Chapter 6
Alternatives Analysis

6.1 Introduction

The California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) require that an environmental impact report (EIR) "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6(a)). If mitigation measures or a feasible project alternative that would meet most of the basic project objectives would substantially lessen the significant environmental effects of a proposed project, then the lead agency should not approve the proposed project unless it determines that specific technological, economic, social, or other considerations make the mitigation measures and the project alternative infeasible (PRC Section 21002, State CEQA Guidelines Section 15091(a)(3)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency's determination (State CEQA Guidelines Section 15126.6(c)).

This section describes several alternatives to the Project and compares the impacts of the alternatives to the environmental impacts of the Project as proposed, consistent with the guidance in CEQA Guidelines Section 15126.6(d). At the conclusion of the analysis, the environmentally superior alternative is identified (State CEQA Guidelines Section 15126.6(e)(2)). One of the alternatives that must be analyzed is the "No Project" Alternative. The purpose of the No Project analysis is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project analysis must discuss the existing conditions at the time the notice of preparation (NOP) is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (State CEQA Guidelines Section 15126.6(e)(2)). Therefore, pursuant to the State CEQA Guidelines, this section also discusses and analyzes a No Project Alternative.

Requirements for Alternatives Analysis

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to foster informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines Section 15126.6(f)). Therefore, an EIR does not need to address every conceivable alternative or consider infeasible alternatives. CEQA Guidelines Section 15364 generally defines "feasible" to mean the ability to be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. CEQA Guidelines Section 15126.6(f)(1) lists the following factors that may be considered when determining the feasibility of alternatives to be evaluated:

- Site suitability
- Economic viability
- Availability of infrastructure

- General plan consistency
- Other plans or regulatory limitations
- Jurisdictional boundaries
- Ability of the project's proponent to attain site control

An EIR does not need to consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines Section 15126.6(f)(3)).

6.2 Project Objectives and Environmental Impacts

The underlying purpose of the Proposed Project is to create a unique master-planned, mixed-use neighborhood with residential units, onsite amenities, neighborhood-serving retail uses, adequate office space to accommodate anticipated demand, a hotel, new bicycle and pedestrian connections, and open space. The Project Sponsor has also identified the following objectives of the Proposed Project:

1. Create a unique master-planned, mixed-use neighborhood with up to 1,730 residential units, a grocery store/supermarket, neighborhood-serving retail uses, office space, a hotel, new bicycle and pedestrian connections, and open space.
2. Redevelop an underutilized property with a contemporary master-planned, mixed-use neighborhood in furtherance of the goals for the Bayfront Area set forth in ConnectMenlo.
3. Promote the City's General Plan goals of providing office, R&D, residential, and commercial uses and a hotel in proximity to or integrated with one another.
4. Reduce vehicle miles traveled by locating residential, commercial, and office uses adjacent to each other.
5. Provide multiple transportation options and a robust transportation demand management (TDM) program to reduce traffic congestion, air quality impacts, and greenhouse gas emissions.
6. Create a bicycle- and pedestrian-friendly environment that enhances connectivity between the Project Site and surrounding areas with minimal traffic conflicts.
7. Provide much-needed market-rate and below-market-rate housing in Menlo Park.
8. Provide a pharmacy to serve the community within the main Project Site (may be located within supermarket or separately) or on Hamilton Avenue Parcel North.
9. Develop an integrated, highly connected office campus that accommodates anticipated worker space demands and provides flexible workspace at densities that support various transportation options.
10. Foster knowledge, partnerships, and innovation by creating a "meeting and collaboration space" where workers can convene to share ideas and goals, visitors can understand the company's background and products, business partners can learn about technology, and new product demonstrations can occur.
11. Use highly sustainable design techniques to promote energy and water efficiency.
12. Respect the surrounding community through appropriate building siting, massing, density, and height, consistent with the standards prescribed for bonus-level development in the City's General Plan and zoning policies.

13. Provide new green spaces and landscaped areas with native, drought-tolerant plant species.
14. Provide for development that can be phased to be responsive to market demands.
15. Provide a mix of uses and at densities that achieve a financially feasible project.
16. Generate revenue for the City, school districts, and other public entities.
17. Ensure a secure, safe, and private work environment.

Significant Project-Level Impacts

Significant and Unavoidable

A central purpose of the discussion of alternatives is to determine whether there are potentially feasible alternatives that could avoid or substantially lessen the significant impacts of the proposed project. Based on the analysis in Chapter 3, *Environmental Impact Analysis*, of this EIR, the project would have the following significant and unavoidable impacts.

- **Impact AQ-1:** The Proposed Project would conflict with or obstruct implementation of the applicable air quality plan.
- **Impact AQ-2 (Operation):** Operation of the Proposed Project would generate levels of ROG that would exceed BAAQMD's ROG threshold. ROG emissions from consumer products constitute most operational ROG emissions associated with the Proposed Project. Other main contributors to ROG emissions are vehicles. Net mitigated operational and construction plus net operational ROG emissions would exceed BAAQMD's ROG threshold, resulting in a significant and unavoidable impact.
- **Impact C-AQ-1:** The ConnectMenlo EIR determined that criteria air pollutant emissions generated by cumulative development would exceed BAAQMD's project-level significance thresholds and contribute to the nonattainment designations for the SFBAAB, and that implementation of ConnectMenlo in combination with past, present, and reasonably foreseeable projects elsewhere within the SFBAAB would result in a significant cumulative impact with respect to air quality after mitigation. Because it would exceed BAAQMD's ROG threshold (Impact AQ-2), the Project would be a cumulatively considerable contributor to the significant and unavoidable cumulative impact identified in the ConnectMenlo EIR.
- **Impact NOI-1a:** Construction noise levels would exceed the City's noise threshold of 10 dB or more relative to ambient noise levels from construction at the main Project Site and the Hamilton Avenue Parcels during daytime, early morning, and evening hours. Noise levels from off-site construction, including the Willow Village Tunnel and the PG&E feeder line, would exceed the City's noise threshold during nighttime hours. Noise from pile drivers would also exceed the City's threshold for individual equipment (85 dBA Leq at a distance of 50 feet). After implementation of feasible mitigation measures, construction noise impacts on offsite uses from construction of on-site and offsite improvements would remain significant and unavoidable. Additionally, construction noise impacts on onsite land uses during early morning, evening, and nighttime hours would remain significant and unavoidable after implementation of feasible mitigation measures.
- **Impact NOI-2:** Offsite vibration levels may exceed applicable vibration-related annoyance thresholds at nearby sensitive uses during daytime construction on site, and these impacts would remain significant even after implementation of feasible mitigation measures. Likewise, construction

vibration from off-site improvements would exceed annoyance thresholds, and those impacts would remain significant even after mitigation.

- **Impact C-NOI-1:** The ConnectMenlo EIR determined that, even with implementation of applicable regulations, the ConnectMenlo project, in combination with past, present, and reasonably foreseeable projects elsewhere in the City, would result in a significant cumulative impact with respect to noise and vibration. The ConnectMenlo EIR determined that implementation of ConnectMenlo Mitigation Measures Noise 1-a through Noise-1c, Noise 2-a, Noise2-b and Noise-4 would reduce cumulative impacts to less-than-significant levels. However, in the case of the Proposed Project, the ConnectMenlo EIR mitigation measures would not reduce significant impacts to less-than-significant levels. Therefore, the Proposed Project's contribution to the cumulative impact would be cumulatively considerable and cumulative noise impacts would be significant and unavoidable with mitigation.

Significant Impacts that can be Mitigated to Less-Than-Significant Levels

As stated above, a focus of the discussion of alternatives is to determine whether there are potentially feasible alternatives that could avoid or substantially lessen the significant impacts of the proposed project. This can include significant impacts for which mitigation measures have been identified to reduce the severity of project impacts to less than significant. As discussed in Chapter 3, *Environmental Impact Analysis*, of this EIR, the following impacts have been identified as significant, but were reduced to less than significant with implementation of mitigation:

- **Impact AQ-2 (Construction):** Construction activities would generate criteria pollutant emissions from off-road equipment exhaust, construction workers' vehicles and heavy-duty trucks traveling to and from the Project Site and off-site utility installation areas, the application of architectural coatings, and paving activities that would exceed BAAQMD's emission thresholds.
- **Impact AQ-3:** The Proposed Project's emissions would exceed BAAQMD's cancer risk and annual $PM_{2.5}$ concentration thresholds when construction activities overlap with Project operation.
- **Impact AQ-4:** Construction of the proposed sanitary sewer pump station would result in odors that would adversely affect a substantial number of people.
- **Impact TRA-2:** The Proposed Project would exceed the applicable VMT threshold for residential land use.
- **Impact TRA-3:** The Proposed Project would result in construction of the eastern driveway of the North Office Garage adjacent to a sharp roadway curve, limiting sight distance for exiting vehicles.
- **Impact BIO-2:** Implementation of the Proposed Project has the potential to result in an increase in the feral cat population. Feral cats could access the main Project Site via the new Elevated Park or Willow Road Tunnel. This could increase predation of local animal populations, including special-status species.
- **Impact BIO-3, Impact BIO-4:** The wetlands outside the boundary for the main Project Site and Hamilton Avenue Parcels North and South may be affected, either temporarily or permanently, during grading.
- **Impact BIO-5, Impact BIO-6:** Nesting birds may be disturbed if the Proposed Project is implemented during nesting season. Building facades and artificial lighting has the potential to result in avian mortality due to collisions.

- **Impact CR-1:** The Proposed Project would require temporary removal of tracks from the Dumbarton Cutoff Line, which could discernibly alter the resource's historical integrity and the public's ability to understand its historic character as observed from Willow Road.
- **Impact CR-2:** The Proposed Project would potentially disturb known archaeological resources and may disturb unknown deposits during construction activities.
- **Impact CR-3:** The Proposed Project could affect known Native American reburial sites as well as previously unknown burials.
- **Impact CR-4:** The Proposed Project could disturb known and undocumented Native American resources.
- **Impact EN-1:** Construction energy usage could result in significant impacts without implementation of best management practices.
- **Impact GHG-1b:** The Proposed Project would exceed the applicable VMT threshold for residential land use.
- **Impact GHG-2:** Construction and operation of the Proposed Project would conflict with CARB's 2017 Scoping Plan for achieving statewide GHG targets.
- **Impact GS-5:** Activities that disturb certain geologic units could expose undisturbed deposits that contain fossils. These activities could damage or destroy fossils.
- **Impact HY-1, Impact HY-5:** Dewatering of potentially contaminated groundwater may occur during Proposed Project construction.
- **Impact HAZ-2:** Groundwater contamination, soil vapor, and soil contamination within the Dumbarton Rail Corridor and Willow Road ROW have not been characterized and could be disturbed during Project excavation and dewatering, potentially exposing construction workers and the environment to the contamination.
- **Impact NOI-1:** Modeling indicates that noise from Project mechanical equipment and emergency generator testing could result in noise levels above applicable significance thresholds.

6.3 Alternatives Considered But Rejected

Section 15126.6(c) of the CEQA Guidelines provides that an EIR should "identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." The screening process for identifying the viable EIR alternatives included consideration of the following criteria.

- Ability to meet the basic project objectives
- Potential ability to substantially lessen or avoid significant environmental effects associated with the proposed project
- Potential feasibility, taking into account economic, environmental, social, technological, and legal factors

The discussion below describes an alternative that was considered during preparation and scoping of this EIR, and gives the rationale for eliminating this alternative from detailed consideration, including because

they would not fulfill most of the basic objectives of the project, would not avoid or substantially lessen significant environmental impacts, and/or would be infeasible.

Alternative Site

State CEQA Guidelines Section 15126.6(f)(2) states that a Draft EIR must consider offsite alternatives if such alternatives are deemed to be feasible by the lead agency. As stated in State CEQA Guidelines, Section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility of an alternative include:

> site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

The applicant does not control, nor is it aware of, a site within the City of Menlo Park that could accommodate the proposed development or meet the basic project objectives. Any sites outside of the City, to the extent they exist and are available, also would not satisfy most of the basic project objectives, including those related to providing a mixed-use neighborhood that enhances connectivity to the surrounding areas and Meta campuses (Objectives 1, 6, and 9) or those related to providing much-need market-rate and below-market-rate housing in the City (Objectives 1, 2, and 7). Further, other sites within the City that could accommodate housing are needed in addition to, and not instead of, the Project Site to assist the City in meeting its housing obligations. Therefore, other sites with the potential for housing development do not represent alternative sites for the Proposed Project. Additionally, building a project of the same magnitude but in a different location would result in the same significant and unavoidable air quality impacts. If the alternative site were located near any sensitive receptors, the project would result in the same significant and unavoidable noise impacts, unless the tunnel were not constructed (which is analyzed under the No Willow Road Tunnel Alternative). Because the amount of development would remain the same, many other impacts under this option would be similar to the Proposed Project. Accordingly, an alternative site would result in similar environmental impacts overall and would not substantially lessen or avoid significant and unavoidable environmental effects.

Office Only

An Office-Only Alternative would consist of development of only office uses on the Project Site. The Office-Only alternative would require a master plan to develop up to approximately 1.775 million square feet of office uses throughout the site, which is zoned O and R-MU. Although the Office-Only Alternative would reduce impacts to some extent due to reduced development as compared to the Proposed Project, the Office-Only Alternative would not eliminate the significant and unavoidable noise impacts associated with the Proposed Project because construction would still occur over the entire Project Site and because the Office-Only Alternative would include the proposed offsite improvements. Further, while the Office-Only Alternative would reduce air quality impacts, this EIR analyzes two reduced development alternatives (the Base Level Development and Reduce Intensity Alternatives) that similarly reduce air quality impacts, and the Office-Only Alternative would not reduce air quality impacts more than those alternatives. Under the Office-Only Alternative, there would be no residential VMT per capita impact; however, employment VMT per capita would increase due to the elimination of internalization of project trips from a mix of uses onsite. The Office-Only Alternative would not satisfy most of the basic project objectives, including objectives related to creating a mixed-use community or residential uses (Objectives 1, 2, 3, 7, and 15). The Office-Only Alternative would not include retail uses, including a pharmacy (Objective 8), or result in

phased development responsive to market demands (Objective 14). The Office-Only Alternative would include publicly accessible open space, but less than the Proposed Project (Objective 13) because the Proposed Project exceeds the minimum open space requirement and the Office-Only Alternative assumes the open space would meet the minimum Zoning Ordinance requirement. The R-MU zoning district requires residential dwelling units as part of any development project and a minimum density of 30 dwelling units per acre. The Office-Only Alternative would not be consistent with the requirements of the R-MU zoning district. The Office-Only Alternative would provide fewer community amenities and would be inconsistent with City policies related to mixed-use development, reduced transportation impacts, and housing and affordable housing (e.g., Policies LU-2.9, LU-4.3, LU-4.6, H-4.4, H-4.6).

Residential and Open Space Only

A Residential and Open Space Only Alternative ("Residential-Only Alternative") would consist of development of residential uses only on the Project Site. The Residential-Only Alternative would require a master plan to develop up to approximately 1.695 million square feet of residential uses (1,730 units) throughout the site, which is zoned O and R-MU. Although the Residential-Only Alternative would reduce impacts to some extent due to reduced development, the Residential-Only Alternative would not eliminate all of the significant and unavoidable noise impacts associated with the Proposed Project because construction would still occur over the entire Project Site, although certain offsite noise impacts may be reduced because the Willow Road Tunnel would not be constructed under this alternative (which is analyzed under the No Willow Road Tunnel Alternative). Further, while the Residential-Only Alternative would reduce air quality impacts, this EIR analyzes two reduced development alternatives (the Base Level Development and Reduce Intensity Alternatives) that similarly reduce air quality impacts. Under the Residential-Only Alternative, there would be no employment VMT per capita impact; however, residential VMT per capita would increase, as the Residential-Only Alternative would not allow for reduced trips through internalization of project trips from a mix of uses onsite, which only occurs with mixed-use development. Without internalization, residential VMT impacts might not be mitigable to a less-than-significant level. GHG impacts similarly would increase, potentially resulting in two significant and unavoidable impacts that would not occur under the Proposed Project. Additionally, the Residential-Only Alternative would not satisfy most of the basic project objectives, including objectives related to creating a mixed-use community (Objectives 1, 2, 3, and 15). Without the Willow Road Tunnel and without on-site retail uses, the Residential-Only Alternative would not satisfy objectives related to creating a pedestrian- and bicycle-friendly environment that enhances connectivity (Objective 6). The Residential-Only Alternative would not include office or retail uses, including a pharmacy (Objectives 8, 9, 10, and 17), or result in phased development responsive to market demands (Objective 14). The Residential-Only Alternative would include publicly accessible open space, but less than the Proposed Project (Objective 13) because the Proposed Project exceeds the minimum open space requirement and the Residential-Only Alternative assumes the open space would meet the minimum Zoning Ordinance requirement. The Residential-Only Alternative would provide fewer community amenities and would be inconsistent with City policies related to mixed-use development, reduced transportation impacts, and commercial development (e.g., Policies LU-2.9, LU-3.3, LU-4.1, LU-4.3, LU-4.6).

Reduced Parking

A Reduced Parking Alternative would reduce the size of one or more proposed parking garages and provide the minimum number of code-required parking spaces for the Proposed Project (5,575 spaces). Using the same methodology and the same parking management and TDM measures used to evaluate the

Proposed Project, the Reduced Parking Alternative would not further reduce transportation impacts, including VMT. The Reduced Parking Alternative might slightly reduce construction-related impacts, but it would not change the impact determinations associated with the Proposed Project. The Reduced Parking Alternative would not eliminate significant and unavoidable air quality and noise impacts. Further, the Proposed Project already proposes parking substantially below city code maximums, including the use of shared parking, and substantially reduces transportation impacts through the TDM program and campus trip cap. The number of striped parking spaces for the Campus District is 20 percent below forecasted demand for office uses.[1] Significant components of the Proposed Project likely would not be feasible under the Reduced Parking Alternative. Retail uses, particularly the proposed grocery store and pharmacy, are extremely sensitive to parking supply and further reductions in retail parking would not be consistent with market demands, as retail tenants require sufficient parking to attract customers to be successful. Likewise, further reductions in office and hotel parking would not be consistent with market demand. Reduced parking could therefore reduce the overall value of the project, which would reduce associated community amenities. Thus, the Reduced Parking Alternative would not satisfy many of the basic project objectives, including objectives related to a mixed-use neighborhood with a grocery store, neighborhood-serving retail uses, office space, and a hotel (Objectives 1, 2, 3, 8, 9, and 15), and could impact the viability of the project as a whole.

Buildings Within Existing Footprint

A Buildings Within Existing Footprint Alternative would consist of the Proposed Project, but developed within the footprint of the existing buildings on the Project Site in an effort to avoid disturbing land (and potential cultural resources, including tribal cultural resources) that has not been previously disturbed. The Buildings Within Existing Footprint Alternative would require taller buildings than the Proposed Project to accommodate the same uses within the smaller existing footprint, particularly for the residential buildings that would vary between 7 and 15 stories in height (average height of 12 stories). Depending on the building type needed to accommodate the proposed uses within the existing building footprint, and the resulting construction methodologies, the Buildings Within Existing Footprint Alternative could result in greater construction impacts than the Proposed Project. Taller buildings may also result in greater operational impacts, including aesthetic impacts. Further, the Buildings Within Existing Footprint Alternative would not eliminate the significant and unavoidable noise and air quality impacts, nor would it alter the impact determinations associated with cultural resources. The Proposed Project protects and avoids resources in the Hiller Mound Core area, while existing buildings that would be demolished and rebuilt under the Buildings Within Existing Footprint Alternative already are located in sensitive resource areas where both known and potentially unknown resources are or may be located. Thus, the impacts with such construction would be similar to the Proposed Project and the same mitigation would apply. The Buildings Within Existing Footprint Alternative would not satisfy most of the basic project objectives or would satisfy them to a lesser extent, including those related to a master-planned neighborhood and integrated office campus (Objectives 1, 2, 9, and 10), those related to pedestrian and bike-friendly environments (Objective 6), and those related to green spaces (Objective 13). The Buildings Within Existing Footprint Alternative also would not satisfy the objectives related to highly sustainable design techniques (Objective 11) or those related to appropriate siting, massing, and height (Objective 12).

[1] Willow Village Parking Assessment, Fehr & Peers, July 2021.

6.4 Description of Alternatives Selected for Evaluation

No Project Alternative

No additional construction would occur at the Project site with implementation of the No Project Alternative. The existing buildings and landscaping on the Project Site would not be demolished and would instead remain in place and be used and maintained the same as current conditions. The Project Sponsor would not construct the new buildings, establish open space area, or install infrastructure. There would be no realignment of Hamilton Avenue at Willow Road and no additional streets within the Project Site.

No Willow Road Tunnel Alternative[2]

The No Willow Road Tunnel Alternative would consist of the Proposed Project but without the Willow Road Tunnel. The trams would use the public street network, Bayfront Expressway and Willow Road to access the proposed Campus District. Historically, three tram routes have served the Willow Village campus. Without the Willow Road Tunnel, the trams would continue to operate as they do under baseline conditions. Two lines would travel eastbound within the Bayfront Campus and make a right turn onto Willow Road and enter Willow Village by making a left turn at either Main Street or Park Street. In the westbound direction, trams would use Willow Road and make a left turn onto Bayfront Expressway. One line enters the Bayfront campus at the transit only entrance (at Building 20) and another line continues to Chilco Street to access the Chilco transit hub. Without the tunnel connection, the line that operates between the Classic and Willow campus would continue to use Willow Road, as it does under baseline conditions.

Most pedestrians and bicyclists accessing the Willow Village Campus District would use the on-street bike lanes and sidewalk improvements to move along the Willow Road corridor and would cross at the Willow Road and Main Street/Hamilton Avenue intersection. Pedestrians and bicyclists desiring to access the Bay Trail or the other Meta campuses would use (i) the bike/pedestrian trail within the City public utility easement located adjacent to and immediately west of Willow Road or (ii) the Elevated Park. Pedestrians and bicyclists would access the Elevated Park using publicly accessible stairs and elevators located within or adjacent to Hamilton Avenue Parcel North and within Town Square.

Base Level Development Alternative

The Base Level Development Alternative would consist of the Proposed Project but developed to be consistent with the "base-level" development standards in R-MU zoning district, which allow for a maximum density of up to 30 dwelling units per acre (du/acre) and a maximum height of up to 40 feet. For the O zoning district, the base-level development standards allow for a floor area ratio (FAR) of 0.45 (plus 10 percent for non-office commercial uses and 175 percent for hotels) and a maximum height of 35 feet (110 feet for hotels). The Proposed Project proposes "bonus-level" development in exchange for providing community amenities acceptable to the Menlo Park City Council (City Council), and the Base Level Development Alternative would not involve this exchange. Table 6-1 provides a comparison of how

[2] As discussed in Chapter 5, *Variants*, the No Willow Road Tunnel Alternative also is considered a variant to the Proposed Project. The City Council could choose to select the No Willow Road Tunnel Alternative to reduce construction noise impacts, and the Willow Road Tunnel would thus not proceed. If the City Council does not select the No Willow Road Tunnel Alternative, then the No Willow Road Tunnel Variant could be approved a part of the Project in light of the potential that Caltrans does not approve the Willow Road Tunnel.

development might differ between the proposed project and the Base Level Development Alternative. Construction of this alternative would also be conducted in one phase rather than in the two phases planned for the Proposed Project. A total of 2,714 parking spaces would be provided.

Table 6-1. Base Level Development Alternative

Zoning District	Base Level Development Alternative[a]	Proposed Project
Maximum Square Footage		
O Zoning		
Office	713,841 sf	1,600,000 sf
Non-Office Commercial/Retail	166,321 sf	200,000 sf
Hotel	172,000 sf[b]	172,000 sf[b]
R-MU Zoning		
Residential	678,390 sf (519 units)	1,695,976 sf (1,730 units)
Office[c]	113,065 sf	-
Maximum Building Height		
O Zoning	35 feet (110 feet for Hotel)	120 feet
R-MU Zoning	40 feet	80 feet, 85 feet for the parcel bounded by Center, West, and Main Street (Building RS 3)
Building Height (average)		
O Zoning	35 feet (110 feet for Hotel)	70 feet
R-MU Zoning	35 feet	62.5 feet
Minimum Open Space at full buildout		
O Zoning	475,894 sf	487,000 sf
R-MU Zoning	188,442 sf	370,000 sf
Total Open Space	664,336 sf	857,000 sf
Minimum Publicly Accessible Open Space		
O Zoning	237,947 sf	200,000 sf
R-MU Zoning	47,110.4 sf	160,000 sf
Total Public Open Space	285,057 sf	360,000 sf

Notes:

a. The development square footage is based on what is allowable under the base zoning as a maximum.

b. The hotel could be built to approximately 2.7M SF based on the 175 % FAR from the O-B-zoned portion of the project site for both the Base Level Development Alternative and the Proposed Project. However, the hotel would be developed to the same square footage in both scenarios, below the maximum allowed size.

c. The office square footage in the R-MU Zoning District Office would also accommodate commercial gross floor area or could be attributed to the non-office commercial/retail designation in the O zoning district.

Reduced Intensity Alternative

The Reduced Intensity Alternative would consist of the Proposed Project but developed at a lesser intensity. Both the total residential and non-residential square footage would be reduced compared to the Proposed

Project, as shown in Table 6-2, below. Construction of this alternative would also be conducted in one phase rather than in the two phases planned for the Proposed Project. A total of 4,910 spaces would be provided.

Table 6-2. Reduced Intensity Alternative

Zoning District	Reduced Intensity Alternative	Proposed Project
Maximum Square Footage		
O Zoning		
Office	1,225,000 sf	1,600,000 sf
Non-Office Commercial/Retail	87,690 sf	200,000 sf
Hotel	172,000 sf[a]	172,000 sf[a]
R-MU Zoning		
Residential	1,499,909 sf (1,530 units)	1,695,976 sf (1,730 units)
Office[b]	-	-
Maximum Building Height		
O Zoning	120 feet	120 feet
R-MU Zoning	80 feet, 85 feet for the parcel bounded by Center, West, and Main Street (Building RS 3)	80 feet, 85 feet for the parcel bounded by Center, West, and Main Street (Building RS 3)
Building Height (average)		
O Zoning	70 feet	70 feet
R-MU Zoning	62.5 feet	62.5 feet
Minimum Open Space at full buildout		
O Zoning	475,894 sf	487,000 sf
R-MU Zoning	188,442 sf	370,000 sf
Total Open Space	664,336 sf	857,000 sf
Minimum Publicly Accessible Open Space		
O Zoning	237,947 sf	200,000 sf
R-MU Zoning	47,110.4 sf	160,000 sf
Total Public Open Space	285,057 sf	360,000 sf

Notes:

a. The hotel could be built to approximately 2.7M SF based on the 175 % FAR from the O-B-zoned portion of the project site for both the Reduced Intensity Alternative and the Proposed Project. However, the hotel would be developed to the same square footage in both scenarios, below the maximum allowed size.

b. The office square footage in the R-MU Zoning District Office would also accommodate commercial gross floor area.

6.5 Attainment of Project Objectives

Pursuant to State CEQA Guidelines Section 15126.6(a), this analysis evaluates whether the alternatives meet the basic objectives of the Project. As described in detail above, there are four alternatives for the Proposed Project: the No Project Alternative, the No Willow Road Tunnel Alternative, the Base Level Development Alternative, and the Reduced Intensity Alternative. The following analysis describes the extent to which these alternatives meet or do not meet the Project Sponsor's objectives as described in Chapter 2, *Project Description*, and discussed above.

No Project Alternative

The No Project Alternative generally would not meet the basic project objectives, including the underlying purpose of the Proposed Project and the objectives identified by the Project Sponsor. The current uses on the Project Site include offices, offices/labs, warehouses, warehouses/offices, retail, and a service station. The No Project Alternative would preserve these uses and not meet any objectives related to creating a mixed-use community or residential uses (Objectives 1, 2, 3, 4, 7, and 15). The No Project Alternative also would not be required to have a TDM program or provide the bicycle and pedestrian friendly environment that enhances the Project Site's connectivity to surrounding areas (i.e., Objectives 5 and 6). No changes to land use would occur so that existing space would remain the same, not meeting several objectives related to design and use of buildings and the land itself (Objectives 8, 9, 10, 11, 12, 13). Development would not respond to market demands (Objective 14). It is probable that the existing buildings provide a secure, safe, and private work environment and generate revenue for the City and other public entities (Objectives 16 and 17).

No Willow Road Tunnel Alternative

The No Willow Road Tunnel Alternative would meet many of the basic project objectives, although it may not meet some objectives to the same degree as the Proposed Project.

The No Willow Road Tunnel Alternative would still contain the land uses proposed under the Proposed Project. Therefore, it would meet objectives related to creating a mixed-use community and residential uses and other specified building and land uses (Objectives 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16). For the objective that also contains new bicycle and pedestrian connections, the No Willow Road Tunnel Alternative would meet them to a lesser degree than the proposed project because the Willow Road Tunnel provides a pedestrian and bicycle connection (Objectives 1, 2, and 6)

The No Willow Road Tunnel Alternative would provide a transportation demand management program and multiple transportation options, although pedestrian and bike connectively would be substantially reduced under the alternative (Objective 5). Further, the loss of the Willow Road Tunnel would reduce the amount of infrastructure for bicycles and pedestrians when compared to the Proposed Project, which may increase traffic congestion and increase safety hazards for pedestrians and bicyclists (Objective 6). However, the increase in traffic congestion would not create new deficiencies in level of service compared to the Proposed Project. The No Willow Road Tunnel would also generate revenue for the City and other public entities (Objective 16).

Base Level Development Alternative

The Base Level Development Alternative would meet most of the basic project objectives, although it may not meet some objectives to the same degree as the Proposed Project.

The Base Level Development Alternative would still contain the land uses proposed under the Proposed Project. Therefore, it would meet objectives related to creating a mixed-use community, residential uses, and other specified building and land uses. However, there would be a reduction in office, non-office commercial/retail, and residential square footage and residential density. This means that the Base Level Development Alternative would meet these objectives to a lesser degree than the Proposed Project (Objectives 1, 2, 3, 4, 7, 11, and 15). The Base Level Development Alternative could still include a pharmacy; an interconnected office campus; a meeting and collaboration space; and a secure, safe, and private work environment (Objectives 8, 9, 10, and 17). The Base Level Development Alternative would meet the objective related to building siting, massing, density, and height because it would be within the standards prescribed for bonus-level development (Objective 12). Open space would be reduced in the Base Level Development Alternative compared to the Proposed Project, which means the Base Level Development Alternative would meet open space related objectives to a lesser degree than the proposed project (Objective 13). The Base Level Development Alternative would not be phased, so it would not meet the objective regarding phasing to meet market demands (Objective 14).

Reduced Intensity Alternative

The Reduced Intensity Alternative would meet most of the basic project objectives, although it may not meet some objectives to the same degree as the Proposed Project.

The Reduced Intensity Alternative would still contain the land uses proposed under the Proposed Project. Therefore, it would meet objectives related to creating a mixed-use community, residential uses, and other specified building and land uses. However, there would be a reduction in office, non-office commercial/retail, and residential square footage and residential density. This means that the Reduced Intensity Alternative would meet these objectives to a lesser degree than the Proposed Project (Objectives 1, 2, 3, 4, 7, 11, and 15). The Reduced Intensity Alternative could still include a pharmacy; an interconnected office campus; a meeting and collaboration space; and a secure, safe, and private work environment (Objectives 8, 9, 10, and 17). The Reduced Intensity Alternative would meet the objective related to building siting, massing, density, and height because it would be within the standards prescribed for bonus-level development (Objective 12). Open space would be reduced in the Reduced Intensity Alternative compared to the Proposed Project, which means the Reduced Intensity Alternative would meet open space related objectives to a lesser degree than the proposed project (Objective 13). The Reduced Intensity Alternative would not be phased, so it would not meet the objective regarding phasing to meet market demands (Objective 14).

6.6 Impact Assessment

This section evaluates whether the alternatives would avoid or substantially lessen the significant impacts of the Project and/or generate impacts other than those identified for the Proposed Project. A reference to mitigation measures for each alternative are provided in the analysis below by reference to the impacts of the Proposed Project. These mitigation measures are fully described in each resource section within Chapter 3, *Environmental Impact Analysis*, of this document. In addition, a summary comparative analysis of the Project and its alternatives is provided in Table 6-11, at the end of this section.

No Project Alternative

Land Use

The land uses on the Project Site would not change under the No Project Alternative. Therefore, there would be no conflict with a land use plan, policy, or regulation adopted to avoid or mitigate an environmental impact (Impact LU-1). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative land use impact (Impact C-LU-1; NI).

Aesthetics

Under the No Project Alternative, there would be no visual change to the Project Site. Therefore, there would be no impact to scenic vistas (Impact AES-1), no conflict with applicable zoning and other regulations governing scenic quality (Impact AES-2), and no new sources of light and glare (Impact AES-3). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative aesthetics impact (Impact C-AES-1; NI).

Transportation

Under the No Project Alternative, there would be no land use changes to the Project Site. There would be no potential to conflict with an applicable plan, ordinance, or policy addressing the circulation system (Impact TRA-1). There would be no VMT impact (Impact TRA-2). There would also be no internal roadway changes on the Project Site. As a result, there would be no impact related to a potentially hazardous condition created by the location of the proposed North Garage driveway (Impact TRA-3). There would be no impact to emergency access (Impact TRA-4) Overall, the No Project Alternative would generate no impact related to transportation (NI). As a result, the No Project Alternative would not contribute to any cumulative transportation impact (Impact C-TRA-1, Impact C-TRA-2, Impact C-TRA-3, Impact C-TRA-4).

Air Quality

Under the No Project Alternative, there would be no construction or buildout. As a result, there would be no emissions generated that would conflict with or obstruct an applicable air quality plan or contribute to or result in a violation of an applicable federal or state ambient air quality standard (Impact AQ-1, Impact AQ-2). Likewise, there would be no exposure to high concentrations of pollutants or to odors (Impact AQ-3, Impact AQ-4). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative air quality impact (Impact C-AQ-1; NI).

Energy

Under the No Project Alternative, there would be no construction or buildout. There would be no energy used for construction and no increase in energy use on site from new buildout (Impact EN-1). There would not be implementation of sustainability and transportation demand features that would be implemented as part of the Proposed Project, and any sustainability requirements applying to new buildings would not be implemented (Impact EN-2). Impacts of energy use would be reduced compared to the Proposed Project's impacts (NI); however, more natural gas would be used compared to the Proposed Project. As a result, the No Project Alternative would not contribute to any cumulative energy impact (Impact C-EN-1; NI).

Greenhouse Gas Emissions

Under the No Project Alternative, there would be no construction or buildout. There would be no greenhouse gas emissions from construction or from energy use and fuel consumption during buildout. There would still be greenhouse gas emissions due to the existing buildings and facilities on the Project Site and mobile sources associated with the Project Site that are considered part of baseline conditions (Impact GHG-1a, Impact GHG-1b). The buildings on the Project Site would continue to operate as they currently do, such that there would not be a conflict with applicable plans and policies (Impact GHG-2). However, the Proposed Project results in a reduction in non-mobile emissions compared to baseline conditions. Therefore, the No Project Alternative would not realize the reduction in emissions onsite. As a result, impacts related to greenhouse gas emissions would be reduced compared to the Proposed Project's impacts (NI).

Noise

Under the No Project Alternative, there would be no construction or buildout. There would be no noise generated during construction or buildout; noise conditions would remain the same as current conditions (Impact NOI-1). There would be no generation of vibration (Impact NOI-2). There would be no impact related to proximity to an airport or airstrip (Impact NOI-3). Impacts related to noise would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative noise impact (Impact C-N-1; NI).

Cultural Resources

Under the No Project Alternative, there would be no construction. Impacts to the Dumbarton Cutoff Line would not occur because the Willow Road Tunnel would not be constructed (Impact CR-1). Impacts to archaeological deposits, burials, and tribal cultural resources would not occur because there would be no ground disturbance (Impact CR-2, Impact CR-3, Impact CR-4). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative cultural resources impact (Impact C-CR-1; NI).

Biological Resources

Under the No Project Alternative, there would be no construction or buildout. As a result, there would not be disturbance of bird and bat species, and no new artificial lighting would be installed that could affect wildlife behavior (Impact BIO-1). No changes would be made to the site that could increase feral cat populations or range (Impact BIO-2). No development would occur that would result in spread of invasive species or temporarily or permanently impact sensitive habitat and wetlands around the Project Site (Impact BIO-3, Impact BIO-4). No new buildings would be constructed that may result in increased bird collision and mortality (Impact BIO-5). There would be no tree removal and no increased bird collision that may trigger local policies and ordinances that protect biological resources (Impact BIO-6). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative biological resources impact (Impact C-BIO-1; NI).

Geology and Soils

Under the No Project Alternative, there would be no construction or buildout. As a result, there would be no new buildings or structures that could be exposed or expose people to seismic ground shaking or related hazards (Impact GS-1). There would be no soil disturbance that could result in erosion, and no new development that could increase runoff (Impact GS-2). There would be no new risk from unstable soils, expansive soils, or unstable geologic units (Impact GS-3, Impact GS 4). There would be no ground

disturbance that could uncover and damage paleontological resources (Impact GS-5). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative geology and soils impact (Impact C-GS-1; NI).

Hydrology and Water Quality

Under the No Project Alternative, no construction would occur that could result in sedimentation or accidental spills that could contaminate surface water, and there would be no construction dewatering that could encounter contaminated groundwater or construction activities that may contaminate groundwater. Impervious surface area would be greater under the No Project Alternative, so that runoff on the Project Site would stay the same (Impact HY-1, Impact HY-5). Impervious area would stay the same as current conditions on the Project Site under the No Project Alternative, though it would decrease under the Proposed Project. Dewatering would not occur under the No Project Alternative (Impact HY-2). There would be no construction that would alter the drainage pattern on the Project Site and no changes to the storm drain system that would permanently change drainage on or off the Project Site (Impact HY-3). No changes would be made to the Project Site that affect flood hazards (Impact HY-4). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative hydrology and water quality impact (Impact C-GS-1; NI).

Hazards and Hazardous Materials

Under the No Project Alternative, there would be no construction or buildout on the site. As a result, there would be no construction that includes the routine use of hazardous materials, and no use of hazardous materials associated with buildout. Any hazardous materials used on the site under current conditions (e.g., solvents, paints, cleaning agents) would continue to be used as they are currently (Impact HAZ-1). Similarly, there would be no potential for accidents involving hazardous materials during construction and buildout because there would be no construction or buildout, though current use of hazardous materials on site would continue. There would also be no risk of exposing contaminated groundwater, contaminated soil, or soil gas because there would be no excavation (Impact HAZ-2). There would be no construction work occurring within 0.25 mile of schools (Impact HAZ-3). No changes in traffic or emergency vehicle access would occur (Impact HAZ-4). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative hazards and hazardous materials impact (Impact C-HAZ-1; NI).

Population and Housing

Under the No Project Alternative there would be no buildout on the site. As a result, employment on the site would stay the same and there would be no residential uses constructed so that there would be no indirect or direct growth in employment or population (Impact POP-1). There would be no demolition of buildings and no displacement of any current uses (Impact POP-2). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative population and housing impact (Impact C-POP-1; NI).

Public Services

Under the No Project Alternative there would be no buildout on the site. As a result, there would be no change in demand from current conditions for fire protection services, police services, school facilities, parks and recreational facilities, or library facilities (Impact PS-1, Impact PS-2, Impact PS-3, Impact PS-4, Impact PS-5). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative public services impact (Impact C-PS-1; NI).

Utilities and Service Systems

Under the No Project Alternative there would be no buildout on the site. As a result, there would be no change in demand from current conditions for water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications, and solid waste services (Impact UT-1, Impact UT-2, Impact UT-3, Impact UT-4, Impact UT-5). Impacts would be reduced compared to the Proposed Project's impacts (NI). As a result, the No Project Alternative would not contribute to any cumulative utilities and service systems impact (Impact C-UT-1, Impact C-UT-2, Impact C-UT-3, Impact C-UT-4, Impact C-UT-5, Impact C-UT-6; NI).

No Willow Road Tunnel Alternative

Land Use

The No Willow Road Tunnel Alternative would include all the same components of the Proposed Project except the Willow Road Tunnel. The Tunnel would have provided connectivity to the Bay Trail but would not have conflicted with the ABAG Bay Trail Plan. The Willow Road Tunnel would have furthered General Plan Policy LU-6.6, Goal CIRC-2, and Policy CIRC-2.11 by facilitating safe crossings for bicycles and pedestrians. Nonetheless, even without the Willow Road Tunnel, the alternative would be consistent with the General Plan, similar to the Proposed Project (Impact LU-1). Impacts would therefore be similar to the Proposed Project (LTS). As a result, cumulative land use impacts would also be similar (Impact C-LU-1; LTS/M).

Aesthetics

The Willow Road Tunnel would be located below grade, and the approaches from the Project Site and West Campus would also begin at grade and extend below grade. The removal of the Willow Road Tunnel would not reduce any impacts on scenic vistas (Impact AES-1). Removal of the Willow Road Tunnel also would not affect compliance with zoning and other regulations governing scenic quality (Impact AES-2). Removal of the Willow Road Tunnel would slightly reduce nighttime lighting impacts because lighting fixtures would no longer be needed for the tunnel entries (Impact AES-3). Impacts would therefore be slightly reduced compared to the Proposed Project (LTS). As a result, cumulative aesthetics impacts would also be slightly reduced (Impact C-AES-1; LTS).

Transportation

Under the No Willow Road Tunnel Alternative, the pedestrian, bicycle, and transit facilities are expected to be the same as the Proposed Project with the exception of the removal of the Willow Road Tunnel. The Meta Trams would enter the Project Site via Main Street instead of the Willow Road Tunnel. The No Willow Road Tunnel Alternative would comply with existing regulations, including General Plan policies, and Zoning regulations and would provide adequate bicycle and pedestrian infrastructure. Therefore, it would be consistent with applicable plans, ordinances, and policies that address the circulation system similar to the Proposed Project (Impact TRA-1). There would be no change in land use under this alternative compared to the proposed project. The change in access and site circulation for the Meta Trams is not expected to have any effect on the VMT for any of the proposed land uses (office, residential, hotel, retail) when compared to the Proposed Project; therefore, VMT impacts would be similar to the Proposed Project (Impact TRA-2). This alternative variant would not introduce any new design features or incompatible uses that could cause potentially hazardous conditions, and the driveway sight distance issue at the "North Garage" would remain the same as under the Proposed Project. Impacts related to hazardous design features would be similar to the Proposed Project (Impact TRA-3). Emergency access to the Project Site

and nearby hospitals would be similar to the Proposed Project, resulting in similar impacts (Impact TRA-4). Impacts would therefore be similar to the Proposed Project, and the same mitigation would apply to Impact TRA-2 and Impact TRA-3 (LTS/M). As a result, cumulative transportation impacts would also be similar (Impact C-TRA-1, Impact C-TRA-2, Impact C-TRA-3, Impact C-TRA-4; LTS/M).

Air Quality

There would be less construction under the No Willow Road Tunnel Alternative, reducing criteria air pollutant emissions during construction. However, the significance of criteria air pollutant emissions is measured per day. It is probable that construction activities would be the same intensity each day so that maximum daily construction emissions would be similar to the Proposed Project. However, total emissions for construction would decrease due to a decrease in overall construction activities. Operational emissions would be similar to the Proposed Project because buildout size would be the same (Impact AQ-1, Impact AQ-2).

For localized emissions and exposure of sensitive receptors to substantial pollutant concentrations, construction activities would be reduced compared to the Proposed Project. Impacts therefore may be reduced for carbon monoxide because fewer vehicle trips would be needed. Asbestos impacts would be the same because the same buildings would be demolished as under the Proposed Project. There could also be less exposure to DPM due to reduced construction. Other site preparation activities would still be similar to the activity occurring under the Proposed Project, limiting reductions in pollutant exposure. The reduction in exposure to substantial concentrations of pollutants during construction would be minor. It is possible that exposure during operations would be similar as the same operational activities would occur (Impact AQ-3). Exposure to odors during construction may be reduced due to there being less construction; however, substantially similar site preparation would occur, which is the most likely source of diesel odors during construction. Operational odor sources would be the same. Therefore, impacts could be similar to the Proposed Project (Impact AQ-4). Overall impacts would be reduced compared to the Proposed Project, and impacts related to criteria air pollutant emissions would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact AQ-1 (SU), Impact AQ-2 (SU), and Impact AQ-3 (LTS/M). As a result, the No Willow Road Tunnel Alternative would make a slightly decreased contribution to the significant cumulative impact (Impact C-AQ-1; SU).

Energy

There would be less construction under the No Willow Road Tunnel Alternative, reducing energy use during construction. The same energy-consuming structures would be built, resulting in about the same energy use during operation of the Proposed Project. The minor change in traffic patterns associated with the No Willow Road Tunnel Alternative would have a negligible impact on energy use associated with vehicle travel (Impact EN-1). The same sustainability measures, energy use measures, and transportation demand features would be implemented as for the Proposed Project (Impact EN-2). Impacts would therefore be similar to the Proposed Project, and impacts related to energy use would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact EN-1 (LTS/M). As a result, cumulative energy impacts would also be slightly reduced (Impact C-EN-1; LTS).

Greenhouse Gas Emissions

There would be less construction under the No Willow Road Tunnel Alternative, reducing greenhouse gas emissions from construction. Operational emissions would be about the same as the Proposed Project because buildout size would be the same (Impact GHG-1a, Impact GHG-1b). The No Willow Road Tunnel

would be similar to the Proposed Project in development patterns and features. As a result, it would have similar impacts to the Proposed Project in terms of consistency with applicable plans and policies (Impact GHG-2). Overall impacts would be reduced compared to the Proposed Project, and impacts related to greenhouse gas emissions would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact GHG-1b and Impact GHG-2 (LTS/M).

Noise

There would be less construction under the No Willow Road Tunnel Alternative, reducing noise generated during construction. Less construction activity would reduce the duration of noise impacts. Removal of the Willow Road Tunnel would also decrease the amount of night construction needed, reducing nighttime noise impacts. The buildout of noise-generating uses would largely be similar to the Proposed Project, resulting in similar noise impacts during operation (Impact NOI-1). Vibration impacts would also be reduced due to removal of the Willow Road Tunnel, including during nighttime hours if activities like pile driving for tunnel shoring would have occurred at night (Impact NOI-2). The No Willow Road Tunnel Alternative would be in the same location as the Proposed Project, so there would still be no impact related to proximity to an airport or airstrip (Impact NOI-3). Overall impacts would be slightly reduced compared to the Proposed Project, and impacts related to noise and vibration would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact NOI-1 and Impact NOI-2 (SU). As a result, cumulative noise impacts would also be slightly reduced (Impact C-NOI-1; SU).

Cultural Resources

Impacts to the Dumbarton Cutoff Line would not occur because the Willow Road Tunnel would not be constructed under this alternative, substantially reducing this significant impact when compared to the proposed project (Impact CR-1). There are no known archaeological deposits, burials, or tribal cultural resources at the Willow Road Tunnel site, so impacts to known archaeological deposits would be the same as the Proposed Project. The No Willow Road Tunnel Alternative has less potential to disturb unknown archaeological deposits and burials because there would be less ground disturbance and excavation (Impact CR-2, Impact CR-3, Impact CR-4). Impacts would be reduced compared to the Proposed Project but could still be significant. The same mitigation would apply as for the Proposed Project for Impact CR-2, Impact CR-3, and Impact CR-4 (LTS/M). As a result, cumulative cultural impacts would also be slightly reduced (Impact C-CR-1; LTS).

Biological Resources

Removal of the Willow Road Tunnel would reduce construction activities, which could reduce disturbance of bird and bat species. Removal of the Willow Road Tunnel would slightly reduce nighttime lighting impacts because lighting fixtures would no longer be needed for the tunnel entries, which could slightly reduce impacts of artificial lighting on wildlife species, particularly if the lighting on the Willow Road Tunnel site were bright enough to increase illumination within the wetlands to the north/northeast (Impact BIO-1). Removal of the Willow Road Tunnel would remove one avenue for feral cats to increase their movement in the Project area. However, predators can already cross the street at street level, so any decrease in impacts when compared to the Proposed Project would be negligible (Impact BIO-2). Impacts related to sensitive habitats and wetlands would be similar to the proposed project. There is a brackish marsh close to the Willow Road Tunnel site; however, the areas between the Willow Road Tunnel Site and a large brackish marsh consist of a storage facility, the Dumbarton Rail Corridor, Willow Road, and an area of uplands planted with native vegetation. Therefore, none of the sensitive habitats and wetlands potentially affected by the Proposed Project are located near the Willow Road Tunnel site and could still be impacted in the same way

under the No Willow Road Tunnel Alternative (Impact BIO-3, Impact BIO-4). Removal of the Willow Road Tunnel may slightly reduce disturbance of bird species, and the No Willow Road Tunnel Alternative would still include vegetation in the design that would provide value to resident and migratory birds. Additionally, impacts related to bird strikes would be similar to the Proposed Project because the No Willow Road Tunnel Alternative would have the same buildings as the Proposed Project (Impact BIO-5). Removal of the Willow Road Tunnel would reduce the need to remove trees in the tunnel entry areas, potentially reducing the need to remove and replace protected trees. However, removal of the Willow Road Tunnel would not change impacts related to bird safe design requirements of the Menlo Park Municipal Code because the same buildings would be constructed. As a result, impacts could be slightly reduced compared to the Proposed Project (Impact BIO-6). Overall biological resources impacts would be reduced compared to the Proposed Project but some impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact BIO-2, Impact BIO-3, Impact BIO-4, Impact BIO-5, and Impact BIO-6 (LTS/M). As a result, cumulative biological resources impacts would also be slightly reduced (Impact C-BIO-1; LTS/M).

Geology and Soils

Removal of the Willow Road Tunnel would remove one structure from the project that could be subjected to seismic ground shaking. However, adherence to Caltrans requirements would have ensured that the Willow Road Tunnel would have the maximum practicable protection from seismic stresses. As a result, seismic hazards impacts would be similar to the Proposed Project (Impact GS-1). Soil disturbance and runoff impacts would be slightly decreased because there would be no construction of the Willow Road Tunnel, slightly decreasing the potential for erosion and decreasing hardscape (Impact GS-2). Excavation would have potentially required dewatering and shoring to address potential soil hazards in the Willow Road Tunnel area, and adherence to Caltrans requirements would have ensured that the Willow Road Tunnel would have the maximum practicable protection from soil failure available under static or dynamic conditions. As a result, soil and geologic stability hazards would be similar to the Proposed Project (Impact GS-3, Impact GS-4). Reduced excavation could reduce the potential to uncover and damage paleontological resources under the No Willow Road Tunnel Alternative (Impact GS-5). Overall geological resources impacts would be reduced compared to the Proposed Project, but paleontological resources impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact GS-5 (LTS/M). As a result, cumulative geology and soils impacts would also be slightly reduced (Impact C-GS-1; LTS).

Hydrology and Water Quality

Removal of the Willow Road Tunnel would reduce the amount of ground disturbance on the Project Site compared to the Proposed Project. This could slightly reduce the potential for sedimentation and contamination of surface water and groundwater during construction. Additionally, less dewatering of potentially contaminated groundwater would be required because there would not be excavation for the Willow Road Tunnel. It is possible the reduction in impervious surface would be greater under the Willow Road Tunnel Alternative than the Proposed Project because impervious surface associated with the Willow Road Tunnel would not be constructed, which could reduce runoff compared to the Proposed Project in that area of the Project Site (Impact HY-1, Impact HY-5). The No Willow Road Tunnel Alternative would reduce the potential need for dewatering and the amount impervious surface area on the Project Site, but not to the extent that there would be a noticeable difference in impacts on groundwater supplies when compared to the Proposed Project (Impact HY-2). Less ground disturbance would occur under the No Willow Road Tunnel Alternative, which would somewhat reduce impacts to drainage during construction and during buildout (Impact HY-3). Flood exposure would be similar to the Proposed Project because the same habitable buildings would still be constructed under this alternative as under the

Proposed Project (Impact HY-4). Overall hydrology and water quality impacts would be reduced compared to the Proposed Project, but water quality impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact HY-1 and Impact HY-5 (LTS/M). As a result, cumulative hydrology and water quality impacts would also be slightly reduced (Impact C-HY-1; LTS).

Hazards and Hazardous Materials

Removal of the Willow Road Tunnel would reduce the total amount of construction occurring on the Project Site, which could slightly reduce the use of hazardous materials on the site during construction activities and maintenance (Impact HAZ-1). Impacts related to potential accidents may be slightly reduced due to the reduction in construction activities under the No Willow Road Tunnel Alternative. Additionally, no excavation would be needed for the Willow Road Tunnel, which would avoid the potential to expose construction workers to contaminated groundwater, contaminated soil, and soil vapor in that area. This would be a substantial reduction in impacts (Impact HAZ-2). There are no schools within 0.25 mile of the Willow Road Tunnel Site; therefore, this alternative would have the same impact as the Proposed Project related to hazardous materials handling in the vicinity of a school (Impact HAZ-3). Impacts to emergency access would be similar to the Proposed Project (Impact HAZ-4). Overall hazards and hazardous materials impacts would be reduced compared to the Proposed Project, but hazardous materials impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact HAZ-2 (LTS/M). As a result, cumulative hazards and hazardous materials impacts would also be slightly reduced (Impact C-HAZ-1; LTS/M).

Population and Housing

Under the No Willow Road Tunnel Alternative, there would be no changes to the residential or non-residential buildout proposed on the site under the Proposed Project. As a result, impacts related to population growth would be the same as the Proposed Project (Impact POP-1). Demolition of current uses on the Project Site would also be the same as for the Proposed Project (Impact POP-2). Impacts would be the same as the Proposed Project's impacts (LTS). As a result, cumulative impacts would be the same as the Proposed Project's (Impact C-POP-1; LTS).

Public Services

Under the No Willow Road Tunnel Alternative, the buildout of residential and non-residential land uses would be the same as the Proposed Project. As a result, the demand for fire protection services, police services, school facilities, parks and recreational facilities, and library facilities would be similar to the Proposed Project (Impact PS-1, Impact PS-2, Impact PS-3, Impact PS-4, Impact PS-5). Impacts would be similar to the Proposed Project's impacts (LTS). As a result, cumulative impacts would be the same as the Proposed Project's (Impact C-PS-1; LTS).

Utilities and Service Systems

Under the No Willow Road Tunnel Alternative, the buildout of residential and non-residential land uses would be the same as the Proposed Project. As a result, the demand for water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications, and solid waste services would be similar to the Proposed Project (Impact UT-1, Impact UT-2, Impact UT-3, Impact UT-4, Impact UT-5). Impacts would be similar to the Proposed Project's impacts (LTS). As a result, cumulative impacts would be similar to the Proposed Project's (Impact C-UT-1, Impact C-UT-2, Impact C-UT-3, Impact C-UT-4, Impact C-UT-5, Impact C-UT-6; LTS).

Base Level Development Alternative

Land Use

Similar changes to land use designations and zoning would need to be conducted for the Base Level Development Alternative as for the Proposed Project. For example, the Base Level Development Alternative would have similar circulation needs as the Proposed Project and therefore would also require amendments to the City General Plan Circulation Map and Zoning Map. However, the Base Level Development Alternative would fit into the footprint of the Proposed Project and have a similar design configuration and therefore would have comparable impacts related to consistency with land use plans, policies, and regulations meant to avoid or mitigate an environmental effect (Impact LU-1). Impacts would therefore be similar to impacts of the Proposed Project (LTS). As a result, cumulative land use impacts would also be similar (Impact C-LU-1; LTS).

Aesthetics

The Base Level Development Alternative would largely appear similar to the Proposed Project but would appear smaller in scale due to the reduced square footage of development and the shorter building heights. There would also be less open space provided than the Proposed Project, which could shift the visual balance to appear more developed. Building heights would be reduced under this alternative so that impacts related to scenic vistas and building heights would be reduced, reducing visibility of development (Impact AES-1). Reduced intensity of development would not affect compliance with zoning and other regulations governing scenic quality (Impact AES-2). Reduced development intensity would slightly reduce nighttime lighting impacts because there would be less lighting used in building interiors, reducing the amount of light visible from buildings (Impact AES-3). Impacts would therefore be slightly reduced compared to the Proposed Project (LTS). As a result, cumulative aesthetics impacts would also be slightly reduced (Impact C-AES-1; LTS).

Transportation

Under the Base Level Development Alternative, the pedestrian, bicycle, and transit facilities are expected to be the same as the Proposed Project. Therefore, it would be consistent with applicable plans, ordinances, and policies that address the circulation system similar to the Proposed Project (Impact TRA-1). Although the Base Level Development Alternative would reduce residential square footage, daily trip generation per resident and daily trip generation per employee would remain the same as the Proposed Project. Under the Base Level Development Alternative, it is expected that there would be minimal to no changes in residential VMT per capita and employment VMT per employee compared to the Proposed Project analysis. The retail and hotel land uses would continue to generate no impact on VMT. Therefore, the Base Level Development Alternative would result in similar impacts to the Proposed Project. Note, however, that a development with fewer residents and workers may result in less reduction in VMT overall (Impact TRA-2). Under the Base Level Development Alternative, it is assumed that the same design would be used for the North Garage, resulting in the same impact regarding sight distance as the Proposed Project (Impact TRA-3). Emergency access to the Project Site and nearby hospitals would be similar to the Proposed Project, resulting in similar impacts (Impact TRA-4). Impacts would therefore be similar to the Proposed Project, and the same mitigation would apply to Impact TRA-2 and Impact TRA-3 (LTS/M). As a result, cumulative transportation impacts would also be similar (Impact C-TRA-1, Impact C-TRA-2, Impact C-TRA-3, Impact C-TRA-4; LTS/M).

Air Quality

There would be less construction and smaller buildout under the Base Level Development Alternative, reducing criteria air pollutant emissions during both construction and operation. However, the significance of emissions is measured per day, and phasing would be compressed under this alternative into one phase. As a result, construction activities would generally be a similar maximum intensity on a given day such that average daily construction emissions would be similar to the Proposed Project. However, total criteria air pollutant emissions during construction would decrease. The square footage of nonresidential uses space could be reduced to about 58 percent of that included in the Proposed Project, and the square footage of residential uses could be reduced to about 40 percent of that included in the Proposed Project. Emissions associated with construction of those buildings (not including grading and site preparation) would therefore also be reduced. Similarly, operational emissions would also decrease due to the smaller size of buildings, fewer residents, and fewer workers. Estimated unmitigated average daily construction emissions of criteria air pollutants and precursors for the Proposed Project are provided in Table 6-3, net unmitigated average daily operational emissions for the Base Level Development Alternative are provided in Table 6-4 and net mitigated average daily operational emissions for the Base Level Development Alternative are provided in Table 6-5. Mitigated emissions when operations overlap with Project construction are provided in Table 6-6. This represents a conservative estimate of emissions since Project construction emissions would likely be higher than Base Level Development Alternative construction emissions. Refer to Appendix 6-1 for detailed emissions calculations. As shown in Table 6-3, the Base Level Development Alternative would have similar construction emissions to the Proposed Project. And, while the Proposed Project would result in a significant ROG impact during operations, that impact would not occur under the Base Level Development Alternative. This would be a substantial reduction in emissions impacts (Impact AQ-1, Impact AQ-2).

For localized emissions and exposure of sensitive receptors to substantial pollutant concentrations, construction activities would be reduced compared to the Proposed Project. Impacts therefore may be reduced for carbon monoxide because fewer vehicle trips would be needed. Asbestos impacts would be the same because the same buildings would be demolished as under the Proposed Project. There would also be less exposure to DPM due to the shortened construction period; however, site preparation would still be similar to the Proposed Project, limiting the reductions in exposure. There would be a reduction in exposure to concentrations of pollutants during construction. Exposure during operations would be similar because the same operational activities would occur; however, exposure to vehicle exhaust would be reduced since the Alternative would result in fewer trips (Impact AQ-3). Exposure to odors during construction may be reduced due to the shorter construction period; however, the same site preparation would occur, which is the most likely source of diesel odors during construction. Operational odor sources would be the same. Therefore, impacts could be similar to the Proposed Project (Impact AQ-4). Overall impacts would be reduced compared to the Proposed Project, and impacts related to pollutant emissions would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact AQ-1, Impact AQ-2, and Impact AQ-3. However, in contrast to the Proposed Project, Mitigation Measure AQ-1.1 and 1.2 would reduce Impact AQ-1 and AQ-2 to less than significant with mitigation. As a result, the Base Level Development Alternative would not result in a cumulatively considerable contribution to the significant cumulative impact (Impact C-AQ-1; LTS/M).

Table 6-3. Estimated Unmitigated Average Daily Construction Emissions of Criteria Air Pollutants and Precursors, Proposed Project

	Average Daily Emissions (lb/day)[a]			
Construction Year	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Year 1	0.12	2.4	0.053	0.050
Year 2	4.5	**64**	1.4	1.3
Year 3	19	**124**	5.8	5.4
Year 4	52	53	2.3	2.1
Year 5	**63**	45	2.1	2.0
Year 6	31	11	0.060	.55
Maximum Average Daily Emissions	**63**	**124**	**5.8**	**5.4**
BAAQMD Significance Thresholds	54	54	82	54
Exceeds Threshold?	**Yes**	**Yes**	**No**	**No**

Source: Modeling files provided in Appendix 6-1.

Notes:

lb/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less

[a.] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions would be controlled using best management practices.

Table 6-4. Estimated Net Unmitigated Average Daily Operational Emissions, Base Level Development Alternative

	Average Daily Emissions (lb/day)			
Emissions Source	**ROG**	**NO_X**	**PM_{10}[a]**	**$PM_{2.5}$[a]**
Existing Conditions (Year 2019)	50	52	23	5.2
Full Build-Out Conditions (Year 2026)	72	43	32	6.8
Total Net Operational Emissions	22	-9.7	9.0	1.6
BAAQMD Significance Threshold	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Modeling files provided in Appendix 6-1.

Notes:

Totals may not add up because of rounding.

lb/day = pounds per day; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

[a.] BAAQMD operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

Table 6-5. Estimated Net Mitigated Average Daily Operational Emissions, Base Level Development Alternative

	Average Daily Emissions (lb/day)			
Emissions Source	**ROG**	**NO_X**	**PM_{10}[a]**	**$PM_{2.5}$[a]**
Existing Conditions (Year 2019)	50	52	23	5.2
Full Build-Out Conditions (Year 2026)	68	43	32	6.8
Total Net Operational Emissions	19	-9.7	9.0	1.6
BAAQMD Significance Threshold	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Modeling files provided in Appendix 6-1.

Notes:

Totals may not add up because of rounding.

lb/day = pounds per day; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

[a.] BAAQMD operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

Table 6-6. Estimated Mitigated Average Daily Construction and Net New Operational Emissions of Criteria Air Pollutants and Precursors, Base Level Alternative

	Average Daily Emissions (lb/day)[a]			
Construction Year	**ROG**	**NO_X**	**PM_{10} Exhaust**	**$PM_{2.5}$ Exhaust**
Year 1	-50	-50	-23	-5.2
Year 2	-47	-7.6	-22	-4.7
Year 3	-40	-5.1	-22	-4.4
Year 4	-20	-18	-20	-4.1
Year 5	12	-6.8	-5.9	-1.3
Year 6	24	-9.4	6.4	1.1
Maximum Average Daily Emissions	**24**	**-5.1**	**6.4**	**1.1**
BAAQMD Significance Thresholds	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Modeling files provided in Appendix 6-1.

Notes:

lb/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less

[a.] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions would be controlled using best management practices.

Energy

There would be less construction under the Base Level Development Alternative, reducing energy use during construction. The total square footage of buildings would be reduced. Residential square footage would be reduced to about 40 percent of the Proposed Project, and nonresidential space would be to about 58 percent of the Proposed Project, which would result in a substantial reduction in energy use (Impact EN-1) The same sustainability measures, energy use measures, and transportation demand features would be implemented as for the Proposed Project (Impact EN-2). Impacts would therefore be reduced compared to the Proposed Project, and impacts related to energy use would still be potentially significant.

The same mitigation would apply as for the Proposed Project for Impact EN-1 (LTS/M). As a result, cumulative energy impacts would also be slightly reduced (Impact C-EN-1; LTS).

Greenhouse Gas Emissions

There would be less construction and smaller buildout under the Base Level Development Alternative, reducing greenhouse gas emissions under both construction and operation. Therefore, total emissions would decrease. The total square footage of buildings would be reduced. Residential square footage would be reduced to about 40 percent of the Proposed Project, and nonresidential space would be to about 58 percent of the Proposed Project. Emissions associated with construction of those buildings (not including grading and site preparation) may be reduced by a similar degree. Similarly, operational emissions would also decrease due to the smaller size of buildings, with net non-mobile emissions totaling -1,567 MT CO_2e per year. Mobile emissions would be 3,557 MT CO_2e per year, not accounting for reductions associated with EV use. Refer to Appendix 6-1 for detailed emissions calculations. Compared to the Proposed Project's non-mobile and mobile emissions of and -1,056 CO_2e per year and 16,766 CO_2e per year, respectively, this would be a substantial reduction in construction and operations emissions impacts (Impact GHG-1a, Impact GHG-1b).

The Base Level Development Alternative would be similar to the Proposed Project in development patterns and features other than the reduction in maximum height and square footage. As a result, it would have similar impacts to the Proposed Project in terms of consistency with applicable plans and policies (Impact GHG-2). Overall impacts would be reduced compared to the Proposed Project, and impacts related to greenhouse gas emissions would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact GHG-1b and Impact GHG-2 (LTS/M).

Noise

There would be less construction and smaller buildout under the Base Level Development Alternative, reducing noise generated under both construction and operation. Less construction activity would reduce the duration of noise impacts. Smaller buildout would reduce noise during operation (Impact NOI-1). Vibration impacts may remain the same, however, as vibration impacts largely result from ground-level construction activities like site preparation and foundation construction. These activities would still occur in the same area as they would under the Proposed Project, resulting in similar vibration impacts to the Proposed Project (Impact NOI-2). The Base Level Development Alternative would be in the same location as the Proposed Project, so there would still be no impact related to proximity to an airport or airstrip (Impact NOI-3). Overall impacts would be reduced compared to the Proposed Project, and impacts related to noise and vibration would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact NOI-1 and Impact NOI-2 (SU). As a result, cumulative noise impacts would also be slightly reduced (Impact C-NOI-1; SU).

Cultural Resources

Impacts to the Dumbarton Cutoff Line would be the same as the Proposed Project because the Willow Road Tunnel would be constructed under this alternative (Impact CR-1). Impacts to known archaeological deposits would be the similar to the Proposed Project. The Base Level Development Alternative has less potential to disturb unknown archeological deposits and burials because there would be less ground disturbance and excavation due to the reduced size of the alternative when compared to the Proposed Project (Impact CR-2, Impact CR-3, Impact CR-4). Impacts would be reduced compared to the Proposed Project but could still be significant. The same mitigation would apply as for the Proposed Project for all

impacts (LTS/M). As a result, cumulative cultural impacts would also be slightly reduced (Impact C-CR-1; LTS).

Biological Resources

Reduction in the intensity of development would reduce construction activities, which could reduce disturbance of bird and bat species. Reduced development intensity would slightly reduce nighttime lighting impacts because there would be less lighting used in building interiors, reducing the amount of light from buildings that could impact animal species (Impact BIO-1). Reduction in the development intensity may reduce the potential increase in feral cat populations, but given the development that could still occur, any decrease in impacts when compared to the Proposed Project may be negligible (Impact BIO-2). Impacts related to sensitive habitats and wetlands would be similar to the Proposed Project because the development footprint of the Base Level Development Alternative would be the same (Impact BIO-3, Impact BIO-4). Reduced development may slightly reduce disturbance of bird species, and the Base Level Development Alternative would still include vegetation in the design that would provide value to resident and migratory birds. However, there could be less open space developed, reducing that potential benefit when compared to the Proposed Project. Impacts related to bird strikes would be reduced compared to the Proposed Project because the Base Level Development Alternative would have a shorter limit for building heights. For example, the average building height in areas of O zoning would be 35 feet instead of 70 feet. This would substantially reduce the potential for bird strikes through reducing the surface area and height of buildings (Impact BIO-5). Impacts related to tree removal would be the same as the Proposed Project because the development footprint of the Base Level Development Alternative would be the same. However, the reduced building size would substantially reduce the potential for bird strikes but would still be subject to bird safe design requirements of the Menlo Park Municipal Code because new buildings would be constructed (Impact BIO-6). Overall biological resources impacts would be reduced compared to the Proposed Project but could still be significant. The same mitigation would apply as for the Proposed Project for Impact BIO-2, Impact BIO-3, Impact BIO-4, Impact BIO-5, and Impact BIO-6 (LTS/M). As a result, cumulative biological resources impacts would also be slightly reduced (Impact C-BIO-1; LTS/M).

Geology and Soils

Similar development would occur under the Base Level Development Alternative, though with less floor space and less height. Similar design measures would be considered for the Base Level Development Alternative as for the Proposed Project. As a result, seismic hazards impacts would be similar to the Proposed Project (Impact GS-1). Soil disturbance, runoff impacts, and soil and geologic stability impacts would be similar because the development footprint of the Base Level Development Alternative would be the same (Impact GS-2, Impact GS-3, Impact GS-4). The amount of excavation and ground disturbance would be similar to the Proposed Project, which would result in similar impacts for the potential to uncover and damage paleontological resources under the Base Level Development Alternative (Impact GS-5). Overall geological resources impacts would be similar to the Proposed Project, and paleontological resources impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact GS-5 (LTS/M). As a result, cumulative geology and soils impacts would also be slightly reduced (Impact C-GS-1; LTS).

Hydrology and Water Quality

The Base Level Development Alternative would largely have the same footprint as the Proposed Project and so would present a similar potential for sedimentation and contamination of surface water and groundwater during as well as similar impacts related to groundwater and drainage (Impact HY-1, Impact HY-2, Impact HY-3, Impact HY-5). Flood exposure would be similar to the Proposed Project because the same habitable buildings would still be constructed under this alternative as under the Proposed Project (Impact HY-4). Overall hydrology and water quality impacts would be similar to the Proposed Project and would still be significant. The same mitigation would apply as for the Proposed Project for Impact HY-1 and Impact HY-5 (LTS/M). As a result, cumulative hydrology and water quality impacts would also be slightly reduced (Impact C-HY-1; LTS).

Hazards and Hazardous Materials

The Base Level Development Alternative would reduce the total amount of construction occurring on the Project Site, which could slightly reduce the use of hazardous materials on the site during construction activities and for maintenance during buildout (Impact HAZ-1). Impacts related to potential accidents may likewise be slightly reduced due to the reduction in construction activities under the Base Level Development Alternative (Impact HAZ-2). The same schools would be within 0.25 mile of the Base Level Development Alternative as the Proposed Project, but the potential impact may be slightly reduced due to more limited development (Impact HAZ-3). Impacts to emergency access would be similar to the Proposed Project (Impact HAZ-4). Overall hazards and hazardous materials impacts would be slightly reduced compared to the Proposed Project, but hazardous materials impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact HAZ-2 and Impact HAZ-3 (LTS/M). As a result, cumulative hazards and hazardous materials impacts would also be slightly reduced (Impact C-HAZ-1; LTS/M).

Population and Housing

Under the Base Level Development Alternative, there would be less development than under the Proposed Project. As a result, impacts related to population growth would be reduced compared to the Proposed Project (Impact POP-1). Demolition of current uses on the Project Site would be the same as for the Proposed Project (Impact POP-2). Overall impacts would be reduced compared to the Proposed Project's impacts (LTS). As a result, cumulative impacts would also be reduced (Impact C-POP-1; LTS).

Public Services

Under the Base Level Development Alternative, the buildout of residential and non-residential land uses would be reduced compared to the Proposed Project. As a result, the demand for fire protection services, police services, school facilities, parks and recreational facilities, and library facilities would be reduced compared to the Proposed Project (Impact PS-1, Impact PS-2, Impact PS-3, Impact PS-4, Impact PS-5). Impacts would be less than the Proposed Project's impacts (LTS). As a result, cumulative impacts would also be reduced (Impact C-PS-1; LTS).

Utilities and Service Systems

Under the Base Level Development Alternative, the buildout of residential and non-residential land uses would be reduced compared to the Proposed Project. As a result, the demand for water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications, and solid waste

services would be reduced compared to the Proposed Project (Impact UT-1, Impact UT-2, Impact UT-3, Impact UT-4, Impact UT-5). Impacts would be less than the Proposed Project's impacts (LTS). As a result, cumulative impacts would also be reduced (Impact C-UT-1, Impact C-UT-2, Impact C-UT-3, Impact C-UT-4, Impact C-UT-5, Impact C-UT-6; LTS).

Reduced Intensity Alternative

Land Use

Similar changes to land use designations and zoning would need to be conducted for the Reduced Intensity Alternative as for the Proposed Project. For example, the Reduced Intensity Alternative would have similar circulation needs as the Proposed Project and therefore would also require amendments to the City General Plan Circulation Map and Zoning Map. However, the Reduced Intensity Alternative would fit into the footprint of the Proposed Project and have a similar design configuration and therefore would have comparable impacts related to consistency with land use plans, policies, and regulations meant to avoid or mitigate an environmental effect (Impact LU-1). Impacts would therefore be similar to impacts of the Proposed Project (LTS). As a result, cumulative land use impacts would also be similar (Impact C-LU-1; LTS).

Aesthetics

The Reduced Intensity Alternative would largely appear similar to the Proposed Project but would appear smaller in scale due to the reduced square footage of development, which could also potentially result in shorter building heights. There would also be less open space than the Proposed Project, which could shift the visual balance to appear more developed. Building heights would be reduced under this alternative so that impacts related to scenic vistas and building heights would be reduced, reducing visibility of development (Impact AES-1). Reduced intensity of development would not affect compliance with zoning and other regulations governing scenic quality (Impact AES-2). Reduced development intensity would slightly reduce nighttime lighting impacts because there would be less lighting used in building interiors, reducing the amount of light visible from buildings (Impact AES-3). Impacts would therefore be slightly reduced compared to the Proposed Project (LTS). As a result, cumulative aesthetics impacts would also be slightly reduced (Impact C-AES-1; LTS).

Transportation

Under the Reduced Intensity Alternative, the pedestrian, bicycle, and transit facilities are expected to be the same as the Proposed Project. Therefore, it would be consistent with applicable plans, ordinances, and policies that address the circulation system similar to the Proposed Project (Impact TRA-1). Although the Reduced Intensity Alternative would reduce residential square footage, daily trip generation per resident and daily trip generation per employee would remain the same as the Proposed Project. Under the Reduced Intensity Alternative, it is expected that there would be minimal to no changes in residential VMT per capita and employment VMT per employee compared to the Proposed Project analysis. The retail and hotel land uses would continue to generate no impact on VMT. Therefore, the Reduced Intensity Alternative would result in similar impacts to the Proposed Project (Impact TRA-2). Under the Reduced Intensity Alternative, it is assumed that the same design would be used for the North Garage, resulting in the same impact regarding sight distance as the Proposed Project (Impact TRA-3). Emergency access to the Project Site and nearby hospitals would be similar to the Proposed Project, resulting in similar impacts (Impact TRA-4). Impacts would therefore be similar to

the Proposed Project, and the same mitigation would apply to Impact TRA-2 and Impact TRA-3 (LTS/M). As a result, cumulative transportation impacts would also be similar (Impact C-TRA-1, Impact C-TRA-2, Impact C-TRA-3, Impact C-TRA-4; LTS/M).

Air Quality

There would be less construction and smaller buildout under the Reduced Intensity Alternative, reducing criteria air pollutant emissions during both construction and operation. However, the significance of emissions is measured per day, and phasing would be compressed under this alternative into one phase. As a result, construction activities would generally be a similar maximum intensity on a given day such that average daily construction emissions would be similar to the Proposed Project. However, total criteria air pollutant emissions during construction would decrease. The square footage of nonresidential uses space could be reduced to about 75 percent of that included in the Proposed Project, and the square footage of residential uses could be reduced to about 87 percent of that included in the Proposed Project. Emissions associated with construction of those buildings (not including grading and site preparation) would therefore also be reduced. Similarly, operational emissions would also decrease due to the smaller size of buildings, fewer residents, and potentially fewer workers. Estimated unmitigated average daily construction emissions of criteria air pollutants and precursors for the Proposed Project are provided in Table 6-7, and net unmitigated average daily operational emissions for the Reduced Intensity Alternative are provided in Table 6-8. Mitigated average daily construction emissions of criteria air pollutants and precursors for the Proposed Project are provided in Table 6-9, and net unmitigated average daily operational emissions for the Reduced Intensity Alternative are provided in Table 6-10. Mitigated emissions when operation overlaps with Project construction are provided in Table 6-11. This represents a conservative estimate of emissions since Project construction emissions would likely be higher than Reduced Intensity Alternative construction emissions. Refer to Appendix 6-1 for detailed emissions calculations. While the Proposed Project would result in a significant ROG impact during operations, that impact would not occur under the Reduced Intensity Alternative. This would be a substantial reduction in emissions impacts (Impact AQ-1, Impact AQ-2).

For localized emissions and exposure of sensitive receptors to substantial pollutant concentrations, construction activities would be reduced compared to the Proposed Project. Impacts therefore may be reduced for carbon monoxide because fewer vehicle trips would be needed. Asbestos impacts would be the same because the same buildings would be demolished as under the Proposed Project. There could also be less exposure to DPM due to the shortened construction period; however, site preparation would still be similar to the Proposed Project, limiting the reductions in exposure. There would be a reduction in exposure to substantial concentrations of pollutants during construction. It is possible that exposure during operations would be similar because the same operational activities would occur; however, exposure to vehicle exhaust would be reduced since the Alternative would result in fewer trips (Impact AQ-3). Exposure to odors during construction may be reduced due to the shorter construction period; however, the same site preparation would occur, which is the most likely source of diesel odors during construction. Operational odor sources would be the same. Therefore, impacts could be similar to the Proposed Project (Impact AQ-4). Overall impacts would be reduced compared to the Proposed Project, and impacts related to pollutant emissions would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact AQ-1, Impact AQ-2, and Impact AQ-3 . However, in contrast to the Proposed Project, Mitigation Measure AQ-1.1 and 1.2 would reduce Impact AQ-1 and AQ-2 to less than significant with mitigation. Refer to Table 6-9 for mitigated construction emissions and to Table 6-10 for mitigated operational emissions. As a result, the Reduced Intensity Alternative would not make a cumulatively considerable contribution to this significant cumulative impact (Impact C-AQ-1; LTS/M).

Table 6-7. Estimated Unmitigated Average Daily Construction Emissions of Criteria Air Pollutants and Precursors, Proposed Project

	Average Daily Emissions (lb/day)[a]			
Construction Year	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Year 1	0.12	2.4	0.053	0.050
Year 2	4.5	**64**	1.4	1.3
Year 3	19	**124**	5.8	5.4
Year 4	52	53	2.3	2.1
Year 5	**63**	45	2.1	2.0
Year 6	31	11	0.060	0.55
Maximum Average Daily Emissions	**63**	**124**	**5.8**	**5.4**
BAAQMD Significance Thresholds	54	54	82	54
Exceeds Threshold?	**Yes**	**Yes**	**No**	**No**

Source: Modeling files provided in Appendix 6-1.

Notes:

lb/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less

[a.] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions would be controlled using best management practices.

Table 6-8. Estimated Net Unmitigated Average Daily Operational Emissions, Reduced Intensity Alternative

	Average Daily Emissions (lb/day)			
Emissions Source	**ROG**	**NO_X**	**PM_{10}[a]**	**$PM_{2.5}$[a]**
Existing Conditions (Year 2019)	50	52	23	5.2
Full Build-Out Conditions (Year 2026)	109	57	46	10
Total Net Operational Emissions	**60**	**5.0**	**23**	**4.3**
BAAQMD Significance Threshold	54	54	82	54
Exceeds Threshold?	**Yes**	**No**	**No**	**No**

Modeling files provided in Appendix 6-1.

Notes:

Totals may not add up because of rounding.

lb/day = pounds per day; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

[a.] BAAQMD operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

Table 6-9. Estimated Mitigated Average Daily Construction Emissions of Criteria Air Pollutants and Precursors, Proposed Project

	Average Daily Emissions (lb/day)[a]			
Construction Year	**ROG**	**NO_X**	**PM_{10} Exhaust**	**$PM_{2.5}$ Exhaust**
Year 1	0.064	1.9	0.019	0.019
Year 2	2.7	45	0.49	0.48
Year 3	10	47	0.78	0.77
Year 4	24	29	0.38	0.37
Year 5	28	22	0.26	0.25
Year 6	13	4.8	0.060	0.058
Maximum Average Daily Emissions	**28**	**47**	**0.78**	**0.77**
BAAQMD Significance Thresholds	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Modeling files provided in Appendix 6-1.

Notes:

lb/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less

[a] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions would be controlled using best management practices.

Table 6-10. Estimated Net Mitigated Average Daily Operational Emissions, Reduced Intensity Alternative

	Average Daily Emissions (lb/day)			
Emissions Source	**ROG**	**NO_X**	**PM_{10}[a]**	**$PM_{2.5}$[a]**
Existing Conditions (Year 2019)	50	52	23	5.2
Full Build-Out Conditions (Year 2026)	103.3	57	46	10
Total Net Operational Emissions	**53.6**	**5.0**	**23**	**4.3**
BAAQMD Significance Threshold	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Modeling files provided in Appendix 6-1.

Notes:

Totals may not add up because of rounding.

lb/day = pounds per day; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

[a] BAAQMD operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

Table 6-11. Estimated Mitigated Average Daily Construction and Net New Operational Emissions of Criteria Air Pollutants and Precursors, Reduced Intensity Alternative

	Average Daily Emissions (lb/day)[a]			
Construction Year	**ROG**	**NO_X**	**PM_{10} Exhaust**	**$PM_{2.5}$ Exhaust**
Year 1	-50	-50	-23	-5.2
Year 2	-47	-7.6	-22	-4.7
Year 3	-40	-5.1	-22	-4.4
Year 4	-20	-18	-20	-4.1
Year 5	22	-2.5	-1.4	-0.42
Year 6	49	1.2	17	3.1
Maximum Average Daily Emissions	**49**	**1.2**	**17**	**3.1**
BAAQMD Significance Thresholds	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Modeling files provided in Appendix 6-1.

Notes:

lb/day = pounds per day; ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 or less

[a] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions would be controlled using best management practices.

Energy

There would be less construction under the Reduced Intensity Alternative, reducing energy use during construction. The total square footage of buildings would be reduced. Residential square footage would be reduced to about 87 percent of the Proposed Project, and nonresidential space would be to about 75 percent of the Proposed Project, which would result in a substantial reduction in energy use (Impact EN-1) The same sustainability measures, energy use measures, and transportation demand features would be implemented as for the Proposed Project (Impact EN-2). Impacts would therefore be reduced compared to the Proposed Project, and impacts related to energy use would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact EN-1 (LTS/M). As a result, cumulative energy impacts would also be slightly reduced (Impact C-EN-1; LTS).

Greenhouse Gas Emissions

There would be less construction and smaller buildout under the Reduced Intensity Alternative, reducing greenhouse gas emissions under both construction and operation. Therefore, total emissions would decrease. The total square footage of buildings would be reduced. Residential square footage would be reduced to about 87 percent of the Proposed Project, and nonresidential space would be reduced to about 75 percent of the Proposed Project. Emissions associated with construction of those buildings (not including grading and site preparation) may be reduced. Similarly, operational emissions would also decrease due to the smaller size of buildings, with net non-mobile emissions totaling -1,300 MT CO_2e per year. Mobile emissions would be 12,441 MT CO_2e per year, not accounting for any reductions associated with EVs. Refer to Appendix 6-1 for detailed emissions calculations. Compared to the Proposed Project's non-mobile and mobile emissions of and -1,056 CO_2e per year and 16,766 CO_2e per year, respectively, this would be a substantial reduction in mobile emissions impacts (Impact GHG-1a, Impact GHG-1b).

The Reduced Intensity Alternative would be similar to the Proposed Project in development patterns and features other than the reduction in maximum height and square footage. As a result, it would have similar impacts to the Proposed Project in terms of consistency with applicable plans and policies (Impact GHG-2). Overall impacts would be reduced compared to the Proposed Project, and impacts related to greenhouse gas emissions would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact GHG-1b and Impact GHG-2 (LTS/M).

Noise

There would be less construction and smaller buildout under the Reduced Intensity Alternative, reducing noise generated under both construction and operation. Less construction activities would reduce the duration of noise impacts. Smaller buildout would reduce the size of noise sources during operation (Impact NOI-1). Vibration impacts may remain the same, however, as vibration impacts largely result from ground-level construction activities like site preparation and foundation construction. These activities would still occur in the same area as they would under the Proposed Project, resulting in similar vibration impacts to the Proposed Project (Impact NOI-2). The Reduced Intensity Alternative would be in the same location as the Proposed Project, so there would still be no impact related to proximity to an airport or airstrip (Impact NOI-3). Overall impacts would be reduced compared to the Proposed Project, and impacts related to noise and vibration would still be potentially significant. The same mitigation would apply as for the Proposed Project for Impact NOI-1 and Impact NOI-2 (SU). As a result, cumulative noise impacts would also be slightly reduced (Impact C-NOI-1; SU).

Cultural Resources

Impacts to the Dumbarton Cutoff Line would be the same as the Proposed Project because the Willow Road Tunnel would be constructed under this alternative (Impact CR-1). Impacts to known archaeological deposits would be the similar to the Proposed Project. The Reduced Intensity Alternative has less potential to disturb unknown archeological deposits and burials because there would be less ground disturbance and excavation due to the reduced size of the alternative when compared to the Proposed Project (Impact CR-2, Impact CR-3, Impact CR-4). Impacts would be reduced compared to the Proposed Project but could still be significant. The same mitigation would apply as for the Proposed Project for all impacts (LTS/M). As a result, cumulative cultural impacts would also be slightly reduced (Impact C-CR-1; LTS).

Biological Resources

Reduction in the intensity of development would reduce construction activities, which could reduce disturbance of bird and bat species. Reduced development intensity would slightly reduce nighttime lighting impacts because there would be less lighting used in building interiors, reducing the amount of light from buildings that could impact animal species (Impact BIO-1). Reduction in the development intensity may reduce the potential increase in feral cat populations, but given the development that could still occur, any decrease in impacts when compared to the Proposed Project may be negligible (Impact BIO-2). Impacts related to sensitive habitats and wetlands would be similar to the Proposed Project because the development footprint of the Reduced Intensity Alternative would be the same (Impact BIO-3, Impact BIO-4). Reduced development may slightly reduce disturbance of bird species, and the Reduced Intensity Alternative would still include vegetation in the design that would provide value to resident and migratory birds. However, there could be less open space developed, reducing that potential benefit when compared to the Proposed Project. Impacts related to bird strikes could be reduced compared to the Proposed Project if the reduced development intensity results in shorter building heights, but it is unknown if this would occur. However, overall impacts to birds would be reduced (Impact BIO-5). Impacts related to tree removal would be the same

as the Proposed Project because the development footprint of the Reduced Intensity Alternative would be the same. However, the reduced building size would substantially reduce the potential for bird strikes but would still be subject to bird safe design requirements of the Menlo Park Municipal Code because new buildings would be constructed (Impact BIO-6). Overall biological resources impacts would be reduced compared to the Proposed Project but could still be significant. The same mitigation would apply as for the Proposed Project for Impact BIO-2, Impact BIO-3, Impact BIO-4, Impact BIO-5, and Impact BIO-6 (LTS/M). As a result, cumulative biological resources impacts would also be slightly reduced (Impact C-BIO-1; LTS/M).

Geology and Soils

Similar development would occur under the Reduced Intensity Alternative, though with less floor space and potentially less height. Similar design measures would be considered for the Reduced Intensity Alternative as for the Proposed Project. As a result, seismic hazards impacts would be similar to the Proposed Project (Impact GS-1). Soil disturbance, runoff impacts, and soil and geologic stability impacts would be similar because the development footprint of the Reduced Intensity Alternative would be the same (Impact GS-2, Impact GS-3, Impact GS-4). The amount of excavation and ground disturbance would be similar to the Proposed Project, which would result in similar impacts for the potential to uncover and damage paleontological resources under the Reduced Intensity Alternative (Impact GS-5). Overall geological resources impacts would be similar to the Proposed Project, and paleontological resources impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact GS-5 (LTS/M). As a result, cumulative geology and soils impacts would also be slightly reduced (Impact C-GS-1; LTS).

Hydrology and Water Quality

The Reduced Intensity Alternative would largely have the same footprint as the Proposed Project and so would present a similar potential for sedimentation and contamination of surface water and groundwater during as well as similar impacts related to groundwater and drainage (Impact HY-1, Impact HY-2, Impact HY-3, Impact HY-5). Flood exposure would be similar to the Proposed Project because the same habitable buildings would still be constructed under this alternative as under the Proposed Project (Impact HY-4). Overall hydrology and water quality impacts would be similar to the Proposed Project and would still be significant. The same mitigation would apply as for the Proposed Project for Impact HY-1 and Impact HY-5 (LTS/M). As a result, cumulative hydrology and water quality impacts would also be slightly reduced (Impact C-HY-1; LTS).

Hazards and Hazardous Materials

The Reduced Intensity Alternative would reduce the total amount of construction occurring on the Project Site, which could slightly reduce the use of hazardous materials on the site during construction activities and for maintenance during buildout (Impact HAZ-1). Impacts related to potential accidents may likewise be slightly reduced due to the reduction in construction activities under the Reduced Intensity Alternative (Impact HAZ-2). The same schools would be within 0.25 mile of the Reduced Intensity Alternative as the Proposed Project, but the potential impact may be slightly reduced due to more limited development (Impact HAZ-3). Impacts to emergency access would be similar to the Proposed Project (Impact HAZ-4). Overall hazards and hazardous materials impacts would be slightly reduced compared to the Proposed Project, but hazardous materials impacts could still be significant. The same mitigation would apply as for the Proposed Project for Impact HAZ-2 and Impact HAZ-3 (LTS/M). As a result, cumulative hazards and hazardous materials impacts would also be slightly reduced (Impact C-HAZ-1; LTS/M).

Population and Housing

Under the Reduced Intensity Alternative, there would be less development than under the Proposed Project. As a result, impacts related to population growth would be reduced compared to the Proposed Project (Impact POP-1). Demolition of current uses on the Project Site would be the same as for the Proposed Project (Impact POP-2). Overall impacts would be reduced compared to the Proposed Project's impacts (LTS). As a result, cumulative impacts would also be reduced (Impact C-POP-1; LTS).

Public Services

Under the Reduced Intensity Alternative, the buildout of residential and non-residential land uses would be reduced compared to the Proposed Project. As a result, the demand for fire protection services, police services, school facilities, parks and recreational facilities, and library facilities would be reduced compared to the Proposed Project (Impact PS-1, Impact PS-2, Impact PS-3, Impact PS-4, Impact PS-5). Impacts would be less than the Proposed Project's impacts (LTS). As a result, cumulative impacts would also be reduced (Impact C-PS-1; LTS).

Utilities and Service Systems

Under the Reduced Intensity Alternative, buildout of residential and non-residential land uses would be reduced compared to the Proposed Project. As a result, the demand for water, wastewater treatment, stormwater drainage, electric power, natural gas, telecommunications, and solid waste services would be reduced (Impact UT-1, Impact UT-2, Impact UT-3, Impact UT-4, Impact UT-5). Impacts would be less than the Proposed Project's impacts (LTS). As a result, cumulative impacts would also be reduced (Impact C-UT-1, Impact C-UT-2, Impact C-UT-3, Impact C-UT-4, Impact C-UT-5, Impact C-UT-6; LTS).

6.7 Comparison of Impacts

Table 6-11 summarizes the comparison of alternatives analysis and determinations described in Section *6.6, Impact Assessment*.

6.8 Environmentally Superior Alternative

As shown in Table 6-12, below, the No Project Alternative would be the environmentally superior alternative. State CEQA Guidelines Section 15126.6(e)(2) states that when the no-project alternative is identified as the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. Selection of an environmentally superior alternative necessitates weighing of numerous environmental considerations. No other alternative is environmentally superior for all resource areas, as shown in Table 6-12, and so the City must balance environmental aspects in determining which alternative is the environmentally superior alternative. This also includes consideration of other factors, as explained below.

Table 6-12. Comparison of Impacts to Proposed Project among Project Alternatives

		No Project Alternative	No Willow Road Tunnel Alternative	Base Level Intensity Alternative	Reduced Intensity Alternative
Environmental Issue	**Project**	**Significance (Comparison)**	**Significance (comparison)**	**Significance (Comparison)**	**Significance (Comparison)**
Land Use					
Impact LU-1	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact C-LU-1	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Aesthetics					
Impact AES-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact AES-2	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact AES-3	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Impact C-AES-1	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Transportation					
Impact TR-1	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact TR-2	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact TR-3	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact TR-4	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact C-TR-1	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact C-TR-2	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact C-TR-3	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact C-TR-4	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Air Quality					
Impact AQ-1	SU	NI (less)	SU (less)	LTS/M (less)	LTS/M (less)
Impact AQ-2	SU	NI (less)	SU (less)	LTS/M (less)	LTS/M (less)
Impact AQ-3	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact AQ-4	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact C-AQ-1	SU	NI (less)	SU (less)	LTS/M (less)	LTS/M (less)

Environmental Issue	Project	No Project Alternative Significance (Comparison)	No Willow Road Tunnel Alternative Significance (comparison)	Base Level Intensity Alternative Significance (Comparison)	Reduced Intensity Alternative Significance (Comparison)
Energy					
Impact EN-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact EN-2	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact C-EN-1	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Greenhouse Gas Emissions					
Impact GHG-1a	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Impact GHG-1b	LTS/M	NI (less)	LTS/M (similar)	LTS/M (less)	LTS/M (less)
Impact GHG-2	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Noise					
Impact NOI-1	SU	NI (less)	SU (less)	SU (less)	SU (less)
Impact NOI-2	SU	NI (less)	SU (less)	SU (similar)	SU (similar)
Impact NOI-3	NI	NI (similar)	NI (similar)	NI (similar)	NI (similar)
Impact-C-NOI-1	SU	NI (less)	SU (less)	SU (less)	SU (less)
Cultural Resources					
Impact CR-1	LTS/M	NI (less)	NI (less)	LTS/M (less)	LTS/M (less)
Impact CR-2	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Impact CR-3	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Impact CR-4	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Impact C-CR-1	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Biological Resources					
Impact BIO-1	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Impact BIO-2	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact BIO-3	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact BIO-4	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)
Impact BIO-5	LTS/M	NI (less)	LTS/M (similar)	LTS/M (less)	LTS/M (less)
Impact BIO-6	LTS/M	NI (less)	LTS/M (similar)	LTS/M (less)	LTS/M (less)
Impact C-BIO-1	LTS/M	NI (less)	LTS/M (similar)	LTS/M (similar)	LTS/M (similar)

Environmental Issue	Project	No Project Alternative Significance (Comparison)	No Willow Road Tunnel Alternative Significance (comparison)	Base Level Intensity Alternative Significance (Comparison)	Reduced Intensity Alternative Significance (Comparison)
Geology and Soils					
Impact GS-1	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact GS-2	LTS	NI (less)	LTS (less)	LTS (similar)	LTS (similar)
Impact GS-3	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact GS-4	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact GS-5	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Impact C-GS-1	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Hydrology and Water Quality					
Impact HY-1	LTS/M	NI (less)	LTS/M (less)	LTS/M (similar)	LTS/M (similar)
Impact HY-2	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact HY-3	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact HY-4	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact HY-5	LTS/M	NI (less)	LTS/M (less)	LTS/M (similar)	LTS/M (similar)
Impact C-HY-1	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Hazards and Hazardous Materials					
Impact HAZ-1	LTS	NI (less)	LTS (less)	LTS (less)	LTS (less)
Impact HAZ-2	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Impact HAZ-3	LTS/M	NI (less)	LTS (less)	LTS (less)	LTS (less)
Impact HAZ-4	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact C-HAZ-1	LTS/M	NI (less)	LTS/M (less)	LTS/M (less)	LTS/M (less)
Population and Housing					
Impact POP-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact POP-2	LTS	NI (less)	LTS (similar)	LTS (similar)	LTS (similar)
Impact C-POP-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)

Environmental Issue	Project	No Project Alternative Significance (Comparison)	No Willow Road Tunnel Alternative Significance (comparison)	Base Level Intensity Alternative Significance (Comparison)	Reduced Intensity Alternative Significance (Comparison)
Public Services					
Impact PS-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact PS-2	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact PS-3	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact PS-4	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact PS-5	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-PS-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Utilities and Service Systems					
Impact UT-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact UT-2	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact UT-3	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact UT-4	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact UT-5	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-UT-1	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-UT-2	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-UT-3	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-UT-4	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-UT-5	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)
Impact C-UT-6	LTS	NI (less)	LTS (similar)	LTS (less)	LTS (less)

Notes:

Project-Level Impacts

NI = No Impact; LTS = Less than Significant; SU = Significant Unavoidable; LTS/M = Less than Significant with Mitigation

Cumulative Impacts

NI = No Cumulative Impact; LTS = Less than Significant Cumulative Impact; LTS/M = Less than Significant Cumulative Impact with Mitigation;

Whereas the No Willow Road Tunnel Alternative largely reduces impacts that are temporary as a result of construction and excavation, the Base Level Development Alternative and Reduced Intensity Alternative result in reductions in impacts during both construction and operation.

The No Willow Road Tunnel Alternative reduces noise and vibration impacts during construction, as well as the criteria air pollutant emissions, energy consumption, and greenhouse gas emissions from activities such as heavy equipment operation and excavation. It reduces the potential for damage of cultural resources and reduces hydrology and hazardous materials impacts during construction of the Willow Road Tunnel.

The Base Level Alternative and Reduced Intensity Alternative also reduce construction impacts as does the No Willow Road Tunnel Alternative because the development would have smaller buildings under those alternatives. However, over the long term, these alternatives would reduce impacts associated with operation of the buildings, such as criteria air pollutant emissions, energy consumption, noise, and greenhouse gas emissions.

Menlo Park's 2030 Climate Action Plan (Menlo Park 2021) sets a goal for the City of Menlo Park to reduce its VMT by 25 percent or an amount recommended by the Complete Streets Commission as one of six actions to eventually reach carbon neutrality. This emphasizes the importance of reducing VMT in Menlo Park. A reduction in VMT is also expressed in the objectives of the Proposed Project, through objectives such as to reduce VMT by locating residential, commercial, and office uses adjacent to each other; provide multiple transportation options and a robust TDM to reduce traffic congestion, air quality impacts, and greenhouse impacts; and develop an integrated, highly connected office campus that accommodates anticipated worker space demands and provides flexible workspace at densities that support various transportation options.

Based on the latest citywide travel demand model, the regional average office VMT is 15.9 and the regional average residential VMT is 13.1. Office VMT for the Proposed Project would be 13.6, while residential VMT would be subject to mitigation to meet the significance threshold of 11.2. Mitigation Measure TRA-1 would require that residential land uses on the Project site reduce trips through a TDM Plan achieving a 36 percent trip reduction from gross ITE trip generation rates.

The Proposed Project and all three alternatives would generate similar VMT per capita. However, there would be differences in total VMT. The No Willow Road Tunnel Alternative would generate similar total VMT at the Project Site to the Proposed Project because it would have the same square footage of non-residential and residential development. The Reduced Intensity Alternative would generate less VMT than the Proposed Project at the Project Site because there would be fewer total residents and employees. The Base Level Development Alternative would generate even less VMT at the Project Site because there would be even fewer total residents and employees. However, the Proposed Project is designed to reduce VMT to below the regional average, such that if office uses and residential uses were developed elsewhere, the VMT reduction benefits at the Project Site would not be realized. The Base Level and Reduced Intensity Alternatives would also reduce VMT to below the regional average. The No Willow Road Tunnel Alternative, with the maximum residential and non-residential buildout at the Project Site among the alternatives, would maximize development and total VMT reduction at the Project Site over the long term while also reducing several construction impacts. However, the No Willow Road Tunnel Alternative would not reduce any of the Proposed Project's significant and unavoidable impacts to a less-than-significant level.. Therefore, the No Willow Road Tunnel Alternative is not the environmentally superior alternative.

None of the alternatives (other than the No Project Alternative) would reduce the Proposed Project's significant and unavoidable construction noise and vibration impacts to a less-than-significant level. The Base Level Development Alternative and the Reduced Intensity Alternative would reduce the Proposed Project's project-level and cumulative operational air quality impacts related to ROG emissions to a less-than-significant level with mitigation. The Base Level Development Alternative would result in the greatest reduction (19 net lbs/day of ROG compared to 53.6 net lbs/day under the Reduced Intensity Alternative). Therefore, the Base Level Development Alternative is the environmentally superior alternative.