. As a result, the potential for discovery of tribal cultural resources under the Mixed-Use Alternative would be similar to this potential discovery under the proposed project. Implementation of MMs 4.4a, 4.4b and 4.15a would continue to ensure that site specific and cumulative impacts associated with tribal cultural resources would remain less than significant. Thus, the Mixed-Use Alternative would result in *similar* tribal cultural resource impacts as the proposed project.

Utilities and Service Systems

The proposed project would result in less than significant impacts associated with utility infrastructure, water supply, wastewater treatment capacity, generation of solid waste, and compliance with solid waste regulations.

The Mixed-Use Alternative would result in a similar level of development compared to the proposed project because it would develop six percent fewer residential units and add 90,000 square feet of office and retail space. This alternative would not require new or expanded infrastructure, water supply and water treatment capacity,

wastewater treatment capacity, and solid waste disposal capacity. Thus, the Mixed-Use Alternative would result in *similar* utility-related impacts as the proposed project.

7.4.3 Base-level Development Alternative (Alternative 3)

The Base-level Development Alternative would involve reduced development compared to the proposed project because it would not include any bonus-level development. Specifically, this alternative would include demolishing existing site buildings and constructing a 4-story apartment building (155,486 square feet) that would provide 179 residential units, an at-grade (one level) parking structure accommodating 206 parking spaces, and 66 3-story residential townhomes with private garages. With less building space, this alternative would also allow for increased open space compared to the proposed project.

Aesthetics

The proposed project would not result in any significant aesthetics impacts related to scenic views, visual character and compatibility with surrounding land uses, or light and glare. The proposed project would adhere to the regulations outlined in the City's design standards and Municipal Code, which are described in Table 4.1-1 of Section 4.1.

Under the Base-level Development Alternative, overall development of the project site would be reduced. This alternative would develop 187 fewer residential units than the proposed project and building heights would be reduced. Similar to the proposed project, the Base-level Development Alternative would result in demolition of existing office/light industrial buildings that were constructed in the 1960s and construction of new residential structures within the Bayfront Area. This alternative would result in *similar* impacts as the proposed project associated with construction-related visual impacts and introduction of new sources of light and glare. Building design and site landscaping would be subject to the City's design standards. Thus, this alternative would not significantly alter the visual character of the project site compared to the proposed project and would not result in visual incompatibilities with surrounding properties. As described above, the proposed project would not result in any significant effects related to scenic views, visual character and compatibility with surrounding land uses, or light and glare. The Base-level Development Alternative would not result in any new or increased aesthetic-related effects, and impacts would be *similar* to the proposed project.

Air Quality

The proposed project would implement MMs 4.2a and 4.2b to reduce potentially significant impacts related construction emissions to a less than significant level. The proposed project would result in less-than-significant impacts related to conflicts with applicable air quality plans, increases in criteria air pollutants, other emissions (including odors), and cumulative air quality impacts.

The Base-level Development Alternative would result in a reduced level of development and residential units compared to the proposed project. Therefore, construction-related air-emissions would be less than the proposed project. Through implementation of MMs 4.2a and 4.2b, neither the proposed project nor the Base-level Development Alternative would result in adverse air quality impacts during construction. During project operation, the Base-level Development Alternative would generate fewer vehicle trips, consume less energy and water, and generate less wastewater than the proposed project. Thus the operational impacts of the Base-level Development Alternative would remain less than significant, consistent with the proposed project. However, because the Base-level Development Alternative involves reduced construction and reduced operational characteristics compared to

the proposed project, the Base-level Development Alternative would result in *fewer* impacts to air quality than the proposed project.

Biological Resources

The proposed project would result in potentially significant impacts related to biological resources associated with potential disturbance to bat habitat and roosting and potential disturbance to nesting birds. Implementation of MMs 4.3a and 4.3b would reduce potentially significant impacts to a less-than-significant level by requiring pre-construction surveys for bats and nesting birds as well as measure to ensure bat roosts are not disturbed.

Both the Base-level Development Alternative and the proposed project would demolish existing site structures and construct new buildings, which would result in potentially significant impacts due to potential disturbance to bat habitat and roosting and potential disturbance to nesting birds. Implementation of MMs 4.3a and 4.3b would continue to ensure that impacts related to bat habitat, roosting bats, and nesting birds would remain less than significant through requiring pre-construction surveys and measures to avoid roosting bats during demolition and construction activities. Thus, the Base-level Development Alternative would result in *similar* biological resource impacts as the proposed project.

Cultural Resources

The project would result in potentially significant impacts associated with cultural resources. The project would implement MMs 4.4a and 4.4b which require completion of an Extended Phase 1 Assessment to evaluate subsurface conditions at the project site, as well as protocols to be implemented in the event any discovery of cultural resources during project construction activities. MMs 4.4a and 4.4b would reduce potentially significant cultural resource impacts to a less-than-significant level.

Under the Base-level Development Alternative, existing site structures would be demolished and new buildings would be constructed. The parking structure for the proposed project includes one below-grade level and one at-grade level while the Base-level Development Alternative includes only the at-grade level. This would reduce the amount of grading and excavation necessary to construct the project, which would lessen the potential for below-ground cultural resources to be encountered. However, this alternative would still involve earth-moving activities associated with construction and impacts would remain potentially significant. Implementation of MMs 4.4a and 4.4b would continue to ensure that impacts related to site specific and cumulative archaeological resources would remain less than significant. The Base-level Development Alternative would result in *slightly reduced* cultural resource impacts compared to the proposed project.

Energy

The proposed project was determined to result in less than significant impacts with regard to energy consumption and conservation. The Base-level Development Alternative would decrease the building intensity on the project site. The reduced building intensity could reduce the total amount of energy consumption during construction and operation compared to the proposed project. This alternative would be required to include green building and sustainability measures to ensure that energy is used efficiently. As a result, the Base-level Development Alternative is expected to result in *similar* energy-related impacts as the proposed project.

Geology, Soils, Seismicity, and Paleontological Resources

The proposed project would not exacerbate the potential for seismic ground shaking or seismic-related ground failure to occur at the project site or in the vicinity and thus would result in no impacts associated with seismic activity. The project could result in potentially significant impacts associated with subsidence on nearby properties to occur during dewatering activities in support of excavation, construction of below-grade parking, and installation of the foundation for the apartment building. The project could also result in potentially significant impacts associated with geological and soil stability associated with placement of fill material at the site. MMs 4.6a and 4.6b would lessen these potential impacts to less-than-significant levels by ensuring that design of the dewatering system avoids offsite subsidence, and that fill placement occurs sufficiently prior to construction to allow for settlement.

Although no paleontological resources are known to be present at the project site, such resources could be encountered during excavation activities. MM 4.6c which is the same as MM CULT-3 in the ConnectMenlo EIR, would lessen this potential impact to a less-than-significant level by ensuring that any potential paleontological resources encountered during construction are appropriately evaluated and recovered when necessary to avoid significant impacts.

Implementation of either the proposed project or the Base-level Development Alternative would include demolition of existing site structures and construction of new buildings that support residential uses. This alternative would not exacerbate the potential for the project site and other properties in the vicinity to be exposed to seismic activity. Construction of the Base-Level Development would require less ground-disturbance and excavation as the proposed project and thus would require less dewatering during construction. This would reduce the potential for the alternative to cause subsidence on nearby properties. This alternative would require the same amount of placement of fill material at the project site to raise the ground elevation as required by the Municipal Code to minimize potential risks associated with sea level rise. Thus, this alternative would have the same potential as the proposed project to result in changes in geological and soil stability. MMs 4.6a, 4.6b, and 4.6c would ensure that impacts would be reduced to a less-than-significant level by requiring implementation of recommendations from the project's Geotechnical Investigation regarding dewatering, soil stability following placement of fill material, and implementing appropriate protocol during construction in the event that a potential paleontological discovery is encountered. As a result, the Base-level Development Alternative is expected to result in *similar* geology-related impacts as the proposed project.

Greenhouse Gas Emissions

The proposed project would result in less than significant impacts related to GHG emissions. The Base-level Development Alternative would decrease the building intensity on the project site by constructing 187 fewer residential units. As discussed in Section 4.7, GHG emissions from project construction would not result in a conflict with adopted GHG reduction targets and programs and would not result in an exceedance of the applicable GHG emissions thresholds. Specifically, in compliance with the City, regional, and state regulations, the proposed project would reduce landfill waste from construction debris, use low-carbon construction equipment fuel, minimize engine idling time, and plant new trees and landscaping. In addition, as required by MM 4.2b, construction vehicles of 50 horsepower or greater would be required to use Tier 4 engines to minimize diesel particulate matter emissions. These elements would serve to reduce GHG emissions during construction in compliance with adopted GHG reduction plans and strategies. Additionally, implementation of the TDM Plan and incorporation of green building and sustainability measures in the building design, as discussed previously, would serve to minimize GHG emissions during project operation. Under the Base-level Development Alternative, the same or similar GHG reduction

strategies would be required to be implemented. Thus, this alternative is expected to result in *similar* GHG-related impacts as the proposed project.

Hazards and Hazardous Materials

The proposed project would result in potentially significant impacts related to release of hazardous materials, the presence of hazardous conditions, and handling hazardous materials within proximity to existing schools. The project includes implementation of MMs 4.8a, 4.8b, 4.8c, and 4.2a, which would reduce impacts to a less-than-significant level.

The Base-level Development Alternative would also result in demolition of existing site structures and construction of new buildings within the project site. As such, the potential to release hazardous materials and handle hazardous materials within proximity to schools exists equally under the Base-level Development Alternative and the proposed project. Implementation of MMs 4.8a, 4.8b, 4.8c, and 4.2a would be required for this alternative to ensure that impacts would be reduced to a less-than-significant level by requiring surveys to identify the presence of hazardous materials/conditions and by implementing minimum specifications for construction equipment to reduce TAC emissions. Therefore, the Base-level Development Alternative is expected to result in *similar* hazardous material-related impacts as the proposed project.

Hydrology and Water Quality

The proposed project would result in less than significant impacts to groundwater supply, stormwater infrastructure, and potential increases in sediment and erosion on local waterways during construction. The Base-level Development Alternative would decrease the building intensity on the project site by constructing 187 fewer residential units. With this decreased building intensity, there would be an increase in the amount of open space within the project site, thus this alternative would result in less impervious surface compared to the proposed project. However, the Base-level Development Alternative would still need to use bioretention ponds and flow-through planters, as described for the proposed project, to ensure that water quality and stormwater impacts remain less than significant. Thus, the Base-level Development Alternative is expected to result in *similar* impacts related to groundwater supply, stormwater infrastructure, and potential increases in sediment and erosion on local waterways during construction.

Land Use and Planning

As described in Section 4.10, the proposed project would result in less than significant impacts related to division of an established community and conflicts with existing land use plans, policies, or regulations. The Base-level Development Alternative would develop the same types of residential uses as the proposed project, at a reduced density. The land use and zoning designations assigned to the project site are Mixed Use Residential These designations provide for higher density housing to meet the needs of all income levels. The Base-level Development Alternative would continue to be consistent with land use and zoning designations established for the project site. Further, this alternative would not physically divide any part of the Bayfront Area. Therefore, the Base-level Development Alternative would result in *similar* land use impacts as the proposed project.

Noise

As described in Section 4.11, MMs 4.11a and 4.11b would be implemented to reduce the potentially significant noise impact associated with construction of the proposed project to a less-than-significant level. The Base-level

Development Alternative would require construction activities with a similar intensity as the proposed project, but due to the reduction in the number of dwelling units, the construction duration would be reduced. During construction activities, the Base-level Development Alternative would have the same potential as the proposed project to create significant noise impacts, requiring implementation of MMs 4.11a and 4.11b. Consistent with the proposed project, this alternative would not cause significant groundborne noise or vibration. As discussed in the Transportation section below, the Base-level Development Alternative would generate approximately 768 fewer daily traffic trips than the proposed project, which could decrease roadway noise in the project area compared to the proposed project. The traffic generated by the proposed project would result in less than significant impacts associated with roadway noise; these effects would be further reduced under the Base-level Development Alternative. This alternative would require fewer heating and air conditioning equipment units for the onsite buildings and all rooftop mechanical equipment would be shielded to ensure that the associated noise levels comply with the Menlo Park Municipal Code threshold of 50 dBA L_{eq} at 50 feet. The proposed project would result in less than significant impacts associated with rooftop mechanical equipment; these effects would be further reduced under this alternative. Therefore, operational noise impacts under the Base0level Development Alternative would therefore be *slightly reduced* compared to the proposed project.

Population, Employment, and Housing

As described in Section 4.12, the proposed project would result in less than significant impacts related to unplanned population growth and displacement of people and housing.

Under the Base-level Development Alternative, the project site would be developed with 187 fewer townhomes and apartments compared to the proposed project. This alternative would be subject to the City's requirement for providing at least 15 percent of the residential units as Below-Market Rate (BMR) units. Though this alternative would result in fewer residents at the project site, population, employment, and housing impacts are expected to be *similar* compared to the proposed project because the Base-level Development Alternative would also not result in unplanned population growth, nor would it result in the displacement of people and/or housing.

However, it is noted that the Base-level Development Alternative would result in construction of only 37 BMR units (15 percent of the total) compared to the 74 BMR units (17 percent of the total) included in the proposed project. The proposed project would provide a greater percentage of BMR units because the additional BMR units are offered as a community amenity, which is required for projects proposing to take advantage of the City's bonus-level development standards. Thus, while the Base-level Development Alternative would not result in an adverse environmental impact associated with population and housing, this alternative would provide less of a contribution to the City's attainment of its affordable housing targets.

Public Services and Recreation

The proposed project would result in less than significant impacts related to the provision of new or physically altered police, fire, school, parks, or other public facilities. As described above, the Base-level Development Alternative would provide 187 fewer new residential units within the Bayfront Area. This would decrease the demand for public services. Therefore, the public service and recreation impacts under the Base-level Development Alternative would be *less* than those of the proposed project.

Transportation

Project impacts related to transportation would be less than significant. As described in Section 4.14, the project would implement a TDM plan that would reduce project-generated VMT per resident by 20.63 percent compared to the average VMT for the project site transportation analysis zone.

Under the Base-level Development Alternative, the project site would be developed with 187 fewer residential units than the proposed project. This would reduce the total number of vehicle trips and total amount of VMT generated from the project site. Under the Menlo Park Municipal Code, a TDM plan demonstrating that the project would attain a minimum 20 percent reduction in daily trips and VMT per capita would be required for this alternative. Thus it is expected that the Base-level Development Alternative would have *similar* impacts associated with VMT as the proposed project.

The reduction in residential units would also reduce the daily trip generation as well as AM and PM peak trip volumes as shown in Table 7-2. The proposed project would have less-than-significant impacts associated with vehicle queuing or emergency access deficiencies; the impacts under the Base-level Development Alternative would remain *similar* to those of the proposed project.

Table 7-2. Base-level Development Alternative Project Trip Generation

Land Use	ITE Code	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates[1]									
Research and Development Center	760	per TSF	11.08	0.84	0.19	1.03	0.16	0.82	0.98
Manufacturing	140	per TSF	4.75	0.52	0.16	0.68	0.23	0.51	0.74
Multifamily Housing (Mid-Rise) - buildings 4 to 10 stories in height	221	per DU	4.54	0.09	0.28	0.37	0.24	0.15	0.39
Multifamily Housing (Low-Rise) - buildings 3 stories or less in height	220	per DU	6.74	0.10	0.30	0.40	0.32	0.19	0.51
Trip Generation of Existing Uses									
119 Independence Drive - Tree Care	760	12.996 TSF	144	10	2	12	2	11	13
123-25 Independence Drive - Defense Contractor	760	12.335 TSF	137	10	2	12	2	10	12
127 Independence Drive - Medical Device R&D	760	13.822 TSF	153	12	3	15	3	11	14
130 Constitution Drive - Defense Contractor	760	25.528 TSF	283	22	5	27	4	21	25
1205 Chrysler Drive - Energy Company	140	39.302 TSF	187	20	7	27	9	20	29
		Existing Uses Subtotal	904	74	19	93	20	73	93

Table 7-2. Base-level Development Alternative Project Trip Generation

Land Use	ITE Code	Size/Units	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation of Proposed Project									
Residential - Multifamily (Apartments) - 5 stories in height	221	179 DU	813	16	51	66	43	27	70
Residential - Multifamily (Townhomes) - 3 stories in height	220	66 DU	445	7	20	27	21	12	34
Proposed Project Subtotal			*1,258*	*23*	*71*	*93*	*64*	*40*	*103*
TDM Plan: 20 percent Reduction[2]			*-252*	*-5*	*-14*	*-19*	*-13*	*-8*	*-21*
Proposed Project Total			*1,006*	*18*	*57*	*74*	*51*	*32*	*83*
Total Net Project Trip Generation (Alternative – Existing)			102	-56	37	-19	31	-41	-10
Total Net Proposed Project Trip Generation (Proposed – Existing) per Table 4.14-2			**870**	**-43**	**81**	**38**	**70**	**-17**	**53**

Source: ITE 2021
Notes: TSF = thousand square feet; DU = dwelling unit
1 Trip rates from Trip Generation, 11th Edition, Institute of Transportation Engineers, 2021.
2 Consistent with the City of Menlo Park City Ordinance 1026, a 20 percent reduction was applied to account for the proposed TDM plan that the project would be required to provide. The TDM would be expected to achieve the required minimum of 20 percent reduction of daily and peak hour vehicle trips

Tribal Cultural Resources

The proposed project site is in the Bayfront Area, which has been identified as archaeologically sensitive. While there are no known tribal cultural resources within or adjacent to the project site and no tribal consultation was requested for this project, there is a known tribal cultural resource approximately 1.5 miles away from the site, and it is possible that resources could be discovered below the ground surface during project construction. If that were to occur, a significant impact to tribal cultural resources could occur, and the project could contribute to the cumulative loss of tribal cultural resources in the project region. Through implementation of MMs 4.4a, 4.4b, and 4.15a and compliance with Health and Safety Code Section 7050.5, any resources that may be uncovered during construction would be evaluated for significance, and any recommended treatment measures would be required to be implemented, and therefore the impact to tribal cultural resources would be reduced to a less-than significant level.

Under the Base-level Development Alternative, existing site structures would be demolished, and new buildings would be constructed. The parking structure for the proposed project includes one below-grade level and one at-grade level while the Base-level Development Alternative includes only the at-grade level. This would reduce the amount of grading and excavation necessary to construct the project, which would lessen the potential for belowground tribal cultural resources to be encountered. However, this alternative would still involve earth-moving activities associated with construction, and impacts would remain potentially significant. Implementation of MMs 4.4a, 4.4b, and 4.15a would continue to ensure that site specific and cumulative impacts associated with tribal cultural resources would remain less than significant. The Base-level Development Alternative would result in *slightly reduced* tribal cultural resource impacts compared to the proposed project.

Utilities and Service Systems

The proposed project would result in less than significant impacts associated with utility infrastructure, water supply, wastewater treatment capacity, solid waste generation, and compliance with solid waste regulations.

The Base-level Development Alternative would result in the same types of land uses being constructed on site but would construct 187 fewer residential units. This would decrease the demand for utilities and service systems compared to the proposed project. As a result, the Base-level Development Alternative would have *similar* impacts as the proposed project associated with new or expanded infrastructure, water demand, wastewater treatment capacity, solid waste.

7.4 Environmentally Superior Alternative

Because the Base-Level Alternative (Alternative 3) (described above in Section 7.4.3) would result in similar and/or less adverse impacts resulting from construction and operation of the proposed project analyzed in Chapter 4, it is the environmentally superior alternative. As illustrated in Table 7-3, the Base-Level Development Alternative is considered the environmentally superior alternative because it would reduce construction-related air quality impacts, would slightly reduce the potential to uncover cultural resources during construction, would generate less noise during construction and operation, and would reduce demands for public services, recreation, and utilities. However, this alternative would not fully achieve the project objectives to provide a sufficient density and intensity of housing in order to best achieve a better jobs/housing ratio at the project site; would provide fewer affordable housing units than the proposed project, both in terms of absolute numbers of units as well as the percentage of affordable units relative to the total development; and would be less effective at helping to alleviate traffic because it would provide fewer residential units close to a jobs center.

Table 7-3. Project Alternatives Impacts Summary

Environmental Issue	Proposed Project Impacts	Alternative 1: No Project Alternative	Alternative 2: Mixed-Use Alternative	Alternative 3: Base Level Development Alternative
Aesthetics	Less than Significant	Similar	Similar	Similar
Air Quality	Less than Significant with Mitigation	Less	Similar	Less
Biological Resources	Less than Significant with Mitigation	Less	Similar	Similar
Cultural Resources	Less than Significant with Mitigation	Less	Similar	Slightly less
Energy	Less than Significant	Greater	Similar	Similar
Geology, Soils, Seismicity, and Paleontological Resources	Less than Significant with Mitigation	Less	Similar	Similar
Greenhouse Gas Emissions	Less than Significant	Greater	Similar	Similar
Hazards and Hazardous Materials	Less than Significant with Mitigation	Less	Similar	Similar
Hydrology and Water Quality	Less than Significant	Greater	Similar	Similar
Land Use and Planning	Less than Significant	Greater	Similar	Similar

Table 7-3. Project Alternatives Impacts Summary

Environmental Issue	Proposed Project Impacts	Alternative 1: No Project Alternative	Alternative 2: Mixed-Use Alternative	Alternative 3: Base Level Development Alternative
Noise	Less than Significant with Mitigation	Less	Similar	Less
Population and Housing	Less than Significant	Similar	Similar	Similar
Public Services and Recreation	Less than Significant	Less	Similar	Less
Transportation	Less than Significant	Greater	Similar	Similar
Tribal Cultural Resources	Less than Significant with Mitigation	Less	Similar	Slightly less
Utilities and Service Systems	Less than Significant	Less	Similar	Similar