

3.15 Utilities and Service Systems

This section describes the existing environment and regulatory setting for utilities and service systems within Menlo Park related to the Willow Village Master Plan Project (Proposed Project). It describes the potential impacts on utilities and service systems, including water, wastewater, stormwater, natural gas, electricity, telecommunications, and solid waste that would result from implementation of the Proposed Project. Cumulative impacts are discussed at the end of this section. The analysis is based on information from the Menlo Park Municipal Water (MPMW) 2020 Urban Water Management Plan (UWMP);¹ the Alternative Water Source Assessment and Water Modeling Memorandum prepared by Freyer & Laureta, Inc.;² the Water Supply Assessment (WSA) for the Proposed Project prepared by West Yost (Appendix 3.15);³ the Willow Village Hydraulic Evaluation technical memorandum prepared for the Project by West Yost;⁴ and multiple sanitary sewer technical studies prepared by Sherwood Design Engineers and Freyer & Laureta, Inc.^{5,6}

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1) were considered in preparing this analysis. Applicable comments included requests by the San Francisco Public Utilities Commission (SFPUC) and West Bay Sanitary District (WBSD) to assess the Proposed Project's potential impacts on SFPUC facilities and their pipeline/property right of way (ROW), as well as impacts on downstream WBSD facilities, potential upgrades, and recycled water treatment. Comments by individuals also requested that the EIR assess the treatment of and impacts to solid waste facilities.

Existing Conditions

Environmental Setting

Water Supply

The Project Site, inclusive of the main Project Site and the Hamilton Avenue Parcels North and South unless otherwise noted, is within the MPMW service area, which consists of two service areas: the Upper Zone (providing water to the Sharon Heights area) and the Lower Zone (providing water to areas east of El Camino Real). The Lower Zone serves the Project Site.⁷ MPMW provides water to roughly half of Menlo

-
- ¹ City of Menlo Park. 2021. *2020 Urban Water Management Plan for Menlo Park Municipal Water*. Available: Prepared by Erler & Kalinowski, Inc. June. <https://www.menlopark.org/DocumentCenter/View/29212/2020-Urban-Water-Management-Plan-June-2021>. Accessed: March 16, 2022.
 - ² Freyer & Laureta, Inc. 2022. *Willow Village Project Water Demand, Alternate Water Source Assessment and Water Modeling Memorandum*. Technical memorandum to Eric Harrison. January 27.
 - ³ West Yost. 2022. *Willow Village Project Water Supply Assessment*. Prepared for the Menlo Park Municipal Water District. February.
 - ⁴ West Yost. Technical Memorandum. 2022. *Willow Village Hydraulic Evaluation*. Prepared for the Menlo Park Municipal Water District. February.
 - ⁵ Sherwood Design Engineers and Freyer & Laureta, Inc. 2019. *Offsite Sanitary Sewer System Study, Willow Village*. July 19.
 - ⁶ Sherwood Design Engineers and Freyer & Laureta, Inc. 2020. *Sanitary Sewer System Study, Willow Village*. December 18.
 - ⁷ Menlo Park Municipal Water. 2021. *Menlo Park Municipal Water*. Available: <https://www.menlopark.org/131/Menlo-Park-Municipal-Water>. Accessed: March 16, 2022.

Park (including the Project Site), which equates to about 16,000 residents in an area of approximately 9 square miles, through 4,296 service connections (as of 2020). MPMW purchases all of its water from the Regional Water System (RWS), which is operated by SFPUC in accordance with the November 2018 Amended and Restated Water Supply Agreement between the City and County of San Francisco and Wholesale Customers in Alameda, San Mateo, and Santa Clara Counties. The term of the agreement is 25 years, with a beginning date of July 1, 2009 and an expiration date of June 30, 2034. Per the agreement, MPMW has an Individual Supply Guarantee (ISG) of 4.456 million gallons per day (mgd), or 1,630 million gallons per year, supplied by the SFPUC RWS. Over the last five years (2016–2020), MPMW has purchased between 52 percent and 66 percent of its individual supply guarantee. Approximately 85 percent of the water supplied to the RWS originates in the Hetch Hetchy watershed in Yosemite National Park. The water flows down the Tuolumne River and into Hetch Hetchy Reservoir. Water from the Hetch Hetchy watershed is managed through the Hetch Hetchy Water and Power Project (Hetch Hetchy Project). The Hetch Hetchy Project is composed of reservoirs, hydroelectric generation and transmission facilities, and water transmission facilities, from the Hetch Hetchy Valley west to the Alameda East Portal of the Coast Range Tunnel in Sunol Valley.⁸

The reliability of MPMW's water supply is dependent upon its water supply contract with the SFPUC and its membership in the Bay Area Water Supply and Conservation Agency (BAWSCA), which represents the SFPUC's 26 wholesale customers and coordinates their water conservation programs. Approximately 15 percent of the water supply to the RWS originates in the Alameda and Peninsula watersheds, which comprise the Alameda System and the Peninsula System. These systems generally consist of facilities west of the Alameda East Portal, including the 63,000-acre Alameda and Peninsula watersheds, storage reservoirs, two water treatment plants (WTPs), and a distribution system that delivers water to retail and wholesale customers. The current reliability of MPMW's water supply is largely dependent upon the reliability of the SFPUC's water supply.⁹

In May 2021, the Menlo Park City Council adopted the 2020 UWMP. The 2020 UWMP carries forward information from the 2015 UWMP that remains current and relevant but also provides additional information required by the amendments to the Urban Water Management Planning Act (California Water Code Sections 10610–10657). The 2020 UWMP concludes that in normal years Menlo Park will have the necessary water resources available to support anticipated growth, including the growth anticipated in the General Plan and M-2 Area Zoning Update (ConnectMenlo). In single and multiple dry years, there is more uncertainty in available water supply due to implementation of the Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment). However, MPMW is taking steps to improve supply reliability through local emergency supply projects, partnerships to pursue recycled water supplies, and actions to reduce potable water demand in dry years through implementation of its adopted Water Shortage Contingency Plan (WSCP). The WSCP was approved in May 2021 concurrent with the 2020 UWMP, but serves as a stand-alone document. It is to be engaged in case of a water shortage event, such as a drought or supply interruption. The WSCP provides specific policies and actions that can be implemented for various shortage scenarios (e.g., implementing customer water

⁸ Menlo Park Municipal Water. 2021. *Menlo Park Municipal Water*. Available: <https://www.menlopark.org/131/Menlo-Park-Municipal-Water>. Accessed: March 16, 2022.

⁹ Ibid.

budgets and surcharges or restricting landscape irrigation to specific days/times). Consistent with Department of Water Resources requirements, the WSCP provides six standard water shortage levels, ranging from 10 percent to more than 50 percent.^{10,11}

Water Treatment

The City of Menlo Park (City) does not own or operate a WTP. Although the Hetch Hetchy water source meets federal and state drinking water quality requirements without the need for filtration, it is secondarily disinfected with ultraviolet treatment at the SFPUC's Tesla Treatment Facility, constructed in 2011. All SFPUC water derived from sources other than Hetch Hetchy Reservoir is treated at one of two treatment plants, the Sunol Valley WTP or the Harry Tracy WTP. The Sunol Valley WTP treats primarily water from the Alameda System reservoirs. The Harry Tracy WTP filters and disinfects water supplied from the Peninsula System, including Crystal Springs Reservoir and San Andreas Reservoir.^{12,13} The Tesla Treatment Facility has the capacity to treat 315 mgd.¹⁴ Recent construction at the Sunol Valley WTP increased the plant's peak capacity from 120 to 160 mgd.¹⁵ The Harry Tracy WTP, which was seismically upgraded in 2017, has the capacity to provide approximately 140 mgd for 60 days within 24 hours of a major earthquake.¹⁶

In 2020, processed and redistributed recycled water, discussed below (see *Wastewater Treatment and Collection and Recycled Water*), accounted for 20 million gallons (mg) in the MPMW system, offsetting the demand for potable water from the SFPUC. In addition, MPMW is pursuing emergency groundwater resources through the Emergency Water Storage/Supply project. If water supplies from the RWS are reduced or unavailable, the Emergency Water Storage/Supply Project would have the capacity to provide MPMW with up to 4.32 mgd from two or three wells at separate locations. In 2021, MPMW completed construction of the first well for emergency use in the Lower Zone at the City's corporation yard. Because of COVID-19, the State Water Resources Control Board (SWRCB) has not yet been able to complete the permitting for the new well, which is now expected to occur in 2022. The SWRCB will also need to amend MPMW's permit to allow water from these wells to be used for drinking water. Future site planning is continuing for additional well(s) or reservoir site(s).

¹⁰ City of Menlo Park. 2021. *2020 Urban Water Management Plan for Menlo Park Municipal Water*. Prepared by Erler & Kalinowski, Inc. June. Available: <https://www.menlopark.org/DocumentCenter/View/29212/2020-Urban-Water-Management-Plan-June-2021>. Accessed: March 16, 2022.

¹¹ As mentioned above, the City receives its water from the SFPUC. In April 2021, the SFPUC issued a draft UWMP for adoption in July 2021. The SFPUC's draft UWMP identified several potential future water supply scenarios. Scenarios that involve full adoption of the Bay-Delta Plan indicate substantial long-term water deficits during multi-year droughts. Such deficits could result in cities not receiving their full annual water allocations from the SFPUC. However, should this scenario occur, the City's WSCP would be implemented, along with further reductions, as needed. Compliance with City code and ordinance requirements, the 2020 UWMP, and the WSCP, as well as any additional water reductions, would apply across the City's water department to all customers.

¹² West Yost. 2022. Willow Village Project Water Supply Assessment. February.

¹³ Menlo Park Municipal Water. 2021. *Menlo Park Municipal Water*. Available: <https://www.menlopark.org/131/Menlo-Park-Municipal-Water>. Accessed: March 16, 2022.

¹⁴ San Francisco Public Utilities Commission (SFPUC). 2011. *Hetch Hetchy Regional Water System, Water System Improvement Program, Tesla Treatment Facility*. Available: <https://infrastructure.sfwater.org/fds/fds.aspx?lib=SFPUC&doc=708008&ver=1&data=272583080>. Accessed: November 19, 2021.

¹⁵ Monterey Mechanical Company. 2021. *Sunol Water Treatment Plant*. Available: <https://www.montmech.com/project/sunol-water-treatment-plant/>. Accessed November 19, 2021.

¹⁶ San Francisco Public Utilities Commission. 2011. *Hetch Hetchy Regional Water System, Harry Tracy Water Treatment Plant*. Available: <https://baywork.org/wp-content/uploads/2017/08/Harry-Tracy-Water-Treatment-Plant-fact-sheet-020817.pdf#:~:text=The%20recently%20upgraded%20Harry%20Tracy%20Water%20Treatment%20Plant,Hetch%20Hetchy%20Regional%20Water%20System.%20Filter%20no.%203>. Accessed: November 19, 2021.

Existing Water Supply and Infrastructure

The Project Site is served by existing water lines throughout the site that anchor the MPMW Lower Zone service area through three adjacent mains: water mains within O'Brien Drive to the south, Adams Court to the west, and Willow Road to the east.

Water use from existing development at the main Project Site equals an average daily demand of 53,151 gallons per day (gpd).¹⁷

Hydraulic Fire Flow Availability

The main Project Site and the neighboring Life Sciences District have existing deficiencies in meeting fire flow requirements.¹⁸ Two pipeline projects were identified in the City's Water System Master Plan (WSMP) to meet the City's water system performance criteria and address fire flow requirements in the area to support future development; proposed upgrades include a 16-inch diameter pipeline along East Loop Road and a 12-inch diameter pipeline connection to the existing 12-inch diameter pipeline on O'Brien Drive, north of the SFPUC easement. These upgrades are required to ensure adequate capacity to meet onsite fire flows and also provide similar or improved flow-through capacity for the Life Sciences District per the recommended WSMP improvements (the WSMP is also discussed below under *Regulatory Setting*).

Wastewater Treatment and Collection and Recycled Water

The City does not own or operate a wastewater treatment plant (WWTP) and does not convey its own wastewater. The West Bay Sanitary District (WBSD) provides wastewater collection and conveyance services to the MPMW service area. WBSD's service area includes Menlo Park, portions of Portola Valley, portions of Atherton, portions of East Palo Alto, portions of Redwood City, portions of Santa Clara County, and portions of unincorporated San Mateo County. Overall, the WBSD service area encompasses approximately 8,325 acres and has approximately 19,000 connections to serve a population of 52,900. The collection system includes approximately 200 miles of gravity sewer mains; about 37 miles of pressure, or force, mains; and 12 sewage pump stations. WBSD conveys the majority of raw wastewater from the Menlo Park pump station and force main to the Silicon Valley Clean Water (SVCW) pump station in Redwood City for treatment and discharge to San Francisco Bay.¹⁹ A limited volume of wastewater is treated within the MPMW service area at the Sharon Heights Recycled Water Facility (RWF), located at the Sharon Heights Golf and Country Club, which began using recycled water in late 2020.

SVCW, a Joint Powers Authority, serves the cities of Belmont, Redwood City, and San Carlos as well as the WBSD. More than 220,000 people and businesses are in its service area. SVCW owns and operates a WWTP, including the support facilities necessary for operation and maintenance of the plant. Its facilities also include force mains for a wastewater conveyance system, five wastewater conveyance pump stations,

¹⁷ West Yost. Technical Memorandum. 2022. *Willow Village Hydraulic Evaluation*. Prepared for the Menlo Park Municipal Water. February.

¹⁸ West Yost. Technical Memorandum. 2022. *Willow Village Hydraulic Evaluation*. Prepared for the Menlo Park Municipal Water. February.

¹⁹ West Bay Sanitary District. 2021. *About Us*. Available: <https://westbaysanitary.org/about-us/>. Accessed: November 19, 2021.

and an effluent outfall to a deep-water channel in the San Francisco Bay.²⁰ As noted in the ConnectMenlo EIR and reported by the Regional Water Quality Control Board (RWQCB), the SVCW WWTP has an average dry-weather design flow of 29 mgd and a peak wet-weather design flow of 71 mgd. In general, conveyance systems and treatment plants are designed and constructed to accommodate future capacity, including additional base flows due to planned growth plus estimated wet-weather flows.²¹

The Sharon Heights RWF is managed by the WBSD in coordination with MPMW. This 0.5 mgd satellite WWTP produces tertiary recycled water under Title 22 for reuse within MPMW's service area. Wastewater is diverted from the WBSD's collection system and pumped into the RWF. In 2020, approximately 63 mg of wastewater was treated at the Sharon Heights RWF. Of that total, 20 mg was recycled; the remaining 43 mg was conveyed to the SVCW WWTP for discharge. According to the 2020 MPMW UWMP, the amount of wastewater collected from the MPMW service area in 2020 totaled approximately 873 mg.

WBSD has completed a feasibility study and approved the feasibility of a Resource Recovery Center at WBSD's former treatment plant behind Bedwell Bayfront Park, which could produce approximately 500,000 gpd of recycled water for reuse (the MPMW 2020 UWMP projects an annual recycled water supply of 72 mg/yr from this new facility). In a public/private partnership with Meta Platforms, Inc. (Meta), the WBSD Board of Directors spearheaded the effort to install 2,800 feet of purple recycled water pipe parallel with the storm drainpipe Meta replaced in Chilco Street. This pipe would be used to distribute recycled water to the main Project Site. According to WBSD, recycled water could be used for irrigation, industrial purposes, firefighting, public fill stations, and toilet flushing in the Bayfront Area.

Existing Wastewater Collection and Treatment at the Project Site

Wastewater from the majority of the existing buildings onsite currently drain to the WBSD Menlo industrial pump station, which pumps to a gravity main that drains toward the intersection of Willow Road and Hamilton Avenue. Buildings near the northwest corner of the site drain to this same gravity main. From the intersection of Willow Road and Hamilton Avenue, the gravity main extends and discharges the existing Hamilton Henderson pump station. The Hamilton Henderson pump station is a duplex station (two pumps; one on-duty, one on-standby) that discharges via a 12-inch pipe into a 30-inch main line, which then drains into a new 36-inch main line constructed within Chilco Street.²² The Hamilton Henderson pump station capacity is 1,650 gpm (one pump on). Wastewater from the Project Site ultimately discharges to the Menlo Park pump station maintained by SVCW. To maintain discharge demands the Proposed Project would construct a new sanitary sewer force main to carry the anticipated flow offsite to the existing sewer infrastructure at Chilco Street past the existing Hamilton Henderson pump station.²³

²⁰ Silicon Valley Clean Water. 2020. *Capital Improvement Program 2020 Update, FY 20–21 to FY 29–30*. Prepared January. Available: <https://svcw.org/wp-content/uploads/2020/08/2020-SVCW-CIP-Update.pdf>. Accessed: November 19, 2021.

²¹ City of Menlo Park. 2016. *ConnectMenlo General Plan Land Use and Circulation Elements and M-2 Area Zoning Update EIR*. Available: https://www.menlopark.org/DocumentCenter/View/10360/ConnectMenloProjectDEIR_060116?bidId=. Accessed: March 19, 2021.

²² Sherwood Design Engineers and Freyer & Laureta, Inc. 2019. *Offsite Sanitary Sewer System Study, Willow Village*. July 19.

²³ Sherwood Design Engineers and Freyer & Laureta, Inc. 2020. *Sanitary Sewer System Study, Willow Village*. December 18.

The existing main Project Site is made up of 18 parcels that include approximately 1 million square feet of existing industrial, office, and warehouse land uses with surface parking. Wastewater currently generated from the main Project Site is from restroom usage, cooking, cleaning, and washing within kitchens, laboratories, and breakrooms associated with the existing approximately 3,570 seated workers. Wastewater associated with the Hamilton Avenue Parcels North and South are related to retail and gas station restroom use, along with a carwash. The ConnectMenlo EIR assumes that 90 percent of water usage becomes wastewater. Using this same methodology and knowing the current total potable water usage at the main Project Site is 19 mg/yr (0.05 mgd), the current wastewater generated at the Project Site is estimated to be approximately 17 mg/yr.

Storm Drainage System

The main Project Site currently consists of approximately 13 percent landscaped area and 87 percent impervious surfaces (buildings and paved surfaces). There are currently no stormwater treatment facilities in place at the main Project Site. The main Project Site's current stormwater runoff discharges to an existing 66-inch storm drain at Hamilton Avenue in Willow Road. This City trunk line discharges to the Ravenswood Slough via a Caltrans pump station. Hamilton Avenue Parcels North and South are currently developed with approximately 71 percent impervious surfaces (buildings and hardscapes) and approximately 29 percent pervious surfaces such as landscaping.

Solid Waste Collection and Disposal

Recology provides solid waste collection and conveyance service for Menlo Park. Collected recyclables, organics, and garbage are conveyed to the Shoreway Environmental Center (Shoreway) in San Carlos for processing and shipment. Shoreway is owned by RethinkWaste (former South Bayside Waste Management Authority), a joint powers authority that comprises 12 public agencies, including the City of Menlo Park. As of January 1, 2011, Shoreway has been operated by South Bay Recycling under a 10-year contract with RethinkWaste. The primary goal of RethinkWaste is to provide cost-effective waste reduction, recycling, and solid waste programs to member agencies through franchised services and the services of other recyclers to divert 50 percent (minimum) of the waste stream from landfills, as mandated by California state law (AB 939).²⁴

Shoreway facilities consist of a transfer station, a materials recovery facility, a public recycling center, an environmental education center, Recology offices, and South Bay Recycling offices. Shoreway serves as a regional solid waste and recycling facility for the receipt, handling, and transfer of refuse, recyclables, and organic materials collected from the RethinkWaste service area (i.e., southern and central San Mateo County). Shoreway is separately permitted by the California State Integrated Waste Management Board to receive 3,000 tons per day of solid waste and recyclables.²⁵ In 2020 Shoreway received, sorted, and transported 419,700 tons of materials.

²⁴ RethinkWaste. 2021. *About Us—Mission, Vision, Core Values & Strategic Priorities*. Available: <https://rethinkwaste.org/about/rethinkwaste/mission-vision-core-values-strategic-priorities/>. Accessed: November 19, 2021.

²⁵ RethinkWaste. 2021. *About Shoreway*. Available: <http://www.rethinkwaste.org/shoreway-facility>. Accessed: November 19, 2021.

In 2020, the RethinkWaste service area (San Mateo County) produced a total of approximately 105,930 tons of commercial solid waste, 44,184 tons of multi-family waste, and 190,060 tons of residential waste.²⁶ Overall, the service area experienced a 52 percent diversion rate by recycling and composting waste. Menlo Park had a slightly higher diversion rate than the county, with approximately 57 percent of waste diverted from the landfill.²⁷ In 2020, Menlo Park's per capita solid waste disposal rate for residents was 4.1 pounds per day (ppd); the target per capita disposal rate for residents is 7.5 ppd. Menlo Park's per capita solid waste disposal rate for employees in 2019 was 3.7 ppd;²⁸ the California Department of Resources Recycling and Recovery (CalRecycle) target per capita disposal rate for employees is 9.2 ppd.²⁹

Materials not composted or recycled at Shoreway are sent to several different landfills, with most going to the Ox Mountain Landfill (also known as Corinda Los Trancos Landfill) near Half Moon Bay. This landfill is expected to remain operational until 2034, with a permitted throughput capacity of 3,598 tons per day.³⁰ In 2019, approximately 23,770 tons of waste from Menlo Park went to the Ox Mountain Landfill.³¹

Electricity

Menlo Park is served by a community choice energy program, known as Peninsula Clean Energy (PCE) as well as Pacific Gas and Electric (PG&E). PCE offers its customers a higher percentage of renewable energy than PG&E and customers in Menlo Park are automatically enrolled in PCE. Customers may opt out and continue to purchase electricity from PG&E. PCE uses PG&E's distribution system to serve Menlo Park customers. Historically PG&E has provided natural gas and electricity services to the vast majority of Northern California, including Menlo Park and the Project Site. PG&E is a publicly traded utility company that, under contract with the California Public Utilities Commission (CPUC), generates, purchases, and distributes energy. PG&E's service area covers 70,000 square miles, roughly extending north to south from Eureka to Bakersfield and east to west from the Sierra Nevada to the Pacific Ocean. PG&E's electricity distribution system consists of 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines.³² Although the Proposed Project is currently served by the existing

²⁶ Since values provided in the RethinkWaste 2019 Annual Report, the COVID-19 pandemic resulted in a substantially reduced commercial waste collection volume (+26%) with an increase to residential waste; RethinkWaste. 2021. *2021 Annual Report*. Available <https://rethinkwaste.org/wp-content/uploads/2021/07/2020-Annual-Report.pdf>. Accessed: November 19, 2021.

²⁷ Recology San Mateo County. 2021. *Annual Report to the SBWMA for Year 2021*. Prepared February. Available: <https://rethinkwaste.org/wp-content/uploads/2021/02/Recology-Annual-Report-2020.pdf>. Accessed: February 15, 2022.

²⁸ The 2020 disposal rate for employees is significantly lower at 2.6 ppd. The 2019 rate is used in this EIR as a worst-case rate because it represents pre-pandemic levels when employees were in offices more than working from homes.

²⁹ California Department of Resources Recycling and Recovery (CalRecycle). 2020. *Jurisdiction Diversion/Disposal Rate Summary (2007-Current), Menlo Park*. Available: <https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>. Accessed: November 19, 2021.

³⁰ California Department of Resources Recycling and Recovery (CalRecycle). 2021. *SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mountain) (41-AA-0002)*. Available: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Details/3223>. Accessed: November 19, 2021.

³¹ California Department of Resources Recycling and Recovery (CalRecycle). 2020. *Jurisdiction Diversion/Disposal Rate Summary (2007-Current), Menlo Park*. Available: <https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>. Accessed: November 19, 2021.

³² Pacific Gas & Electric Company. 2021. *Company Profile*. Available: www.pge.com/en_US/about-pge/company-information/profile/profile.page. Accessed: March 16, 2022.

PG&E Belle Haven Substation, PG&E would upgrade the Ravenswood Substation³³ and provide improvements to support distribution-level electrical service to the main Project Site from this substation. The upgrades to the Ravenswood substation would be required to serve the Proposed Project given the increased electrical demand from compliance with the City's reach code, which limits the amount of natural gas usage at the main Project Site.

Natural Gas

PG&E's natural gas (methane) pipe delivery system includes 42,000 miles of distribution pipelines and 6,700 miles of transmission pipelines. Gas delivered by PG&E originates in gas fields in California, the Southwest, the Rocky Mountains, and Canada. Transmission pipelines send natural gas from fields and storage facilities in large pipes under high pressure. Smaller distribution pipelines deliver gas to individual businesses and residences. PG&E's gas transmission pipeline systems serve approximately 15 million energy customers in California. The system is operated under an inspection and monitoring program in real time on a 24-hour basis, with leak inspections, surveys, and patrols taking place continuously along the pipelines.³⁴ The PG&E gas transmission pipeline nearest the Project Site runs in a north-south direction, primarily along Sevier Avenue, west of the Project Site, from US 101 to the Dumbarton Rail Corridor.³⁵ Distribution gas pipelines are located throughout the Bayfront Area.

Telecommunications

There are numerous telecommunications providers in Menlo Park that offer DSL, wireless, cable, fiber, and copper services, including Atherton Fiber, Sonic, XFINITY from Comcast, AT&T, Earthlink, Wave Broadband, Viasat Internet, Zayo, Lumen, Verizon, and HughesNet, to residents and businesses in the city. The Project Site primarily receives services from AT&T, EarthLink, and XFINITY.³⁶ Telecommunications facilities include underground conduits and overhead cables throughout the vicinity of the Project Site.

Regulatory Setting

Federal

Federal Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), enacted in 1974, is a federal law. Its intent is to ensure safe drinking water for the public. The SDWA, which has been amended several times since it came into law, authorizes the U.S. Environmental Protection Agency (EPA) to set national standards for drinking water. These are called the National Primary Drinking Water Regulations. The regulations, which provide protection from both naturally occurring and manufactured contaminants, set enforceable maximum contaminant levels for drinking water and require all water providers in the United States to treat water sources, except for

³³ The current Ravenswood Substation operates as an existing Transmission Substation and is not equipped with distribution system infrastructure.

³⁴ Pacific Gas and Electric Company. n.d. *Learn about the PG&E Natural Gas System*. Available: https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/natural-gas-system-overview.page. Accessed: December 2, 2021.

³⁵ Pacific Gas and Electric Company. 2021. *Learn Where Natural Gas Pipelines Are Located*. Available: https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/gas-transmission-pipeline/gas-transmission-pipelines.page. Accessed: December 2, 2021.

³⁶ BroadbandNow. 2021. *Internet Providers in Menlo Park, California*. Last updated November 25. Available: <https://broadbandnow.com/California/Menlo-Park?zip=94025>. Accessed: December 2, 2021.

private wells that serve fewer than 25 people. In California, the State Department of Health Services conducts most enforcement activities. If a water system does not meet the standards, it is the water supplier's responsibility to notify its customers.

Clean Water Act

Refer to Section 3.11, *Hydrology and Water Quality*, of this EIR, for a discussion of the federal Clean Water Act of 1972.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established in the CWA to regulate municipal and industrial discharges to surface waters in the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits identify effluent and receiving water limits for allowable connections and/or mass emissions for pollutants contained in discharges, prohibitions on discharges that were not specifically allowed under the permit, and provisions that describe required actions for the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

Wastewater discharges are regulated under the NPDES permit program for direct discharges to receiving waters as well as the National Pretreatment Program for indirect discharges to sewage treatment plants.

Operation of the SVCW WWTP and its wastewater collection system is regulated by the waste discharge requirements (NPDES No. CA0038369) found in RWQCB Order No. R2-2018-00XX, effective April 1, 2018, and expiring March 31, 2023.³⁷ The discharger's wastewater collection system consists of four pump stations, which receive wastewater from the "satellite" wastewater collection systems of four municipal jurisdictions (i.e., WBSD, City of Belmont, City of San Carlos, City of Redwood City). Effluent from the WWTP is also subject to two other NPDES permits, 1) the waste discharge requirements for mercury and polychlorinated biphenyls (PCBs) from municipal and industrial wastewater discharges to San Francisco Bay (NPDES No. CA0038849) and 2) the waste discharge requirements for nutrients from municipal wastewater discharges to San Francisco Bay (NPDES No. CA0038873). The three NPDES permits enable SVCW to discharge treated wastewater into San Francisco Bay.

State

California Porter-Cologne Water Quality Control Act

As addressed under Section 3.11, *Hydrology and Water Quality*, under the California Porter-Cologne Water Quality Control Act, passed in 1969 and amended in 2013, the SWRCB has authority over state water rights and water quality policy. The act divides the state into nine regional basins, each of which is under the jurisdiction of the RWQCB that oversees water quality on a day-to-day basis at the local and regional level. RWQCBs oversee a number of water quality functions in their respective regions. RWQCBs regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. Menlo Park is under the jurisdiction of the San Francisco Bay RWQCB.

³⁷ San Francisco Bay Regional Water Quality Control Board. 2018. *Tentative Order No. R2-2018-00XX*. Available: https://www.waterboards.ca.gov/sanfranciscobay/board_info/agendas/2018/February/SiliconValley/SVCW_Tentative_Order.pdf. Accessed: March 16, 2022.

The San Francisco Bay-Delta Water Quality Control Plan

The SWRCB adopted an amendment to the San Francisco Bay-Delta Water Quality Control Plan (Bay-Delta Plan) on December 12, 2018. The plan establishes water quality objectives that protect uses of water in the Bay-Delta watershed, including uses pertaining to drinking water, water for irrigation, and fish and wildlife habitat. The Bay-Delta Plan Amendment requires the release of 40 percent of the “unimpaired flow” on the Lower San Joaquin River’s three salmon-bearing tributaries, the Stanislaus, Tuolumne, and Merced Rivers, from February through June in every year type, whether wet, normal, dry, or critically dry and requires a program for implementation. The new flow objectives recognize the vital role upstream flows provide for habitat as well as the migration of threatened and endangered fish. The revised salinity objectives reflect updated scientific information about the salt levels that are suitable for agriculture in the southern delta. The reliability of the SFPUC RWS supply is highly dependent on the assumption of whether or not the 2018 Bay-Delta Plan Amendment is implemented. According to the SFPUC, should the Bay-Delta Plan Amendment be implemented, significant supply shortfalls are projected in dry years for agencies that receive water supplies from the SFPUC RWS, as well as other agencies whose water supplies would be affected by the amendment. For MPMW, supply shortfalls are projected in single dry years (ranging from 27 to 32 percent) and in multiple dry years (ranging from 27 to 44 percent) through 2040, with similar shortfalls through 2045. If supply shortfalls do occur, MPMW expects to meet these supply shortfalls through water demand reductions and other shortage response actions by implementation of its WSCP.³⁸ The projected single dry year shortfalls would require implementation of Stage 3 or 4 of the MPMW WSCP, and the projected multiple dry year shortfalls would require implementation of Stage 3, 4 or 5 of the MPMW WSCP.

Should the Bay-Delta Plan Amendment not be implemented, MPMW expects to meet the demand for existing and planned future uses through 2040 in normal years, single dry years, and multiple dry years. A 16.5 percent supply shortfall is projected during the fourth and fifth consecutive dry years for base year 2045. These projected supply shortfalls are significantly less than the projected supply shortfalls if the Bay-Delta Plan Amendment is implemented. The SFPUC is currently implementing an Alternative Water Supply Planning Program to investigate and plan for new water supplies to address future long-term water supply reliability challenges and vulnerabilities on the RWS. As of June 2021, the SFPUC is pursuing several strategies to uphold its supply agreements, including strategies involving voluntary agreements, drought planning, alternative water supplies, and litigation.

Senate Bills 610 and 221

California Senate Bill (SB) 610 and SB 221 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 were companion measures that sought to promote more collaborative planning between local water suppliers and the cities and counties. Both statutes require detailed information regarding water availability. This information would be provided to city and county decision-makers prior to approval of specified large development projects to ensure that prudent water supply planning has been conducted and that planned water supplies will be adequate with respect to meeting existing demands, anticipated demands from approved projects and tentative maps, and the demands of proposed projects.

³⁸ A main focus of MPMW’s planned demand reduction measures is to increase public outreach and keep customers informed of the water shortage emergency and actions they can take to reduce consumption. The City will utilize its emergency supply well(s) as supply augmentation during WSCP Stages 5 and 6. Other actions that the City will take will include coordination with other agencies, implementing drought surcharge, increasing water waste patrols, etc. Additional information on MPMW’s WSCP is provided in Chapter 8 of MPMW’s 2020 UWMP.

SB 610 amended California Water Code Sections 10910 through 10915 (inclusive) to require land use lead agencies to, in certain instances:

- Identify any public water purveyor that may supply water for a proposed development project and
- Request a WSA from the identified water purveyor.

The purpose of the WSA is to demonstrate the sufficiency of the purveyor's water supplies with respect to satisfying the water demands of proposed projects that exceed a certain size and are subject to review under CEQA while still meeting the demands of the water purveyor's existing and planned future uses. Projects requiring a WSA include the following: (1) a proposed residential development of more than 500 dwelling units; (2) a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space; (3) a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) a proposed hotel or motel, or both, having more than 500 rooms; (5) a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; (6) a mixed-use project that includes one or more of the projects specified in this subdivision; and (7) a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project. California Water Code Sections 10910 through 10915 delineate the specific information that must be included in the WSA.

SB 221 amended state law (California Government Code Section 66473.7) to require affirmative written verification of an adequate water supply prior to approval by a city or county of certain residential subdivisions. SB 221 was intended to be a fail-safe mechanism that would ensure collaboration in finding the needed water supplies before construction begins.

The WSA prepared for the Proposed Project, included in Appendix 3.15, complies with SB 610 (California Water Code Sections 10910 through 10915) and SB 221. The Proposed Project includes a residential subdivision with more than 500 units; therefore, the SB 221 requirements apply to the Proposed Project.

Senate Bill 1383

SB 1383 requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCPs), such as CH₄, hydrofluorocarbons, and anthropogenic black carbon (soot) emissions. SLCPs are GHGs that degrade in the atmosphere at a faster rate than CO₂ and are considered to be responsible for 40 percent of current net climate changing emissions. The strategy includes a target to reduce CH₄ emissions by 40 percent below 2013 levels by 2030, including those from livestock management operations. This bill also requires CalRecycle and CARB to adopt regulations that achieve specific targets to reduce organic waste in landfills. The Final SLCP Reduction Strategy was approved by CARB in March 2017 and includes recommendations to reduce CH₄ emissions from a variety of sources as well as refrigerants and fumigants.³⁹ As it pertains to CalRecycle, SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025 and grants CalRecycle the regulatory authority required to achieve these targets. SB 1383 also establishes an additional waste reduction target (i.e., not less than 20 percent of currently disposed edible food to be recovered for human consumption by 2025). The Office of Administrative Law approved CalRecycle's regulations to reduce SLCP from organic waste in November 2020.

³⁹ California Air Resources Board. 2017. Short-Lived Climate Pollutant Reduction Strategy. Available: https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf. Accessed February 28, 2022.

Urban Water Management Planning Act

Through the Urban Water Management Planning Act of 1983, the California Water Code requires all urban water suppliers within California to prepare and adopt an UWMP and update it every 5 years. This requirement applies to all suppliers that provide water to more than 3,000 customers or supply more than 3,000 acre-feet of water annually. The act is intended to support the conservation and efficient use of urban water supplies. It requires a comparison between a project's water use and water supply sources for the next 20 years, in 5-year increments; planning for single and multiple dry years; and a water recycling analysis with a description of the wastewater collection and treatment system within the agency's service area and the current and potential recycled water uses. In September 2014, the act was amended by SB 1420 to require urban water suppliers to provide descriptions of their water demand management measures and similar information. The MPMW's most recent update to its UWMP occurred in 2021.

The MPMW 2020 UWMP incorporated the future population, employment, and water demand projections for buildout of the General Plan, including the additional allowable development associated with ConnectMenlo (including bonus level development potential) and other major development projects within the MPMW service area. The Proposed Project, if approved, would be within this permitted total development potential that could occur within ConnectMenlo and the associated program-level EIR. Therefore, the water demand for the Proposed Project is included and accounted for in the MPMW 2020 UWMP. The SFPUC 2020 UWMP, adopted in June 2021, extends to a 2045 horizon year and analyzes two supply scenarios, one with the Bay-Delta Plan Amendment assuming implementation starting in 2023, and one without the Bay-Delta Plan Amendment. Results of these analyses are summarized as follows:

- If the Bay-Delta Plan Amendment is implemented, SFPUC will be able to meet its contractual obligations to its wholesale customers as presented in the SFPUC 2020 UWMP in normal years but would experience significant supply shortages in dry years. In single dry years, supply shortages would range from 36 to 46 percent. In multiple dry years, supply shortages would range from 36 to 54 percent. Implementation of the Bay-Delta Plan Amendment will require rationing in all single dry and multiple dry years through 2045.
- If the Bay-Delta Plan Amendment is not implemented, SFPUC would be able to meet 100 percent of the projected purchases of its wholesale customers during all year types through 2045 except during the fourth and fifth consecutive dry years for base year 2045 when 15 percent wholesale supply shortages are projected.

In June 2021, in response to various comments from wholesale customers regarding the reliability of the RWS as described in SFPUC's 2020 UWMP, the SFPUC provided a memorandum describing SFPUC's efforts to remedy the potential effects of the Bay-Delta Plan Amendment. As described in the memorandum,⁴⁰ SFPUC's efforts include the following:

- Pursuing a Tuolumne River Voluntary Agreement
- Evaluating the drought planning scenario in light of climate change
- Pursuing alternative water supplies
- In litigation with the State over the Bay-Delta Plan Amendment
- In litigation with the State over the proposed Don Pedro FERC Water Quality Certification

⁴⁰ West Yost. 2022. Willow Village Project Water Supply Assessment. February.

Sustainable Groundwater Management Act

Refer to Section 3.11, *Hydrology and Water Quality*, of this EIR, for a discussion of the Sustainable Groundwater Management Act of 2014.

2009 Water Conservation Act

The Water Conservation Act of 2009, SB X7-7, requires all water suppliers to increase water use efficiency. The legislation set an overall goal of reducing per capita water use by 20 percent by 2020, with an interim goal of 10 percent by 2015. Effective in 2016, urban retail water suppliers that did not meet the water conservation requirements established by this bill were not eligible for state water grants or loans. SB X7-7 requires urban retail water suppliers to determine baseline water use and set reduction targets according to specified standards. As demonstrated in MPMW's 2020 UWMP, MPMW is in compliance with SB X7-7 requirements.⁴¹

State Updated Model Water Efficient Landscape Ordinance

The updated Model Water Efficient Landscape Ordinance required cities and counties to adopt landscape water conservation ordinances by February 1, 2016, or a different ordinance that would be at least as effective in conserving water as the updated ordinance. The City adopted Ordinance No. 968, Water Efficient Landscaping Regulations, in 2016 and revised Menlo Park Municipal Code Chapter 12.44, as described below.

CALGreen Building Code

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations [CCR]). It applied to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in the code, throughout California. CALGreen established planning and design standards for sustainable site development, including water conservation measures and requirements for new buildings to reduce water consumption by 20 percent. The mandatory provisions of CALGreen became effective January 1, 2011. The building efficiency standards are enforced through the local building permit process. The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through building concepts with either a reduced negative impact or a positive environmental impact and the encouragement of sustainable construction practices in the following categories:

- Planning and design,
- Energy efficiency,
- Water efficiency and conservation,
- Material conservation and resource efficiency, and
- Environmental quality.

⁴¹ City of Menlo Park. 2021. *2020 Urban Water Management Plan for Menlo Park Municipal Water*. Available: Prepared by Erler & Kalinowski, Inc. June. <https://www.menlopark.org/DocumentCenter/View/29212/2020-Urban-Water-Management-Plan-June-2021>. Accessed: March 16, 2022.

The California Plumbing Code

The California Plumbing Code (Part 5, Title 24, CCR) was adopted as part of the California Building Standards Code to prevent disorder in the industry as a result of widely divergent plumbing practices and the use of many different, and often conflicting, plumbing codes by local jurisdictions. Among the many topics covered in the code were water fixtures, potable and non-potable water systems, and recycled water systems. According to the code, water supply and distribution practices shall comply with all applicable provisions of the current edition of the California Plumbing Code.

Executive Order N-10-21

On July 8, 2021, California Governor Gavin Newsom issued Executive Order N-10-21, which proclaimed a state of emergency due to drought conditions in nine counties, Inyo, Marin, Mono, Monterey, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, and Santa Cruz. It directs state agencies to take actions to bolster drought resilience and prepare for impacts on communities, businesses, and ecosystems. The order calls on all Californians to reduce their water use voluntarily by 15 percent from their 2020 levels.⁴² Menlo Park is in San Mateo County.

State Water Resources Control Board General Waste Discharge Requirement

On May 2, 2006, the SWRCB adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1 mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system, prevent sanitary sewer waste from entering the storm sewer system, and develop a Sanitary Sewer Master Plan. The General Waste Discharge Requirement requires storm sewer overflows to be reported to the SWRCB with use of an online reporting system. The SWRCB has delegated enforcement authority to the nine RWQCBs. The San Francisco Bay RWQCB issues and enforces NPDES permits applicable to the WBSD wastewater collection system in Menlo Park and the SVCW WWTP in Redwood City.

State Water Resources Control Board Drought Emergency Regulations

On January 4, 2022, the SWRCB adopted emergency regulations, prohibiting certain wasteful water-use practices, such as irrigating in ways that cause more than incidental runoff, washing vehicles without an automatic shutoff valve, irrigating turf and ornamental landscaping within 48 hours of measurable rainfall, and washing impervious areas, unless necessary to address an immediate health and safety need. These regulations became effective January 18, 2022.

Sanitary District Act of 1923

The Sanitary District Act of 1923 (Health and Safety Code Section 6400 et seq.) authorizes the formation of sanitation districts. It also authorizes the districts to construct, operate, and maintain facilities for the collection, treatment, and disposal of wastewater. The act was amended in 1949 to allow the districts to provide solid waste management and disposal services, including refuse transfer and resource recovery

⁴² State of California. 2021. *Executive Order N-10-21*. Available: <https://www.gov.ca.gov/wp-content/uploads/2021/07/Conservation-EO-N-10-21.pdf>. Accessed: March 16, 2022.

Assembly Bill 939 and Senate Bill 1016

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of all solid waste (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. In 2006, SB 1016 updated the requirements. The new per capita disposal and goal measurement system moves the emphasis from an estimated diversion measurement number to an actual disposal measurement number, along with an evaluation of program implementation efforts. These two factors will help determine each jurisdiction's progress toward achieving AB 939 diversion goals. The 50 percent diversion requirement is now measured in terms of per capita disposal, expressed as pounds per day. Under the SB 1016 measurement system, a city is required to annually dispose of an amount equal to or less than its "50 percent equivalent per capita disposal target," as calculated by CalRecycle.

Assembly Bill 1826

Assembly Bill 1826 (AB 1826) requires that state agencies, businesses, and multifamily complexes that generate specific quantities of organic or solid waste each week enroll in organic recycling programs through an applicable solid waste disposal company. AB 1826 defines organic waste as food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. Solid waste is defined as the total of trash, recycling, and organics. Organic recycling programs may take the form of composting, mulching, or anaerobic digestion. Businesses and multifamily residential housing complexes that generate the following quantities are required to implement organic or solid waste recycling programs under AB 1826:

- Eight or more cubic yards of organic waste per week as of April 1, 2016;
- Four or more cubic yards of organic waste per week as of January 1, 2017;
- Four or more cubic yards of solid waste per week as of January 1, 2019; and
- Two or more cubic yards of solid waste per week as of January 1, 2020, if statewide disposal of organic waste is not reduced by half.

In September 2020, CalRecycle reduced the threshold to 2 cubic yards of solid waste generated by covered businesses.

Title 14, CalRecycle

CCR Title 14, Division 7, contains CalRecycle regulations pertaining to all nonhazardous waste management in California. It contains regulations regarding the minimum standards for solid waste handling and disposal, standards for handling and disposal of asbestos containing waste, special waste standards, enforcement of standards, commercial recycling, and solid waste cleanup programs, among other topics.

Title 24, California Green Building Standards (CALGreen)

In accordance with CCR Title 24, part 6 (last amended in 2019, effective January 1, 2020), buildings constructed after June 30, 1977, must comply with the standards identified in CCR Title 24. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. Title 24 requires the inclusion of state-of-the-art energy conservation features in building designs and construction, such as specific energy-conserving design features and non-depletable energy resources. In addition, it must be

demonstrated that a building would comply with a designated energy budget. Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). Unless otherwise noted in a regulation, all newly constructed buildings in California are subject to the requirements of the CALGreen Code.

Local

Bay Area Water Supply and Conservation Agency

The BAWSCA, created in 2003, represents 26 agencies that depend on the San Francisco RWS, including MPMW. The BAWSCA oversees and coordinates water conservation, water supply, and water recycling activities for member agencies; acquires water and makes it available to other agencies on a wholesale basis; finances improvements to the RWS; and builds facilities as necessary.

Water Shortage Allocation Plan. In November 2018, the wholesale customers and SFPUC adopted the November 2018 Amended and Restated Water Supply Agreement, which included a Water Shortage Allocation Plan (WSAP) to allocate water from the RWS to retail and wholesale customers during system-wide shortages of 20 percent or less, including such shortages occurring as a result of implementation of the Bay-Delta Plan Amendment. The WSAP has two tiers:

- Tier One allocates water between SFPUC and the wholesale customers collectively based on the level of the shortage (up to 20 percent). This plan applies only when SFPUC determines that a system-wide water shortage exists and issues a declaration of a water shortage emergency under California Water Code Section 350. The SFPUC may also opt to request voluntary cutbacks from San Francisco and the wholesale customers to achieve 7 BAWSCA Drought Allocation to achieve necessary water use reductions during drought periods.
- Tier Two allocates the collective wholesale customer share among the wholesale customers based on a formula that accounts for each wholesale customer's individual supply guarantee, seasonal use of all available water supplies, and residential per capita use. BAWSCA calculates each wholesale customer's Allocation Factors annually in preparation for a potential water shortage emergency.

BAWSCA recognizes that the Tier Two plan was not designed for RWS shortages greater than 20 percent, and in a memorandum dated March 1, 2021, BAWSCA provided a refined methodology to allocate RWS supplies during projected future single dry and multiple dry years in the instance where supply shortfalls are greater than 20 percent for the purposes of the BAWSCA member agencies' 2020 UWMPs. The revised methodology developed by BAWSCA allocates the wholesale supplies as follows:

- When the average Wholesale Customers' RWS shortages are 10 percent or less, an equal percent reduction will be applied across all agencies. This is consistent with the existing Tier Two requirements in a Tier Two application scenario.
- When average Wholesale Customers' shortages are between 10 and 20 percent, the Tier Two Plan will be applied.
- When the average Wholesale Customers' RWS shortages are greater than 20 percent, an equal percent reduction will be applied across all agencies.

In another memorandum dated February 18, 2021, BAWSCA explains that in actual RWS shortages greater than 20 percent, BAWSCA member agencies would have the opportunity to negotiate and agree upon a more nuanced and equitable approach. This would likely consider basic health and safety needs, the water needs to support critical institutions, and minimizing economic impacts on individual communities and the region.

Silicon Valley Clean Water 2020 Capital Improvement Program

The 2020 updated SVCW Capital Improvement Program (CIP), which is applicable through fiscal year 2030, identifies and allocates funds for projects within the SVCW system. This includes projects that would replace and rehabilitate existing infrastructure (e.g., pump stations, treatment plant, force main).

Menlo Park Municipal Water 2018 Water System Master Plan

MPMW completed the 2018 Water System Master Plan as a comprehensive evaluation of its water distribution system. The master plan identifies strategies to 1) meet the system's infrastructure needs in a cost-effective manner; 2) guide capital expenditures for the system; 3) furnish important guidance to enhance renewal and replacement strategies, and operational and water quality practices; and 4) provide a framework for diversifying MPMW's water supply.

West Bay Sanitary District Collection System Master Plan

The WBSD completed a sewer Collection System Master Plan in June 2011. In July 2013, the WBSD updated the plan to address recalibration issues following completion of several CIP projects that affected the district's flow monitoring program. The 2011 master plan assessed the conveyance capacity of the WBSD's sewer collection system (e.g., pipes, pump stations); evaluated facilities, which may require rehabilitation or replacement; developed a prioritized CIP; and established a funding plan for the proposed CIP.

West Bay Sanitary District Code of General Regulations

The WBSD's Code of General Regulations establishes standards, conditions, and provisions for fees related to the use of the district's sanitary wastewater facilities. Article VII requires Class 1 sewer permits for residential connections, Class 2 sewer permits for non-residential connections, and Class 3 sewer permits for construction of sewer mains, pumping stations, and other wastewater facilities. To receive a permit, a developer must submit an application, pay all fees and charges, and satisfy requirements, such as extending collection facilities to the vicinity of the development site. For a Class 3 permit, the WBSD manager examines the submitted application's conformance with engineering practices and the standard specifications and policies of the WBSD and then submits it to the WBSD board of directors for approval. Subsequent to the WBSD's acceptance of a Class 3 permit, but prior to connection of and discharge into the WBSD's wastewater facilities, a Class 1 or Class 2 permit, as applicable, must be obtained by the developer. All costs and expenses associated with the installation and connection of the building sewer shall be at the owner's expense. All work shall be inspected and performed in accordance with the standard specifications of WBSD.

Water Shortage Contingency Plan

As part of MPMW's updated 2020 UWMP, the district has updated its WSCP,⁴³ which serves as a stand-alone document to be engaged in case of a water shortage event, such as a drought or supply interruption. It defines the specific policies and actions that will be implemented for various shortage scenarios. The main objective of the WSCP is to ensure that MPMW has in place the necessary resources and management responses needed to protect health and human safety, minimize economic disruption, and preserve environmental and community assets during water supply shortages and interruptions. Consistent with

⁴³ Menlo Park Municipal Water District. 2021. *2020 Urban Water Management Plan, Appendix J, Water Shortage Contingency Plan*. Available: <https://www.menlopark.org/DocumentCenter/View/28016/Draft-Urban-Water-Management-Plan>. Accessed: March 16, 2022.

California Water Code Section 10632, the WSCP provides six standard water shortage levels to address shortage conditions, ranging from 10 percent to more than 50 percent; identifies a suite of demand mitigation measures for MPMW to implement at each level; and identifies procedures for MPMW to use to assess annually whether or not a water shortage is likely to occur in the coming year, among other things.

In light of currently prevailing drought conditions, on March 1, 2022, the Menlo Park City Council adopted a resolution declaring an emergency water shortage condition pursuant to California Water Code Section 350; declaring a Stage 1 drought under the City's WSCP; and adopting a Water Conservation Plan to enforce the SWRCB's emergency regulations to prohibit wasteful water-use practices.⁴⁴

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-7: Promote the implementation and maintenance of sustainable development, facilities and services to meet the needs of Menlo Park's residents, businesses, workers, and visitors.

Policy LU-7.1 Sustainability. Promote sustainable site planning, development, landscaping, and operational practices that conserve resources and minimize waste

Policy LU-7.2: Water Supply. Support the efforts of the Bay Area Water Supply and Conservation Agency or other appropriate agencies to secure adequate water supplies for the Peninsula, to the extent that these efforts are in conformance with other City policies.

Policy LU-7.3: Supplemental Water Supply. Explore and evaluate development of supplemental water sources and storage systems, such as wells and cisterns, for use during both normal and dry years, in collaboration with water providers and users.

Policy LU-7.4: Water Protection. Work with regional and local jurisdictions and agencies responsible for ground water extraction to develop a comprehensive underground water protection program in accordance with the San Francisco Creek Watershed Policy, which includes preservation of existing sources and monitoring of all wells in the basin to evaluate the long term effects of water extraction.

Policy LU-7.5: Reclaimed Water Use. Implement use of adequately treated "reclaimed" water (recycled/non-potable water sources such as, graywater, blackwater, rainwater, stormwater, foundation drainage, etc.) through dual plumbing systems for outdoor and indoor uses, as feasible.

Policy LU-7.6: Sewage Treatment Facilities. Support expansion and improvement of sewage treatment facilities to meet Menlo Park's needs, as well as regional water quality standards, to the extent that such expansion and improvement are in conformance with other City policies.

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

⁴⁴ These regulations were adopted January 4, 2022, became effective January 18, 2022, and are described above.

Goal OSC-4: Promote Sustainability and Climate Action Planning. Promote a sustainable energy supply and implement the City's Climate Action Plan to reduce greenhouse gas emissions and improve the sustainability of actions by City government, residents, and businesses in Menlo Park. This includes promoting land use patterns that reduce the number and length of motor vehicle trips, and encouraging recycling, reduction and reuse programs.

Policy OSC-4.2: Sustainable Building. Promote and/or establish environmentally sustainable building practices or standards in new development that would conserve water and energy, prevent stormwater pollution, reduce landfilled waste, and reduce fossil fuel consumption from transportation and energy activities.

Policy OSC-4.3 Renewable Energy. Promote the installation of renewable energy technology, such as, on residences and businesses through education, social marketing methods, establishing standards and/or providing incentives.

Policy OSC-4.4: Vehicles Using Alternative Fuel. Explore the potential for installing infrastructure for vehicles that use alternative fuel, such as electric plug in recharging stations.

Policy OSC-4.5: Energy Standards in Residential and Commercial Construction. Encourage projects to achieve a high level of energy conservation exceeding standards set forth in the California Energy Code for Residential and Commercial development.

Policy OSC-4.6: Waste Reduction Target. Strive to meet the California State Integrated Waste Management Board per person target of waste generation per person per day through their source reduction, reuse, and recycling programs.

Policy OSC-4.7: Waste Management Collaboration. Continue to support and participate in efforts such as the South Bayside Waste Management Authority, which provides waste reduction, recycling, and solid waste programs and solutions.

Policy OSC-4.8: Waste Diversion. Develop and implement a zero waste policy, or implement standards, incentives, or other programs that would lead the community towards a zero waste goal.

Goal OSC-5: Ensure Healthy Air and Water Quality. Enhance and preserve air quality in accord with state and regional standards, and encourage the coordination of total water quality management, including both supply and wastewater treatment.

Policy OSC-5.3: Water Conservation. Encourage water-conserving practices in businesses, homes and institutions.

The following policies from the Safety Element were adopted to avoid or minimize environmental impacts and pertain to the Proposed Project:

Goal S-1: Ensure a Safe Community. Minimize risk to life and damage to the environment and property from natural and human-caused hazards, and assure community emergency preparedness and a high level of public safety services and facilities.

Policy S-1.6: Design and Location of Utilities. Monitor appropriate location, design, construction, maintenance and inspection standards for utility systems traversing hazard areas within the City limits. This would include evaluation and upgrading outdated systems and infrastructure, coordination with the State Public Utilities Commission and locating new utility systems away from potential hazard areas.

Policy S-1.27: Regional Water Quality Control Board (RWQCB) Requirements. Enforce stormwater pollution prevention practices and appropriate watershed management plans in the RWQCB general National Pollutant Discharge Elimination System requirements, the San Mateo County Water Pollution Prevention Program and the City's Stormwater Management Program. Revise, as necessary, City plans so they integrate water quality and watershed protection with water supply, flood control, habitat protection, groundwater recharge, and other sustainable development principles and policies.

Additional goals and policies related to water and wastewater are discussed in Section 3.11, *Hydrology and Water Quality*, of this EIR.

ConnectMenlo/General Plan Update

In 2016, the City completed a multi-year planning effort to update the Land Use and Circulation Elements and M-2 Zoning specifications of its general plan for the 2040 planning horizon. This general plan update process was known as ConnectMenlo. ConnectMenlo reaffirmed remaining development potential within Menlo Park and incorporated land use changes in the Bayfront Area, including the development potential for up to 4,500 new multi-family residential units, 2.3 million gross square feet (gsf) of new non-residential uses, and 400 new hotel rooms.

A program-level EIR was prepared for ConnectMenlo that analyzed more detailed land uses within the maximum development potential set by ConnectMenlo. Furthermore, in conjunction with the ConnectMenlo EIR, a Water Supply Evaluation Study (WSE Study)⁴⁵ was prepared to determine whether there would be an adequate water supply available to meet current and planned water demands within the service area during normal and dry hydrologic years over a 20-year horizon. More specifically, the WSE Study included:

- Summaries of the WSA requirements articulated in California Water Code Sections 10910–10915 and a description of how they were addressed in the WSE Study.
- A description and analysis of current and projected future water demands for the ConnectMenlo project through 2040.
- A description and analysis of historical, current, and projected future water demands for the MPMW service area through 2040.
- A description and analysis of current and projected future water supplies for the MPMW service area through 2040.
- A comparison of water supplies and demands for the MPMW's water service area, including projected water demands associated with the ConnectMenlo project.

Data in the WSE Study were based primarily on the MPMW 2010 UWMP; the draft MPMW 2015 UWMP, which was developed at the same time as the WSE Study; information from the City; and specific information from PlaceWorks, author of the 2016 ConnectMenlo EIR. The final adopted MPMW 2015 UWMP incorporated the ConnectMenlo growth projections.

ConnectMenlo identifies the maximum development potential that could occur within the ConnectMenlo study area, including potential bonus-level increased development, and the associated program-level EIR further defines the maximum development that can occur by specific land uses. MPMW and the City's

⁴⁵ City of Menlo Park. 2016. *Water Supply Evaluation Study for ConnectMenlo – General Plan and M-2 Area Zoning Update*. Available: <https://www.menlopark.org/DocumentCenter/View/9587/020916-ConnectMenlo-WSE-2016-02-04-FINAL?bidId=>. Accessed: March 16, 2022.

Planning Division are actively tracking the planned projects, including projects in the ConnectMenlo study area, on a cumulative basis to ensure that development remains below the maximum level permitted by ConnectMenlo and is consistent with the ConnectMenlo EIR. The Proposed Project, if approved, would be included in this cumulative development total, which would be below the maximum level permitted.

Menlo Park Municipal Code

Title 7, Health and Sanitation; Title 12, Buildings and Construction; and Title 16, Zoning, of the Menlo Park Municipal Code include the following regulations relevant to water resources.

Chapter 7.35, Water Conservation, contains regulations and restrictions regarding water use in order to conserve water resources and eliminate wasteful water uses. Menlo Park Municipal Code Section 7.35.020 allows the City Council to adopt by resolution a water conservation plan and mandate water conservation measures in the event of adoption of emergency water conservation regulations by the SWRCB, SFPUC or the City.

Chapter 12.44, Water Efficient Landscaping Ordinance, adopted in 2016 (Ordinance No. 968), establishes water-efficient landscaping standards to conserve water used for irrigation. The ordinance applies to all new landscapes greater than 500 square feet and rehabilitated landscapes greater than 1,000 square feet associated with projects that require City review and approval.

Section 16.43.140(3) for the Office District and 16.45.130(3) for the Residential Mixed-Use District, Green and Sustainable Building, Water Use Efficiency and Recycled Water, specifies requirements for water use efficiency and recycled water use in the Office (O) and Residential- Mixed Use-Bonus (R-MU-B) zones. These include:

- a. Single-pass cooling systems shall be prohibited in all new buildings.
- b. All new buildings shall be built and maintained without the use of well water.
- c. Applicants for a new building with more than 100,000 square feet of gross floor area shall prepare and submit a proposed water budget and accompanying calculations, following the methodology approved by the City. For all new buildings with 250,000 square feet or more in gross floor area, the water budget shall account for the potable water demand reduction resulting from the use of an alternative water source for all City-approved non-potable applications. The water budget and calculations shall be reviewed and approved by the City's Public Works Director prior to certification of occupancy. Twelve months after the date of certification of occupancy, the building owner shall submit the data and information necessary for the City to compare actual water use to the allocation in the approved water budget. In the event that actual water consumption exceeds the water budget, a water conservation program, as approved by the City's Public Works Director, shall be implemented. Twelve months after City approval of the water conservation program, the building owner shall submit the data and information necessary for the City to determine compliance with the conservation program. If water consumption exceeds the budgeted amount, the City's Public Works Director may prohibit the use of water for irrigation or enforce compliance as an infraction, pursuant to Chapter 1.12, until compliance with the water budget is achieved.
- d. All new buildings shall be dual plumbed for the internal use of recycled water.
- e. All new buildings with 250,000 square feet or more in gross floor area shall use an alternate water source for all City-approved non-potable applications. An alternative water source may include, but is not limited to, treated non-potable water such as graywater. An alternate water source

assessment shall be submitted that describes the alternative water source and proposed non-potable application. The alternate water source assessment, the alternative water source, and the water's proposed uses shall be approved by the City's Public Works Director and Community Development Director. If MPMW has not designated a recycled water purveyor and/or a municipal recycled water source is not available prior to project approval, applicants may propose conservation measures to meet the requirements of this section, subject to approval of the City Council. The conservation measures shall achieve a reduction in potable water use equivalent to the projected demand of City-approved non-potable applications, but in no case shall the reduction be less than 30 percent compared to the water budget in subsection (3)(C) of this section. The conservation measures may include onsite measures, offsite measures, or a combination thereof.

- f. Potable water shall not be used for dust control on construction projects.
- g. Potable water shall not be used for decorative features, unless the water recirculates.

A Water Use Budget was prepared for the Proposed Project. Also, because the Proposed Project includes more than 250,000 sf of gross floor area in its proposed new buildings, an Alternate Water Source Assessment was prepared⁴⁶ (refer to (c) and (e) above). Further since the Proposed Project meets the definition of a Project, as specified in State Water Code Section 10912(a), a water supply assessment has been prepared for the Proposed Project, per the requirements of State Water Code section 10910(a).

Environmental Impacts

This section describes the impact analysis related to utilities for the Project. It describes the methods used to determine the impacts of the 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 State CEQA Guidelines, the Project would be considered to have a significant effect if it would result in any of the conditions listed below.

- Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

⁴⁶ Sherwood Design Engineers. 2020. Technical Memorandum to Eric Harrison Regarding: *Willow Village Project Water Use Budget and Alternate Water Source Assessment*. October 20.

Methods for Analysis

Potential impacts on utilities and service systems are evaluated by:

- Assessing the potential for the Proposed Project to increase demand for utilities services, based on goals established by service providers; and
- Comparing the ability of the service provider/public facility to serve the Proposed Project and accommodate the associated increase in demand.

Next, a determination is made as to whether existing services and facilities would be capable of meeting the demand of the Proposed Project and, if not, whether the expansion of existing facilities would cause an adverse environmental effect. The analysis is based on a review of City documents and maps, field reconnaissance, direct communication with City service providers, and the technical reports prepared for the Project.

Water Supply and Infrastructure. The analysis of water supply and infrastructure focuses on the nature and magnitude of the change in water use compared with existing and projected water use in the MPMW service area. To determine potential impacts, existing and projected water consumption was estimated from demand projection calculations and quantitative evaluation of data for existing land uses, approved projects, and proposed development, including the Proposed Project. The primary resources used for this analysis include MPMW's 2020 UWMP, the WSA, the Water Use Budget, and the Alternate Water Source Assessment prepared for the Proposed Project.

Wastewater Generation and Infrastructure. The ConnectMenlo EIR assumes that 90 percent of water demand becomes wastewater. Following that assumption, it is assumed that wastewater generation under the Proposed Project would equal 90 percent of water consumed by the Proposed Project and would be conveyed to the SVCW WWTP. The wastewater demands of the Proposed Project are compared to the available capacity of the WBSD sanitary sewer system and the SVCW WWTP to assess the potential for significant environmental impacts.

Summary of Analysis in the ConnectMenlo EIR

The ConnectMenlo EIR analyzed the impacts below that would result from implementing the updates to the Land Use and Circulation Elements and the M-2 Area Zoning Update.⁴⁷

- Impacts related to construction or relocation of utilities were analyzed in the ConnectMenlo EIR under Impacts UTIL-2 (pages 4.14-28 and 4.14-29), UTIL-4 (pages 4.14-36 to 4.14-38), UTIL-5 (pages 4.14-38 to 4.14-41), UTIL-11 (pages 4.14-64 to 4.14-66), and UTIL-13 (pages 4.14-76 to 4.18-81) and determined to be less than significant. It is expected that the City will implement General Plan programs that require expansion of the Menlo Park Municipal Water District's conservation programs and future development to employ green building best practices. No mitigation measures were recommended.⁴⁸
- Impacts related to water supply were analyzed in the ConnectMenlo EIR under UTIL-1 (pages 4.14-24 to 4.14-27) and determined to result in a less-than-significant impact because future development under ConnectMenlo would be required to comply with existing regulations, including City General Plan

⁴⁷ City of Menlo Park. 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Zoning Update for the City of Menlo Park*. June 1. Prepared by PlaceWorks, Berkeley, CA. Menlo Park, CA. Available: <https://www.menlopark.org/1013/Environmental-Impact-Report>. Accessed: March 19, 2021

⁴⁸ The ConnectMenlo EIR does not discuss impacts on telecommunication facilities.

policies and zoning requirements, to minimize impacts related to water supplies. Development would result in a demand for 343 mg/yr. The ConnectMenlo EIR concluded that the water supply would be adequate and able to meet increased demands in normal years as well as the additional demand generated by the increase in development associated with implementation of ConnectMenlo. During single and multiple dry years, water shortages would be managed through demand reductions. Furthermore, future development under ConnectMenlo would be required to comply with existing regulations, including City General Plan policies and zoning requirements, to minimize impacts related to water supplies. No mitigation measures were recommended.

- Impacts related to wastewater capacity were analyzed in the ConnectMenlo EIR under Impact UTIL-6 (pages 4.14-43 to 4.14-45) and determined to result in a less-than-significant impact because future development is expected to tie into existing collection facilities. The installation of extension lines would comply with applicable sewer permits, which require projects to reduce impacts on service capacity. In addition, projects would be required to comply with existing regulations that promote water conservation and minimize impacts related to wastewater generation. No mitigation measures were recommended.
- Impacts related to solid waste generation were analyzed in the ConnectMenlo EIR under Impact UTIL-8 (pages 4.14-52 to 4.14-55) and determined to result in a less-than-significant impact because future development would be required to comply with existing regulations to minimize impacts related to solid waste disposal and attain solid waste reduction goals. No mitigation measures were recommended.
- Impacts related to compliance with solid waste regulations were analyzed in the ConnectMenlo EIR under Impact UTIL-9 (pages 4.14-55 and 4.14-56) and determined to result in a less-than-significant impact. No mitigation measures were recommended.

Impacts and Mitigation Measures

Impact UT-1: Construction or Relocation of Utilities. The Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (LTS)

The construction of the water system, sewer infrastructure, and upgrades to the PG&E Ravenswood substation would have the potential to cause significant adverse environmental effects such as fugitive dust generation, noise generation, sedimentation, and erosion. The proposed utility expansions are a part of the Project Description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (e.g., refer to Section 3.4, *Air Quality*; Section 3.6, *Greenhouse Gas Emissions*, Section 3.11, *Hydrology and Water Quality*; and Section 3.7, *Noise and Vibration*).

Water

Water for the Proposed Project would be treated at one of three WTPs: the SFPUC's Tesla Treatment Facility, the Sunol Valley WTP, or the Harry Tracy WTP. The Tesla Treatment Facility has the capacity to treat 315 mgd. The Sunol Valley WTP has the capacity to treat 160 mgd. The Harry Tracy WTP has the capacity to treat approximately 140 mgd. The total net increase in potable water demand of the Proposed

Project is estimated to be approximately 0.22 mgd⁴⁹. Although it is not known exactly which of the three WTPs would treat water for the Project Site, the increase in demand (i.e., about 0.22 mgd) would not be considered a significant increase for the SFPUC system, which can treat approximately 615 mgd with the combined capacity of its three WTPs. Also, the ConnectMenlo EIR found that the existing capacity for water treatment would be sufficient for the development planned under ConnectMenlo, of which the Proposed Project is within the scope of development for. Therefore, no new or expanded water treatment facilities would be required to serve the Project.

As the ConnectMenlo EIR notes, the SFPUC is continuously planning operational upgrades, maintenance, and capital improvements for its WTPs. This is expected to continue in the future, independent of the Proposed Project. Environmental impacts from construction of new or expanded water treatment facilities deemed necessary through the planning process would be addressed in the CEQA review conducted by the lead agency for such facility expansion or development (i.e., SFPUC). Therefore, an evaluation of the possible environmental effects of future expansion/development of such facilities would be speculative and beyond the scope of this EIR.

As stated previously, the City's 2018 WSMP identified a deficiency in the volume of the existing 10-inch water main which would not be adequate to serve the Project. To meet the City's water system performance criteria and in doing so, improve fire flow availability in the Life Sciences District, the Proposed Project would construct a 16-inch diameter pipeline within proposed Park Street, Main Street, and East Loop Road and a 12-inch diameter pipeline connection to the existing 12-inch diameter pipeline on O'Brien Drive, north of the SFPUC easement, to meet on-site fire flow requirements. The on-site system includes a mix of public and private water mains that were evaluated in the Technical Memorandum *Willow Village Hydraulic Evaluation* prepared for the Project by West Yost,⁵⁰ to ensure compliance with City requirements. The installation of new or expanded water lines on or adjacent to the Project Site would require excavation, trenching, soil movement, and other activities that are typical during construction of development projects. These construction impacts are a part of the Project Description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (e.g., refer to Section 3.4, *Air Quality*; Section 3.6, *Greenhouse Gas Emissions*, Section 3.11, *Hydrology and Water Quality*; and Section 3.7, *Noise and Vibration*).

The Proposed Project, as part of the City's project approval process, would be required to comply with existing regulations, including plans, policies, and zoning regulations that promote water conservation and green building best practices, and would not require or result in the relocation of existing or construction of new or expanded water treatment facilities beyond those proposed as part of the Project and analyzed in this EIR. In addition, the Project Sponsor would be required to coordinate with the City and MPMW to address water-flow requirements through the subdivision mapping process, and ensure that the existing and proposed water delivery infrastructure would be adequate for the Proposed Project. Therefore, adoption of the Proposed Project would result in **less-than-significant** impacts regarding the need for new or expanded water treatment facilities.

⁴⁹ Total Project potable water demand of 0.27 mgd minus existing potable water use of 0.05 mgd = 0.22 mgd net increase in water demand.

⁵⁰ West Yost. Technical Memorandum. 2022. *Willow Village Hydraulic Evaluation*. Prepared for the Menlo Park Municipal Water District. February.

Wastewater

The Proposed Project would include gravity main lines on-site within public rights of way or private streets and easements, two on-site pump stations within easements dedicated to WBSD, and force mains on-site and off-site to properly convey wastewater from the site to the 36-inch gravity main in Chilco Street. The pump station proposed at the southwest corner of the main Project Site will be sized to handle all flow from the Proposed Project, as well as wastewater diverted from the existing Willow Road pump station. Because the Proposed Project would install new pipes on the main Project Site, infiltration and inflow amounts would be reduced to negligible.⁵¹

Wastewater in MPMW service area is collected by the WBSD and the SVCW WWTP. According to the 2020 MPMW UWMP, the volume of wastewater from the MPMW service area collected by the WBSD totaled approximately 873 mg/yr in 2020, or about 2.4 mgd. It is estimated that, applying the ConnectMenlo EIR methodology, 90 percent of the Project's water usage would become wastewater. The total water usage is estimated at 155 mg/yr with 128 mg/yr of non-irrigation water. Irrigation water would by its use not become wastewater. Therefore, because the Project's total water non-irrigation demand is estimated at 0.35 mgd (or 128 mg/yr)⁵², the estimated wastewater generation rate for the Proposed Project would be approximately 0.27 mgd (or 115 mg/yr). This would not represent a significant increase for the WBSD relative to its current average collection rates. In addition, the Proposed Project would be within the maximum scope of development studied in ConnectMenlo and the ConnectMenlo EIR concluded that such development would not require the construction or relocation of new wastewater facilities.

Operation of the SVCW WWTP and its wastewater conveyance system is governed by the waste discharge requirements found in RWQCB Order No. R2-2018-00XX (NPDES No. CA0038369). This order has a dry-weather facility design flow of 29 mgd and a peak wet-weather design flow of 71 mgd. The NPDES permit does not have a limitation on flow quantity. As noted in the ConnectMenlo EIR, SVCW reports that its treatment plant has a capacity of 80 mgd; however, to utilize the full plant capacity of 80 mgd, certain pump station and pipe improvements are necessary. Therefore, the WWTP design is not necessarily limited to the peak wet-weather flow of 71 mgd mentioned in the NPDES permit, but for the purpose of this analysis 71 mgd is considered the maximum flow under current conditions.

As stated above, the Sharon Heights RWF at the Sharon Heights Golf and Country Club processes a limited amount of wastewater in Menlo Park, some of which could originate from the Project and be released as recycled water. This, however, is considered speculative. Because the overall amount of processed wastewater would be minimal, it is not included in this analysis. As reported by the RWQCB, from October 2012 through August 2017, the SVCW WWTP treated an average of 13.5 mgd, with a maximum instantaneous flow of 50 mgd. Both rates are well within the 29 mgd average dry-weather design flow and 71 mgd peak wet-weather design flow. Under its Stage 2 expansion program, SVCW will increase WWTP capacity to 80 mgd as needed.

Assuming that 90 percent of the net amount of total non-irrigation water use by the Proposed Project (0.35 mgd or 128 mg/yr) would become wastewater (see Impact UT-3, below), the estimated net increase in wastewater generation would be approximately 0.27 mgd (or 115 mg/yr). This increase in wastewater generation would not be significant relative to the currently available excess dry-weather design flow

⁵¹ Sherwood Design Engineers and Freyer & Laureta, Inc. 2019. *Offsite Sanitary Sewer System Study, Willow Village*. July 19

⁵² Total potable water use = Project net increase of potable water of 0.27 mgd + 0.06 mgd of water for toilet flushing (non-potable) + 0.02 mgd water for cooling (non-potable) = 0.35 mgd.

capacity of 15.5 mgd (i.e., 29 mgd design flow minus 13.5 mgd current average flow = 15.5 mgd) or its excess wet-weather design flow capacity of 57.5 mgd (i.e., 71 mgd design flow minus 13.5 mgd current average flow = 57.5 mgd).

Although the increase in wastewater flows with implementation of the Proposed Project would add to capacity demands for the WWTP and its conveyance system, the effect would not be substantial. Any increase would be integrated into ongoing planning and budgeting processes to improve the conveyance system, treatment processes, and capacity because the Proposed Project is within the scope of development planned by ConnectMenlo. Planning for operational upgrades, maintenance, and capital improvements at the WWTP is expected to continue in the future, independent of the Proposed Project. Environmental impacts from construction of the new or expanded wastewater treatment facilities deemed necessary through the planning process would be addressed in the CEQA review conducted by the lead agency for such facility expansion or development. Therefore, an evaluation of possible environmental effects from future expansion/development of such facilities would be speculative and beyond the scope of this EIR.

The Proposed Project, as part of the City's project approval process, would be required to comply with existing regulations, including policies and zoning requirements that promote water conservation and minimize impacts related to wastewater generation. In addition, the Proposed Project would not reduce the capacity of the wastewater treatment system substantially. Therefore, the Proposed Project would not require or result in the relocation of existing or construction of new or expanded wastewater treatment facilities and there would be a less-than-significant impact regarding the need for new or expanded wastewater treatment facilities.

The installation of new or expanded sewer lines near the Project Site would require excavation, trenching, soil movement, and other activities that are typical during construction of development projects. These construction impacts are a part of the Project Description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (e.g., refer to Section 3.4, *Air Quality*; Section 3.6, *Greenhouse Gas Emissions*, Section 3.11, *Hydrology and Water Quality*; and Section 3.7, *Noise and Vibration*). The Project Sponsor would be required to coordinate with the City and WBSD and the SVCW through the subdivision mapping process to assess wastewater flow requirements and ensure that the existing wastewater infrastructure would be adequate for the Proposed Project.

Stormwater

Implementation of the Proposed Project would result in a slight increase (approximately 4 percent) in pervious surface area compared to existing conditions. Hamilton Avenue Parcels North and South would have an increased pervious area of 8 percent (or 11,273 sf); the main Project Site would have a 4 percent increase in pervious area (or 98,221 sf) over existing conditions. This would result in total Project Site pervious area of approximately 17 percent (or 545,279 sf) inclusive of vegetation, soil, and permeable paving. Hardscape would therefore cover approximately 2.3 msf, or approximately 83 percent of the Project Site with materials such as concrete, decomposed granite, and other pavers.⁵³ Because the Proposed Project would have a larger pervious area than existing conditions, there would be a net decrease in the volume of stormwater runoff leaving the Project Site. The Project Sponsor would be required to develop and implement a final Stormwater Management Plan, with the goal of reducing the discharge of pollutants to the maximum extent practicable, in compliance with State and County of San Mateo requirements.

⁵³ Freyer & Laureta Inc. 2021. *Willow Village Impervious Areas*. May.

As part of the Proposed Project, an onsite storm drain system would be built to convey runoff by gravity from all buildings and other areas to the existing City main in Willow Road. The onsite system is anticipated to include private and public storm drain mains. The Proposed Project would comply with San Mateo County C.3 requirements, as required by the City's NPDES municipal permit. Project Site runoff would be managed by a combination of low-impact development strategies, which could include bioretention areas, flow-through planters, permeable paving, rain gardens, and/or vegetated swales. Along the southern property line of the main Project Site, an existing open channel directs stormwater flows to the existing storm drain located along the eastern property line of the main Project Site. To accommodate main Project Site improvements, drainage flows within this offsite channel would be sent underground, and the channel would be filled.

As part of an integrated approach to stormwater management, consistent with City and San Mateo County requirements, streetscapes, parks, and open spaces would employ best management practices to reduce and treat stormwater runoff and increase the amount of pervious landscaped area compared with existing conditions. The Proposed Project improvements on the individual parcels as well as the design of private streets and public rights-of-way through the main Project Site would incorporate green infrastructure, per the requirements of the City's adopted Green Infrastructure Plan. Proposed treatment areas would receive diverted stormwater runoff from impervious surfaces associated with streets, building roofs, and level surfaces on the main Project Site prior to discharge to the storm drain system.

Routine maintenance at the bioretention and landscaped stormwater treatment areas would be required to prevent sediment buildup and clogging, which reduce efficiency and can lead to bioretention and treatment area failure. Maintenance tasks include inspecting the bioretention and treatment areas to ensure proper drainage between storms and removing obstructions, debris, and trash. Furthermore, the Project Sponsor would be required to enter into a Stormwater Operations and Maintenance Agreement with the City for maintenance of the stormwater treatment facilities. In addition, the Proposed Project would implement BMPs, both during and after construction, to minimize or prevent pollutant discharges and runoff. The Proposed Project would comply with the General Construction Permit; San Francisco Bay Municipal Separate Storm Sewer System Permit, Provision C.3; and San Mateo Countywide Water Pollution Prevention Program C.3 Stormwater Technical Guidance and implement a SWPPP and other erosion and pollution control measures.

The Proposed Project, as part of the City's project approval process, would be required to comply with existing stormwater regulations, as discussed above. In addition, the Proposed Project would reduce the total volume of stormwater runoff at the Project Site over existing conditions due to the on-site stormwater elements discussed above. Therefore, the Proposed Project would not require or result in the relocation of existing or construction of new or expanded stormwater drainage facilities beyond what is proposed at the main Project Site and within the vicinity of the Proposed Project. There would be no impact regarding the need for new or expanded off-site stormwater treatment facilities.

Electricity and Natural Gas

During operation, the Proposed Project would meet 100 percent of its energy demand (electricity and natural gas), consistent with the requirements of Menlo Park Municipal Code Sections 16.43.140 (for the Office portion) and 16.45.130 (for the Residential Mixed-Use portion), through a combination of the purchase of 100 percent renewable electricity from Peninsula Clean Energy and implementation of a reach code-mandated onsite renewable energy system. Other sustainability features (see Chapter 2, *Project Description*) of the Proposed Project also include photovoltaic solar systems or solar hot water systems (solar thermal) on each residential building; only all-electric residential buildings; electric-vehicle charging

stations in parking garages for 10 percent of all parking spaces as well as infrastructure for additional electric-vehicle parking spaces; and enrollment in and use of Energy Star Portfolio Manager for all buildings. If needed, PG&E would provide gas and electrical power for the proposed facilities. Although the Proposed Project is currently served by the existing PG&E Belle Haven Substation, PG&E would upgrade the Ravenswood Substation⁵⁴ and provide offsite improvements to support distribution-level electrical service to the main Project Site from this substation. The proposed offsite upgrades would require excavation, trenching, soil movement, and other activities that are typical during construction of development projects. These construction impacts are a part of the Project Description, and the potential impacts that would result from construction of these facilities are evaluated throughout this EIR (e.g., refer to Section 3.4, *Air Quality*; Section 3.11, *Hydrology and Water Quality*; and Section 3.7, *Noise and Vibration*).

Annual natural gas usage at the main Project Site would be limited because of the City's reach code, which allows only public commercial restaurant/food service operations to use natural gas for cooking, subject to approval of an exception (allowed through Ordinance No. 1057) by the Environmental Quality Commission. If exceptions are granted, the natural gas allowed by City reach codes would be required to be offset, per the City Zoning Ordinance.⁵⁵

The installation of new or expanded gas lines on the main Project Site would require excavation, trenching, soil movement, and other activities that are typical during construction of development projects. In addition, although construction related to the new or relocated gas and electric lines could result in short-term environmental effects (e.g., noise, dust, traffic, temporary service interruption), the work would comply with City and PG&E regulations as well as standard conditions for new construction related to infrastructure improvements. For example, these regulations and conditions would require new gas line construction, or the expansion of existing lines, to include BMPs (e.g., require construction areas to minimize dust generation). In addition, any such work would be subject to compliance with applicable regulations and standard conditions of approval for the Proposed Project, including City permits/review for construction (e.g., grading permits, private development review, encroachment permits). No offsite natural gas facilities would need to be constructed or expanded as a result of the Proposed Project.

Telecommunications

Telecommunications lines may need to be extended or relocated as a result of the Proposed Project. The installation of new or expanded telecommunication lines on the Project Site would require excavation, trenching, soil movement, and other activities that are typical during construction of development projects. These construction impacts are discussed in the appropriate topical sections of this Draft EIR as part of the assessment of overall Project impacts. However, no offsite telecommunications facilities would need to be constructed or expanded as a result of the Proposed Project.

Conclusion

The physical conditions, as they relate to water, wastewater treatment facilities, stormwater, natural gas, electricity, and telecommunications, have not changed substantially in the ConnectMenlo EIR study area since preparation of the ConnectMenlo EIR. The Proposed Project would not result in a substantial change

⁵⁴ The current Ravenswood Substation operates as an existing Transmission Substation and is not equipped with distribution system infrastructure.

⁵⁵ In 2019, the City of Menlo Park adopted local amendments to the State Building Code that require electricity to be the only fuel source for new buildings (not natural gas). This ordinance (Menlo Park Municipal Code Section 12.16) applies only to newly constructed buildings (i.e., from the ground up) and does not include additions or remodels.

in the ConnectMenlo project, a change in circumstances, or a disclosure of new information of substantial importance that shows new or substantially more severe significant effects than those originally analyzed in the ConnectMenlo EIR; therefore, the Proposed Project would be within the scope of the ConnectMenlo project covered by the ConnectMenlo EIR, and there would be no new specific effects as a result of the Proposed Project. The Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects beyond the construction impacts discussed throughout this document. Impact UT-1 would be ***less than significant***, consistent with the ConnectMenlo EIR. No mitigation is required.

Impact UT-2: Water Supply. The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. (LTS)

The Proposed Project would be within the maximum development potential studied in ConnectMenlo, the water demand of the Proposed Project is included in the further refined land uses and development potential studied in the ConnectMenlo EIR as well as the MPMW's 2015 and 2020 UWMP water demand analyses. Furthermore, the water supply evaluation (WSE) that was prepared as part of the ConnectMenlo process considered the development potential created by the ConnectMenlo General Plan Update and the refined land uses studied in the associated EIR. The ConnectMenlo EIR determined that there would be an increase in water demand as a result of buildout of ConnectMenlo. The ConnectMenlo EIR concluded that the MPMW's water supply would be adequate and able to meet increased demands in normal years as well as the additional demand generated by the increase in development associated with implementation of ConnectMenlo. This analysis of water supply availability for the Proposed Project is based on information and analysis provided from the 2020 MPMW's UWMP and the WSA prepared for this Proposed Project.

As required by the City, a water budget was prepared for the Proposed Project and is discussed below. The water budget divided water use for the Proposed Project between interior and exterior water usage during operation of the Project. A City standard project condition to ensure compliance with the approved water budget for the Proposed Project (refer to Chapter 2, *Project Description*), would require that 12 months after certification of occupancy, the building owner(s) would submit the data and information necessary to allow the City to compare actual water use to the allocation in the approved water budget. If actual water consumption exceeds the water budget, a water conservation program, as approved by the City's public works director, would be implemented. Also, because the Proposed Project includes more than 250,000 square feet of gross floor area in its proposed new buildings, an alternate water source assessment is required and has been prepared. The alternate water source assessment describes the use of an alternate water source for all City-approved non-potable applications and given the size of the Proposed Project, recycled water would be utilized for all City-approved non-potable applications.

A summary of the water demands for the Proposed Project, as estimated by the Project Sponsor and evaluated by the City's consultant in preparation of the WSA, is provided in Table 3.15-1. As shown, the total projected water demand for the Proposed Project, inclusive of the main Project Site and Hamilton Avenue Parcels North and South, is approximately 155 mg/yr. Approximately 63 percent of the total water demand is for potable water; the remaining 37 percent is for non-potable water. The demand for non-potable water will be met with recycled water on the main Project Site. As shown in Table 3.15-1, the existing potable water demand at the main Project Site is estimated to be approximately 19 mg/yr and is assumed to be entirely replaced by the Proposed Project demand. Therefore, the net increase in potable water demand for the Proposed Project is estimated to be 79 mg/yr.

Table 3.15-1. Projected Water Demand for Proposed Project (mg/yr)

Water Use	Proposed Project
Indoor Potable	98
Toilet Flushing (non-potable)	21
Cooling (non-potable)	9
Irrigation (non-potable)	27
Total Projected Water Demand	155
Projected Water Demand (potable)	98 (63%)
Projected Water Demand (non-potable)	57 (37%)
Existing Potable Water Use at Proposed Project Site ^a	19
Net increase in Potable Water Demand^b	79

Source: Peninsula Innovation Partners, LLC., and West Yost, 2022.

^a. Existing potable water demand at the main Project Site based on 2015 data (18.2 mg/yr plus 6 percent for unaccounted for water) and is assumed to be replaced by the Proposed Project.

^b. Assumes the existing potable water demand at the main Project Site is replaced by the Proposed Project demand.

Project Interior Water Use

The Proposed Project would use water for indoor uses on the main Project Site (i.e., in the proposed residential, retail/restaurant, office and accessory, hotel uses). The water demands for the Hamilton Avenue Parcels North and South include retail, food service, and a reconstructed service and fueling station. Estimated water use for the Proposed Project considers office, retail/restaurant, residential, and hotel demands for plumbing fixtures, including water closets, urinals, public lavatories, kitchen faucets, and showerheads, as calibrated to comply with 2019 CALGreen standards and LEED frequency of fixture use and duration times. Water demands for offices include restrooms and the occasional shower user. The water use associated with the proposed onsite accessory spaces is based on data from similar facilities. Included are estimates for meals per day, restroom use, and shower water. Residential water use is based on an average of two occupants per unit. Hotel water use is based on the average of two occupants per room and considers water for hotel laundry, hotel kitchen, and icemakers. Retail spaces have water demands associated with restrooms for employees and customers. Restaurants have a high water demand for activities including cooking, cleaning, and consumption. Finally, a 10 percent “leakage factor” is added to the water budget for water losses attributed to on-site leaks, loose pipe connections, and unintentional running water. The projected interior water demand, excluding the leakage factor, of the Proposed Project would total 119 mg/yr, or about 0.32 mgd. It is anticipated that recycled water would be used for toilet fixture flushing within all buildings on the main Project Site and possibly for the reconstructed service station and increased square footage on the Hamilton Avenue Parcels.

Project Exterior Water Use

Exterior water use at the Project Site would be needed for cooling and irrigation, amounts which vary based on the season. It is anticipated that retail and residential areas would employ air-based cooling technologies; therefore, water demands for mechanical cooling were estimated only for the office and accessory space. Mechanical cooling technology selection has not yet been finalized and would impact these demands; however, it is estimated that cooling demands for the campus space would, using the high end of the seasonal ranges, result in an annual average demand of 9 mg/yr. The Project would not use single-pass cooling systems or well water, per the requirements of the Zoning Ordinance. The Project

includes approximately 18 acres of irrigated landscaping. The landscape concepts have not yet been finalized; however, assuming compliance with the Maximum Applied Water Allowance, in accordance with the Model Water Efficient Landscape Ordinance, and the potential use of green roofs, the total estimated water demand from irrigation would be approximately 27 mg/yr. It is anticipated that recycled water would be used for the Project Site's irrigation needs and may be used for mechanical cooling applications. Also, per the Zoning Ordinance, potable water would not be used for decorative features, unless the water recirculates.

The WSA for the Proposed Project summarizes the projected availability of the MPMW's existing and planned future water supplies as well as the MPMW's projected water demands in normal, single, and multiple dry years through 2040. Because MPMW purchases all of its water from SFPUC, and the availability of water to SFPUC would be affected by implementation of the Bay-Delta Plan Amendment, the WSA for the Project considered two scenarios, one assuming the Bay-Delta Plan Amendment is implemented and one assuming that the Bay-Delta Plan Amendment is not implemented. Pursuant to California Water Code Section 10910(c)(4) and the technical analyses described in the WSA for the Proposed Project, MPMW found that there is adequate water supply for the Proposed Project during normal years. As described previously, ConnectMenlo identifies the maximum level of development that could occur in the ConnectMenlo study area, including potential bonus-level increased development. The ConnectMenlo EIR further studied the maximum development potential by more specific land uses. MPMW and the Planning Division are actively tracking the projected water demands of all projects in the ConnectMenlo study area on a cumulative basis to ensure that development remains not only below the maximum level permitted in ConnectMenlo and analyzed in the ConnectMenlo EIR but within the MPMW's service abilities. The Proposed Project, if approved, would be included in this cumulative development total, which would be below the maximum development level permitted.

MPMW, a member of agency of BAWSCA, purchases water solely from the SFPUC RWS. As such, MPMW's water supply is largely dependent upon the reliability of the SFPUC's water supply. The reliability of the SFPUC RWS supply is highly dependent on the assumption of whether or not the 2018 Bay-Delta Plan Amendment is implemented, which is analyzed further below.

The WSA for the Proposed Project summarizes the projected availability of MPMW's existing and planned future water supplies as well as MPMW's projected water demands in normal, single, and multiple dry years through 2040. The WSA determined that water demand within the MPMW service area is not expected to exceed MPMW water supplies during normal water years to 2040. During single and multiple dry years water demand is similarly expected to meet MPMW water supplies through the anticipated procurement of a new recycled water source at the Bayfront Recycled Water Facility by 2030, continued mandatory water demand management program with prohibitions, and implementation of the Water Shortage Contingency Plan (WSCP), discussed above. Should the Bay-Delta Plan Amendment be implemented starting in 2023, MPMW expects its supply to meet demand during normal water years, however, significant shortfalls during dry and multiple dry years may occur, requiring stricter water demand reductions of the WSCP, as discussed below.

Bay-Delta Plan Amendment Implementation

The Bay-Delta Plan Amendment was adopted in December 2018 by the State Water Resources Control Board (SWRCB) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 40 percent of the "unimpaired flow" on

the three tributaries from February through June in every year type, whether wet, normal, dry, or critically dry. The implementation of the Bay-Delta Plan Amendment significantly impacts the SFPUC RWS supply reliability in dry years; however, the actual implementation of the Bay-Delta Plan Amendment is uncertain⁵⁶.

If the Bay-Delta Plan Amendment is implemented, SFPUC will be able to meet its contractual obligations to its wholesale customers as presented in the SFPUC 2020 UWMP in normal years but would experience significant supply shortages in dry years. In single dry years, supply shortages would range from 36 to 46 percent. In multiple dry years, supply shortages would range from 36 to 54 percent. Implementation of the Bay-Delta Plan Amendment will require rationing in all single dry and multiple dry years through 2045.

If the Bay-Delta Plan Amendment is not implemented SFPUC would be able to meet 100 percent of the projected purchases of its wholesale customers, including MPMW, during all year types through 2045 except during the fourth and fifth consecutive dry years for base year 2045 when 15 percent wholesale supply shortages are projected.

In June 2021, in response to various comments from wholesale customers regarding the reliability of the RWS as described in SFPUC's 2020 UWMP, the SFPUC provided a memorandum describing SFPUC's efforts to remedy the potential effects of the Bay-Delta Plan Amendment which include: pursuing a Tuolumne River voluntary agreement; evaluating the drought planning scenario in light of climate change; pursuing alternative water supplies; litigation with the State over the Bay-Delta Plan Amendment; and litigation with the State over the proposed Don Pedro Federal Energy Regulatory Commission Water Quality Certification. The SFPUC has initiated an Alternative Water Supply Planning Program to ensure that San Francisco can meet the water needs of its retail and wholesale customers, address shortages in projected dry years, and limit rationing to a maximum 20 percent system-wide, in accordance with adopted SFPUC policies. This program, which is in its early planning stages, is intended to meet future water supply challenges and vulnerabilities (e.g., environmental flow needs and other regulatory changes; earthquakes, disasters, and emergencies; increases in population and employment; climate change). Because the region faces future challenges, both known and unknown, the SFPUC is considering a suite of diverse, non-traditional supplies and leveraging regional partnerships to meet retail and wholesale customer needs through 2045.

Water Supply Reliability

In normal years MPMW expects that its water supplies would be adequate to satisfy projected normal year demands. However, MPMW anticipates that its available purchases from the SFPUC RWS would experience dry year supply reductions under implementation of the Bay-Delta Plan Amendment, which significantly reduces dry year allocations for all SFPUC wholesale customers. Recycled water is estimated to be available during all hydrologic years at a volume that meets MPMW's projected recycled water demands. Table 3.15-2 shows MPMW's projected supplies during normal, single dry, and multiple dry years through 2040 based on the assumptions in the MPMW 2020 UWMP, which assumes implementation of the Bay-Delta Plan Amendment by 2023. Based on the SFPUC's analysis, similar water supply quantities would be available to MPMW in 2045 under the various hydrologic conditions.

⁵⁶ As noted in the regional water system supply reliability memorandum and the UWMP 2020 memorandum, included as Appendix B to the WSA for the Proposed Project, the SFPUC is actively pursuing all options to resolve the potential effects of the Bay-Delta Plan Amendment. It remains committed to creating benefits for the Tuolumne River while meeting water supply level-of-service goals and objectives for retail and wholesale customers, such as MPMW.

Table 3.15-2. MPMW's Projected Normal, Single Dry, and Multiple Dry-Years Water Supplies (with Bay Delta Plan Amendment)

Hydrologic Condition ^b	Projected Water Supply (mg) ^a			
	2025	2030	2035	2040
Normal Year	1,678	1,750	1,750	1,750
Single Dry Year	877	978	1,018	1,062
Multiple Dry Years – Year 1	877	978	1,018	1,062
Multiple Dry Years – Year 2	760	854	877	927
Multiple Dry Years – Year 3	760	854	877	927
Multiple Dry Years – Year 4	760	854	877	832
Multiple Dry Years – Year 5	760	854	824	832

Source: West Yost. 2022. *Willow Village Project Water Supply Assessment*. Prepared for Menlo Park Municipal Water District.

a. Includes projected potable water supply from the SFPUC RWS and projected recycled water supply (48 mg/yr in 2025 and 120 mg/yr for 2030 to 2040).

b. The estimates do not account for climate change impacts on the SFPUC RWS and potential delays in completion of the WSIP.

Table 3.15-3 shows MPMW's projected supplies during normal, single dry, and multiple dry years through 2040 assuming that the Bay-Delta Plan Amendment is not implemented. In the event that the Bay-Delta Plan Amendment is not implemented, the SFPUC has indicated that it would be able to meet 100 percent of the wholesale projected purchases, including those for MPMW, during all year types through 2045 except during the fourth and fifth consecutive dry years for base year 2045 when MPMW would likely experience a 16.5 percent supply shortfall.

Table 3.15-3. MPMW's Projected Normal, Single Dry, and Multiple Dry-Years Water Supplies (without Bay Delta Plan Amendment)

Hydrologic Condition ^b	Projected Water Supply (mg) ^a			
	2025	2030	2035	2040
Normal Year	1,678	1,750	1,750	1,750
Single Dry Year	1,344	1,465	1,530	1,603
Multiple Dry Years – Year 1	1,344	1,465	1,530	1,603
Multiple Dry Years – Year 2	1,344	1,465	1,530	1,603
Multiple Dry Years – Year 3	1,344	1,465	1,530	1,603
Multiple Dry Years – Year 4	1,344	1,465	1,530	1,603
Multiple Dry Years – Year 5	1,344	1,465	1,530	1,603

Source: West Yost. 2022. *Willow Village Project Water Supply Assessment*. Prepared for Menlo Park Municipal Water District.

a. Includes projected potable water supply from the SFPUC RWS (based on projected purchases) and projected recycled water supply (48 mg/yr in 2025 and 120 mg/yr for 2030 to 2040).

b. A 16.5 percent reduction in supply from the SFPUC RWS is projected for MPMW in the fourth and fifth years of multiple dry year drought, but not until 2045.

Conclusion

In summary, if the Bay-Delta Plan Amendment is implemented, the total projected water supplies determined to be available for the Proposed Project in normal years will meet the projected water demand associated with the Proposed Project, in addition to MPMW's existing and planned future uses, through 2040. However, with the implementation of the Bay-Delta Plan Amendment, significant supply shortfalls are projected in dry years for agencies that receive water supplies from the SFPUC RWS, as well as other agencies whose water supplies would be affected by the amendment. For MPMW, supply shortfalls are projected in single dry years (ranging from 27 to 32 percent) and in multiple dry years (ranging from 27 to 44 percent) through 2040. Based on SFPUC's analysis, similar supply shortfalls would occur through 2045.

If supply shortfalls do occur, MPMW expects to meet these supply shortfalls through water demand reductions and other shortage response actions by implementation of its WSCP.⁵⁷ With the MPMW's Water Shortage Contingency Plan (WSCP) in place, the shortages in single and multiple dry years would be managed through demand reductions of 50 percent or greater in Stages 5 and 6. The projected single dry year shortfalls would require implementation of Stage 3 or Stage 4 of the MPMW WSCP, and the projected multiple dry year shortfalls would require implementation of Stage 3, 4, or 5 of the MPMW WSCP. In accordance with the zoning ordinance, the CALGreen code, and City water use regulations, the Proposed Project would incorporate green and sustainable building practices (e.g., ultra-low-flow fixtures within the building) and implement water conservation measures, both in the design of the base building and tenant spaces as well as daily operations, employee practices, and landscaping choices. Also, MPMW is pursuing emergency groundwater resources through the Emergency Water Storage/Supply Project. If water supplies from the RWS are reduced or unavailable, the Emergency Water Storage/Supply Project would have the capacity to provide MPMW with up to 4.32 mgd from two or three wells at separate locations. The Proposed Project on-site water system has been evaluated to ensure the Proposed Project would meet fire flow requirements and not negatively affect the fire flow in the neighboring life sciences district. The Project would utilize recycled water for all City-approved non-potable applications (e.g. irrigation, mechanical cooling, and toilet flushing), which would offset the demand for potable water and contribute to MPMW's efforts to reduce future supply shortages. According to the WSA, the proposed project would utilize recycled water for approximately 37 percent (57 mg/yr) of the total anticipated water demand for the Proposed Project. Furthermore, the water demand associated with buildout of ConnectMenlo, which the Proposed Project is within, is included in the 2020 UWMP, and indicates that the City would have water resources available to serve anticipated growth, including the growth anticipated from buildout of ConnectMenlo and the buildout of the specific land uses studied in the associated EIR. The Proposed Project would not exacerbate MPMW's anticipated supply shortages and therefore would not cause MPMW to increase customer water use restrictions beyond those anticipated in the 2020 UWMP. The Proposed Project also would be subject to the same water conservation and water use restrictions as other water users within the MPMW system under ConnectMenlo, including annual compliance with the approved water budget. The Proposed Project would utilize a significant amount of recycled water for non-potable applications to reduce its potable water demand from MPMW. If shortfalls occur with or without the Bay Delta Plan, the Water Shortage Contingency Plan (which is applicable to all

⁵⁷ A main focus of MPMW's planned demand reduction measures is to increase public outreach and keep customers informed of the water shortage emergency and actions they can take to reduce consumption. The City will utilize its emergency supply well(s) as supply augmentation during WSCP Stages 5 and 6. Other actions that the City will take will include coordination with other agencies, implementing drought surcharge, increasing water waste patrols, etc. Additional information on MPMW's WSCP is provided in Chapter 8 of MPMW's 2020 UWMP.

customers) would ensure that MPMW could deliver water to its customers during the dry year and multiple dry year shortfalls. Therefore, adequate water supplies would be available to serve the Proposed Project and reasonably foreseeable future development (including buildout of ConnectMenlo) during normal, dry, and multiple dry years, with implementation of applicable stages of water use reductions from the Water Shortage Contingency Plan during dry and multiple dry years. Impact UT-2 would be *less than significant* consistent with the ConnectMenlo EIR. No Mitigation is required.

Impact UT-3: Generation of Wastewater. The Proposed Project would not result in a determination by the wastewater treatment providers that they have inadequate capacity to serve the Proposed Project's projected demand in addition to the providers' existing commitments. (LTS)

The WBSD provides wastewater collection and conveyance services for MPMW, which conveys the majority of raw wastewater to the SVCW WWTP. According to the 2020 MPMW UWMP, the total volume of wastewater collected by the WBSD from the MPMW service area in 2020 was approximately 873 mg, or an average of about 2.4 mgd.

The Proposed Project would be consistent with the type and intensity of development as well as the population projections assumed for the Project Site in ConnectMenlo and the ConnectMenlo EIR. The Proposed Project would generate approximately 0.27 mgd (115 mg/yr) of wastewater at the Project Site. Given the current wastewater generated at the Project Site is estimated to be approximately 0.05 mgd (17 mg/yr), this is an increase of approximately 0.22 mgd wastewater generated compared with existing conditions, which is a negligible amount given the capacity of the existing system. Therefore, there would be adequate wastewater treatment capacity available to serve the Project's projected demand in addition to the provider's existing commitments.

As stated above under Impact UT-1, operation of the SVCW WWTP and its wastewater conveyance system is governed by the waste discharge requirements found in RWQCB Order Number R2-2018-00XX (NPDES No. CA0038369). This order has a dry-weather facility design flow of 29 mgd and a peak wet-weather design flow of 71 mgd. The NPDES permit does not have a limitation on flow quantity. As noted in the ConnectMenlo EIR, SVCW reports that SVCW WWTP has a capacity limit of 80 mgd; however, in order to utilize the full plant capacity of 80 mgd, certain pump station and pipe improvements are necessary. Therefore, the WWTP design is not necessarily limited to the peak wet-weather flow of 71 mgd mentioned in the NPDES permit, but for the purpose of this analysis 71 mgd is considered the maximum flow under current conditions. Therefore, the WWTP design is not necessarily limited to the peak wet-weather flow of 71 mgd. As reported by the RWQCB, from October 2012 through August 2017, the plant treated an average of 13.5 mgd, with a maximum instantaneous flow of 50 mgd. Both rates are well within the 29 mgd average dry-weather design flow and 71 mgd peak wet-weather design flow. Under its Stage 2 expansion program, SVCW will complete the necessary pump station and pipe improvements to utilize the full 80 mgd of plant capacity as needed.

Assuming that 90 percent⁵⁸ of the total amount of non-irrigation water used by the Proposed Project would become wastewater, and the Project's non-irrigation water demand is estimated at 0.3 mgd (or 128 mg/yr),⁵⁹ the estimated wastewater generation rate for the Proposed Project would be approximately 0.27 mgd (or 115 mg/yr). This increase in wastewater generation would not be significant relative to the currently available excess dry-weather design flow capacity of 15.5 mgd (i.e., 29 mgd design flow minus

⁵⁸ ConnectMenlo EIR assumes 90 percent of indoor water becomes wastewater. It is used here for consistency.

⁵⁹ Total indoor water use = Project net increase of potable water of 0.22 mgd + 0.06 mgd of water for toilet flushing (non-potable) + 0.02 mgd water for cooling (non-potable) = 0.3 mgd.

13.5 mgd current average flow = 15.5 mgd) or its excess wet-weather design flow capacity of 57.5 mgd (i.e., 71 mgd design flow minus 13.5 mgd current average flow) at the SVCW WWTP. Estimated wastewater flows from the Proposed Project would therefore represent a very small percentage of the total daily wastewater capacities of the SVCW WWTP. Likewise, wastewater generation from the Project (i.e., maximum of approximately 115 mg/yr) would not be significant relative to current average collection rates at the WBSD.

Conclusion

Based on existing SVCW WWTP and WBSD collection and processing capacity, it is not expected that the Proposed Project would cause a determination by either of the wastewater treatment providers that they have inadequate capacity to serve the Proposed Project's projected demand in addition to existing commitments. Impact UT-3 would be *less than significant* consistent with the ConnectMenlo EIR. No mitigation required.

Impact UT-4: Generation of Solid Waste. The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. (LTS)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. In addition, Senate Bill 1383, passed in 2016, established a target that calls for a 50 percent reduction in organic waste by 2020 and 75 percent by 2025. The City of Menlo Park has been working to meet these standards. As noted above, in 2020, the service area experienced a 52 percent diversion rate by recycling and composting waste, while Menlo Park had a diversion rate of approximately 57 percent.⁶⁰

In total, construction of the Proposed Project would generate approximately 125,000 cubic yards of debris from structure demolition, of which approximately 101,000 cubic yards would be generated during Phase 1 and 24,000 cubic yards during Phase 2. Main Project Site excavation and grading activities are anticipated to generate approximate 175,000 cubic yards of excess soil, which will require offsite disposal. All soil and debris, including contaminated soil, would most likely be off-hauled to Ox Mountain Landfill (approximately 22.3 miles from the Project Site).

The Proposed Project would be required to comply with the City's Construction and Demolition Recycling Ordinance, which calls for salvage or recycling at least 60 percent of construction-related solid waste. Therefore, construction of the Proposed Project is not expected to have a significant impact on existing landfills.

Operation of the Proposed Project would result in the generation of solid waste, beyond existing conditions, but would continue to meet state and local standards for solid waste and recycling. The Proposed Project would generate 4,332 net new employees and an estimated 3,520 new residents at the main Project Site who would generate waste. As part of the sustainability features of the Project (refer to Chapter 2, Project Description), a zero-waste management plan would be prepared to achieve a 90 percent diversion rate by 2035 for the waste stream generated during the occupancy phase of the Proposed Project. The Project would achieve the state and local requirements for waste reduction through

⁶⁰ Recology San Mateo County. 2021. *Annual Report to the SBWMA for Year 2020*. Available: <https://rethinkwaste.org/wp-content/uploads/2021/02/Recology-Annual-Report-2020.pdf>. Accessed: February 15, 2022.

implementation of the Proposed Project's zero waste management plan. Operational waste would be separated and sorted into salvage, recycle, and reuse materials for proper disposal, donation, and sale. The solid waste generated at the main Project Site would be collected by Recology San Mateo and hauled to Shoreway. Shoreway is permitted to receive 3,000 tons of refuse per day. Once collected and sorted at Shoreway, solid waste would be transported to Ox Mountain, which is permitted to receive 3,598 tons per day. Solid waste generated by operation of the Proposed Project would represent a small percentage of the permitted capacity of Shoreway and Ox Mountain. The implementation of the required zero waste management plans for all new buildings and uses on the main Project Site would further reduce waste from the occupancy phase of the building. As such, Shoreway and Ox Mountain would have adequate capacity for the Proposed Project. Therefore, operation of the Proposed Project is not expected to have a significant impact on existing landfills.

Conclusion

The Proposed Project would be served by a landfill with sufficient permitted capacity to accommodate its solid waste disposal needs. In addition, the Proposed Project is within the amount of potential development enabled by ConnectMenlo and further the amount of potential development studied in the ConnectMenlo EIR and, as such, would not result in impacts that were not already evaluated. The Proposed Project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste reduction goals. Impact LU-4 would be *less than significant* consistent with the ConnectMenlo EIR. No mitigation is required.

Impact UT-5: Compliance with Solid Waste Regulations. The Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste (LTS)

Construction and operation of the Proposed Project would comply with all applicable statutes and regulations related to solid waste. State law (AB 341 and AB 939) requires businesses to recycle and cities to divert 50 percent of their solid waste from landfills. The Proposed Project would adhere to these laws. In addition, the Proposed Project would be required to adhere to the City's Construction and Demolition Recycling Ordinance and zero-waste management plan requirements during the occupancy phase of the Proposed Project.

Conclusion

The Proposed Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. In addition, the Proposed Project is within the amount of development potential enabled by ConnectMenlo and further the amount of potential development studied in the ConnectMenlo EIR and, as such, would not result in impacts that were not already evaluated. Impact UT-5, with regard to compliance with solid waste-related management and reduction statutes and regulations, would be *less-than-significant* consistent with the ConnectMenlo EIR. No mitigation required.

Cumulative Impacts

Impact C-UT-1: Cumulative Water Service and Infrastructure Impacts. Cumulative development would result in a less-than-significant cumulative impact on water service and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on water service. (LTS)

Summary of Analysis in the ConnectMenlo EIR

As stated in Chapter 4.14, Utilities and Service Systems, of the ConnectMenlo EIR, the geographic scope of this cumulative analysis is the SFPUC retail and wholesale service area.

Development of past, current, and future projects within the SFPUC retail and wholesale service area have the potential to contribute to additional water demands. However, development projects are subject to State and SFPUC voluntary and mandatory conservation measures to reduce usage, the BAWSCA's long-term water supply strategy to enhance supplies, and the SFPUC's WSIP projects to improve the regional water system reliability and capacity.

The ConnectMenlo EIR determined that, through compliance with existing state and SFPUC conservation measures, development under ConnectMenlo, in combination with other new development within the SFPUC retail and wholesale service area, would not contribute to a significant cumulative impact with respect to water service demands. Furthermore, any new or expanded local water distribution facilities would require permitting and review in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated to the extent possible. The ConnectMenlo EIR determined that implementation of ConnectMenlo would not contribute to a significant cumulative impact on water service, and the cumulative impact would be *less than significant*.

Cumulative Impacts with the Proposed Project

Consistent with the ConnectMenlo EIR, the geographic context for cumulative water service with the Proposed Project is the SFPUC retail and wholesale service area.

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 Project and East Palo Alto projects, which are also located within the service area. As with the Proposed Project, the entire 123 Independence Drive project (inclusive of the additional unrestricted units) and East Palo Alto projects, as well as other projects within the service area, would be required to comply with existing regulations, including plans, policies, and Zoning Ordinance regulations that promote water conservation and green building best practice. While the projects within East Palo Alto are subject to different Zoning Ordinance requirements and local regulations than the 123 Independence Drive project, water conservation measures from SFPUC, BAWSCA, and State requirements would apply similarly to projects in Menlo Park and East Palo Alto since both cities obtain water supply primarily from the SFPUC RWS. Therefore, these additional projects would not alter the cumulative impact determination as stated in the ConnectMenlo EIR, and the cumulative impact with respect to water service would remain less than significant.

The Proposed Project would not result in a substantial change in the ConnectMenlo project, would not be a cumulatively considerable contributor to a significant cumulative water service impact, and would not cause new or substantially more severe significant cumulative water service impacts than those analyzed in the ConnectMenlo EIR. The Proposed Project would be required to comply with all applicable existing

regulations, including plans, policies, and Zoning Ordinance regulations that promote water conservation and green building best practices. In accordance with Zoning Ordinance, the CALGreen code, and City water use regulations, the Proposed Project would incorporate green and sustainable building practices (e.g., ultra-low-flow fixtures within the building) and implement water conservation measures, both in the design of the base building and tenant spaces as well as daily operations, employee practices, and landscaping choices. In addition, the Proposed Project would be subject to the same water conservation and water use restrictions as other water users within the MPMW system under ConnectMenlo. The Proposed Project would utilize recycled water for City-approved non-potable applications, accounting for approximately 37 percent of the total water usage for the Proposed Project. Therefore, consistent with the conclusions in the ConnectMenlo EIR, the Proposed Project combined with other past, present, and reasonably foreseeable future development would result in a less-than-significant cumulative impact with respect to water service. No mitigation is required.

Impact C-UT-2: Cumulative Wastewater Service and Infrastructure Impacts. Cumulative development would result in a less-than-significant cumulative impact on wastewater service and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on wastewater service. (LTS)

Summary of Analysis in the ConnectMenlo EIR

As stated in Chapter 4.14, Utilities and Service Systems, of the ConnectMenlo EIR, the geographic scope of this cumulative analysis is the WBSD and SVCW service areas.

Development of past, current, and future projects within the WBSD and SVCW service areas have the potential to contribute to additional wastewater demands. However, development projects are subject to applicable policies and Municipal Code regulations that promote water conservation and minimize impacts related to wastewater generation.

The ConnectMenlo EIR determined that, through compliance with General Plan policies and zoning regulations that promote water conservation and minimize impacts related to wastewater generation, development under ConnectMenlo, in combination with other new development within WBSD and SVCW service areas, would not contribute to a cumulative impact with respect to wastewater service demands. Furthermore, the Connect Menlo EIR indicated that the WBSD's CIPs would ensure that the WBSD's wastewater collection system would have sufficient capacity to accommodate the cumulative growth. The ConnectMenlo EIR determined that implementation of ConnectMenlo would not contribute to a significant cumulative impact on wastewater service, and the cumulative impact would be *less than significant*.

Cumulative Impacts with the Proposed Project

Consistent with the ConnectMenlo EIR, the geographic context for cumulative wastewater service with the Proposed Project is the WBSD and SVCW service areas.

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 123 Independence Drive Project and East Palo Alto projects, which are also located within the service areas. As with the Proposed Project, the 123 Independence Drive project and East Palo Alto projects, as well as other projects within the service areas, would be required to comply with applicable policies and zoning regulations that promote water conservation and minimize impacts related to wastewater generation. Therefore, these additional projects would not alter the cumulative impact determination as stated in the ConnectMenlo EIR, and the cumulative impact with respect to wastewater service would remain less than significant.

The Proposed Project would not result in a substantial change in the ConnectMenlo project, and would not be a cumulatively considerable contributor to a significant cumulative water service impact and would not cause new or substantially more severe significant cumulative wastewater service impacts than analyzed in the ConnectMenlo EIR. The Proposed Project would be required to comply with all applicable existing regulations, including plans, policies, and Municipal Code regulations that promote water conservation and green building best practices. In addition, wastewater generation from the Proposed Project combined with other past, present, and reasonably foreseeable future development would not be significant relative to current average collection rates for the WBSD. Therefore, consistent with the conclusions in the ConnectMenlo EIR, the Proposed Project would result in a less-than-significant cumulative impact with respect to wastewater service. No mitigation is required.

Impact C-UT-3: Cumulative Solid Waste Impacts. Cumulative development would result in a less-than-significant cumulative impact on solid waste service and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on solid waste service. (LTS/M)

Summary of Analysis in the ConnectMenlo EIR

As stated in Chapter 4.14, Utilities and Service Systems, of the ConnectMenlo EIR, the geographic scope of this cumulative analysis includes the landfills that serve the City and other cities in the region.

Development of past, current, and future projects served by the landfills have the potential to contribute to exceedances in landfill capacity. However, development projects are required to comply with state and local regulations that require municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling.

The ConnectMenlo EIR determined that, implementation of ConnectMenlo when considered with the other jurisdictions that divert solid waste to the same facilities, in particular Ox Mountain Landfill, may eventually experience insufficient future capacity at a specific landfill to accommodate existing or increased population and employment levels. Implementation of Mitigation Measure UTIL-10 requires the City to continue its reduction programs and diversion requirements in an effort to further reduce solid waste that is diverted to the landfill and lower its per capita disposal rate. Furthermore, proposed development in Menlo Park would be required to comply with the City's regulations prepared to reduce solid waste and therefore, reduce impacts related to landfill capacity. For this reason, and because the growth under ConnectMenlo would occur incrementally over a period of 24-years,⁶¹ the ConnectMenlo EIR determined that implementation of ConnectMenlo would not contribute to a significant cumulative impact on solid waste, and the cumulative impact would be *less than significant with mitigation*.

Cumulative Impacts with the Proposed Project

Consistent with the ConnectMenlo EIR, the geographic context for cumulative solid waste with the Proposed Project includes the landfills that serve the city and other cities in the region.

⁶¹ Although the ConnectMenlo Final EIR assumed a buildout horizon of 2040, the maximum development potential may be reached sooner than anticipated. However, the ConnectMenlo Final EIR evaluated the maximum development potential that could occur at any given time and did not consider the phased buildout of the development potential; therefore, no new or additional impacts are anticipated as a result of the expedited buildout.

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 123 Independence Drive Project and East Palo Alto projects, which are also located within the service areas. As with the Proposed Project, the 123 Independence Drive project and East Palo Alto projects, as well as other projects within the service areas, would be required to comply with state and local regulations that require municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. Therefore, these additional projects would not alter the cumulative impact determination as stated in the ConnectMenlo EIR, and the cumulative impact with respect to solid waste service would remain less than significant.

The Proposed Project would not result in a substantial change in the ConnectMenlo project, would not be a cumulatively considerable contributor to a significant cumulative solid waste impact, and would not cause new or substantially more severe significant cumulative solid waste impacts than those analyzed in the ConnectMenlo EIR. The Proposed Project would be required to comply with Senate Bill 1383, passed in 2016, established a target that calls for a 50 percent reduction in organic waste by 2020 and 75 percent by 2025. Furthermore, the Proposed Project would be required to comply with the City's Construction and Demolition Recycling Ordinance, which calls for salvage or recycling at least 60 percent of construction-related solid waste. As part of the zoning ordinance amendments associated with the ConnectMenlo General Plan Update and in response to the mitigation measure from Impact UTIL-10 from the ConnectMenlo program level EIR, the City adopted zero waste requirements for private development projects in the O (Office), LS (Life Science), and R-MU (Residential Mixed Use) zoning districts. Accordingly, the Proposed Project would be required to prepare a zero waste management plan for the occupancy phase of the Proposed Project with the goal of 90 percent diversion of waste from landfills by 2035. Therefore, the Proposed Project combined with other past, present, and reasonably foreseeable future development would result in a less-than-significant cumulative impact with respect to solid waste. No mitigation is required.

Impact C-UT-4: Cumulative Stormwater Service and Infrastructure Impacts. Cumulative development would result in a less-than-significant cumulative impact on stormwater service, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on stormwater service and infrastructure. (LTS)

Summary of Analysis in the ConnectMenlo EIR

As stated in Chapter 4.14, Utilities and Service Systems, of the ConnectMenlo EIR, the geographic scope for the cumulative analysis is the San Francisquito Creek watershed.

Development of past, current, and future projects within the San Francisquito Creek watershed have the potential to alter stormwater quality, stormwater flows, drainage, impervious surfaces, and flooding. However, development projects are subject to federal, state, and local standards pertaining to water quality. As a result, there is no significant cumulative impact with ConnectMenlo.

The ConnectMenlo EIR determined that, through compliance with existing state and local regulations, as well as general plan design guidelines, Menlo Park Municipal Code requirements, and other applicable City requirements, development under ConnectMenlo in combination with other new development within the San Francisquito watershed would not contribute to a significant cumulative impact with respect to stormwater service. Furthermore, all cumulative projects would be subject to similar permit requirements and would be required to comply with City ordinances and to be consistent with ConnectMenlo as well as numerous water quality regulations that control construction related and

operational discharge of stormwater. ConnectMenlo EIR determined that implementation of ConnectMenlo would not contribute to a significant cumulative impact on stormwater, and the cumulative impact would be *less than significant*.

Cumulative Impacts with the Proposed Project

Consistent with the ConnectMenlo EIR, the geographic context for cumulative stormwater service with the Proposed Project is the San Francisquito Creek watershed.

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 in the 123 Independence Drive Project and East Palo Alto projects, which are also located within the San Francisquito Creek watershed. As with the Proposed Project, the 123 Independence Drive project and East Palo Alto projects, as well as other projects within the San Francisquito Creek watershed, would be required to comply with federal, state, and local standards pertaining to water quality. Therefore, these additional projects would not alter the cumulative impact determination as stated in the ConnectMenlo EIR, and the cumulative impact with respect to stormwater service would remain less than significant.

The Proposed Project would not result in a substantial change in the ConnectMenlo project, and would not be a cumulatively considerable contributor to a significant cumulative stormwater service impact and would not cause new or substantially more severe significant cumulative stormwater service impacts than analyzed in the ConnectMenlo EIR. The Proposed Project would implement BMPs, and would comply with the General Construction Permit; San Francisco Bay Municipal Separate Storm Sewer System Permit, Provision C.3; and San Mateo Countywide Water Pollution Prevention Program C.3 Stormwater Technical Guidance and implement a SWPPP and other erosion and pollution control measures. Therefore, consistent with the conclusions in the ConnectMenlo EIR, the Proposed Project combined with other past, present, and reasonably foreseeable future development would result in a less-than-significant cumulative impact with respect to stormwater. No mitigation is required.

Impact C-UT-5: Cumulative Natural Gas and Electrical Service Impacts. Cumulative development would result in a less-than-significant cumulative impact on natural gas and electrical, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on natural gas and electrical service and infrastructure. (LTS)

Summary of Analysis in the ConnectMenlo EIR

As stated in Chapter 4.14, Utilities and Service Systems, of the ConnectMenlo EIR, the geographic scope for the cumulative analysis is the 70,000 square mile PG&E service territory.

Development of past, current, and future projects within the PG&E service territory have the potential to increase energy demands (natural gas and electricity). However, development projects would be required to comply with applicable state and local regulations pertaining to energy conservation. Furthermore, as noted in the ConnectMenlo EIR, PG&E routinely updates its long-range plans to incorporate potential growth in its service area.

The ConnectMenlo EIR determined that, through compliance with existing state and local regulations, as well as general plan design guidelines, Menlo Park Municipal Code requirements, and other applicable City requirements, development under ConnectMenlo in combination with other new development within the PG&E service territory would not contribute to a cumulative impact with respect to natural gas and electrical service; the cumulative impact would be *less than significant*.

Cumulative Impacts with the Proposed Project

Consistent with the ConnectMenlo EIR, the geographic context for cumulative natural gas and electrical service with the Proposed Project is the 70,000 square mile PG&E service territory.

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 under the 123 Independence Drive and East Palo Alto projects, which are also within PG&E's service territory. As with the Proposed Project, the 123 Independence Drive project and East Palo Alto projects, as well as other projects within the PG&E service territory, would be required to comply with federal, state, and local standards pertaining to energy conservation. Therefore, these additional projects would not alter the cumulative impact determination as stated in the ConnectMenlo EIR, and the cumulative impact with respect to natural gas and electrical service would remain less than significant.

The Proposed Project would not result in a substantial change in the ConnectMenlo project, and would not be a cumulatively considerable contributor to a significant cumulative natural gas and electrical service impact and would not cause new or substantially more severe significant cumulative natural gas and electrical service impacts than analyzed in the ConnectMenlo EIR. The Proposed Project would meet 100 percent of its energy demand (electricity and natural gas), consistent with the requirements of Menlo Park Municipal Code Sections 15.43.140 (for the Office portion) and 16.45.130 (for the Residential Mixed-Use portion), through a combination of the purchase of 100 percent renewable electricity from Peninsula Clean Energy and implementation of a reach code-mandated onsite renewable energy system. Therefore, consistent with the conclusions in the ConnectMenlo EIR, the Proposed Project combined with other past, present, and reasonably foreseeable future development would result in a less-than-significant cumulative impact with respect to natural gas and electrical service. No mitigation is required.

Impact C-UT-6: Cumulative Telecommunication Impacts. The Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on telecommunication facilities and infrastructure. (LTS)

Cumulative Impacts with the Proposed Project

The geographic context for cumulative telecommunication service with the Proposed Project is the service area for telecommunication providers, this includes Atherton Fiber, Sonic, XFINITY from Comcast, AT&T, Earthlink, Wave Broadband, Viasat Internet, Zayo, Lumen, Verizon, and HughesNet.

Development of past, current, and future projects within the telecommunications service area have the potential to increase demand. However, similar to the Proposed Project, cumulative development of underground conduits and overhead cables to facilitate telecommunications services would be required to comply with applicable federal, state, and local standards pertaining to underground and overhead utility infrastructure. For these reasons, the Proposed Project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative telecommunications demand and facilities impact. The cumulative impact would be *less than significant*. No mitigation is required.