3.2 Aesthetics

This section describes the existing aesthetic resources and visual characteristics of the Project Site and its immediate vicinity, along with existing plans and policies relevant to visual resource issues within Menlo Park. This section also evaluates the effect on visual resources associated with implementation of the Proposed Project. The evaluation of potential impacts on aesthetics and visual resources is based on a review of photographs, visual simulations, site reconnaissance materials, and Project data. The specific impacts examined in this section pertain to the Proposed Project's potential to change the visual quality and character of the area and create new sources of light and glare.

Issues identified in response to the Notice of Preparation (Appendix 1) were considered during preparation of this analysis. Applicable issues pertain to baseline conditions and the scale of development.

Existing Conditions

Environmental Setting

Regional Context

Menlo Park is a 19-square-mile municipality on the San Francisco Peninsula (Peninsula), approximately 30 miles south of San Francisco and 20 miles north of San José. Located east of the San Andreas Fault Zone, Menlo Park is one of more than a dozen cities on the flatter portions of the western margin of San Francisco Bay (Bay). The city is bounded by Redwood City to the northwest, Atherton to the west, Palo Alto and Stanford University to the southwest, and East Palo Alto to the east. The Bay is north of the city.

Urban development within the area is concentrated primarily between the Bay and the Interstate 280 (I-280) corridor. In general, the Peninsula is developed with low-density uses within distinct neighborhoods that include commercial, retail, and residential uses. Larger-scale development, such as office parks and industrial uses, are located between the Bay and US 101. High-rise office developments, multi-family housing units, and hospital buildings are concentrated along the US 101 and El Camino Real corridors.

The Bay and its natural features are key visual components in the eastern and northern portions of the city. The Santa Cruz Mountains, which form a barrier between the Pacific Ocean and the Bay, are visible throughout Menlo Park and adjacent cities, especially in areas north and east of US 101. The visible portion of the mountain range is Skyline Ridge, which rises to more than 2,400 feet; the ridge is approximately 15 miles south of the Project Site.

Project Vicinity

The urban design in the Project vicinity is influenced by both the undeveloped areas along the Bay and the mix of development, including life science, office, and residential uses, elsewhere. The undeveloped areas, which are north of the Dumbarton Rail Corridor and across State Route (SR) 84, include the Bay's tidal mudflats and marshes, Don Edwards San Francisco Bay National Wildlife Refuge (Refuge), and Ravenswood Slough. Developed areas include the Menlo Park Labs Campus east of the main Project Site, Open Mind School/Wund3rSCHOOL and Mid-Peninsula High School to the south, and the Belle Haven

neighborhood to the west. North of the Project Site is the Meta Platforms, Inc. (Meta), West Campus, which includes Building 20, the original West Campus building, and three large office buildings (Buildings 21, 22, and 23), along with the site for a future hotel, part of the Meta Campus Expansion Project. The West Campus also includes landscape vegetation, pathways, and a small portion of the Dumbarton Rail Corridor. A bicycle/pedestrian tram undercrossing/tunnel at Bayfront Expressway connects the Meta West Campus to the Meta East Campus.

The Project vicinity, which is relatively flat, has limited long-range views due, in part, to the prevalence of buildings in the area. In addition, trees and vegetation provide visual separation and screening between buildings and along roadways. The visual resources to the north, including the Bay, tidal mudflats and marshes, Refuge, and Dumbarton Bridge, are generally not visible from vantage points in the vicinity of the Project Site; these resources are visible only from areas immediately adjacent to Bayfront Expressway. No scenic resources, such as rock outcroppings, cliffs, or knolls, are present in the Project vicinity, although mature trees are present throughout the area.

The development pattern in this area of Menlo Park is characterized by one- or two-story structures, mostly tilt-up construction, with landscaped setbacks, tree-lined streets, and surface parking lots. The older industrial construction in the area has limited windows, sparse landscaping, and surrounding parking lots. Overhead utility lines are visible in most areas. Bicycle lanes, which connect to Bayfront Expressway, are provided along Willow Road. The Belle Haven neighborhood, located east of the Project Site, generally consists of one- or two-story single-family residential developments, with ample street setbacks, landscaped front yards, mature street trees, and well-maintained sidewalks. The neighborhood also features open spaces, parks, and a small retail area adjacent to Willow Road, Fire Station 77, and Belle Haven Elementary School.

The residential neighborhoods in East Palo Alto are east of the Project Site (across University Avenue) and to the south (across O'Brien Drive). Included in these neighborhoods, some of which are as close as 500 feet from the main Project Site, are single-family residences, multi-family residential buildings, and neighborhood-serving retail centers. The neighborhoods generally feature one- or two-story buildings, mature front landscaping, sidewalks, utility poles, and overhead wires. The adjacent neighborhoods in East Palo Alto include Cesar Chavez Elementary School; the 4 Corners Civic Hub, including East Palo Alto Library, City Hall, and Post Office; Costaño School and San Francisco 49ers Academy; and Jack Ferrell Park. Because of flat topography, structures, and dense vegetation, background views of the areas surrounding the East Palo Alto neighborhoods are generally not available.

Project Site

As discussed in Chapter 2, *Project Description*, the main Project Site comprises approximately 59 acres. It is generally bounded by the currently inactive Dumbarton Rail Corridor to the north, an existing life science complex to the east (Menlo Park Labs Campus), the San Francisco Public Utilities Commission (SFPUC) Hetch Hetchy right-of-way to the south, and Willow Road to the west. The Proposed Project would also alter parcels west of the main Project Site, across Willow Road, on both the north and south sides of Hamilton Avenue (i.e., Hamilton Avenue Parcels North and South) to support realignment of the right-of-way and provide access to the new Elevated Park. The Proposed Project would also include a below-grade tunnel for trams, service vehicles, bicyclists, and pedestrians that would connect the Campus District on the main Project Site to the West and East Campuses. The southern approach to Willow Road Tunnel comprises the northwest portion of the Menlo Science and Technology Park, consisting of a single-story concrete structure, 925 Hamilton Avenue, and circulation and parking improvements, including landscape improvements. The tunnel would be beneath the right-of-way for Willow Road and the

Dumbarton Rail Corridor. The western approach of Willow Road Tunnel is within an eastern portion of the West Campus (MPK 20), which contains landscape improvements as well as vehicle, bicycle, and pedestrian circulation improvements.

The above-grade Elevated Park, spanning Willow Road, that would be open to the public would connect Hamilton Avenue Parcel North to the main Project Site. The western access route to the Elevated Park would be on Hamilton Avenue Parcel North from a staircase and elevator. The Elevated Park would extend over the Willow Road right-of-way and through the Town Square and Campus Districts on the main Project Site. The northeast access point from North Loop Road would include a staircase and elevator to the Elevated Park.

The Ravenswood substation, which would serve the Proposed Project, is an approximately 17.5-acre site with electrical transmission equipment adjacent to the former Cargill salt ponds.

Visual Character

The main Project Site currently contains 20 buildings with employee amenities/support services (for Meta) and a mix of office, research-and-development (R&D), and warehousing uses. Existing buildings at the main Project Site were constructed between 1956 and 1996 and have an area of approximately 1 million square feet (sf). The buildings are conventional reinforced-concrete structures, with heights ranging from approximately 21 feet to a maximum of approximately 38 feet. Landscaping consists of mostly native trees, hedges, and plant material, although most of the site is paved.

The main Project Site buildings are set back from Willow Road but relatively close to the inactive Dumbarton Rail Corridor. A chain link fence runs along the northern, eastern, and southern boundaries of the main Project Site. Street trees and ornamental landscaping also create a natural buffer.

Hamilton Avenue Parcel North, the approximately 1.8-acre block, composed of two legal parcels, at the northwest corner of Willow Road and Hamilton Avenue, is developed with approximately 16,000 sf of retail buildings, including the Belle Haven Retail Center and a Jack in the Box restaurant. The one- or two-story commercial buildings are fronted by surface parking lots, decorative landscaping, mulched and irrigated areas, and interior sidewalks. Hamilton Avenue Parcel South, an approximately 1.3-acre parcel at the southwest corner of Willow Road and Hamilton Avenue, includes a 12-pump Chevron gas station with approximately 4,500 sf of retail space and a car wash. The buildings on both parcels are set back and relatively screened from view along Willow Road and Hamilton Avenue by mature street trees, open space buffers, and manicured vegetation.

Onsite Topography

The main Project Site is relatively flat, with a 0.5 percent slope south–north across the site; elevations range from 6 to 11 feet North American Vertical Datum 1988 (NAVD88). The parking lots are generally graded toward existing drainage facilities.[1] Hamilton Avenue Parcels North and South are nearly flat, with elevations ranging from about 6 to 12 feet NAVD 88.[2,3,4] Hamilton Avenue Parcel South is approximately 3 feet above adjacent streets.[5]

Vegetation

Vegetation on the main Project Site includes trees and shrubs on the perimeter and at entrances, along internal circulation routes, in parking lots, and between buildings. Perimeter landscaping provides a visual barrier between the main Project Site and exterior land uses, emphasizing the separation between adjacent development and onsite buildings. Breaks in the landscape buffer along Willow Road and the southern boundary of the main Project Site provide intermittent views of adjacent development, including the Belle Haven neighborhood.

The arborist report prepared for the main Project Site identified 784 trees, consisting of 40 different species. Of the total number of onsite trees, 274 are considered heritage trees, according to Chapter 13.24 of the Menlo Park Municipal Code.[6] The heritage trees consist almost entirely of nonnative ornamental species, such as Canary Island pine (*Pinus canariensis*), shamel ash (*Fraxinus uhdei*), raywood ash, (*Fraxinus oxycarpa* "Raywood"), deodar cedar (*Cedrus deodara*), Tasmanian blue gum (*Eucalyptus globulus*), Peruvian pepper (*Schinus mole*), and purple leaf plum (*Prunus cerasifera* "Krauter Vesuvius"). Native but planted, and therefore considered ornamental, heritage trees on the main Project Site include two coast live oaks (*Quercus agrifolia*) and five coast redwoods (*Sequoia sempervirens*).[7]

Hamilton Avenue Parcels North and South are landscaped with trees and ornamental shrubs. Street trees line the public right-of-way surrounding the parcels. According to the arborist report, Hamilton Avenue Parcels North and South contain 141 trees, consisting of 10 different species. Of the trees surveyed, 18 are considered heritage.[8] The 18 heritage tree comprise two species, coast redwoods and coast live oaks. The most numerous tree species on Hamilton Avenue Parcels North and South are Chinese pistache (*Pistacia chinensis*) (32 trees, including 16 City street trees) and red maple (*Acer rubrum*) (19 trees).

---

1 Cornerstone Earth Group. 2020. *Preliminary Geotechnical Investigation Update, Willow Village, Willow Road, Hamilton Avenue, and Hamilton Court, Menlo Park, California.* (Project Number 254-11-7.) May 27. Prepared for Peninsula Innovation Partners, LLC, Menlo Park, CA. Sunnyvale, CA.

2 Cornerstone Earth Group. 2019. *Phase I Environmental Site Assessment, Belle Haven Retail Center, 871-899 Hamilton Avenue, Menlo Park, California*. (Project Number 254-11-21.) June 10. Prepared for Facebook, Inc., Menlo Park, CA. Sunnyvale, CA.

3 Cornerstone Earth Group. 2018. *Phase I Environmental Site Assessment, 1401 Willow Road, Menlo Park, California*. (Project Number 254-11-15.) April 23. Prepared for Peninsula Innovation Partners, LLC, Menlo Park, CA. Sunnyvale, CA.

4 Cornerstone Earth Group. 2020. *Phase I Environmental Site Assessment, 1399 Willow Road, Menlo Park, California*. (Project Number 254-45-1.) October 13. Prepared for Facebook, Inc., Menlo Park, CA. Sunnyvale, CA.

5 Cornerstone Earth Group. 2020. *Geotechnical Consultation Willow Village Expansion Feasibility Study*. October 15, 2020.

6 SBCA Tree Consulting. 2020. *Tree Survey and Valuation of Heritage Trees*. August 27, 2020.

7 H.T. Harvey & Associates. 2020. *Willow Village Master Plan Biological Resources Report*. Los Gatos, CA. Prepared for Peninsula Innovation Partners, Menlo Park, CA. June 12. Unpublished.

8 SBCA Tree Consulting. 2021. *Tree Survey.* April 1, 2021.

Views from the Project Site

Views on the main Project Site include buildings, paved parking lots, landscaping, and power lines. At-grade offsite views from the interior of the main Project Site are limited because of the relatively flat topography, onsite buildings, fencing, and vegetation. To the north, views of the inactive Dumbarton Rail Corridor from pedestrian-level viewpoints are obscured by a chain link fence and dense vegetation. Similarly, views of the Menlo Park Labs Campus to the east and the SFPUC Hetch Hetchy right-of-way to the south are partially obscured by vegetation. To the west, intermittent views across Willow Road to the Belle Haven neighborhood and Hamilton Avenue Parcels North and South are available from the main Project Site through breaks in the landscape buffer.

Views at Hamilton Avenue Parcels North and South consist mainly of existing development, including the Belle Haven Retail Center, a Jack in the Box restaurant, paved parking lots, and landscaping. Similar to the main Project Site, at-grade offsite views from Hamilton Avenue Parcels North and South are limited because of the relatively flat topography, onsite and offsite development, and landscaping. To the north, views of the inactive Dumbarton Rail Corridor from pedestrian-level viewpoints are obscured by onsite buildings. However, because of its height, the two-story building at the Meta West Campus, as well as the vegetation on its rooftop garden, is visible beyond the Dumbarton Rail Corridor. To the east, intermittent views to the main Project Site are available across Willow Road through breaks in the landscape buffer. To the west and south, views of the Belle Haven neighborhood and commercial development are partially obscured by street trees, fencing, and landscape buffers.

Public View Corridors

Public view corridors are areas where short-range, medium-range, and long-range views are available from publicly accessible viewpoints, such as city streets. Portions of the main Project Site are visible from nearby public vantage points; however, the main Project Site is not visible in its entirety from a single grade-level vantage point because of its large size, flat topography, and surrounding development. Public vantage points with views of the main Project Site and Hamilton Avenue Parcels North and South are discussed below.

Bayfront Expressway

Bayfront Expressway is a major roadway that links Dumbarton Bridge to US 101. This six-lane roadway runs in an east–west direction north of the main Project Site. A concrete median, approximately 3 feet in height, separates the eastbound and westbound lanes. Views of the main Project Site from passing automobiles traveling in the eastbound and westbound direction are partially obscured by vegetation and a storage facility along the inactive Dumbarton Rail Corridor. However, views of the buildings on the northeastern portion of the main Project Site—specifically, MPK 44 and MPK 45—can be seen through breaks in the vegetation. Hamilton Avenue Parcels North and South are also obscured by surrounding development and vegetation. In addition, the regional lattice-type electrical transmission towers and electrical transmission lines along the northern portion of the main Project Site and Hamilton Avenue Parcels North and South are highly visible from Bayfront Expressway. The Pacific Gas and Electric Company (PG&E) Ravenswood substation is highly visible from Bayfront Expressway; the substation is adjacent to the westbound travel lanes. The facility and its distribution lines are not screened from Bayfront Expressway. The ridges of the Santa Cruz Mountains can be seen in the distance beyond the onsite rooftops and mature trees.

San Francisco Bay Trail

The San Francisco Bay Trail (Bay Trail) runs north of Bayfront Expressway between the salt ponds and marsh from Marsh Road to Willow Road. At Willow Road, the Bay Trail runs along the south side of Bayfront Expressway, including the portion north of the main Project Site.[9] The Bay Trail uses an existing tunnel between the East and West Campuses to cross Bayfront Expressway. The Willow Road Tunnel site is visible from the existing Bayfront Expressway undercrossing. Because of the natural Bay setting north and west of the Bay Trail, as well as to the south toward the Santa Cruz Mountains, this public viewpoint is considered a scenic resource. Depending on the location, views of the main Project Site are visible to bicyclists and pedestrians traveling along the Bay Trail, particularly on the northeast portion. Views of Hamilton Avenue Parcels North and South from the Bay Trail are limited because of landscaping on the West Campus and MPK 20. Looking west and east, prominent middleground features within the viewshed include Bayfront Expressway, traffic signals, electrical transmission towers, and utility poles and wires. Given the proximity of the Bay Trail to Bayfront Expressway and the PG&E Ravenswood substation, which is adjacent to Bayfront Expressway, the substation and distribution lines are visible from the Bay Trail. Views of the Santa Cruz Mountains are available in the background.

Bay Conservation and Development Commission Public Shoreline trail

Portions of the Bay Conservation and Development Commission (BCDC) Public Shoreline Trail are approximately 1 mile northeast of the main Project Site—specifically, Ravenswood Trail and the SF2 Trail.[10] Because of the natural Bay setting north and west of the Bay Trail, as well as to the south toward the Santa Cruz Mountains, this public viewpoint is considered a scenic resource. From this vantage point, foreground views feature the trail, the Refuge, and salt ponds. The high-voltage PG&E transmission lines and the Ravenswood substation are visible in the foreground, given the proximity of the Ravenswood Trail and SF2 trail. Middleground views include Bayfront Expressway, surrounding vegetation, rooftops of buildings on the main Project Site, electrical transmission towers, and power lines. Views of Hamilton Avenue Parcels North and South are obstructed by vegetation, electrical transmission towers, and power lines. Unobstructed distant views of the Santa Cruz Mountains are available to the southwest.

Willow Road

Willow Road extends south from Bayfront Expressway along the western edge of the main Project Site. This segment of the street provides two vehicular lanes and one bicycle lane in each direction. There are no sidewalks along the southbound roadway segment. The main Project Site and Hamilton Avenue Parcels North and South are visible along Willow Road; however, views are partially obstructed by vegetation, depending on the viewer's location. There are no views of the PG&E substation from Willow Road. The areas for the approaches to the Willow Road Tunnel are visible from Willow Road.

[9] San Francisco Bay Trail. 2021. *Navigational Map*. Available: https://baytrail.org/baytrailmap.html. Accessed: October 4, 2021.

[10] U.S. Fish and Wildlife. *Don Edwards San Francisco Bay National Wildlife Refuge, Directory of Trails*. Available: https://www.fws.gov/uploadedImages/Region_8/NWRS/Zone_2/San_Francisco_Bay_Complex/Don_Edwards_San_Francisco_Bay/Images/Visit/Trail_Maps/Map%20Overview.jpg?n=41. Accessed: October 4, 2021.

Viewer Perspective and Sensitivity

Viewer sensitivity, which refers to a viewer's reaction to landscape change, is affected by viewer activity, awareness, and expectations, in combination with the number of viewers and the duration of the view. Visual sensitivity is generally higher for views that are observed by people who are driving for pleasure or engaging in recreational activities, such as biking, walking, or hiking; residents of an area; or people who are engaged in work activities or commuting to work. For purposes of this analysis, sensitive viewers include individuals with a direct view of the Project Site from a public vantage point. These include employees, and individuals traveling on public roadways, in bike lanes, on sidewalks, and at nearby recreational facilities, such as the Bay Trail and BCDC Public Shoreline Trail.

Light and Glare

Light pollution refers to all forms of unwanted light in the night sky, including glare, light trespass or spill on adjacent sensitive receptors, sky glow, and over-lighting. Views of the night sky are an important part of the natural environment. Excessive light and glare can be visually disruptive to humans and nocturnal animal species. Light pollution in most of the city is minimal and restricted primarily to areas with lighting along major streets and freeways or areas with nighttime illumination within commercial and industrial areas.

Existing sources of light on the main Project Site include the light fixtures on buildings, along walkways, and along internal circulation routes. Similarly, sources of light on Hamilton Avenue Parcels North and South include the light fixtures on buildings and along pathways as well as street lighting in the public right-of-way. Site-level lighting for bicycles, pedestrians, and vehicles at the Willow Road Tunnel approaches on the main Project Site and West Campus is present. On the Ravenswood substation site, existing sources of light include the light fixtures on the support buildings. Sources of daytime glare on the main Project Site and Hamilton Avenue Parcels North and South include reflected sunlight from windows on buildings, glass doors, and parked vehicles. There are no sources of daytime glare at the Willow Road Tunnel approaches or the Ravenswood substation. Sources of nighttime glare include vehicle headlights and street lighting. Dense vegetation and fencing on the main Project Site aid in minimizing light trespass from the area.

Regulatory Setting

State

California Scenic Highway Program

The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), protects state scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. A highway's designation of "scenic" depends on how much of the natural landscape travelers can see, the scenic quality of the landscape, and the extent to which development intrudes on travelers' enjoyment of the view. The segment of I-280 that runs from the Santa Clara County line to the San Bruno city limit, southwest of the Project Site, is designated as a state scenic highway by Caltrans.[11]

[11] California Department of Transportation. 2021a. *California State Scenic Highways*. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed: September 27, 2021.

California Code of Regulations, Title 24

The 2019 Building Energy Efficiency Standards outlined in the California Code of Regulations (Title 24, Parts 1 and 6) contain energy and water efficiency requirements for new construction. These standards are intended to improve the quality of outdoor lighting and reduce the impacts of light pollution, light trespass, and glare. Specifically, non-residential, high-rise residential, and hotel developments must comply with the standards that regulate lighting characteristics, such as maximum power and brightness, shielding, and sensor controls, as outlined in Sections 130.2(a) through 130.2(c).[12]

Local

Menlo Park General Plan

The City General Plan consists of the Open Space/Conservation, Noise, and Safety Elements, adopted May 21, 2013; the 2014-2023 Housing Element, adopted by the City on April 1, 2014; and the Circulation and Land Use Elements, adopted November 29, 2016. The following policies from the Land Use Element, adopted to avoid or mitigate environmental impacts, pertain to the Proposed Project:

Goal LU-1: Promote the orderly development of Menlo Park and its surrounding area.

> **Policy LU-1.1: Land Use Patterns.** Cooperate with the appropriate agencies to help ensure a coordinated land use pattern in Menlo Park and the surrounding area.

Goal LU-2: Maintain and enhance the character, variety and stability of Menlo Park's residential neighborhoods.

> **Policy LU-2.1: Neighborhood Compatibility.** Ensure that new residential development possesses a high-quality design that is compatible with the scale, look, and feel of the surrounding neighborhood and respects the city's residential character.
>
> **Policy LU-2.2: Open Space.** Require accessible, attractive open space that is well maintained and use sustainable practices and materials in all new multiple-dwelling and mixed-use development.
>
> **Policy LU-2.3: Mixed-Use Design.** Allow mixed-use projects with residential units if project addressed potential compatibility issues such as traffic, parking, light spillover, dust, odors, and transport and use of potentially hazardous materials.
>
> **Policy LU-2.6: Underground Utilities.** Require all electric and communications lines that serve new development to be placed underground.

Goal LU-3: Retain and enhance existing and encourage new neighborhood-serving commercial uses, particularly retail services, to create vibrant commercial corridors.

> **Policy LU-3.2: Neighborhood Shopping Impacts.** Limit the impacts from neighborhood shopping areas, including traffic, parking, noise, light spillover, and odors, on adjacent uses.

Goal LU-4: Promote and encourage existing and new business to be successful and attract entrepreneurship and emerging technologies for providing goods, services amenities, local job opportunities, and tax revenue for the community while avoiding or minimizing potential environmental and traffic impacts.

[12] California Energy Commission. 2019. *Building Energy Efficiency Standards for Residential and Non-residential Buildings.* Available: https://www.energy.ca.gov/sites/default/files/2021-06/CEC-400-2018-020-CMF_0.pdf. Accessed: October 2021.

Policy LU-4.3: Mixed-Use and Non-residential Development. Limit parking, traffic, and other impacts of mixed-use and non-residential development on adjacent uses, and promote high-quality architectural designs and effective transportation options.

Goal LU-6: Preserve open space lands for recreation; protect natural resources and air and water quality; and protect and enhance scenic qualities.

Policy LU-6.2: Open Space in New Development. Require new non-residential, mixed-use, and multiple dwelling development of a certain minimum scale to provide ample open space in the form of plazas, greens, community gardens, and parks whose frequent use is encouraged through thoughtful placement and design.

Policy LU-6.6: Public Bay Access. Protect and support public access to the Bay for the scenic enjoyment of open water, sloughs, and marshes, including restoration efforts, and completion of the Bay Trail.

Policy LU-6.8: Landscaping in Development. Encourage extensive and appropriate landscaping in public and private development to maintain the city's tree canopy and to promote sustainability and healthy living, particularly through increased trees and water-efficient landscaping in large parking areas and in the public right-of-way.

Policy LU-6.11: Baylands Preservation. Allow development near the Bay only in already-developed areas.

The following policies from the Open Space and Conservation Element were adopted to avoid or minimize environmental impacts:

Policy OSC1.12: Landscaping and Plazas. Include landscaping and plazas on public and private lands and well-designed bicycle and pedestrian facilities in areas of intensive non-vehicular activity. Require landscaping for shade and surface runoff or to obscure parked cars in extensive parking areas.

Policy OSC1.15: Heritage Trees. Protect heritage trees, including during construction activities, through enforcement of the Heritage Tree Ordinance (Chapter 13.24 of the Menlo Park Municipal Code).

Menlo Park Municipal Code

Chapter 13.24, Heritage Trees

Chapter 13.24 of the Menlo Park Municipal Code regulates the removal and replacement of heritage trees, promotes additional heritage tree planting, and supports public education about the planting, maintenance, and preservation of healthy heritage trees. Pursuant to Section 13.24.050, a permit issued by the public works director is required to remove and conduct major pruning of a heritage tree. Heritage trees include:

- All trees other than oaks that have a trunk with a circumference of 47.1 inches (diameter of 15 inches) or more, measured 54 inches above natural grade.
- An oak tree (*Quercus*) that is native to California and has a trunk with a circumference of 31.4 inches (diameter of 10 inches) or more, measured 54 inches above natural grade.
- A tree or group of trees of historical significance, special character, or community benefit—specifically, designated by resolution of the City Council.

Sections 16.43.140(6) and Section 16.45.130(6), Bird-Friendly Design

All new construction, regardless of size, is required to comply with the City of Menlo Park (City) bird-safe design requirements provided in Menlo Park Municipal Code Sections 16.43.140(6) (with respect to the O District) and 16.45.130(6) (with respect to the R-MU District). These design requirements include appropriate measures to reduce bird collisions, as follows:

A. No more than 10 percent of the façade surface area shall have non-bird-friendly glazing.

B. Bird-friendly glazing includes, but is not limited to, opaque glass; clear glass with patterns covering the outside surface; paned glass with fenestration, frit, or etching patterns; and nonreflective glass with external screens. Highly reflective glass is not permitted.

C. Occupancy sensors or other switch control devices shall be installed on non-emergency lights and programmed to shut off during non-work hours and between 10:00 p.m. and sunrise.

D. The placement of buildings shall avoid the potential funneling of flight paths toward a building façade.

E. Glass skyways or walkways, free-standing (see-through) glass walls and handrails, and transparent building corners shall not be allowed.

F. Transparent glass shall not be allowed at the rooflines of buildings, including in conjunction with roof decks, patios, and green roofs.

G. Rodenticides shall not be allowed.

H. A project may receive a waiver from one or more of the items listed in subsections (6)(A) to (F) of this section, subject to submittal of a site-specific evaluation from a qualified biologist and review and approval by the Planning Commission.

Chapter 16.64, Fences, Walls, Trees, and Hedges

Chapter 16.64 of the Menlo Park Municipal Code establishes standards for fences, walls, trees, and hedges in non-residential and residential areas. In non-residential areas, fences, walls, hedges, and similar structures between the building and front lot line are required to obtain written approval from the community development director. The following features must be considered when obtaining approval: structural stability; aesthetics; the general health, safety, and welfare of the community; clear lines of sight for vehicular and pedestrian traffic; and other safety factors.

Chapter 16.82, Permits

Sections 16.82.050 through 16.82.100 of the Menlo Park Municipal Code establish criteria for the issuance of conditional development permits (CDPs). A CDP may be issued to allow adjustments to zoning district requirements to secure special benefits through comprehensive planning of large developments. A CDP would be required for the main Project Site to permit a master-planned project with bonus-level development, define any adjustments to City Zoning Ordinance development standards, identify project conditions and requirements, and create mechanisms for the City to use to process any revisions to the Proposed Project that might arise over the buildout period. Section 16.82.060 requires that each CDP application be accompanied by architectural drawings and plot plans that clearly identify elevations, locations of proposed buildings, landscaping, parking, and other physical features. Section 16.68.020 of the Menlo Park Municipal Code establishes requirements for architectural control approval. Each application for a building permit for construction or alternation of a building must be accompanied by architectural drawings showing elevations, landscaping or other ground treatments, and the design of parking facilities, including access points.

The City Council is the final decision-making body in the CDP; however, subsequent architectural control permits would be reviewed and acted upon, perhaps concurrently, by the Planning Commission. The Planning Commission would consider the following when conducting architectural control review of the Proposed Project:

1. The general appearance of the structures is in keeping with the character of the neighborhood.
2. The development will not be detrimental to the harmonious and orderly growth of the city.
3. The development will not affect the desirability of investment or occupation in the neighborhood.
4. The development provides adequate parking, as required in all applicable City ordinances, and has made adequate provisions for access to such parking.

Environmental Impacts

This section describes the impact analysis related to aesthetics for the Proposed Project. It describes the methods used to determine the impacts of the Proposed Project and lists the thresholds used to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion.

Thresholds of Significance

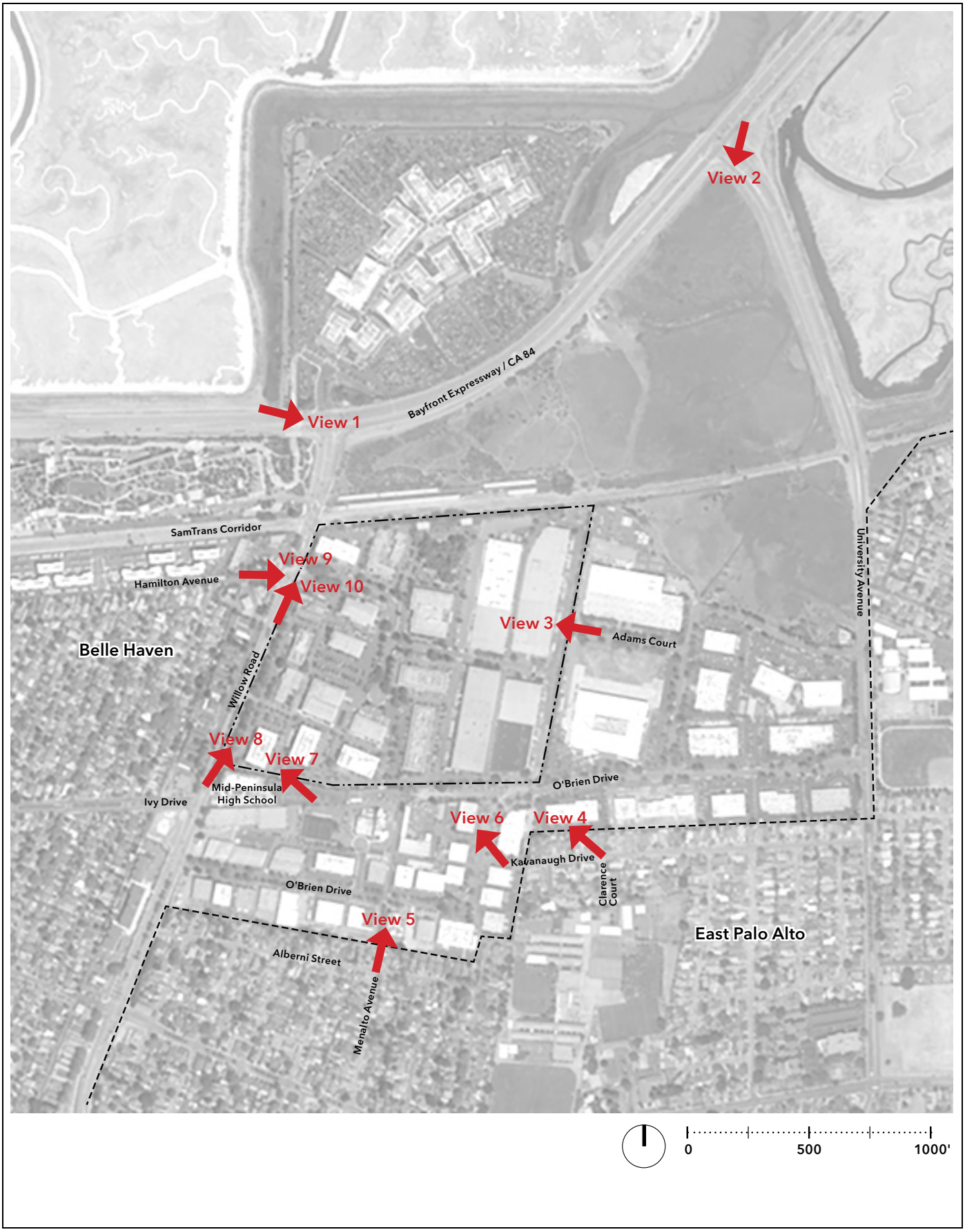
In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Proposed Project would have a significant effect if it would result in any of the conditions listed below.

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are experienced from publicly accessible vantage points); if a project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
- Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Methods for Analysis

Visual conditions within the Project vicinity are influenced by both the undeveloped areas along the Bay and the mix of development, including life science, office, and residential uses, elsewhere. The interplay of these elements of the visual setting varies from point to point, depending on viewer location. The appearance of the main Project Site, Hamilton Avenue Parcels North and South, the location for proposed offsite improvements (refer to Chapter 2, *Project Description*), and the surrounding community would change with construction of the Proposed Project.

To illustrate the general appearance of the Project Site, photomontages (massing studies) from 10 vantage points were prepared, as shown in Figure 3.2-1, Map of Viewpoints. A photomontage is a photograph of existing conditions, with an image of the proposed development superimposed over the photograph through the use of computer imaging techniques. The photomontages created for the Proposed Project were prepared in a photo-realistic fashion to depict proposed development, inclusive of buildings, roadway configurations,



Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-1
Map of Viewpoints

and landscaping. The photomontages provide a reasonable representation of building massing, scale, and height upon Project completion. Building façade and architectural designs for the Proposed Project would be determined through the architectural control (design review) process set forth in the CDP and the subdivision mapping process. Therefore, these features are not included in the photomontages.

The photomontages in Figures 3.2-2 through 3.2-11 provide both "existing" (without Project development) and "illustrative" (with Project development) conditions. Notably, there are no designated scenic vistas or scenic highways in the vicinity of the Project Site. The viewpoints were selected to demonstrate existing and proposed conditions from each cardinal direction (north, east, south, west). Depictions of the "proposed" conditions are based on the development standards and conceptual and illustrative designs included in the CDP for the Proposed Project. As described above, final Project designs would be subject to architectural control approval and reviewed for consistency with the development parameters established in the CDP for the Proposed Project. The selected viewpoints for each photomontage are listed below.

- Viewpoint 1: Bay Trail and Bayfront Expressway (facing southeast)
- Viewpoint 2: Bay Trail and Bayfront Expressway (facing southwest)
- Viewpoint 3: Adams Court (facing west)
- Viewpoint 4: Kavanaugh Drive and Clarence Court in East Palo Alto (facing northwest)
- Viewpoint 5: Alberni Street and Menalto Avenue in East Palo Alto (facing north)
- Viewpoint 6: O'Brien Drive and Kavanaugh Drive (facing northwest)
- Viewpoint 7: Mid-Peninsula High School (facing northwest)
- Viewpoint 8: Willow Road (facing north)
- Viewpoint 9: Hamilton Avenue and Carlton Avenue (facing southeast)
- Viewpoint 10: Willow Road (facing northwest)

For the purposes of this analysis, viewpoints are separated into foreground, middleground, and background views. Generally, the foreground is characterized by clear details (up to 0.5 mile from the viewer); the middleground is characterized by the loss of clear detail in a landscape, creating a uniform appearance (up to 4 miles from the foreground); and the background extends from the middleground to the limit of human sight.[13]

Summary of Analysis in the ConnectMenlo EIR

- Impacts related to scenic vistas were analyzed in the ConnectMenlo Environmental Impact Report (EIR) as Impact AES-1 (pages 4.1-8 to 4.1-14) and determined to be less than significant because no publicly accessible views of scenic resources would be blocked or obstructed by increasing height limits in the Bayfront Area. Similar views would continue to be visible between buildings and over lower-intensity areas. No mitigation measures were required.
- Impacts related to scenic resources within a state scenic highway were analyzed in the ConnectMenlo EIR as Impact AES-2 (pages 4.1-14 to 4.1-15). The ConnectMenlo EIR determined that impacts would be less than significant because none of the potential new development that would result in more intense development or increased heights would be within the I-280 viewshed. Furthermore,

[13] U.S. Department of Agriculture, U.S. Forest Service. 1995. *Landscape Aesthetics, A Handbook for Scenery Management.* Agricultural Handbook Number 701. Washington D.C.

potential future development in the I-280 viewshed would, if necessary, be subject to the City's existing architectural control process, in accordance with Section 16.68.020 of the City Zoning Ordinance, and required to comply with applicable design standards outlined in the City Zoning Ordinance. No mitigation measures were required.

- Consistency with applicable zoning and other regulations was analyzed in the ConnectMenlo EIR as Impact LU-2 (pages 4.9-14 to 4.9-23) and determined to be less than significant with mitigation incorporated. In addition, consistency with regulations governing scenic quality was analyzed in the ConnectMenlo EIR as Impact AES-3 (pages 4.1-15 to 4.1-16). The following City General Plan goals and policies, among others, would serve to reduce impacts on visual quality and character in the Bayfront Area: Goal LU-1, Policy LU-1.1; Goal LU-2, Policy 2.1, Policy 2.2; Goal LU-3, Policy LU-3.2; Goal LU-4, Policy LU-4.3, Policy LU-4.5; Goal LU-6, Policy LU-6.2, Policy LU-6.6, Policy LU-6.8, Policy LU-6.11; and Goal OSC-1, Policy OSC-1.11, Policy OSC1.12, Policy OSC-1.13, and Policy OSC-1.15. These policies encourage orderly development and land use patterns, promote high-quality architectural design, and protect and enhance the scenic qualities of Menlo Park. The ConnectMenlo EIR concluded that the impacts would be less than significant. Although more intense development with taller and larger buildings could occur in the Bayfront Area, future development would not result in a substantial change to the existing visual character of the Bayfront Area or its surroundings. The ConnectMenlo EIR notes that potential future development under the update to the City General Plan would create a shift in uses from light industrial and business park uses to office, technology, R&D, life sciences, and mixed-use uses with multi-family residential and commercial development and involve notable changes in building intensity and height (from 35 to 120 feet). However, given the existing commercial, industrial, and residential uses surrounding areas of potential new growth, the gradual development of future projects would continue to be compatible with the existing visual character and quality of the Bayfront Area or its surroundings. No mitigation measures were required.
- Impacts related to light and glare were analyzed in the ConnectMenlo EIR under Impact AES-4 (pages 4.1-16 to 4.1-17). The ConnectMenlo EIR determined that impacts would be less than significant because new development would be required to comply with general best management practices and City General Plan policies that ensure that new land uses would not generate excessive levels of light that would spill onto adjacent sensitive receptors and reduce light and glare spillover from future development on surrounding land uses. No mitigation measures were required.

Impacts Not Evaluated in Detail

Impacts on Scenic Resources along a State Scenic Highway. There are no officially designated state scenic highways or eligible state scenic highways in the vicinity of the Project Site. The nearest state-designated scenic highway, I-280, is approximately 5.5 miles southwest of the Project Site.[14] The Proposed Project would not be visible from this highway. No impacts on scenic resources along a state scenic highway would occur, and therefore, this topic is not discussed further.

Impacts on Public Views in Non-Urbanized Areas. The Project Site is in an urbanized area. The applicable threshold in non-urbanized areas regarding substantial degradation of the existing visual character or the quality of public views of the site and its surroundings is therefore not applicable. This topic is not discussed further.

[14] California Department of Transportation. 2021b. *California State Scenic Highway System Map*. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed: October 4, 2021.

Impacts and Mitigation Measures

Impact AES-1: Substantial Adverse Effect on Scenic Vistas. The Proposed Project would not result in a substantial adverse effect on scenic vistas. (LTS)

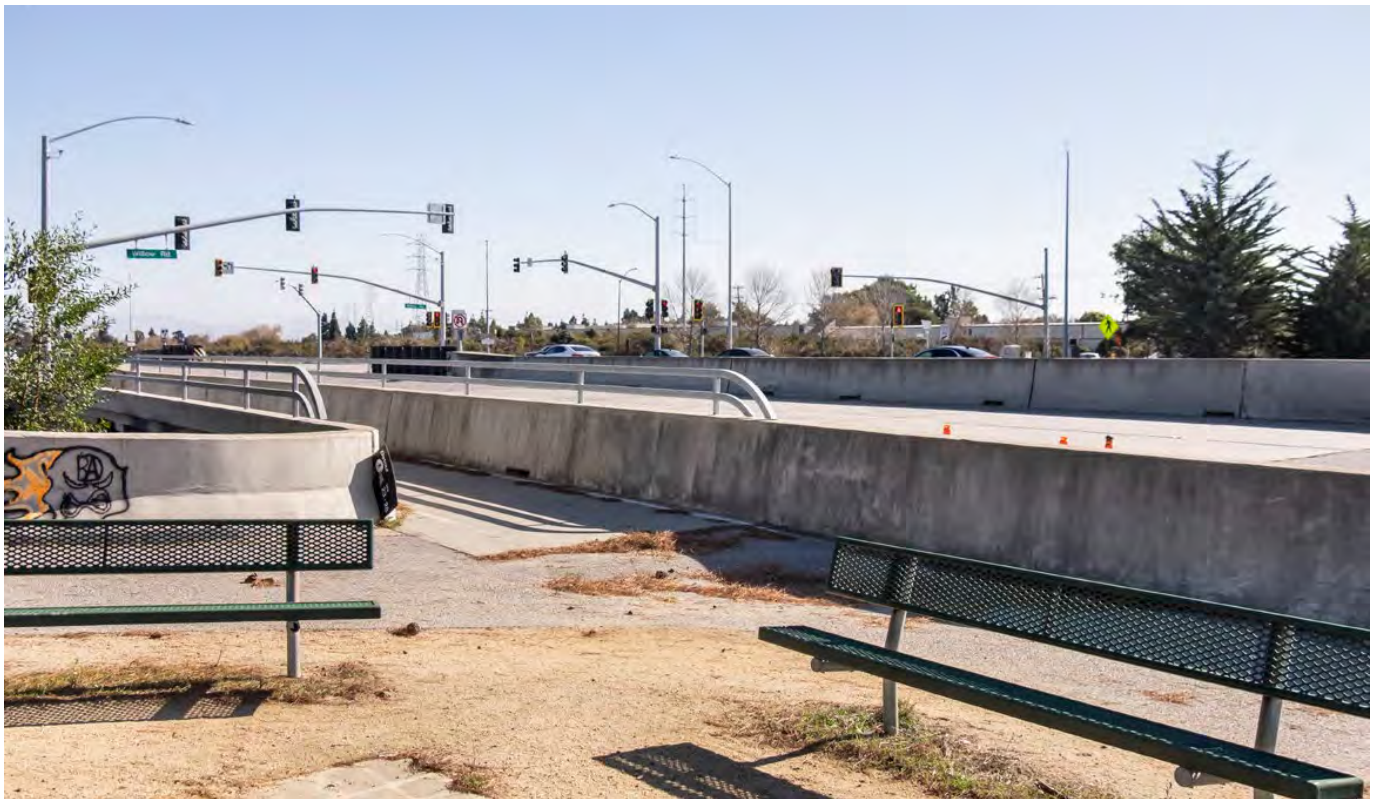
For the purposes of this analysis, a scenic vista is defined as a vantage point with a broad and expansive view of a significant landscape feature (e.g., a mountain range, lake, or coastline) or a significant historic or architectural feature (e.g., a historic tower). A scenic vista is a location with high-quality views, including harmonious and visually interesting views. Menlo Park does not have any officially designated scenic views or vistas. However, in the areas surrounding the Project Site, scenic resources that could be considered scenic vistas are the Santa Cruz Mountains, BCDC Public Shoreline Trail, the Bay Trail, and Bayfront Expressway. These areas offer expansive views of the natural setting, including a mountain range, marsh, the Refuge, salt ponds, and Bay, which is farther north.

Construction of the Proposed Project would increase the total building area on the main Project Site by more than 2.6 million sf compared to existing conditions. Therefore, building massing and height would increase, resulting in greater visibility of the onsite buildings compared with existing conditions. To accommodate the intersection realignment at Hamilton Avenue and Willow Road, Hamilton Avenue Parcel North would include an expanded one-story structure; the service station would be reconstructed on Hamilton Avenue Parcel South, with a height similar to that under existing conditions. However, as noted above, the ConnectMenlo EIR determined that impacts related to scenic vistas within the Bayfront Area would be less than significant because publicly accessible views of scenic vistas would not be blocked or obstructed by increased building heights. The Willow Road tunnel would be below grade. The approaches from the Project Site and West Campus would begin at grade and extend below grade. The PG&E Ravenswood substation upgrades would be contained within the existing substation footprint. Distribution feeder lines from the substation would be below grade. As demonstrated by the photomontages described below, scenic views would continue to be available from publicly accessible vantage points, between buildings, and over lower-intensity areas.

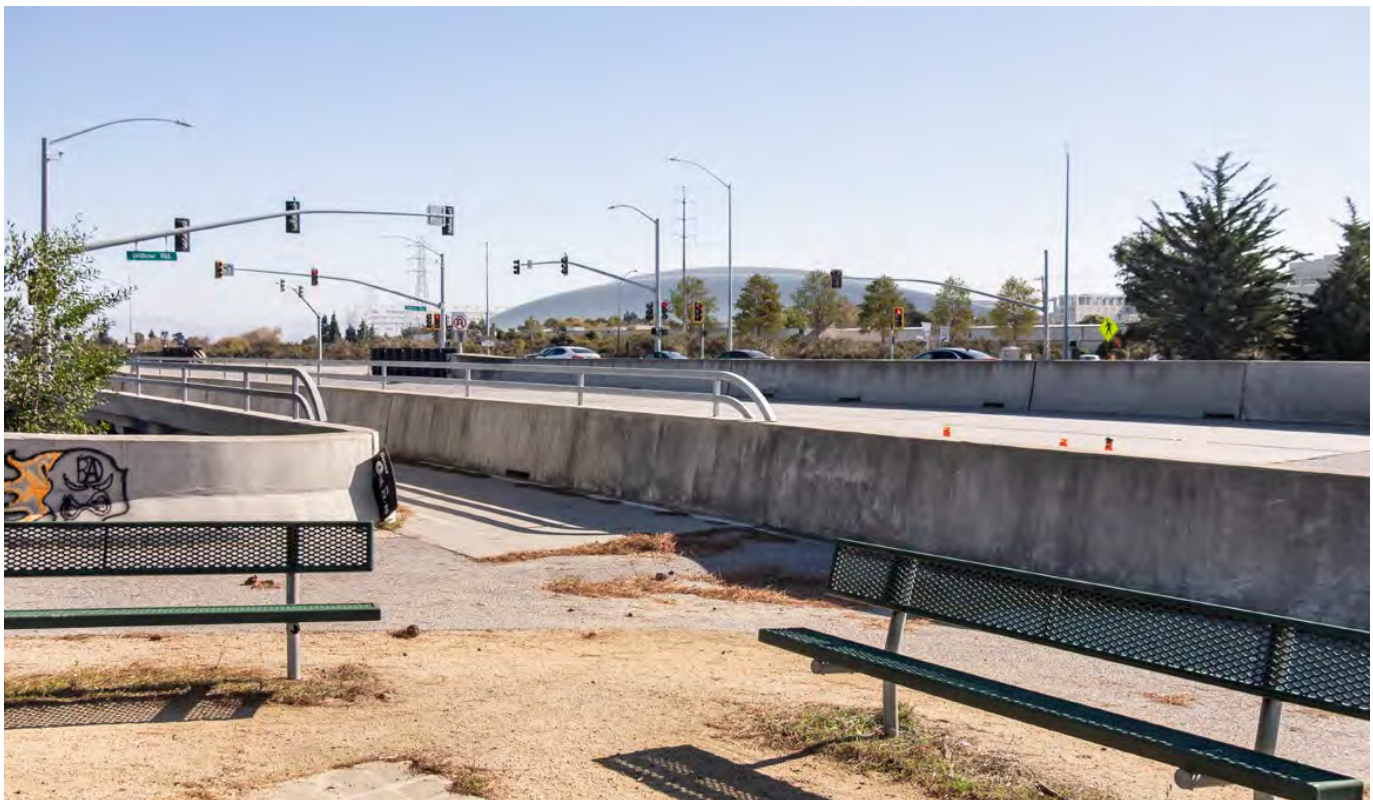
Viewpoint 1: View from Bay Trail and Bayfront Expressway Looking Southeast toward the Project Site

Viewpoint 1 represents a view of the Project Site from the Bay Trail and Bayfront Expressway looking southeast toward the Project Site. Sensitive viewers at this viewpoint include individuals traveling along Bayfront Expressway and recreationalists using the Bay Trail. As shown in Figure 3.2-2a, Viewpoint 1, views of the main Project Site are obscured by the storage facility and vegetation. In the foreground, prominent views of the BCDC Public Shoreline Trail and Bay Trail, with associated amenities such as benches, are available. The Bayfront Expressway undercrossing/tunnel for cyclists, pedestrians, and Meta trams is also visible. In the middleground, the Bayfront Expressway and Willow Road intersection is visible to the left, and the northeast corner of the Meta West Campus is visible to the right. In the background, long-distance views of the Santa Cruz Mountains are not available because of the flat topography and intervening tree line.

As shown in Figure 3.2-2b, the foreground views would remain the same, but the middleground views would be altered. The glass atrium structure surrounding the proposed meeting and collaboration space (Building O7), depicted with an illustrative height of approximately 116 feet, would be visible above the roofline of the storage facility. The Elevated Park in the northern portion of the site would be visible across Willow Road to the northeast corner of Hamilton Avenue Parcel North. Proposed development would be visible to viewers along the Bay Trail and Bayfront Expressway; however, because long-distance views of the Santa Cruz Mountains are not available in the background from this vantage point and views of scenic vistas in the foreground would not be altered, no substantial adverse changes are anticipated.



a. Existing



b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-2
Viewpoint 1: Bay Trail and Bayfront Expressway (southeast)

Viewpoint 2: Bay Trail and Bayfront Expressway Looking Southwest toward the Project Site

Viewpoint 2 provides a background view of the Santa Cruz Mountains to the southwest toward the Project Site, as viewed from the Bay Trail and Bayfront Expressway. Sensitive viewers at this viewpoint include individuals traveling along Bayfront Expressway and recreationalists using the Bay Trail. As shown in Figure 3.2-3a, Viewpoint 2, from this vantage point, views of the Bay Trail, Bayfront Expressway, and wetlands are available in the foreground. In the middleground, views of existing development on the main Project Site and storage facility are largely obscured by existing vegetation. In the background, long-distance views of the Santa Cruz Mountains are available.

As shown in Figure 3.2-3b, with implementation of the Proposed Project, the foreground and background views would remain the same, but the middleground views would be altered. On the eastern boundary of the main Project Site, the Campus District buildings (O5 and O6), depicted with an illustrative height of approximately 83 feet, would be visible in the distance above the roofline of the storage facility. The proposed North Garage on the northeast boundary of the main Project Site, depicted with an illustrative height of approximately 89 feet, would be visible directly north of the Bay Trail and Bayfront Expressway. It would partially obstruct views of the Santa Cruz Mountains, some of which also are partially obstructed by existing development on the main Project Site. However, portions of the continuous ridgeline would be visible above the roof line. Therefore, no substantial adverse changes are anticipated.

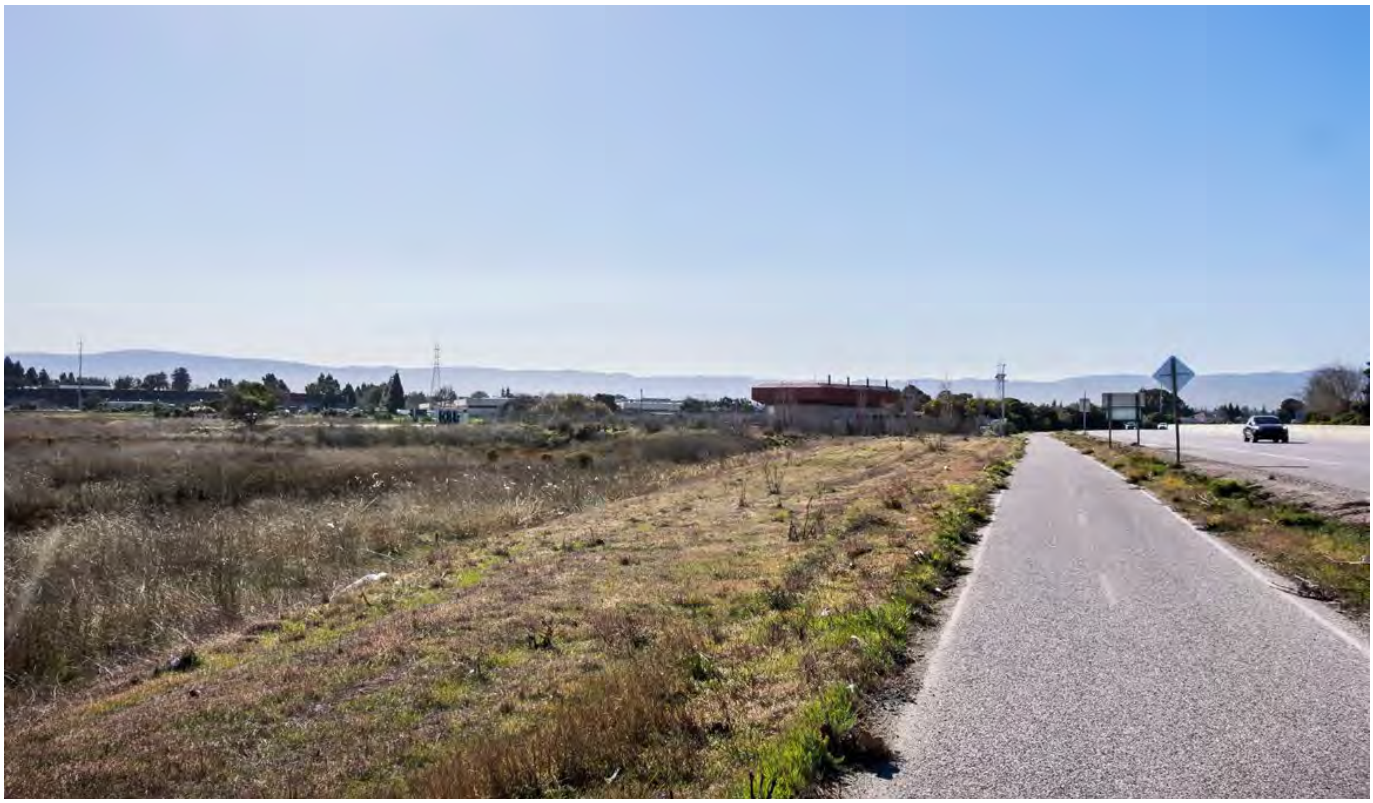
Viewpoint 3: Adams Court Looking West toward the Project Site

Viewpoint 3 provides views of developed and undeveloped areas along Adams Court. Sensitive viewers at this viewpoint include individuals traveling along Adams Court and employees working in the area. As shown in Figure 3.2-4a, Viewpoint 3, from this vantage point, views of streetscape vegetation, a warehouse building to the north, and a vacant lot to the south are available in the foreground. In the middleground, a two-story warehouse building (MPK 44) at the main Project Site is visible. Scenic vistas, including views of the Santa Cruz Mountains, are not available from this vantage point because of flat topography and intervening structures.

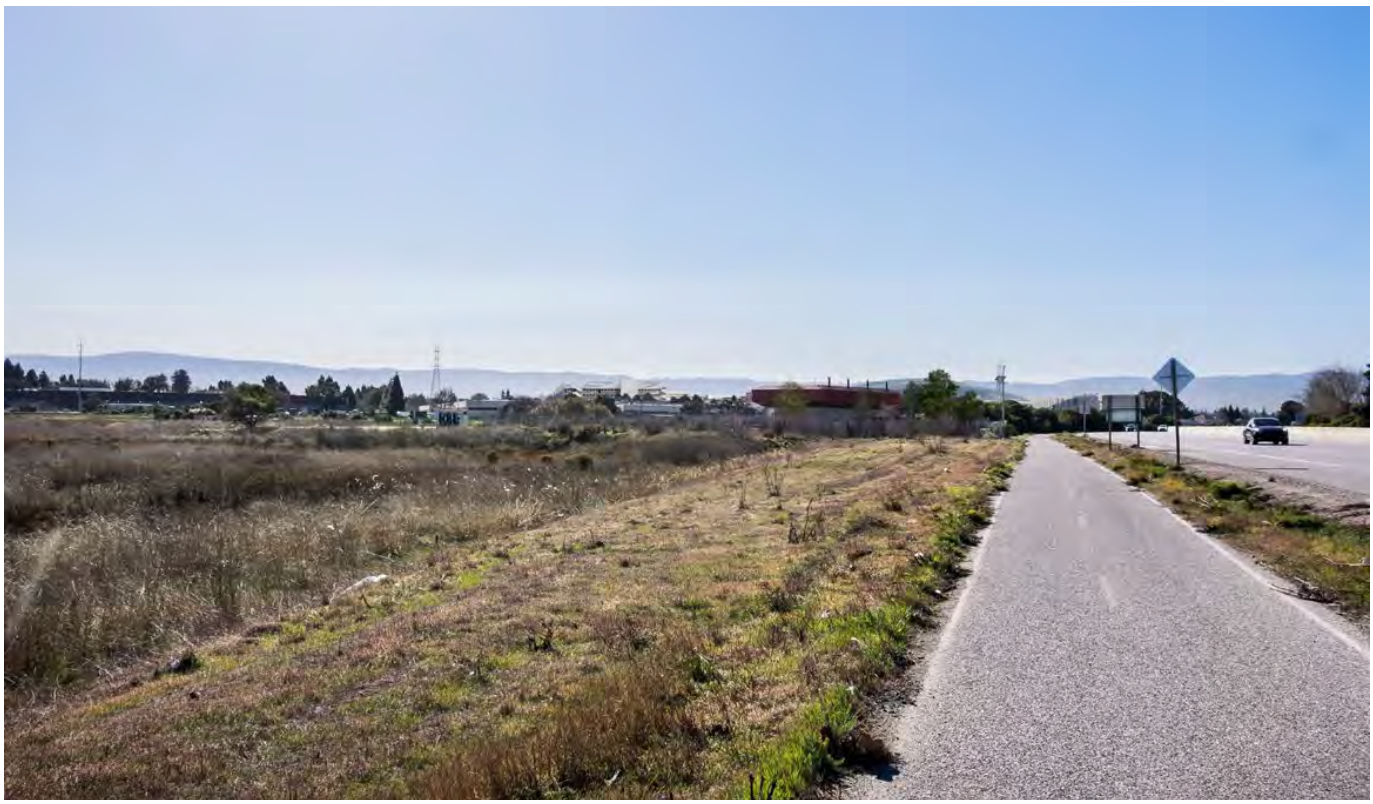
As shown in Figure 3.2-4b, the foreground and background views would remain the same, but the middleground views would be altered. To the southwest, the Campus District buildings (O5 and O6), depicted with an illustrative height of approximately 83 feet, would be visible. To the northwest, the North Garage, with a transit hub on the ground level and depicted with an illustrative height of approximately 89 feet, would be visible. Between the North Garage and O5, a view corridor would be provided, looking west of the proposed open space at an additional Campus District building (O4), depicted with a illustrative height of 82 feet. Although the proposed buildings would be taller than buildings under existing conditions, the proposed buildings would be generally compatible with surrounding development because development would be within the maximum and average height parameters of the City Zoning Ordinance, with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. This building would be in the middle of the Residential/Shopping District and Town Square District, thereby limiting potential aesthetic impacts from the increased height. Furthermore, scenic vistas are not available from this vantage point; therefore, no substantial adverse changes are anticipated.

Viewpoint 4: Kavanaugh Drive and Clarence Court Looking Northwest toward the Project Site

Viewpoint 4 provides views of a residential neighborhood in East Palo Alto. Sensitive viewers at this viewpoint include individuals traveling along Kavanaugh Drive and Clarence Court. As shown in Figure 3.2-5a, Viewpoint 4, from this vantage point, views of single-family homes, neighborhood streets,



a. Existing

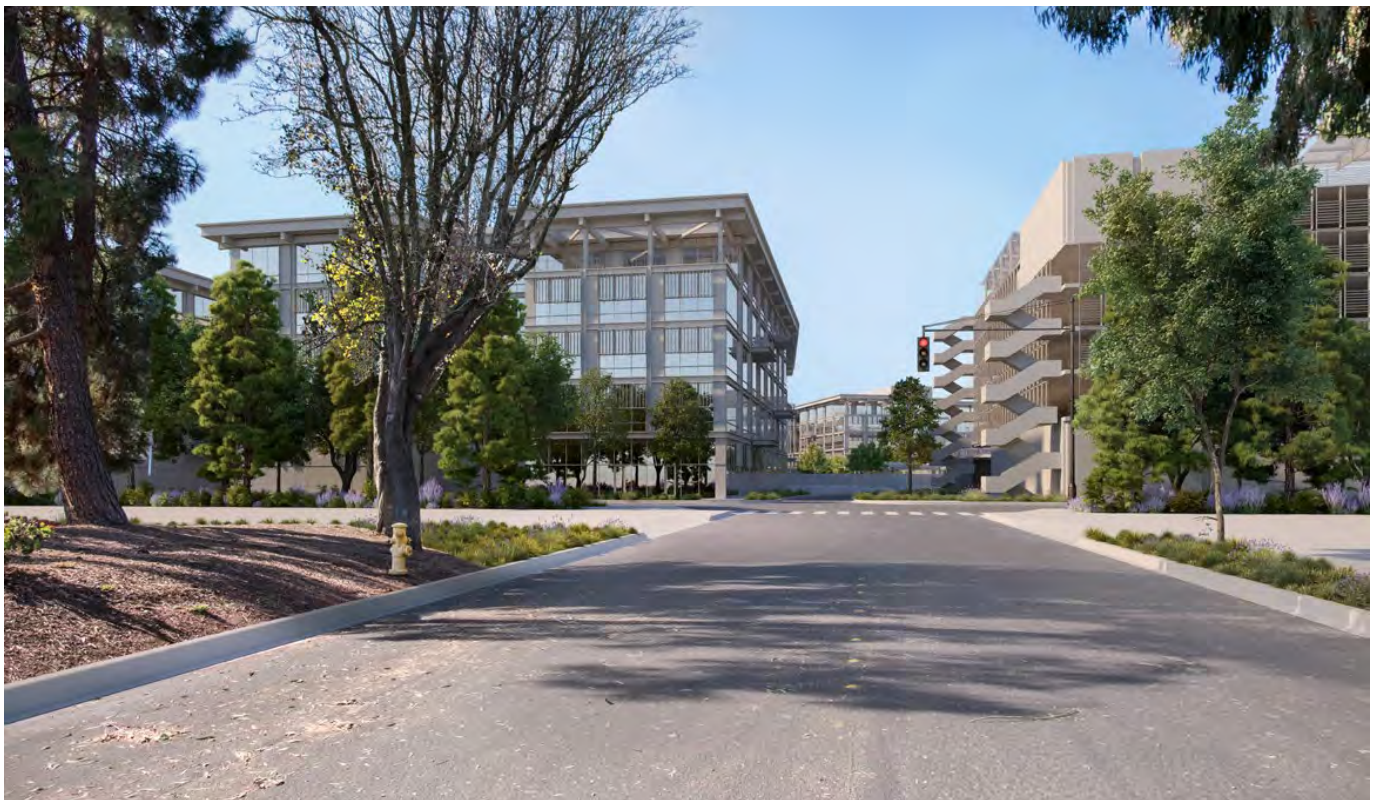


b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-3
Viewpoint 2: Bay Trail and Bayfront Expressway (south)

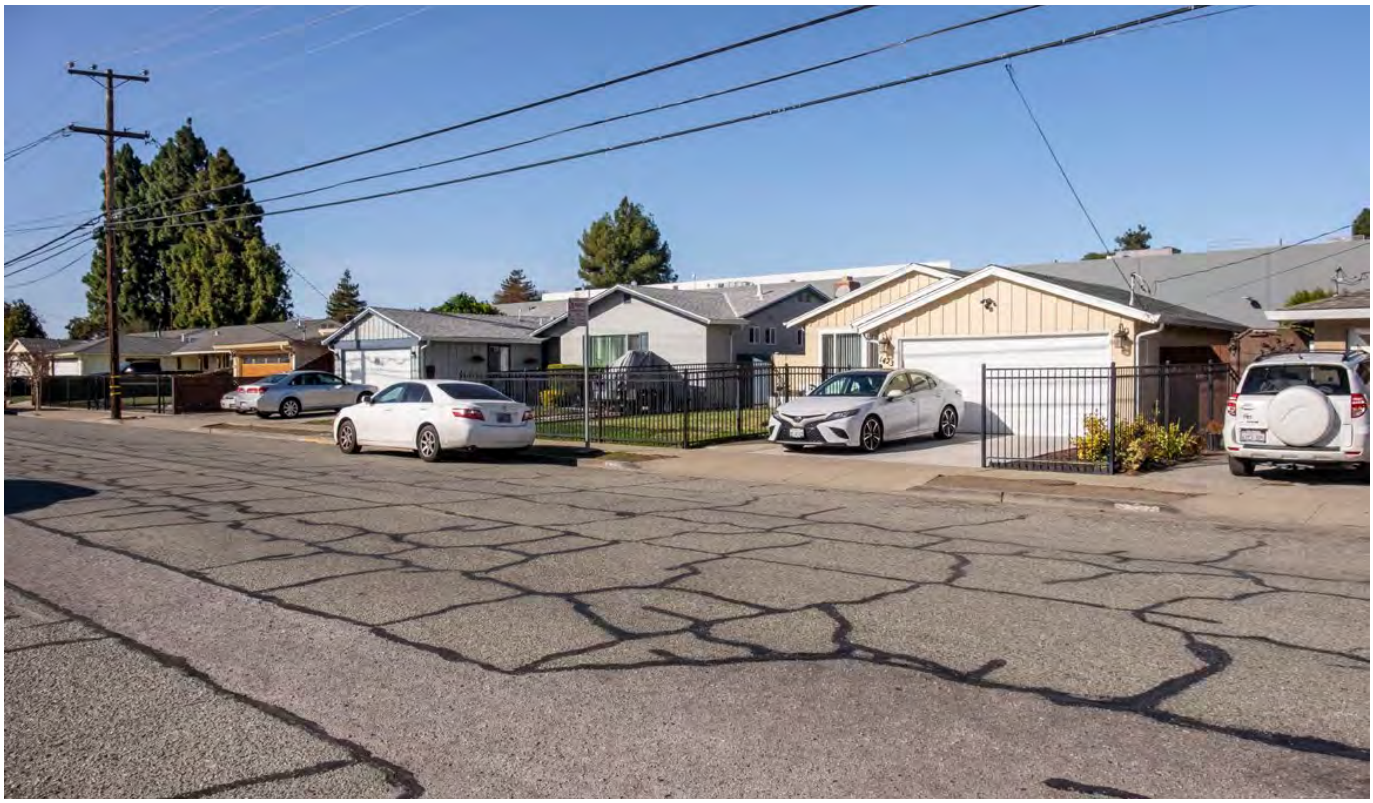
a. Existing



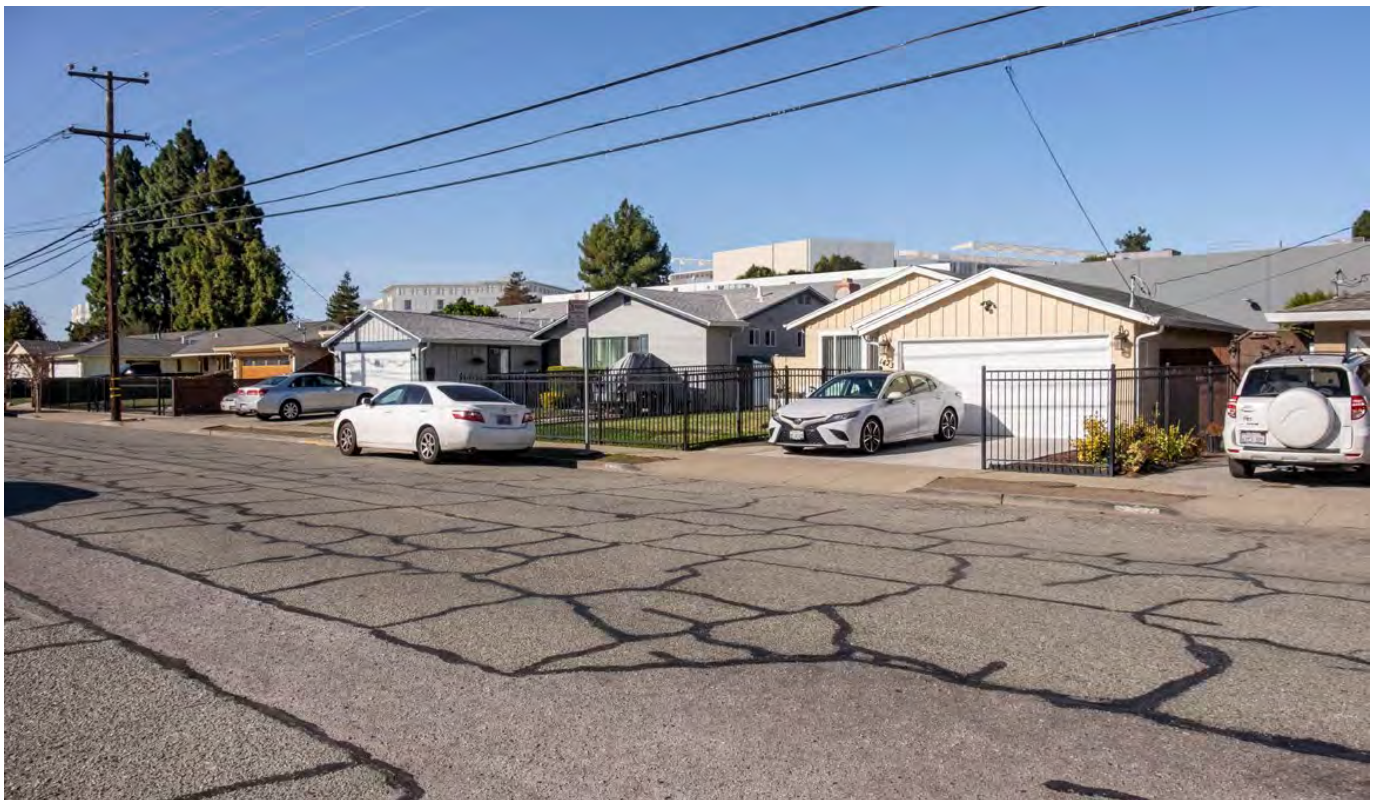
b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-4
Viewpoint 3: Adams Court



a. Existing



b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-5
Viewpoint 4: Kavanaugh Drive and Clarence Court

and vehicles are available in the foreground. In the middleground, the roofline of an office/warehouse building at 1330 O'Brien Drive in Menlo Park is visible above the single-family homes. Scenic vistas are not available from this vantage point because of the flat topography and intervening structures.

As shown in Figure 3.2-5b, the foreground and background views would remain the same, but the middleground views would be altered. The South Garage on the southeast corner of the main Project Site, depicted with an illustrative height of approximately 79 feet, would be visible above the roofline of existing single-family homes. Residential buildings (RS 5 and RS 7), depicted with an illustrative height of approximately 77 feet, as proposed for the southern portion of the main Project Site, would also be visible. Although the proposed buildings would be taller than existing buildings, the buildings would not constitute a significant feature in the area. Furthermore, given that scenic vistas are not available in the background, no substantial adverse changes are anticipated.

Viewpoint 5: Alberni Street and Menalto Avenue Looking North toward the Project Site

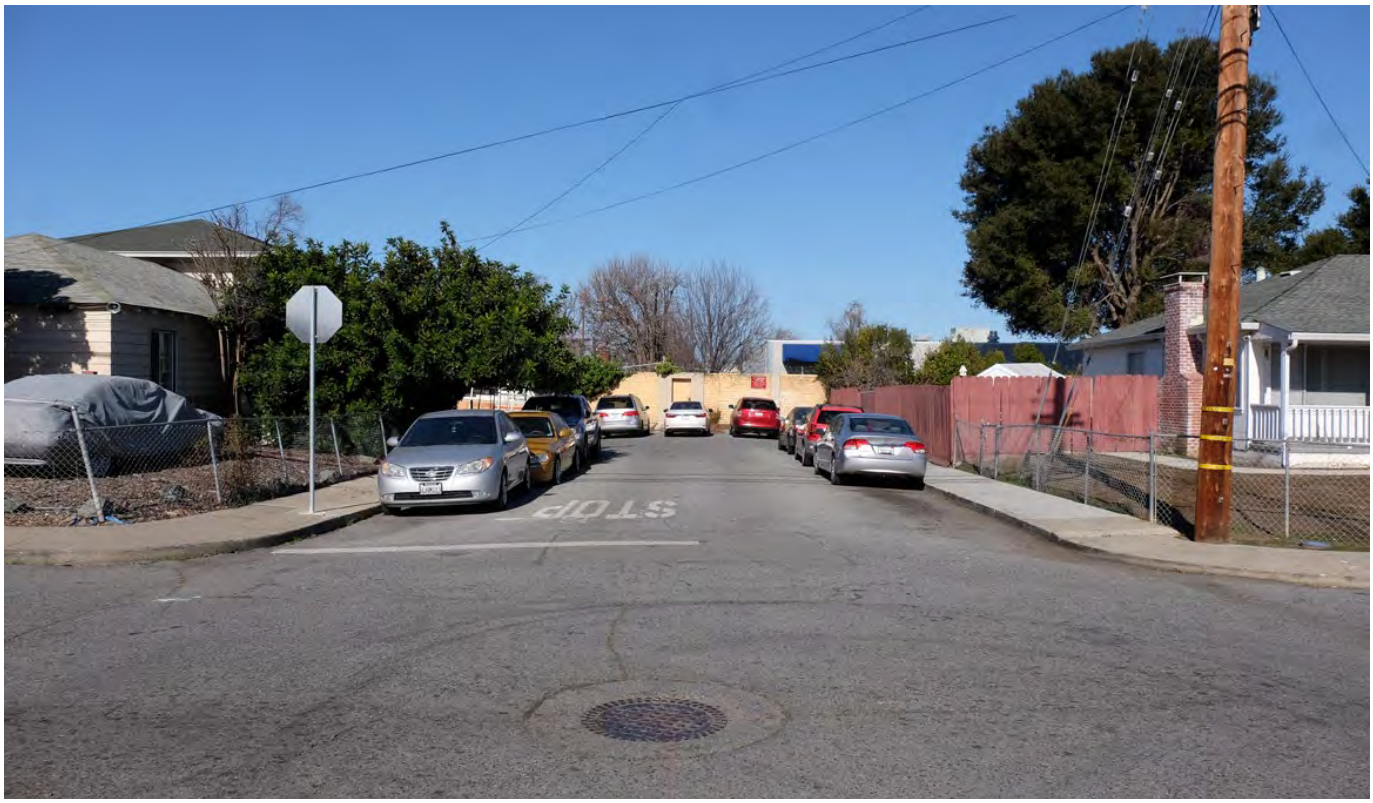
Viewpoint 5 provides views of a residential neighborhood in East Palo Alto, looking north toward the Project Site. Sensitive viewers at this viewpoint include individuals traveling along Alberni Street and Menalto Avenue. As shown in Figure 3.2-6a, Viewpoint 5, from this vantage point, views of single-family homes, neighborhood streets, vehicles, and utility poles are available in the foreground. An existing two-story warehouse building at 1100 O'Brien is visible in the middleground. Scenic vistas are not available from this vantage point because of the flat topography and intervening structures.

As shown in Figure 3.2-6b, views from this vantage point would remain the same. The Project Site would not be visible from this vantage point because of the flat topography and surrounding development. Therefore, no substantial adverse changes are anticipated.

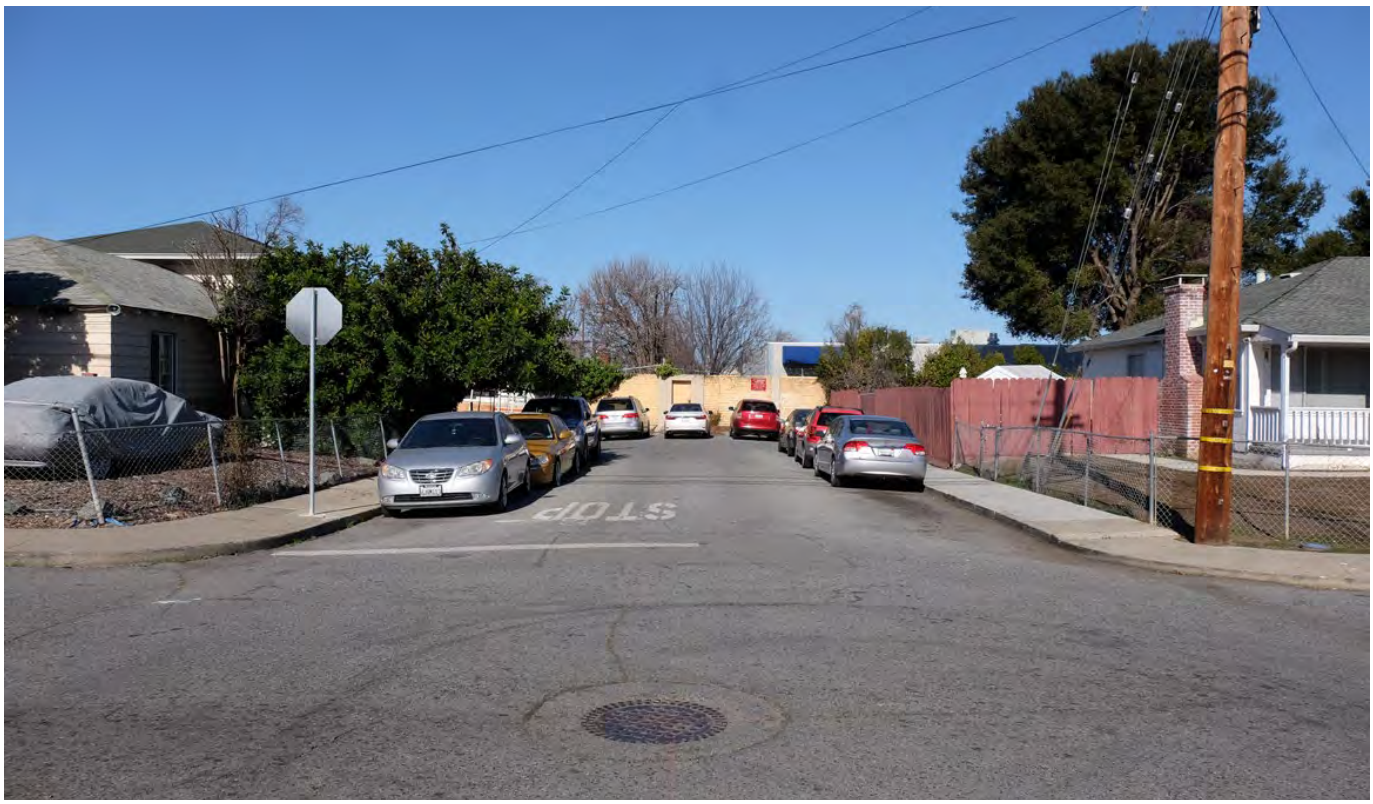
Viewpoint 6: O'Brien Drive and Kavanaugh Drive Looking Northwest toward the Project Site

Viewpoint 6 provides views of the O'Brien Drive and Kavanaugh Drive intersection and surrounding development. Sensitive viewers at this viewpoint include individuals traveling along O'Brien Drive and Kavanaugh Drive. As shown in Figure 3.2-7a, Viewpoint 6, from this vantage point, views of the intersection, utility poles, electrical wires, and streetscape vegetation are available in the foreground. In the middleground, a white warehouse building at 1185 O'Brien Drive and a green and blue Open Mind School/Wund3SCHOOL building at 1215 O'Brien Drive are visible. Scenic vistas are not available from this vantage point because of the flat topography and surrounding development.

As shown in Figure 3.2-7b, foreground and background views would remain the same, but middleground views would be altered. The proposed residential building (RS 5), depicted with an illustrative height of approximately 78 feet, would be visible to the north, above the roofline of the Open Mind School/Wund3SCHOOL. To the northeast, a Campus District building (O1), depicted with an illustrative height of approximately 68 feet, is visible in the distance. Farther northeast, beyond the utility pole on the corner of O'Brien Drive and Kavanaugh Drive, the south parking structure (SG), depicted with an illustrative height of approximately 79 feet, would be visible. Although the proposed buildings would be taller than existing buildings, the buildings would be generally compatible with surrounding development as the proposed buildings would be within the maximum and average height parameters of the zoning ordinance, with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. Furthermore, given that scenic vistas are not available from this vantage point, no substantial adverse changes are anticipated.



a. Existing

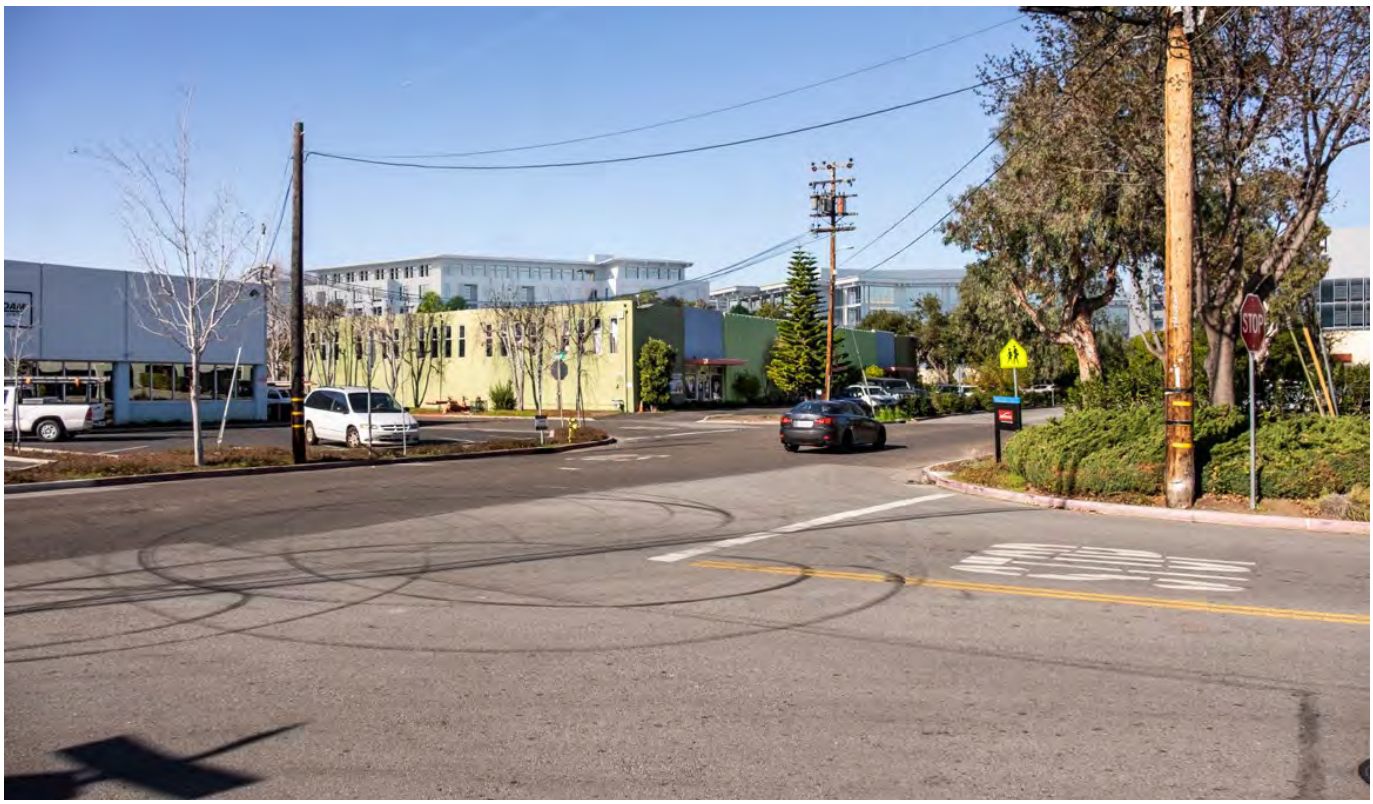


b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-6
Viewpoint 5: Alberni Street and Menalto Avenue

a. Existing



b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-7
Viewpoint 6: O'Brien Drive and Kavanaugh Drive

Viewpoint 7: Mid-Peninsula High School Looking Northwest toward the Project Site

Viewpoint 7 provides foreground views of the Mid-Peninsula High School athletic field. Sensitive viewers at this viewpoint include Mid-Peninsula High School staff members, students, and visitors. As shown in Figure 3.2-8a, Viewpoint 7, this vantage point provides views of a Mid-Peninsula High School building, perimeter fencing, mature trees, and an onsite building (MPK 58) at 1360 Willow Road. Scenic vistas are not available from this vantage point because of the flat topography, perimeter fencing, mature trees, and intervening structures.

As shown in Figure 3.2-8b, foreground and background views would remain the same, but middleground views would be altered. To the north, the proposed residential building (RS 6), depicted with an illustrative height of approximately 80 feet, would be visible beyond the perimeter fence and line of mature trees. The Publicly Accessible Park, as proposed directly adjacent to the Mid-Peninsula High School building, would not visible beyond the tree line. However, this park would serve as a buffer to distance the majority of proposed building from the shared property line with Mid-Peninsula High School. Although the proposed buildings would be taller than existing buildings, the buildings would be generally compatible with surrounding development because development would be within the maximum and average height parameters of the City Zoning Ordinance, with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. Furthermore, given that scenic vistas are not available from this vantage point, no substantial adverse changes are anticipated.

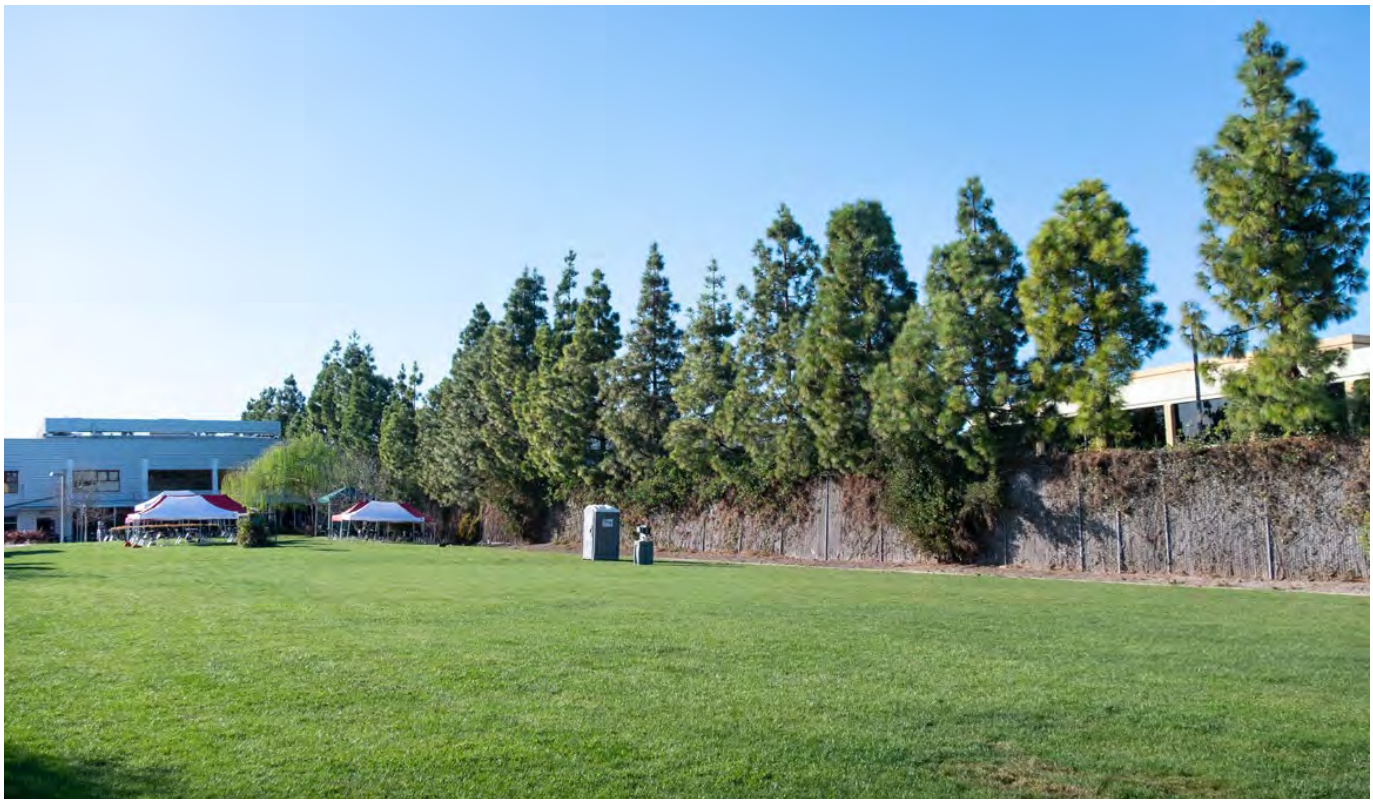
Viewpoint 8: Willow Road Looking North toward the Project Site

Viewpoint 8 provides views along Willow Road, looking north toward Hamilton Avenue. Sensitive viewers at this viewpoint include individuals traveling along Willow Road. As shown in Figure 3.2-9a, Viewpoint 8, from this vantage point, the roadway, vegetated median, and the Mid-Peninsula High School building are visible in the foreground. Visible features in the middleground include mature trees within the vegetated median along Willow Road, an onsite building (MPK 57) at 1350 Willow Road, and a surface parking. Scenic vistas are not available from this vantage point because of the flat topography, mature trees, and surrounding development.

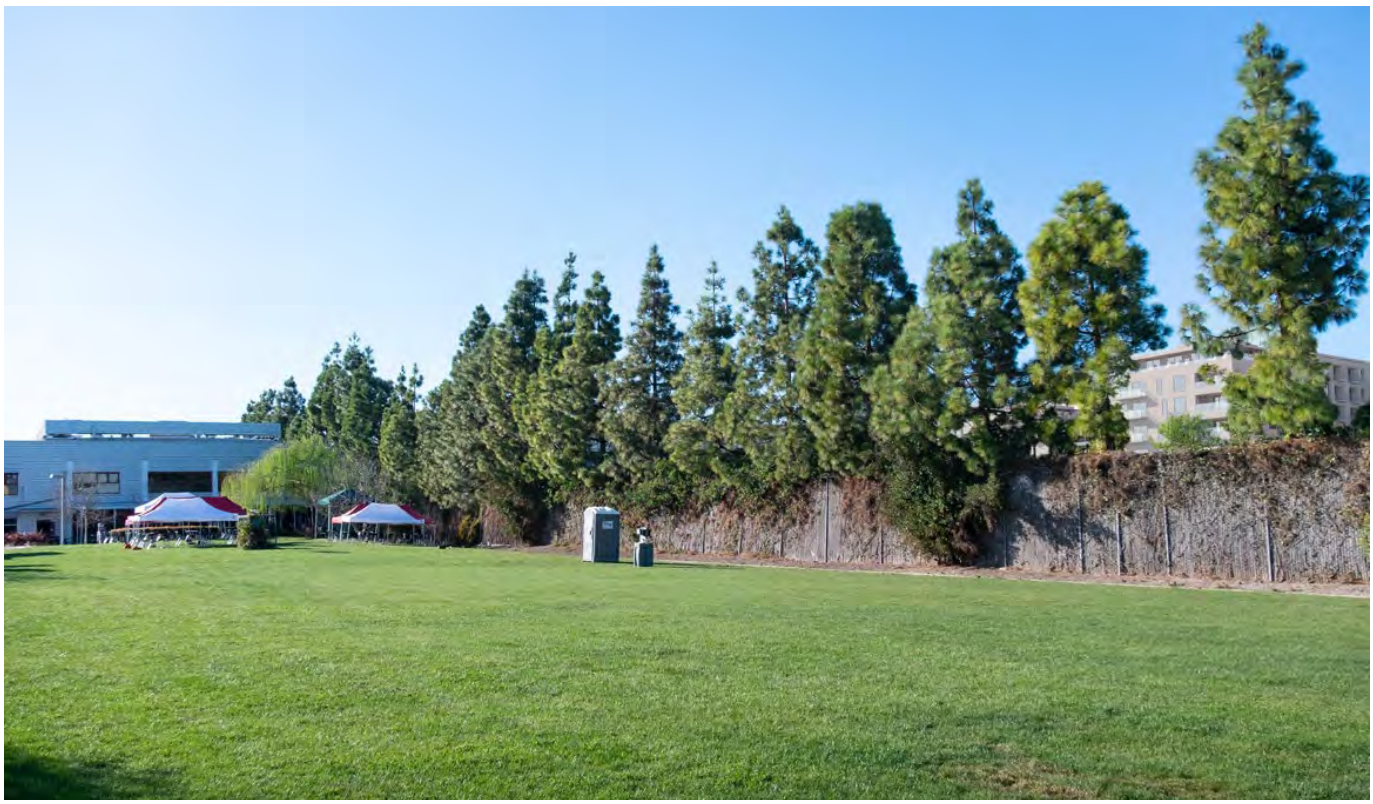
As shown in Figure 3.2-9b, foreground and background views would remain the same, but middleground views would be altered. The Publicly Accessible Park and residential building (RS 2), depicted with a illustrative height of approximately 77 feet, would be visible east of Willow Road. In this portion of Willow Road, the park would serve as a visual buffer, setting back the majority of proposed buildings from the street. The hotel (TS1), depicted with an illustrative height of approximately 84 feet, would be seen in the distance. Farther to the north, the Elevated Park overcrossing above Willow Road would be visible to the viewer. Although the proposed buildings would be taller than existing buildings, the buildings would be generally compatible with surrounding development because development would be within the maximum and average height parameters of the City Zoning Ordinance, with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. Furthermore, given that scenic vistas are not available from this vantage point, no substantial adverse changes are anticipated.

Viewpoint 9: Hamilton Avenue and Carlton Avenue Looking Southeast toward the Project Site

Viewpoint 9 provides views of the Hamilton Avenue and Carlton Avenue intersection, looking southeast toward the Project Site. Sensitive viewers at this viewpoint include individuals traveling along roadways and sidewalks. As shown in Figure 3.2-10a, Viewpoint 9, from this vantage point views, of the



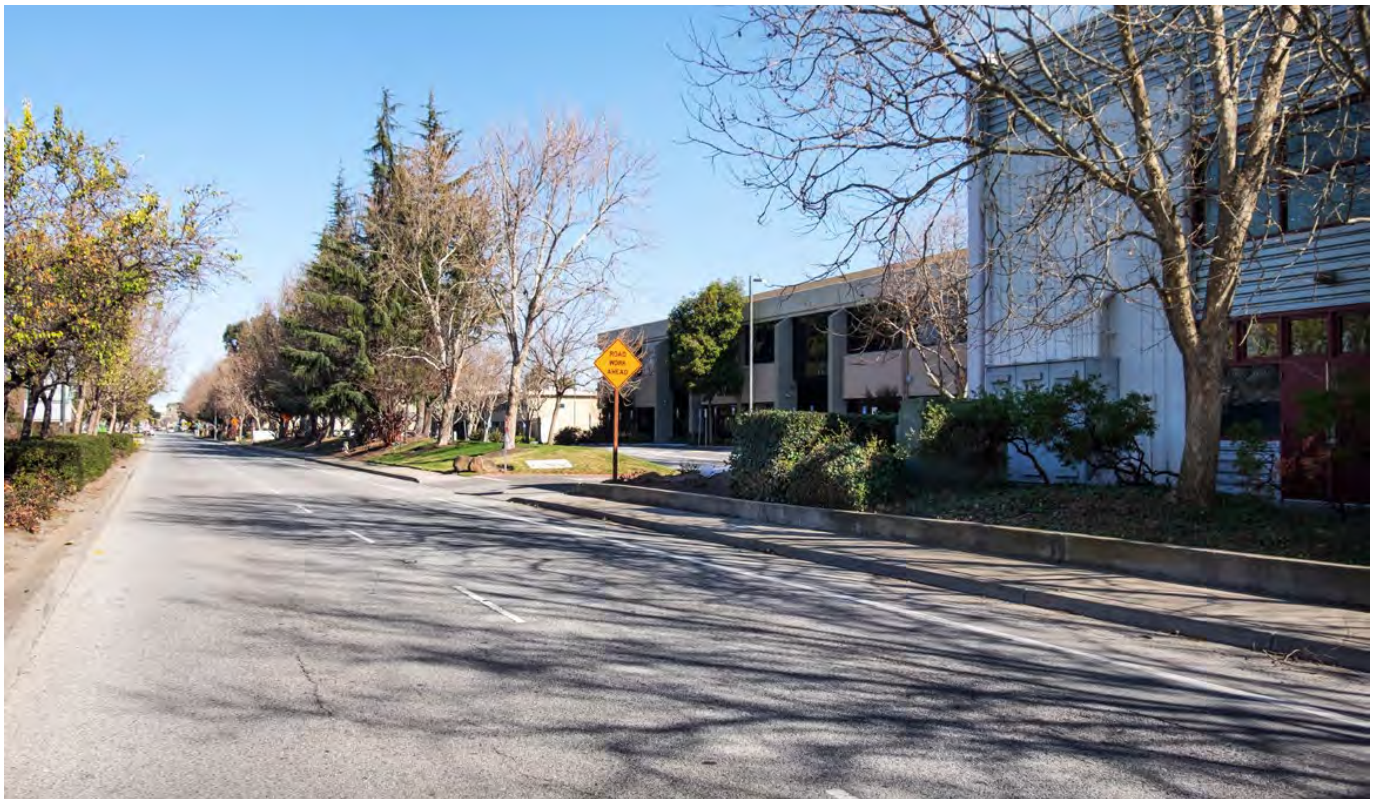
a. Existing



b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-8
Viewpoint 7: Mid-Peninsula High School

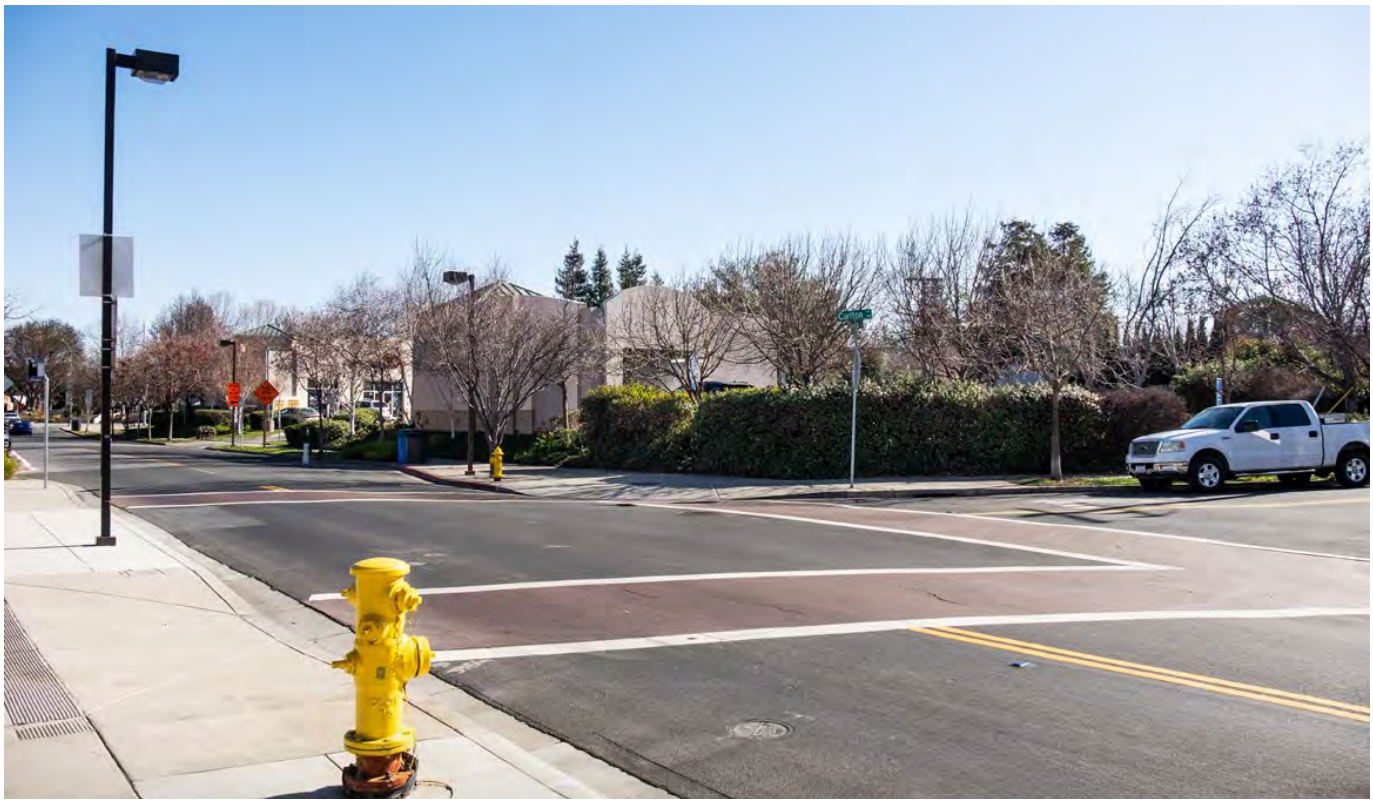


a. Existing

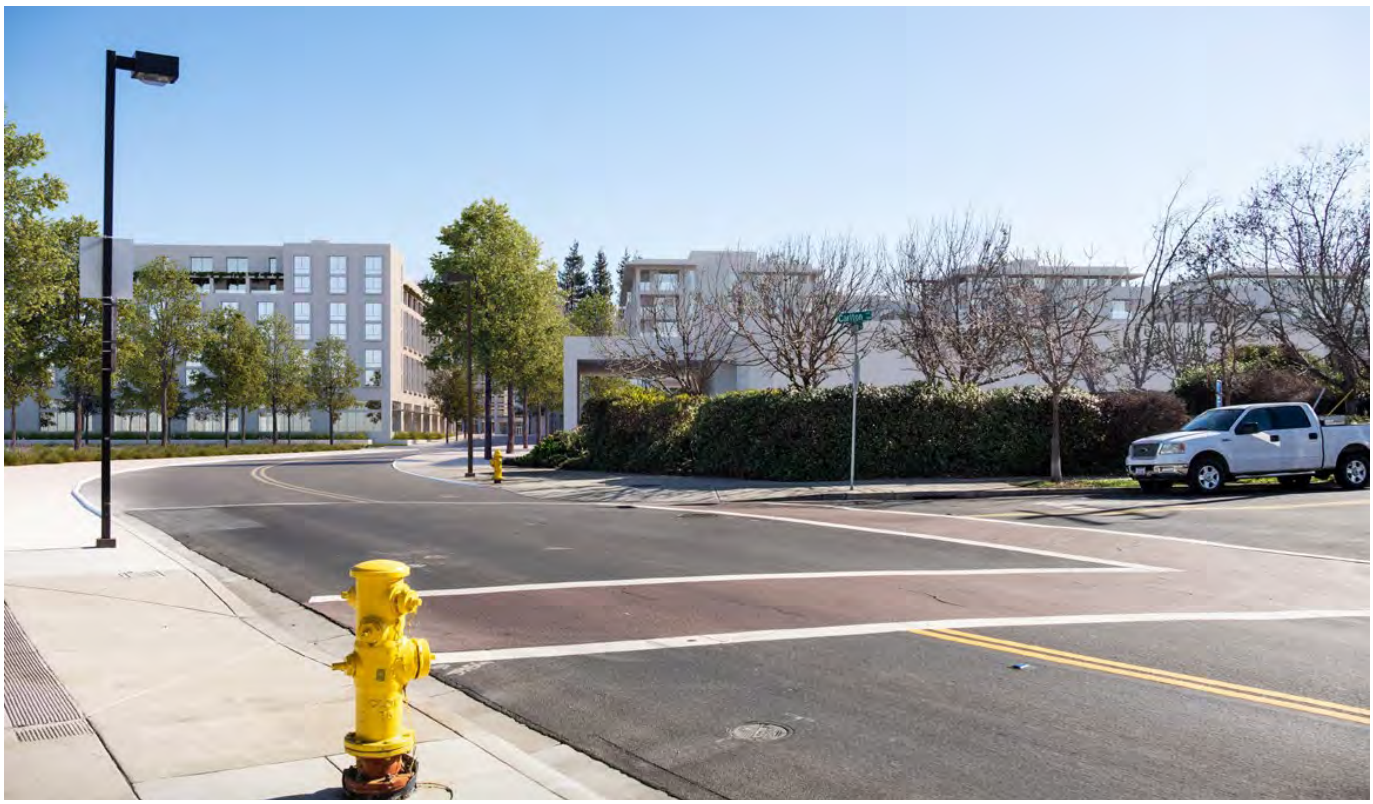
b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-9
Viewpoint 8: Willow Road (north)



a. Existing



b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-10
Viewpoint 9: Hamilton Avenue and Carlton Avenue

intersection, streetlights, fire hydrants, and streetscape vegetation are visible in the foreground. In the middleground, mature trees and the service station on Hamilton Avenue Parcel South are visible. Because of the flat topography and intervening views, scenic vistas would not be available in the background.

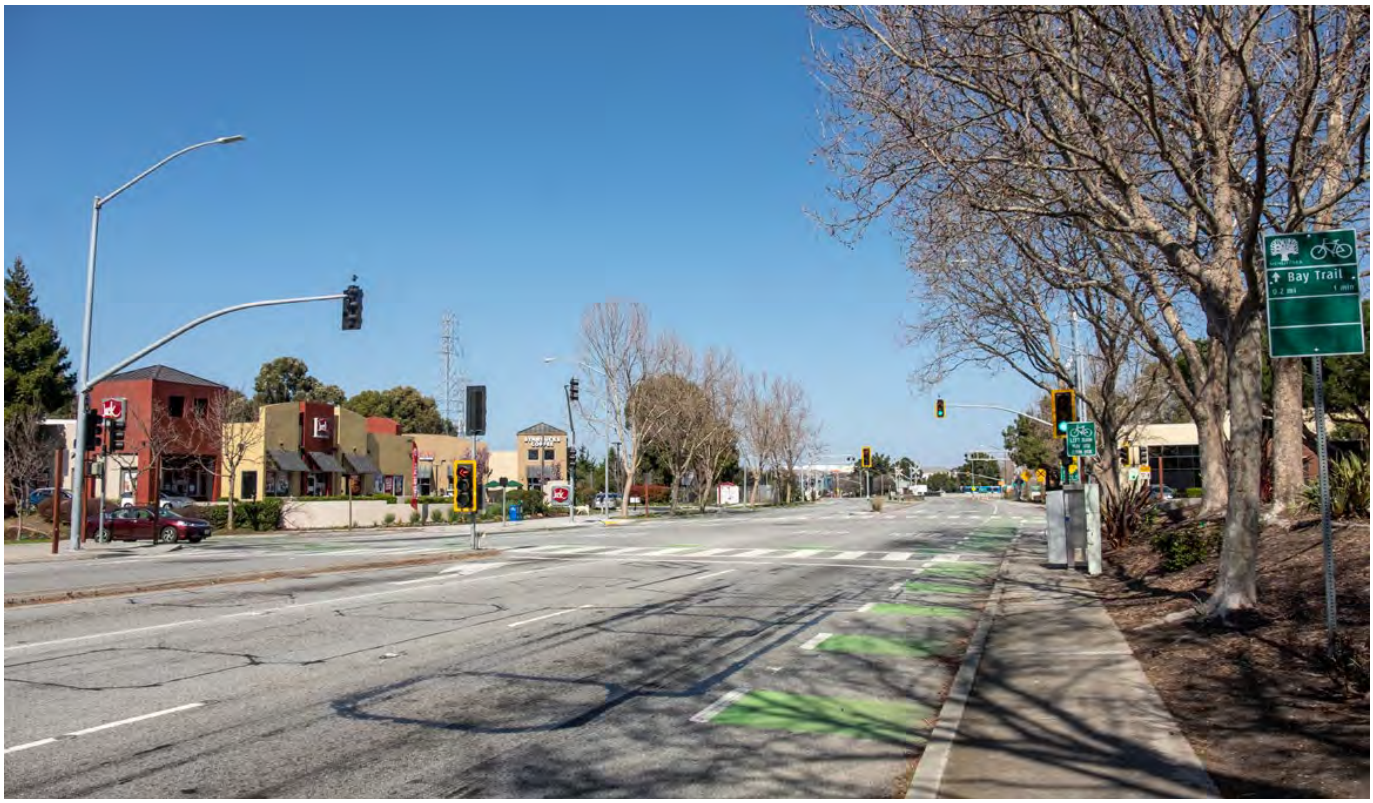
As shown in Figure 3.2-10b, foreground views would remain the same, but middleground views would be altered. The Hamilton Avenue alignment would be reconfigured to align with the proposed Main Street on the main Project Site. The redesigned service station would be partially visible through proposed vegetation on Hamilton Avenue Parcel South. The proposed open space area on Hamilton Avenue Parcel North would be visible beyond the streetlight. North of Main Street, the hotel (TS1), depicted with a n illustrative height of approximately 84 feet, would be seen in the distance. South of Main Street, the residential building (RS 2), depicted with an illustrative height of approximately 77 feet, would be visible. Although the proposed buildings would be taller than existing buildings, the buildings would be generally compatible with surrounding development because development would be within the maximum and average height parameters of the City Zoning Ordinance, with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. Furthermore, given that scenic vistas are not available from this vantage point, no substantial adverse changes are anticipated.

Viewpoint 10: Willow Road Looking Northwest toward the Project Site

Viewpoint 10 provides views of Willow Road and surrounding development. Sensitive viewers at this viewpoint include individuals traveling along the roadway, bicycle lanes, and sidewalks. As shown in Figure 3.2-11a, Viewpoint 10, from this vantage point, views of the Willow Road and the Hamilton Avenue intersection, traffic lights, wayfinding signs, and streetscape vegetation are available in the foreground. In the middleground, existing commercial retail and dining establishments are visible at Hamilton Avenue Parcel North. Mature vegetation and transmission towers are also visible in the distance, beyond existing development. The Willow Road and Bayfront Expressway intersection is visible in the background, and the roofline of the Meta East Campus is visible north of Bayfront Expressway. Because of the flat topography and surrounding development, scenic vistas are not available in the background.

As shown in Figure 3.2-11b, foreground, middleground, and background views would be altered. The Hamilton Avenue and Willow Road intersection would be reconfigured, the pedestrian crosswalk would be farther south on Willow Road, and the vegetated median would extend farther south. However, the viewshed of existing buildings on Hamilton Avenue Parcel North would remain the same. The hotel (TS1), depicted with an illustrative height of approximately 84 feet, and associated sidewalk improvements would be visible to those traveling north on Willow Road.

The Elevated Park over Willow Road would be a dominant feature in this area, with views of the concrete overcrossing structure and the large trees and vegetation in the park. The northeast corner of Hamilton Avenue Parcel North would include a structure with an elevator and staircase, providing access to the Elevated Park. The southeast corner of the parcel would provide a new surface parking lot and additional open space areas. The proposed development would be taller than existing development and would alter the viewshed within this vantage point. However, proposed structures would be generally compatible with surrounding development because development would be within the maximum and average height parameters of the City Zoning Ordinance, with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. Furthermore, because long-distance scenic vistas are not available from this vantage point, no substantial adverse changes are anticipated.



a. Existing

b. Proposed

Graphics ... 00040.18 (11/2/21) AB

Figure 3.2-11
Viewpoint 10: Willow Road (northwest)

Summary

As demonstrated by the photomontages, the Proposed Project would construct buildings and associated structures with additional height, bulk, and massing compared with existing conditions. However, increased development would represent a small portion of the overall vista, as viewed from the Bay Trail, Bayfront Expressway, BCDC Public Shoreline Trail, and surrounding roadways. Scenic views would continue to be available from publicly accessible vantage points, between buildings, and over lower-intensity areas. Because scenic views would continue to be available from publicly accessible vantage points, impacts on scenic vistas would be ***less than significant***.

Impact AES-2: Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality. The Proposed Project would not conflict with applicable zoning or other regulations governing scenic quality. (LTS)

For purposes of this analysis, a conflict with applicable zoning and other regulations governing scenic quality would occur if the Proposed Project were to introduce a new visible element that would be inconsistent with regulations governing the overall scenic quality, scale, and character of surrounding development. The new element would also need to be consistent with the City Zoning Ordinance, Menlo Park Municipal Code, and City General Plan policies. The analysis considers consistency with City General Plan policies, zoning, the land use designation, and municipal code regulations governing scenic quality.

Construction Activity

Project construction would involve demolition and removal of all structures on the main Project Site. Demolition activities on Hamilton Avenue Parcel South would remove the service station; targeted demolition would occur on Hamilton Avenue Parcel North. The Proposed Project would also construct an undercrossing (Willow Road Tunnel) to provide tram and bicycle/pedestrian access to the neighboring Meta campuses. Other offsite transportation and utility improvements would be constructed to serve the Proposed Project (refer to Chapter 2, *Project Description*, for more details). Construction vehicles, equipment, and materials would be staged onsite in three key locations, including one offsite location (as shown in Figure 2-18, included in Chapter 2, *Project Description*). Offsite Staging Location 1, at 1520 Willow Road, would be north of the SamTrams corridor and adjacent to the main Project Site. Onsite Staging Location 2 comprises Parcels 4, 5, and C. Staging Location 3 would be located at the 3.5-acre Publicly Accessible Park. Once constructed, the North and South Garages would be used for construction worker parking. Staging for Hamilton Avenue Parcels North and South and road realignment would occur within the proposed new right-of-way (west of Willow Road) and Hamilton Avenue Parcel South. Construction fencing and existing landscaping would provide visual screening and be required to comply with Menlo Park Municipal Code Chapter 16.64, which establishes standards for fences. Although construction equipment would be visible from public view corridors along Willow Road, visual degradation associated with construction would be short term and temporary and would not conflict with applicable regulations governing scenic quality. Therefore, impacts would be ***less than significant***.

Project Operation

The main Project Site is zoned O-B (Office Bonus) and R-MU-B (Residential Mixed-Use Bonus). Under current zoning designations, additional "bonus-level" development is permitted in exchange for providing community amenities that are acceptable to the City Council in the manner provided by the Menlo Park Municipal Code or by entering into a Development Agreement (DA) with the City. Consistent with these requirements, the Project proposes a variety of potential community amenities, including

onsite features such as a Publicly Accessible Park along the southern boundary, Elevated Park, Town Square at the center, and multi-modal transportation facilities for bicyclists, pedestrians, and vehicles on Main Street. Furthermore, the Proposed Project would be subject to the City's architectural control (design review) process, as set forth in the CDP, Sections 16.82.050 through 16.82.100 of the Menlo Park Municipal Code. Through the CDP, the subsequent architectural control applications would be required to demonstrate consistency with the Menlo Park Municipal Code, including compliance with Zoning Ordinance development regulations (16.43.050 and 16.45.050) and design standards (16.43.130 and 16.45.120). Section 16.68.020 of the Menlo Park Municipal Code establishes the requirements for architectural control approval. Each application for a building permit for construction or alternation of a building must be accompanied by architectural drawings showing elevations, landscaping or other ground treatments, and the design of parking facilities, including access points. The architectural control process would determine the specifics of each building's architectural design and configuration to ensure consistency with existing visual character. Upon review of the architectural drawings prepared for the Proposed Project, the Planning Commission or City Council, as applicable, would make findings regarding neighborhood character, orderly growth, and neighborhood desirability. Therefore, development on the main Project Site would be required to comply with requirements set forth for the designated zoning districts.

Regarding Hamilton Avenue Parcels North and South, the redeveloped service station and other amenities proposed in this area would be similar in size and massing to existing development. The Neighborhood Commercial District, Special (C-2-S) zoning designation establishes a maximum FAR of 50 percent and provides for setbacks, heights, distances between buildings, lot coverage, parking requirements, and landscaping requirements to be established by the Planning Commission for each development**.** In addition, the proposed improvements to the Hamilton Avenue Parcels North and South would be subject to architectural control review, through which the City would ensure compliance with the applicable requirements. Therefore, development on Hamilton Avenue Parcels North and South would comply with requirements set forth for the designated zoning district.

The main Project Site and Hamilton Avenue Parcels North and South currently include 925 trees, which are planted mainly in parkways and pavement cutouts adjacent to buildings, parking lots, and streets. Of the existing onsite trees, 821 trees are proposed for removal, 269 of which qualify as heritage trees, per the City's Heritage Tree Ordinance (Chapter 13.24). Consistent with Chapter 13.24 of the Menlo Park Municipal Code, the Proposed Project would obtain a permit to remove protected trees and pay applicable fees. Furthermore, the proposed landscape plan for the main Project Site includes approximately 822 new trees, which is more that the number of trees proposed for removal. Heritage tree replacements would meet the City's replacement value requirements, based on the valuation of the existing heritage trees proposed for removal. Therefore, the Proposed Project would comply with requirements set forth in Chapter 13.24 of the Menlo Park Municipal Code.

The City General Plan includes policies adopted to minimize impacts on aesthetic resources and preserve scenic quality. Consistent with City General Plan Policy LU-2.3, which directs the City to allow mixed-use projects with residential units, the Proposed Project would provide a mixed-use neighborhood. Consistent with City General Plan Policy LU-6.2, which directs the City to require development projects to provide ample open space, the Proposed Project would provide a minimum of 360,000 sf of publicly accessible open space. The illustrative design depicted in the CDP includes 392,372 sf of publicly accessible open space and a Town Square. Consistent with Policy LU-6.8, the Proposed Project's landscape plan includes replacement trees and water-efficient varieties of plants. Policy LU-6.11 directs the City to allow development near the Bay only on already-developed parcels. Consistent with this policy, the Proposed Project would redevelop an existing industrial site and an existing retail site. The approximately 2.0-acre publicly accessible Elevated Park would

include well-designed bicycle and pedestrian facilities, consistent with Policy OSC1.12. As noted previously, the Proposed Project would comply with Chapter 13.24 of the Menlo Park Municipal Code, consistent with Policy OSC1.15. Therefore, the Proposed Project would comply City General Plan policies adopted to minimize impacts on aesthetic resources and preserve scenic quality.

Summary

Based on the development standards and conceptual designs included in the CDP, the Proposed Project on the main Project Site would comply with applicable zoning code regulations (Sections 16.43.050 and 16.45.050) and design standards (Sections 16.43.130 and 16.45.120), with the exception of one mixed-use/residential building that would exceed the maximum height limit by up to 5 feet, subject to approval of an adjustment through the CDP. Development on Hamilton Parcels North and South would comply with the maximum FAR of the Neighborhood Commercial District, Special (C-2-S) zoning designation as well as the setbacks, heights, distances between buildings, lot coverage, parking requirements, and landscaping requirements established by the Planning Commission for the parcels. The Proposed Project would undergo the City's architectural control process to ensure that the final designs comply with applicable development and design standards, as outlined in the City Zoning Ordinance and the CDP. The proposed landscape plan would replace heritage trees in accordance with Chapter 13.24 of the Menlo Park Municipal Code. In addition, compliance with City General Plan policies, as listed above, would minimize potential adverse impacts on aesthetic resources. Therefore, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be ***less than significant***, consistent with the ConnectMenlo EIR. No mitigation is required.

Impact AES-3: New Sources of Light and Glare. The Proposed Project would not create a new source of substantial light or glare that could adversely affect daytime or nighttime views in the area (LTS)

Construction Light and Glare

During Project construction, glare would be produced from sources such as reflective surfaces on construction vehicles. However, these sources would be temporary, occurring only during construction. Glare would depend on the time of day. It would also be transient and distributed as vehicles move through the Project Site.

Work conducted during evenings and on weekends would be limited to reduce potential disruptions within the broader neighborhood. Low-level safety lighting may be needed for construction site security. However, the safety lighting would be temporary. Furthermore, the lighting would be low to the ground and, therefore, shielded from nearby development. As a result, temporary construction glare and nighttime lighting impacts would be ***less than significant,*** consistent with the ConnectMenlo EIR. No mitigation is required.

Project Light and Glare

As noted in the Existing Conditions section, existing sources of light on the main Project Site include the light fixtures on buildings, along walkways, and along internal circulation routes. Similarly, sources of light on Hamilton Avenue Parcels North and South include the light fixtures on buildings and along pathways as well as the street lighting in public rights-of-way, at the location for the Willow Road Tunnel, and at the PG&E substation. Sources of daytime glare on the main Project Site and on Hamilton Avenue Parcels North and South include reflected sunlight from buildings, glass doors, and parked vehicles. Sources of nighttime glare include vehicle headlights and street lighting. Dense vegetation and fencing on the main Project Site aid in minimizing light trespass from the area.

The Proposed Project includes nighttime lighting along the perimeter of the site as well as internal circulation routes for bicyclists, and pedestrians, and vehicles. Proposed buildings would include safety lighting along pathways and near entrances. Project lighting would be visible to individuals traveling along Willow Road and Bayfront Expressway as well as recreationalist using the Bay Trail during evening hours.

Because of the urbanized nature of surrounding areas east, south, and west of the Project Site, a substantial amount of ambient nighttime lighting currently exists. However, areas to the north—which include Bayfront Expressway, Meta East Campus, salt ponds, marshes, the Refuge, and Bay—contain minimal nighttime lighting. Proposed lighting would be required to comply with the Building Energy Efficiency Standards outlined in the California Code of Regulations (Title 24, Parts 1 and 6). Specifically, all fixtures would be energy efficient and designed to reduce glare and unnecessary light spillage. Occupancy controls for non-emergency lighting would be required, as would safety lighting for vehicles and pedestrians. Light fixtures throughout the main Project Site would be designed for bicyclists, pedestrians, and vehicles. Therefore, impacts related to nighttime light and glare would be ***less than significant***, consistent with the ConnectMenlo EIR. No mitigation is required. In addition, the less than significant impact would be further reduced with Mitigation Measure BIO-5.3, *Lighting Design Requirements.* As discussed in Section 3.9, *Biological Resources*, implementation of Mitigation Measure BIO-5.3 would require the Project Sponsor to implement measures to reduce lighting impacts on birds. Specifically, the Proposed Project would be required to install fully shielded lighting to avoid illumination from shining upward, minimize exterior lighting consistent with the International Dark Sky Association, and require temporary lighting for nighttime social events to be switched off no later than midnight.

Glare is caused by light reflected from pavement, vehicles, and building materials, such as reflective glass and polished surfaces. During the daytime, the amount of glare depends on the intensity and direction of the sunlight. Daytime glare can create hazards for individuals traveling along Willow Road and Bayfront Expressway as well as recreationalists on the Bay Trail. The exact materials to be included in the building façades are not known at this time. However, as noted above, the Proposed Project would be required to comply with the City's bird-safe design requirements, as set forth in Section 16.43.140(6) and 16.45.130(6) of the Menlo Park Municipal Code. Specifically, the Proposed Project would avoid the installation of highly reflective glass and instead install opaque glass or treated glass that would reduce daytime glare. In addition, City General Plan Policy LU-2.3 directs the City to allow mixed-use projects with residential units if the design addresses potential compatibility issues, such as light spillover. Therefore, impacts related to daytime glare would be ***less than significant,*** consistent with the ConnectMenlo EIR. No mitigation is required.

Cumulative Impacts

Impact C-AES-1: Cumulative Aesthetics Impacts. Cumulative development would result in a less than significant cumulative aesthetic impact, and thus the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact to aesthetics (LTS).

Summary of Analysis in the ConnectMenlo EIR

The cumulative impact analysis included in Chapter 4.1, *Aesthetics*, of the ConnectMenlo EIR considered growth projected by ConnectMenlo within the study area,[15] in combination with impacts from projected growth in the rest of San Mateo County and the surrounding regions, as forecast by the Association of Bay Area Governments (ABAG). The cumulative setting for visual impacts included potential future development under ConnectMenlo combined with effects of development on lands adjacent to Menlo Park within East Palo Alto, Palo Alto, Stanford, Atherton, North Fair Oaks, and Redwood City.

The ConnectMenlo EIR determined that the new development would alter the visual environment of Menlo Park and surrounding areas. However, given the existence of previously approved projects with greater heights, future development would be consistent with existing conditions. Furthermore, the ConnectMenlo EIR determined that impacts associated with scenic resources, visual character, and increased light and glare would generally be site specific and would not contribute to cumulative impacts through compliance with applicable general plan and municipal code policies.

The ConnectMenlo EIR determined that, because of the developed nature of the overall study area and Bayfront Area, future development under ConnectMenlo in combination with other new development would not contribute to a significant cumulative impact with respect to the visual resources. Individual development projects would continue to be subject to applicable general plan policies and municipal code provisions related to aesthetics, including potential project-level design review. In addition, as part of the approval process, potential new development under ConnectMenlo would be subject to architectural review and design standards, as applicable, to ensure that development would be aesthetically pleasing and compatible with adjoining land uses. With these development review mechanisms in place, approved future development under ConnectMenlo would not be anticipated to result in substantial impacts on visual resources, resulting in a ***less-than-significant*** cumulative impact with respect to aesthetics.

Cumulative Impacts with the Proposed Project

Consistent with the ConnectMenlo EIR, the geographic context for cumulative aesthetic impacts with the Proposed Project includes development in the ConnectMenlo study area in combination with impacts from projected growth in the rest of San Mateo County and the surrounding regions.

As noted in Chapter 3, *Environmental Impact Analysis*, of this EIR, in addition to the buildout projections considered in the ConnectMenlo EIR, the cumulative scenario for this EIR also includes the additional unrestricted units at the 123 Independence Drive and East Palo Alto projects. As shown in Figure 3.0-1, these additional projects are not close to the Project Site, nor are the other projects in the rest of San Mateo County and surrounding regions. Given the distance from the Project Site and the developed nature of the

[15] The ConnectMenlo EIR study area consists of all land within Menlo Park and its sphere of influence (i.e., where the City maintains a role in land use and transportation decisions through future annexations of unincorporated areas) and a proposed planning area (i.e., where the City believes the Menlo Park community should be able to participate in influencing land use and transportation decisions).

Bayfront Area, the 123 Independence Drive Project and East Palo Alto projects, as well as other more distant projects, would not be visible from the Project viewshed. Therefore, these additional projects would not alter the cumulative impact determination stated in the ConnectMenlo EIR, and the cumulative impact with respect to scenic resources, visual character, and increased light and glare would remain less than significant.

The Proposed Project would not result in a substantial change in the ConnectMenlo project. It would not be a cumulatively considerable contributor to a significant aesthetic impact and would not cause new or substantially more severe significant aesthetic impacts than those analyzed in the ConnectMenlo EIR. Therefore, the Proposed Project in combination with other past, present, and reasonably foreseeable future projects would result in a ***less-than-significant cumulative impact*** with respect to aesthetics. No mitigation measures would be required.