Project Overview

Peninsula Innovation Partners, LLC (Project Sponsor), a subsidiary of Meta Platforms, Inc. (Meta), is proposing redevelopment of an approximately 59-acre industrial site plus three parcels (within two sites) west of Willow Road (collectively, the Project Site) as a multi-phase, mixed-use development.[1] The Willow Village Master Plan Project (Proposed Project) includes demolition of all buildings and landscaping on the 59-acre portion of the Project Site (main Project Site) and construction of new buildings, establishment of various open space areas (defined below), and installation of infrastructure within a new Residential/Shopping District, Town Square District, and Campus District. In addition, the Proposed Project would alter three parcels (Hamilton Avenue Parcels North and South), totaling 3.1 acres, to accommodate realignment of Hamilton Avenue at Willow Road for Project Site access. The City of Menlo Park (City) is the Lead Agency for the Proposed Project.

At the main Project Site, the Proposed Project would demolish approximately 1 million square feet (sf) of existing nonresidential uses and construct approximately 1.8 million sf of nonresidential uses (excluding the proposed hotel), for a net increase of 800,000 sf in nonresidential square footage. The new nonresidential uses would be composed of up to 1.6 million sf of office and accessory uses[2] in the Campus District (i.e., up to 1.25 million sf of office space, with the balance [space for accessory use, including meeting and collaboration space of 350,000 sf if the office sf is maximized], in multiple buildings) and up to approximately 200,000 sf of commercial/retail space in the Residential/Shopping District and Town Square District. Some of the commercial/retail sf would be located on the East Side of Main Street within the Office Campus District and would be accessible by the public from Main Street. The Proposed Project would also include up to approximately 1,730 multi-family residential units, an up to 193-room hotel, and, assuming full buildout, approximately 20 acres of open spaces, which include approximately 8 acres of publicly accessible parks, bike paths, and trails. The Proposed Project would be developed using the bonus level allowances from the Zoning Ordinance. The Proposed Project would utilize these allowances for increased density, intensity, and height in exchange for the provision of Community Amenities.

The three proposed districts within the main Project Site would be located as follows: the approximately 17.7-acre Residential/Shopping District in the southwestern portion of the main Project Site, the approximately 4.3-acre Town Square District in the northwestern portion of the main Project Site, and the approximately 32-acre Campus District in the eastern portion of the main Project Site.[3] The Campus District would include office uses and amenity space, accessory uses,[4] publicly

[1] The Project Site includes the main 59-acre existing industrial site plus Hamilton Avenue Parcels North and South. However, references to the Project Site in this Draft EIR will generally focus on the main 59-acre campus; changes and modifications to the two parcels on Hamilton Avenue will generally be discussed separately.

[2] Accessory uses could include the following types of spaces: meeting/collaboration space, orientation space, training space, event space, incubator space, a business partner center, an event building (including pre-function space, collaboration areas, and meeting/event rooms), a visitor center, product demonstration areas, film studio, gathering terraces and private gardens, and space for other Meta accessory uses. Accessory uses could occur in spaces located anywhere throughout the Campus District.

[3] The Proposed Project also includes approximately 5.6 acres of land designated as public right-of-way.

[4] Accessory uses are defined in footnote 3 above.

accessible retail space, and a publicly accessible elevated park (i.e., the Elevated Park) that would serve to connect the main Project Site to the adjacent Belle Haven neighborhood via an overpass at Willow Road. The Proposed Project includes an undercrossing (Willow Road Tunnel) to provide tram and pedestrian/bicyclist access to the neighboring Meta campuses from the Campus District.

The main Project Site would be bisected by a new north–south street (Main Street) as well as an east–west street that would provide access to all three districts. The Proposed Project would include a circulation network for vehicles, bicycles, and pedestrians, inclusive of both public rights-of-way and private streets, that would be generally aligned to an east-to-west and a north-to-south grid. The Proposed Project would also alter parcels west of the main Project Site, across Willow Road, on both the north and south sides of Hamilton Avenue (Hamilton Avenue Parcels North and South) to support realignment of the Hamilton Avenue right-of-way and provide access to the new Elevated Park. The realignment of Hamilton Avenue would require demolition and reconstruction of an existing Chevron gas station (with a potential increase in approximately 1,000 sf) at Hamilton Avenue Parcel South and enable the potential addition of up to 6,700 sf of retail uses at the existing neighborhood shopping center (Belle Haven Retail Center) on Hamilton Avenue Parcel North. In addition, other offsite transportation and utility improvements would be constructed to serve the Proposed Project. These include various potential intersection improvements (that may be required to bring intersection congestion back to pre-Project conditions per the City's transportation impact analysis guidelines), expansion of a Pacific Gas and Electric (PG&E) Ravenswood substation, installation of a new conduit to connect the Ravenswood substation to the main Project Site, construction of a sanitary sewer force main and recycled water line in the same trench in Hamilton Avenue, and an extension of the sanitary sewer line in Willow Road from O'Brien Drive to the proposed southwest sanitary sewer pump station.

Regulatory Context and Background

The main Project Site is zoned O-B (Office Bonus) and R-MU-B (Residential Mixed-Use Bonus) on the City's General Plan Land Use Designation Map, which was updated as part of the General Plan Land Use and Circulation Elements Update (referred to herein as ConnectMenlo). The existing Hamilton Avenue Parcels North and South are zoned Neighborhood Commercial District, Special (C-2-S). The certified ConnectMenlo Final Environmental Impact Report (ConnectMenlo Final EIR) provided a program-level analysis of the development potential envisioned for the entire city, including the increased development potential in the Bayfront Area. The Land Use Element specifically identified available development potential in the Bayfront Area as follows: up to 4.1 million gsf of non-residential space, 400 hotel rooms, and 4,500 residential units.

This EIR was prepared in accordance with the terms of the settlement agreement between the cities of Menlo Park and East Palo Alto, which allows for simplification in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168 for all topic areas, except housing and transportation. The analysis provided in this EIR tiers from the ConnectMenlo Final EIR, as appropriate and as further described in each topic section. Refer to the *2017 Settlement Agreement* section in Chapter 3.0, *Environmental Impact Analysis*, for a complete description of the settlement agreement.

Areas of Controversy

California Environmental Quality Act (CEQA) Guidelines Section 15124 specifies that the Draft Environmental Impact Report (EIR) summary identify "areas of controversy" known to the Lead Agency, including issues raised by agencies and the public.

A Notice of Preparation (NOP) was released for the Project on September 18, 2019, for a 30-day public review period. A public scoping meeting was held before the City's Planning Commission on October 7, 2019. This summary list is based on written comments received (included in Appendix 1 of this Draft EIR) and comments stated during the public scoping meeting. The topics that would result in physical impacts under CEQA are addressed in the EIR analysis. Potential areas of controversy may include those listed below:

Aesthetics

- Provide overlay of Meta developments (both current and future) for project context.

Air Quality

- Air quality impacts resulting from the significant number of vehicles
- Dust and air pollution from construction of new offices and structures in the perimeter of the Belle Haven neighborhood
- Concern for impacts on asthma and respiratory illnesses for children
- Use Belle Haven Neighborhood air quality monitoring location and not Redwood City
- Work to reduce the spread of air pollution caused by traffic
- Increase in soot from cutting down the trees at Willow and 101
- Consider net zero emissions from all buildings, without the use of offset or credits
- Consider no net increase in indoor and outdoor air pollution

Alternatives

- Consider alternative where the street connection (Main Street) over the SFPUC property is not built
- Consider alternative with less office space and more housing units
- Consider alternative with 1 million sf office, 3000 homes, with Dumbarton rail
- Consider alternative with 1 million sf office, 3000 homes without Dumbarton rail
- Consider alternative keeping office space at or close to its current size
- Consider alternative keeping traffic at or close to existing baseline
- Consider alternative where FAR is reduced for office, and housing is increased

Biological Resources

- Evaluate impacts to birds
- Evaluate impacts to plant and insect species
- Trees to be planted on site, and inclusion of mitigation measures for trees that would be removed
- Plant 10 percent of trees (50) with older, mature trees (e.g., 20 year native oak)

Cumulative

- Include these projects in the cumulative analysis: Dumbarton Corridor project, including train stop; Bohannon Gateway (almost completed); Gateway Family Housing; Sobrato Office development; SP Menlo LLC multi-family; Menlo Uptown; Menlo Portal; and Hotels citizen and Moxy
- Include Dumbarton Rail in analysis
- Consider cumulative impacts on traffic [Bohannon buildings, Sobrato proposed development, and Hotels shuttles, buses, and private vehicles (including Uber, Lyft and limousines)]

Energy

- Do not include credits/offsets as options for this project in order to meet 100 percent renewable energy use

Geology and Soils

- Consider secondary impacts resulting from earthquakes (i.e., fire)

Greenhouse Gas Emissions

- Evaluate impacts related to climate change

Hazardous Materials

- Consider toxic release site

Hydrology and Water Quality

- Address compliance with current West Bay Regulations and Standards
- Evaluate sea level rise sustainability and flood resilience

Land Use

- Consider Project's consistency with SFPUC adopted plans and policies
- Evaluate the potential loss of the local businesses on Willow Road and Hamilton Avenue and resulting additional hardship on the residential area
- Consider land use compatibility with other office developments south of the Project Site

Noise

- Analyze Project-related noise sources and volume impacts on nearby schools
- Analyze noise impacts from construction equipment and labor in the perimeter of the Belle Haven neighborhood
- Work to reduce the spread of noise caused by traffic
- Evaluate increase in noise from cutting down the trees at Willow and 101

Population and Housing

- Address jobs/housing imbalance
- Type and number of anticipated dwelling units resulting directly or indirectly from the Project
- Include average square footage for anticipated dwelling units, broken down by type of unit, directly or indirectly resulting from the Project
- Specify amount of development fees to be generated
- Consider total population growth, both directly and indirectly, resulting from the Project
- Analyze impacts resulting from provision of 20 percent below market rate units
- Consider cumulative jobs and housing growth impacts
- Analyze impacts on current occupants of the Project Site due to displacement
- Use ConnectMenlo General Plan projections instead of the ABAG projections

Project Description

- Address temporary access or staging area locations
- Provide Project construction details
- Specify Project-related review/approvals
- Prepare a Housing Needs Assessment (HNA)
- Move construction of the grocery store from Phase 3 to Phase 1 and in an alternative location
- Suggest building housing before office uses
- Pursuit of AB 900
- Public amenities to be incorporated
- Retail, grocery, and restaurant uses to be incorporated as part of the Project
- Community space to be provided
- Provide increased housing rather than community space
- Increase affordable housing to be provided from a minimum of 15 percent to 30 percent
- Increase amount of open space to be provided by 50 percent more
- Reduce FAR and decrease office size (30-50%) to allow for more housing

- Include access to Bayfront Expressway from the Southern boundary
- Include plans for connecting the Project with future rail or bus rapid transit station (Dumbarton)
- Evaluate each phase separately since mitigation measures should be implemented by phase, as they occur

Public Services

- Address impacts to school districts
- Consider historical, current, and future population projections for the School District
- Address impacts to emergency services providers

Transportation

- Prepare a Transportation Impact Analysis (TIA)
- Address pedestrian and bicyclists' safety
- Address parking and access to the Project Site
- Consider traffic impacts from the increase in the number of vehicles
- Consider existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites
- Estimate travel demand and trip generation, trip distribution, and trip assignment by including consideration of school sites and home-to-school travel
- Evaluate cumulative traffic impacts on schools and the community
- Consider increased potential for accidents due to gridlock during school drop-off and pick-up hours
- Analyze response time for emergency services and first responders
- Include East Palo Alto intersections in the TIA
- Analyze City intersections, grade separations, specify the trip reduction measures, and specify transit capacity enhancements
- Include potential mitigation measures to reduce traffic-related impacts on surrounding roadways and intersections
- Consider transportation impacts to and from the Willow station, which will be adjacent or co-located with the development
- Include VMT for the following scenarios: Project with Dumbarton Rail and Project without Dumbarton Rail
- Address timeline for offsetting new traffic caused by the Project
- Consider cost from the infrastructure improvements needed due to increased traffic from the Project
- Include Bus Stop Occupancy Plan in analysis
- Include "cross-traffic" between University Avenue, O'Brien Drive, and Willow Road

- Study “cut-through traffic" along Hamilton Avenue, Chilco Street, and Ivy Drive
- Include LOS analysis
- Consider no net increase in VMT

Cultural and Tribal Cultural Resources

- Consult with California Native American Tribes
- Adhere to AB 52 and SB 18, including the procedures that would be followed for AB 52, including notification, consultation, requirements for the environmental document, and the types of mitigation that could be implemented
- Recommendations for cultural resources assessments

Utilities and Service Systems

- Describe SFPUC pipelines and property ownership as part of the existing setting, as well as the Project’s impact on this infrastructure.
- Adhere to the SFPUC permitting and project review process.
- Applicant should determine the feasibility of constructing Main Street over the SFPUC pipelines, and adjacent to the SFPUC appurtenances
- Describe the disruptions that could occur to the SFPUC Hetch Hetchy Regional Water System during construction and whether critical infrastructure would be impacted or reconfigured
- Address all sewer improvements, including gravity mains, force mains, and pump stations
- Consider on-site recycled water
- Address impacts to landfill resulting from Project demolition debris

Project Alternatives

In accordance with CEQA and the CEQA Guidelines, specifically Section 15126.6, an EIR must describe a reasonable range of alternatives to a project, or the location of a project, that could attain most of the project’s basic objectives while avoiding or substantially lessening any of the significant environmental effects of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. CEQA states that an EIR should not consider alternatives “whose effects cannot be ascertained and whose implementation is remote and speculative.”

The four alternatives to the Proposed Project that are discussed and analyzed in Chapter 6, *Alternatives*, of this EIR are:

- **No Project Alternative**. The No Project Alternative is provided in this EIR to compare the impacts of the Proposed Project with what would be reasonably expected to occur in the foreseeable future if the Proposed Project were not approved and no additional construction would occur at the Project site (CEQA Guidelines Section 15126.6 [e][2]).

- **No Willow Road Tunnel Alternative.** 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. Most bicyclists and pedestrians would use on-street bicycle lanes and sidewalk improvements when accessing the proposed Campus District by traveling through the Willow Road corridor and crossing the Willow Road and Main Street/Hamilton Avenue intersection.
- **Base Level Alternative**. The Base Level Alternative assumes a FAR consistent with the base-level development standards in the R-MU zoning district, which allow for a maximum density of up to 30 dwelling units per acre, a maximum height of up to 40 feet, and a maximum nonresidential FAR of 0.15. For the O zoning district, the base-level development standards allow for a 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 for hotels).
- **Reduced Intensity Alternative**. The Reduced Intensity Alternative would consist of the Proposed Project, developed utilizing the bonus level development provisions of the Zoning Ordinance, but developed at a lesser intensity. Both the total residential and non-residential square footage would be reduced compared to the Proposed Project. Under this alternative approximately 1,225,000 sf of office uses, 80,000 sf of non-office commercial/retail uses, 172,000 sf of hotel uses, and 1,482,222 sf of residential uses would be provided.

Each alternative is compared to the Proposed Project and discussed in terms of its adverse effects on the environment. Analysis of the alternatives focuses on those topics for which significant adverse impacts would result from the Proposed Project. The No Project Alternative is considered to be the environmentally superior alternative. However, when the No Project Alternative is deemed the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives considered (State CEQA Guidelines Section 15126.6(e)(2)). As discussed in Chapter 6, *Alternatives Analysis*, the Base Level Development Alternative and the Reduced Intensity Alternative would reduce the project-level and cumulative operational air quality impacts related to reactive organic gases (ROG) emissions to a less-than-significant level with mitigation. The Base Level Development Alternative would result in the greatest reduction (19 net pounds per day [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.

Impacts and Mitigation Measures

Table ES-1 presents a summary of the impacts of the Project, proposed mitigation measures, and each impact's level of significance after mitigation. The environmental impacts are identified and classified as "Significant," "Potentially Significant," "Less than Significant," or "No Impact." According to State CEQA Guidelines Section 15382, a significant impact is "… a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project…" State CEQA Guidelines Section 15126.4 (a)(1) also states that an EIR "…shall describe feasible mitigation measures which could minimize significant adverse impacts…" Mitigation measures are identified for all impacts labeled as "Significant" or "Potentially Significant" where feasible mitigation measures have been identified.

Significant Impacts

As discussed in more detail in Chapter 3 of this EIR, and as summarized in Table ES-1 below, impacts in the following areas would be significant or potentially significant without implementation of mitigation measures. Impacts associated with transportation, air quality, energy, greenhouse gas emissions, noise, cultural and tribal cultural resources, biological resources, geology and soils, hydrology and water quality, and hazards and hazardous materials would be reduced to a less-than-significant level if the mitigation measures recommended in this report are implemented.

- Transportation (vehicle miles traveled, and hazards due to design feature or incompatible uses)
- Air Quality (sensitive and receptors, and other air emissions)
- Energy (consumption of energy resources)
- Greenhouse Gas Emissions (generation of greenhouse gas emissions, and conflicts with applicable plans and polices)
- Noise (operational noise)
- Cultural and Tribal Cultural Resources (historical resources, archaeological resources, human remains, and tribal cultural resources)
- Biological Resources (special-status species, riparian habitat and other sensitive natural communities, protected wetlands, wildlife movement and native wildlife nursery sites, and conflicts with any local policies or ordinances)
- Geology and Soils (paleontological resources)
- Hydrology and Water Quality (water quality, and conflict or obstruct a water resource management plan)
- Hazards and Hazardous Materials (accidental hazardous materials release, and exposure to schools)

Impacts related to land use, aesthetics, population and housing, public services and recreation, and utilities and service systems would be less than significant, and no mitigation measures would be required.

Significant and Unavoidable Impacts

CEQA) requires that an EIR identify any significant environmental effects that cannot be avoided should a project be implemented. Many impacts identified for the Proposed Project would either be less than significant or mitigated to a less-than-significant level with implementation of identified mitigation measures, as discussed throughout Chapter 3 of this EIR. However, air quality impacts (Impact AQ-1 and AQ-2) and noise impacts (Impact NOI-1a and NOI-2) would be significant and unavoidable even with implementation of mitigation measures. Because the EIR identifies impacts that would remain significant and unavoidable, the City will need to determine whether to approve the Project as proposed and, if so, provide its rationale in a Statement of Overriding Considerations.

Draft EIR Conclusions

In accordance with State CEQA Guidelines Section 15123(b)(3), this summary section must identify issues to be resolved, including whether or how to mitigate the significant effects and the choice among alternatives. Chapter 3 of the Draft EIR, *Environmental Impact Analysis*, presents mitigation measures to reduce or avoid significant impacts identified for the Project. A Mitigation Monitoring and Reporting Program (MMRP) will be prepared to define the timing of implementation of the measures, the parties who will be responsible for implementation, and the parties who will be responsible for reporting and verifying implementation.

How to Comment on This Draft EIR

This Draft EIR is considered a draft under CEQA because it must be reviewed and commented upon by public agencies, organizations, and individuals before being finalized. This document is being distributed for a 45-day (minimum) public review and comment period. Readers are invited to submit written comments on the document. Comments are most helpful when they suggest specific alternatives or measures that would better mitigate significant environmental effects. Hard copies of the Draft EIR are available for review at the Menlo Park Library located at 800 Alma Street and the Belle Haven Branch Library, located at 413 Ivy Drive. Electronic copies of the Draft EIR are available for review online at [https://beta.menlopark.org/willowvillage]. Written comments should be submitted to:

Kyle Perata, Acting Planning Manager
City of Menlo Park
Community Development Department, Planning Division
701 Laurel Street
Menlo Park, CA 94025
Email: ktperata@menlopark.org

To receive comments on the Draft EIR, a public hearing will be held before the Planning Commission on April 25, 2022. Hearing notices will be mailed to responsible agencies and interested individuals.

Summary Tables

Information in Table ES-1, *Summary of Impacts and Mitigation Measures*, (a) describes impact topics considered in the EIR, (b) level of significance without mitigation, (c) recites recommended mitigation measures, and (d) recites level of significance with mitigation. Levels of significance are categorized as follows:

NI	No Impact
LTS	Less than Significant
PS	Potentially Significant
LTS/M	Less than Significant with Mitigation
SU/M	Significant and Unavoidable with Mitigation

For a complete description of potential impacts and recommended mitigation measures, please refer to the specific topic discussion in Chapter 3.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.1 Land Use			
Impact LU-1: Conflicts with any Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect. The Proposed Project would not result in a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation with jurisdiction over the Proposed Project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	LTS	None required	N/A
Impact C-LU-1: Cumulative Land Use Impacts. Cumulative development would not result in a significant cumulative impact to land use, and the Proposed Project would not be a cumulatively considerable contributor to such cumulative impact.	PS	***ConnectMenlo Mitigation Measure LU-2:*** Prior to project approval, as part of the project application process, future development in Menlo Park is required to demonstrate consistency with the applicable goals, policies, and programs in the General Plan and the supporting Zoning standards to the satisfaction of the City of Menlo Park's Community Development Department. A future project is consistent with the General Plan and Zoning standards if, considering all its aspects, it will further the goals, policies and programs of the General Plan and supporting Zoning standards and not obstruct their attainment.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.2 Aesthetics			
Impact AES-1: Substantial Adverse Effect on Scenic Vista. The Proposed Project would not result in a substantial adverse effect on scenic vistas.	LTS	None required	N/A
Impact AES-2: Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality. The Proposed Project would not conflict with applicable zoning or other regulations governing scenic quality.	LTS	None required	N/A
Impact AES-3: The Proposed Project would not create new Sources of Light and Glare. The Proposed Project would not create a new source of substantial light or glare that could adversely affect daytime or nighttime views in the area.	LTS	None required	N/A
Impact C-AES-1: Cumulative Aesthetic Impacts. Cumulative development would result in less than significant cumulative aesthetic impact, and thus the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact to aesthetic.	LTS	None required	N/A
3.3 Transportation			
Impact TRA-1: The Proposed Project would not conflict with Applicable Plans, Ordinances, or Policies. The Proposed Project would not conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact TRA-2: The Proposed Project would exceed an applicable VMT threshold of significance. The Proposed Project would exceed the applicable VMT threshold of significance for the residential land use and would result in a significant impact.	PS	***Mitigation Measure TRA-2*:** The residential land use of the Project Site will be required to implement a TDM Plan achieving 19% active TDM trip reduction from ITE trip generation rates equivalent to 6,023 daily trips. Should a different number of residential units be built, the total daily trips will be adjusted accordingly. The required residential TDM Plan will include annual monitoring and reporting requirements on the effectiveness of the TDM program. The Project applicant will be required to work with City staff to identify the details of the TDM plan. If the annual monitoring finds that the TDM reduction is not met (i.e. the Proposed Project exceeds 6,023 daily trips from the residential land use), the TDM coordinator will be required to work with City staff to detail next steps to achieve the TDM reduction.	LTS/M
Impact TRA-3: The Proposed Project would substantially increase hazards due to a design feature or incompatible uses. The Proposed Project includes a design feature that could increase hazards and would result in a significant impact.	PS	***Mitigation Measure TRA-3*:** Revise the North Garage access design to provide adequate sight distance for the eastern driveway or incorporate other design solutions to reduce hazards to the satisfaction of the Public Works Director. Potential solutions that would reduce hazards to a less than significant level include restricting the eastern driveway to inbound vehicles only or prohibiting exiting left turns, modifying landscaping or relocating the driveway to the west to allow for adequate sight distance for exiting vehicles, or installing an all-way stop or signal.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact TRA-4: The Proposed Project would not result in inadequate emergency access. The Proposed Project would not result in inadequate emergency access.	LTS	None required	N/A
Impact C-TRA-1: Conflicts with Applicable Plans, Ordinances, or Policies.	LTS	None required	N/A
Impact C-TRA-2: Vehicle Miles Traveled.	PS	Implement ***Mitigation Measure TRA-2*** above.	LTS/M
Impact C-TRA-3: Hazards or Incompatible Uses.	PS	Implement ***Mitigation Measure TRA-3***, above.	LTS/M
Impact C-TRA-4: Emergency Access.	LTS	None required	N/A
3.4 Air Quality			
Impact AQ-1: Conflict with or Obstruct Implementation of the Applicable Air Quality Plan. The Proposed Project would conflict with or obstruct implementation of the applicable air quality plan.	PS	***Project Mitigation Measure AQ-1.1: Use Clean Diesel-powered Equipment during Construction to Control Construction-related Emissions.*** The Project Sponsor shall either: • Ensure all off-road construction equipment with greater than 25 horsepower and operating for more than 20 hours total over the entire duration of construction activities have engines that meet or exceed either EPA or ARB Tier 4 Final off-road emission standards. The exception to this requirement allows a cumulative total of 618,028 horsepower-hours over the duration of construction activities before residents move onsite and 34,716 horsepower-hours over the duration of construction activities after residents move onsite from the operation of off-road construction equipment that meets standards less than Tier 4 Final; or • Prior to issuance of building permits, provide supplemental analysis prepared by a qualified air quality specialist to the City for approval that shows that	SU/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		emissions of ROG and NO_X, the excess lifetime cancer risk, and the $PM_{2.5}$ concentration would not exceed the thresholds from the 2017 BAAQMD CEQA Air Quality Guidelines using the mix of equipment proposed by the applicant. ***Project Mitigation Measure AQ-1.2: Architectural Coatings.*** The Project Sponsor shall use super-compliant architectural coatings during construction and operation for all buildings, which shall have VOC content that meet SCAQMD Rule 1113 Architectural Coatings as revised on February 5, 2016.	
Impact AQ-2: Cumulatively Considerable Net Increase in Criteria Pollutants. The Proposed Project would result in a cumulative net increase in a criteria pollutant for which the Project region is classified as a nonattainment area under an applicable federal or ambient air quality standard.	PS	Implement ***Mitigation Measures AQ-1.1 and AQ-1.2*****,** above, plus: ***ConnectMenlo Mitigation Measure AQ-2b1*****:** Prior to building permit issuance, the City shall require applicants for all development projects in the city to comply with the current Bay Area Air Quality Management District's (BAAQMD) basic control measures for reducing construction emissions of PM_{10} (Table 8-1, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines). ***ConnectMenlo Mitigation Measure AQ-2b2*****:** Prior to issuance of a building permit, development projects in the City that are subject to CEQA and exceed the screening sizes in the BAAQMD's CEQA Guidelines shall prepare and submit to the City of Menlo Park a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines,	SU/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		the project applicant is required to incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds (e.g., Table 8-2, Additional Construction Mitigation Measures Recommended for projects with Construction Emissions Above the Threshold of the BAAQMD CEQA Guidelines, or applicable construction mitigation measures subsequently approved by BAAQMD). These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans), subject to the review and approval of the Planning Division prior to building permit issuance. (The AQTR prepared and submitted for the Proposed Project fulfills the air quality technical assessment requirement.)	
Impact AQ-3: Expose Sensitive Receptors to Substantial Pollutant Concentrations. The Proposed Project would expose sensitive receptors to substantial pollutant concentrations.	PS	Implement ***Project Mitigation Measure AQ-1.1 and ConnectMenlo Mitigation Measures AQ-2b1 and AQ-2b2***, above.	LTS/M
Impact AQ-4: Other Air Emissions. The Proposed Project would result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.	PS	***Project Mitigation Measure AQ-4.1: Molecular Neutralizer for Odors.*** The Project Sponsor and West Bay Sanitary District shall install a molecular neutralizer at the proposed sanitary sewer pump station to convert hydrogen sulfide gas into a biodegradable effluent during sewer pump operations. The molecular neutralizer shall be installed prior to the commencement of sewer pump operations.	LTS/M
Impact C-AQ-1: Cumulative Air Quality Impacts. Cumulative development would result in a significant and unavoidable cumulative impact on air quality; thus, the Proposed Project would be a cumulatively considerable contributor to a significant cumulative impact on air quality.	PS	Implement ***Project Mitigation Measure AQ-1.1 and ConnectMenlo Mitigation Measures AQ-2b1 and AQ-2b2***.	SU/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.5 Energy			
Impact EN-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources. The Proposed Project would not result in significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.	LTS	None required.	N/A
Impact EN-2: Conflict with Energy Plan. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	None required	N/A
Impact C-EN-1: Cumulative Energy Impacts. Cumulative development would result in a less-than-significant cumulative impact on energy resources; thus, the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on energy resources.	LTS	None required	N/A
3.6 Greenhouse Gas Emissions			
Impact GHG-1a: Generation of GHG Emissions during Construction. Construction of the Proposed Project would not generate GHG emissions that may have a significant impact on the environment.	LTS	None required.	N/A
Impact GHG-1b: Generation of GHG Emissions during Operation. Operation of the Proposed Project would generate GHG emissions that may have a significant impact on the environment.	PS	Implement ***Mitigation Measure TRA-2***, above.	LTS/M
Impact GHG-2: Conflicts with Applicable Plans and Policies. The Proposed Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions or GHGs.	PS	Implement ***Mitigation Measure TRA-2***, above.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.7 Noise			
Impact NOI-1a: Construction Noise. Construction of the Proposed Project would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.	PS	***Modified ConnectMenlo Mitigation Measure NOISE-1c.*** Project applicants for all development projects in the city shall minimize the exposure of nearby properties to excessive noise levels from construction-related activity through CEQA review, conditions of approval and/or enforcement of the City's Noise Ordinance. Prior to issuance of demolition, grading, and/or building permits for development projects, a note shall be provided on development plans indicating that during on-going grading, demolition, and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise: • All internal combustion engines on construction equipment and trucks are fitted with properly maintained mufflers, air intake silencers, and/or engine shrouds that are no less effective than as originally equipped by the manufacturer. • Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. • Stockpiling is located as far as feasible from nearby noise-sensitive receptors. • Limit unnecessary engine idling to the extent feasible. • Limit the use of public address systems. • Construction traffic shall be limited to the haul routes established by the City of Menlo Park. ***Mitigation Measure NOI-1.1: Construction Noise Control Plan to Reduce Construction Noise.*** The Project applicant and/or the contractor(s) shall obtain a permit to complete work outside the	SU/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		exempt/standard construction hours outlined in the City of Menlo Park Municipal Code, which may be incorporated into the conditional development permit for the Proposed Project. In addition, the applicant and/or contractor(s) shall develop a construction noise control plan to reduce noise levels and comply with Municipal Code daytime (during non-exempt hours) and nighttime noise standards to the extent feasible and practical, subject to review and determination by the Community Development Department. The plan shall also include measures to reduce noise levels such that a 10-dB increase over the ambient noise level does not occur at nearby noise-sensitive land uses, such as schools and residences to the extent feasible and practical (as determined by the City). Finally, the plan shall include measures to reduce pile driving noise such that noise from this equipment does not exceed 85 dBA L_{eq} at a distance of 50 feet, as feasible. The plan shall demonstrate that, to the extent feasible and practical, noise from construction activities that occur daily between 7:00 and 8:00 a.m. or between 6:00 p.m. and 10:00 p.m. will comply with the applicable City of Menlo Park noise limit of 60 dBA at the nearest existing residential or noise-sensitive land use, and construction activities that occur between 10:00 p.m. and 7:00 a.m. will comply with the applicable City noise limit of 50 dBA at the residential or noise-sensitive land use. The plan shall also demonstrate that, to the extent feasible and practical (as determined by the City), noise from construction activities during all hours will not result in a 10 dB increase over the ambient noise level at the nearest noise-sensitive land uses, and that pile driving noise would not exceed 85 dBA L_{eq} at a distance	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		of 50 feet. This Noise Control Plan shall be approved by the City prior to the issuance of building permits to confirm the precise noise minimization strategies that will be implemented and to document that strategies will be employed to the extent feasible and practical. Measures to help reduce noise from construction activity to these levels shall be incorporated into this plan and may include, but are not limited to, the following: • To the extent feasible and practical, plan for the noisiest construction activities to occur during daytime hours when the quantitative standards are less stringent, existing ambient noise levels are generally louder, and when people are less sensitive to noise. • Require all construction equipment be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) that are in good condition (at least as effective as those originally provided by the manufacturer) and appropriate for the equipment. • Maintain all construction equipment to minimize noise emissions. • Locate construction equipment as far as feasible from adjacent or nearby noise-sensitive receptors. • Require all stationary equipment be located to maintain the greatest possible distance to the nearby existing buildings, where feasible and practical. • Require stationary noise sources associated with construction (e.g., generators and compressors) in proximity to noise-sensitive land uses to be muffled and/or enclosed within temporary enclosures and shielded by barriers, which can reduce construction noise by as much as 5 dB.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• Install noise-reducing sound walls or fencing (e.g. temporary fencing with sound blankets) around noise-generating equipment, to the extent feasible and practical, where no perimeter wall is provided pursuant to Mitigation Measure NOI-1.2. • Prohibit idling of inactive construction equipment for prolonged periods during nighttime/non-standard hours (i.e., more than 2 minutes). • Provide advance notification in the form of mailings/deliveries of notices to surrounding land uses regarding the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period. • Provide the name and telephone number of an on-site construction liaison through on-site signage and on the notices mailed/delivered to surrounding land uses. If construction noise is found to be intrusive to the community (i.e., if complaints are received), the construction liaison shall take reasonable efforts to investigate the source of the noise and require that reasonable measures be implemented to correct the problem. • Use electric motors rather than gasoline- or diesel-powered engines to avoid noise associated with compressed air exhaust from pneumatically powered tools during nighttime hours, to the extent feasible and practical (as determined by the City). Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust could be used; this muffler can lower noise levels from the exhaust by about 10 dB. External jackets on the tools themselves could be used, which could achieve a reduction of 5 dB.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		Mitigation Measure NOI-1.2: Construction of Temporary Noise Barrier along Project Perimeter. The Project contractor(s) shall install an 8-foot-high temporary noise barrier along the complete length of the western and southern perimeter (e.g., areas near residential and school land uses), and along the southernmost 500 feet of the eastern perimeter of the main Project Site. As project buildout occurs, removal and/or adjustment in the location of the perimeter noise barrier may occur because either the construction of project buildings (completion of core and shell) in alignment with said perimeter barrier and therefore the perimeter barrier is not needed or preparation of an acoustical analysis indicates the balance of the construction activities will not result in construction noise that exceeds the allowable limits. Regarding the Hamilton Avenue Parcel South, a similar noise barrier shall be installed around the complete length of the southern, western and northern perimeters as well as the southernmost 100 feet of the eastern perimeter of the Hamilton Avenue Parcel South, unless the Project Sponsor can demonstrate, through an acoustical analysis, that construction noise at this site would not exceed the allowable limits. The decision regarding the necessity of this barrier and location(s) shall be subject to review and approval of the City based on evidence and analyses providing by the applicant team. Regarding the Hamilton Avenue Parcel North, a similar noise barrier shall also be constructed along the complete length of the southern and western perimeters, along with the eastern most 100 feet of the northern perimeter of the Hamilton Avenue Parcel North, unless the Project Sponsor can demonstrate, through an acoustical analysis, that	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		construction noise at this site would not exceed the allowable limits. The decision regarding the necessity of this barrier and location(s) shall be subject to review and approval of the City based on evidence and analyses providing by the applicant team. The barriers shall be constructed of material that has an acoustical rating of at least 26 STC (Sound Transmission Class). This can include a temporary barrier constructed with plywood supported on a wood frame, sound curtains supported on a frame, or other comparable material.	
Impact NOI-1b: Operational Noise. Operation of the Proposed Project would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.	PS	***ConnectMenlo Mitigation Measure NOISE-1b.*** Stationary noise sources and landscaping and maintenance activities citywide shall comply with Chapter 8.06, Noise, of the Menlo Park Municipal Code. ***Mitigation Measure NOI-1.3: Mechanical Equipment Noise Reduction Plan.*** To reduce potential noise impacts resulting from Project mechanical equipment, including heating, cooling, and ventilation equipment, the Project applicant shall conduct a noise analysis to estimate noise levels of Project-specific mechanical equipment based on the final selected equipment models and design features. In addition to the analysis, a Mechanical Equipment Noise Reduction Plan shall be created to ensure noise levels of equipment, once installed, are below the applicable criteria described below. The Noise Reduction Plan shall include any necessary noise reduction measures required to reduce Project-specific mechanical equipment noise to a less-than-significant levels.. The plan shall also demonstrate that with the inclusion of selected measures, noise from equipment would be below the significance thresholds. Feasible noise reduction measures to reduce noise below the significance thresholdsinclude, but are not limited to,	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		selecting quieter equipment, utilizing silencers and acoustical equipment at vent openings, siting equipment farther from the roofline, and/or enclosing all equipment in a mechanical equipment room designed to reduce noise. This analysis shall be conducted and the results and final Noise Reduction Plan shall be provided to the City prior to the issuance of building permits for each building. The noise analysis and Noise Reduction Plan shall be prepared by persons qualified in acoustical analysis and/or engineering. The Noise Reduction Plan shall demonstrate with reasonable certainty that noise from mechanical equipment selected for the Project, including the attenuation features incorporated into the Project design, will not exceed the City of Menlo Park's property plane threshold of 60 dBA during daytime hours or 50 dBA during nighttime hours at nearby noise-sensitive land uses, as well as the 50 dBA at 50 feet threshold that applies to rooftop equipment in the City. The Project applicant shall incorporate all feasible methods to reduce noise identified above and other feasible recommendations from the acoustical analysis and Noise Reduction Plan into the building design and operations as necessary to ensure that noise sources meet applicable requirements of the respective noise ordinances at receiving properties. ***Mitigation Measure NOI-1.4: Emergency Generator Noise Reduction Plan (All Parcels).*** Prior to approval of a building permit for each building, the Project applicant shall conduct a noise analysis to estimate noise levels from the testing of Project-specific emergency generators, based on the actual generator makes and models proposed and the actual selected attenuation features. Based on the results of	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		the analysis, a Noise Reduction Plan shall be created to ensure noise levels of generator testing are below the applicable Code requirements. The results, methods, and final Noise Reduction Plan shall be provided to the City prior to the issuance of building permits. The analysis shall account for proposed noise attenuation features, such as specific acoustical enclosures and mufflers or silences, and the final Noise Reduction Plan shall demonstrate with reasonable certainty that proposed generator(s) will not exceed the City of Menlo Park noise thresholds of 60 dBA at the nearest noise-sensitive use during daytime hours, and/or 85 dBA at 50 feet for powered equipment, whichever is lower. Acoustical treatments may include, but are not limited to: • Enclosing generator(s); • Installing relatively quiet model generator(s); • Orienting or shielding generator(s) to protect noise-sensitive receptors to the greatest extent feasible; • Installing exhaust mufflers or silencers; • Increasing the distance between generator(s) and noise-sensitive receptors; and/or • Placing barriers around generator(s) to facilitate the attenuation of noise. In addition, all Project generator(s) shall be tested only between the hours of 7:00 a.m. and 10:00 p.m. Because no nighttime testing of generators will be allowed, compliance with the 50-dB nighttime noise threshold in the City need not be demonstrated. The Project applicant shall incorporate sufficient recommendations from the acoustical analysis into the building design and operations to ensure that noise sources meet applicable requirements of the noise ordinance.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact NOI-2: Generation of excessive vibration or groundborne noise levels. The Proposed Project would generate excessive groundborne vibration or noise levels.	PS	***ConnectMenlo Mitigation Measure NOISE-2a.***[5] To prevent architectural damage citywide as a result of construction-generated vibration: • Prior to the issuance of a building permit for any development project requiring pile driving or blasting, the project applicant/developer shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. The maximum levels shall not exceed 0.2 in/sec, which is the level that can cause architectural damage for typical residential construction. If maximum levels would exceed the thresholds, alternative methods, such static rollers, non-explosive blasting, and pile drilling, as opposed to pile driving, shall be used to the extent feasible and practical, subject to review and determination by the Community Development Department. To prevent vibration-induced annoyance as a result of construction-generated vibration: • Individual projects that involve vibration-intensive construction activities, such as blasting or the use of pile drivers, jack hammers, or vibratory rollers, within 200 feet of sensitive receptors shall be evaluated for potential vibration impacts. A vibration study shall be conducted for individual projects where vibration-intensive impacts may occur. The study shall be prepared by an acoustical or vibration engineer holding a degree in engineering, physics, or an allied discipline who is able to demonstrate a minimum of 2 years of	SU/M

[5] This noise and vibration study for the Proposed Project has been prepared in accordance with ConnectMenlo Mitigation Measure NOISE-2a.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		experience in preparing technical assessments regarding acoustics and/or ground-borne vibration. The study is subject to review and approval of the Community Development Department. Vibration impacts on nearby receptors shall not exceed the vibration annoyance levels (in RMS inches per second), as follows: • Workshop = 0.126 • Office = 0.063 • Residence, daytime (7:00 a.m.–10:00 p.m.) = 0.032 • Residence, nighttime (10:00 p.m. to 7:00 a.m.) = 0.016 If construction-related vibration is determined to be perceptible at vibration-sensitive uses, additional requirements, such as less vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., non-explosive blasting, pile drilling, as opposed to pile driving, preclusion for vibratory roller use, use of small or medium-sized bulldozers) to the extent feasible and practical. Vibration reduction measures shall be incorporated into the site development plan as a component of the Project and applicable building plans, subject to the review and approval of the Community Development Department. ***Mitigation Measure NOI-2.1: Vibration Control Measures for Annoyance from Daytime Pile Driving Activity.*** During daytime hours, pile driving activity shall take place no closer than 335 feet from residential land uses, 210 feet from office or school land uses, and 130 feet from workshops or retail land uses, to the extent feasible and practical. When pile driving work must take place closer than these distances from the aforementioned land uses, reduction measures shall be incorporated to the extent feasible and practical, such as the use of alternative pile	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		installation methods that do not require impact or vibratory pile driving. Examples of alternative pile installation methods include auger cast pressure grouted displacement (APGD) piles, stone columns, cast-in-drilled-hole (CIDH) piles, or press-in piles. These measures will be subject to review and approval of the Community Development Department. In addition, the construction contractor shall appoint a Project vibration coordinator who will serve as the point of contact for vibration-related complaints during project construction. Contact information for the Project vibration coordinator will be posted at the Project Site and on a publicly available Project website. Should complaints be received, the Project vibration coordinator shall work with the construction team to adjust activities (e.g., drilling instead of driving piles in closer proximity to certain land uses) to the extent feasible and practical to reduce vibration or to reschedule activities for a less sensitive time. The Project vibration coordinator shall notify the Community Development Department of all vibration-related complaints and actions taken to address the complaints. ***Project Mitigation Measure NOI-2.2: Vibration Control Measures for Annoyance from Daytime Construction Activities Excluding Pile Driving.*** During daytime hours, construction activity involving a vibratory roller shall take place no closer than 90 feet from residential land uses, 60 feet from office or school land uses, and 35 feet from workshops or retail land uses, to the extent feasible and practical, subject to review and approval by the Community Development Department. In addition, equipment that generates vibration levels similar to a large bulldozer shall take place no closer than 50 feet from	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		residential land uses, 35 feet from office or school land uses, and 20 feet from workshops or retail land uses, to the extent feasible and practical, subject to review and approval by the Community Development Department. Maintaining these distances between equipment and the nearest residential, school/office, or workshop land uses would ensure vibration levels would be below 0.032 PPV in/sec at the nearest residences, 0.063 PPV in/sec at the nearest school or office, and 0.126 PPV in/sec at the nearest workshop, per the requirements in ConnectMenlo Mitigation measure NOISE-2a. When construction would require the use of these equipment types at distances closer than these to nearby sensitive uses, reduction measures shall be incorporated to the extent feasible and practical, such as the use of smaller or less vibration-intensive equipment. For example, the vibration level from a large bulldozer at 10 feet would be approximately 0.352 PPV in/sec, whereas the vibration level from a large bulldozer at the same distance would be approximately 0.012 PPV in/sec. The vibration level from a small bulldozer at 10 feet would be below all daytime vibration thresholds from ConnectMenlo Mitigation Measure Noise-2a. The feasibility of reduction measures shall be subject to review and determination by the Community Development Department. In addition, the construction contractor shall appoint a Project vibration coordinator who will serve as the point of contact for vibration-related complaints during Project construction. Contact information for the Project vibration coordinator will be posted at the Project Site and on a publicly available Project website. Should complaints be received, the Project vibration coordinator shall work	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		with the construction team to adjust activities (e.g., drilling instead of driving piles in closer proximity to certain land uses) to the extent feasible and practical to reduce vibration or to reschedule activities for a less sensitive time. The Project vibration coordinator shall notify the Community Development Department of all vibration-related complaints and actions taken to address the complaints. ***Project Mitigation Measure NOI-2.3: Vibration Control Measures for Annoyance from Nighttime Pile Installation Activity.*** During the nighttime hours of 10:00 p.m. to 7:00 a.m., pile driving activity shall take place no closer than 540 feet from residential land uses to the extent feasible and practical. When pile installation work must take place closer than this distance to residences, alternative pile installation methods that do not require impact or vibratory pile driving shall be employed to the extent feasible and practical. Examples of alternative pile installation methods include auger cast pressure grouted displacement (APGD) piles, stone columns, cast-in-drilled-hole (CIDH) piles, or press-in piles. The feasibility of these alternative measures shall be subject to review and determination of the Community Development Department. In addition, the construction contractor shall appoint a Project vibration coordinator who will serve as the point of contact for vibration-related complaints during Project construction. Contact information for the Project vibration coordinator will be posted at the Project Site and on a publicly available Project website. Should complaints be received, the Project vibration coordinator shall work with the construction team to adjust activities (e.g., drilling instead of driving piles in closer proximity to certain land uses) to the extent feasible and practical to	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		reduce vibration or to reschedule activities for a less sensitive time. The Project vibration coordinator shall notify the Community Development Department of all vibration-related complaints and actions taken to address the complaints.	
Impact NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose of people residing or working in the project area to excessive noise levels.	NI	None required	NI
Impact C-NOI-1: Cumulative Noise Impacts. Cumulative development would result in a significant and unavoidable cumulative noise impact; thus, the Proposed Project would be a cumulatively considerable contributor to a significant cumulative noise impact.	PS	Implement ***Mitigation Measure NOI-1.1, NOI-1.2, and NOI-1.3, and ConnectMenlo Mitigation Measure NOI-1c***, above.	SU/M
3.8 Cultural and Tribal Cultural Resources			
Impact CR-1: Historical Resources. The Proposed Project would cause a substantial adverse change in the significance of a historical resource, pursuant to Section 15064.5.	PS	***CR 1.1. Remove, Store, and Reinstall Dumbarton Cutoff Line Tracks.*** The Project Sponsor shall remove the Dumbarton Cutoff Line tracks, store them during construction of the Proposed Project, and reinstall them in their historic location without irreparable damage to their character-defining historic fabric. The Project Sponsor will prepare a preservation plan specifying the practices to be employed to preserve the historical integrity of the tracks during their removal, storage, and reinstallation. These methods may include the following: using straps to lift rails rather than chains or other "metal on metal" methods, marking or numbering the track components so they can be replaced in their original sequence, and ensuring secure	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		storage onsite or in a lay-down area. Following tunnel construction, the rail segments will be returned to their preconstruction location in Willow Road on new ballast and ties or other appropriate material for the rail crossing. The preservation plan shall be reviewed and approved by the City and Samtrans prior to the issuance of demolition permits related to construction activities within Willow Road, and the Project Sponsor will incorporate the recommended protective measures into construction specifications.	
Impact CR-2: Archaeological Resources. The Proposed Project would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	PS	***Mitigation Measure CR 2.1. Avoidance, Monitoring, and Treatment*** **Avoidance and Minimization of Ground-Disturbing Activities** The Project Sponsor shall avoid or minimize ground-disturbing excavation in CA-SMA-160/H to the extent feasible in both the high-sensitivity area[6] (1.77 acres) and revised site boundary (7.03 acres), as detailed below. The City of Menlo Park will review and confirm implementation of mitigation measures with each construction phase. • The Project Sponsor shall note on any plans that require ground-disturbing excavation that there is potential for exposing buried cultural resources, including Native American burials. Any archaeological site information supplied to the contractor shall be considered and marked confidential. • The Project Sponsor shall install a culturally sterile engineered cap to cover the archaeological deposit within the Hiller Mound Core and preserve the resource in place. The 4 to 7 feet of engineered fill will	LTS/M

[6] Defined here as the Hiller Mound Core.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		function as a protective cover for cultural deposits within the Hiller Mound Core and raise the grade to accommodate future sea-level-rise above the 100-year flood elevation, consistent with surrounding areas where buildings will be constructed. • Onsite soil material is suitable as fill material provided it is processed to remove concentrations of organic material, debris, and particles greater than 6 inches in maximum dimension; oversized particles shall either be removed from the fill or broken down to meet the requirement. Imported fill material shall meet the above requirements and have a plasticity index of less than 20. Material used for engineered fill shall meet appropriate Department of Toxic Substances Control (DTSC) Environmental Screening Levels (ESLs), as determined by the environmental engineer. **Fill Placement within the Hiller Mound Core Boundary** Construction activities shall be conducted in a manner that protects against penetration of the core area and reduces the potential for disturbance from concentrated surface loads. The following measures shall be implemented within the Hiller Mound Core during fill placement and any subsequent construction to reduce potential impacts on subsurface archaeological materials. • An elevation contour plan shall be created to guide the surface preparation necessary to place the fill cap within the Hiller Mound Core boundaries. The plan shall show the top of the primary midden elevation, based on archaeological GeoProbe data, to establish a 6-inch-thick buffer zone above the primary midden layer, below which soil disturbance or penetration shall not be permitted.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• Tree root balls from trees removed within the Hiller Mound Core boundary that have roots extending within an area 24 inches from the primary midden layer shall be left in place. Stumps may be ground flat with the existing grade. • Clearing of surface vegetation within the Hiller Mound Core boundary shall be performed through hand grubbing. • Ground surface preparation prior to fill placement within the Hiller Mound Core boundary shall use a walk-behind sheepsfoot roller to densify the 6-inch-thick buffer-zone material. The use of relatively light equipment (typical equipment weight of 3,000–5,000 pounds), such as a walk-behind roller, reduces potential for densification below the buffer zone. • A layer of geogrid reinforcement shall be placed over the prepared ground surface within the Hiller Mound Core boundary. Geogrid shall consist of a triaxial grid (e.g., TX140 or approved equivalent). A second layer of geogrid shall be placed to reinforce the engineered fill approximately 24 inches above the base geogrid layer. Geogrid shall be installed in accordance with the manufacturer's specifications. • Once the 6-inch-thick buffer zone has been prepared and reinforcement grid placed within the Hiller Mound Core boundary, engineered fill may be placed in 8-inch lifts and compacted using a single-drum ride-on sheepsfoot roller. The roller shall not be parked or left stationary on the Hiller Mound Core overnight. If yielding subgrade is encountered in the buffer zone, the geotechnical consultant may recommend placement of additional layers of reinforcement within the	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		engineered fill. This determination will be based on field observations during preparation of the ground surface. • In order to protect against construction damage to the primary midden, construction and construction vehicle traffic (with the exception of equipment necessary to place and compact engineered fill) shall not be permitted to rest on or pass over the Hiller Mound Core boundary until after the engineered fill placement is complete to provide a buffer between mound material and the concentrated vehicle loads. Once the fill placement is complete, the primary midden will be protected, but construction equipment and construction vehicle traffic within the Hiller Mound Core nonetheless shall continue to be limited to the minimum necessary to complete construction of the Proposed Project. Vehicles shall not be stationary or parked on the Hiller Mound Core overnight. The contractor shall ensure that vehicles and equipment do not leak fuel or other liquids when operating on the Hiller Mound Core. Leaking vehicles and equipment shall be promptly removed from the Hiller Mound Core area and repaired before use is resumed on the Hiller Mound Core. **Temporary Construction Loading – Installation of Temporary Scaffolding within the Hiller Mound Core Boundary** The following measures shall be implemented within the Hiller Mound Core boundary during scaffold erection to reduce potential impacts on subsurface archaeological materials.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• Scaffolds within the Hiller Mound Core boundary shall be installed no earlier than 3 months after the engineered fill placement related to sea-level rise. • Scaffolds within the Hiller Mound Core boundary shall use 16-foot square bases on the engineered fill cap. Minor leveling of the fill cap shall be allowed at each scaffold installation, but excavation or other penetrations into the fill surface shall not be permitted. If equipment or the temporary auxiliary structures needed to install the atrium frame and associated glass would disturb more than 12 inches below the surface of the fill , the archeological consultant shall determine whether protective measures shall be required, including the installation of a wood or plastic mat around each scaffold. • Scaffolds within the Hiller Mound Core boundary shall be removed promptly after installation and inspection of the framework and glass within the atrium to remove pressure from the engineered fill over the Hiller Mound Core. ***Mitigation Measure CR 2.2. Train Workers to Respond to the Discovery of Cultural Resources and Prepare an Archaeological Monitoring Plan and Archeological Treatment Plan.*** If avoidance or preservation in place are not possible, the following measures will be followed: • Prior to the start of fill placement and other ground-disturbing construction, the archaeological consultant archaeological resources sensitivity training and Native American tribal representatives shall conduct tribal cultural sensitivity training for workers and construction superintendents. Training shall be required for all construction personnel	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		participating in ground-disturbing construction to alert them to the archaeological sensitivity of the area and provide protocols to follow in the event of a discovery of archaeological materials. The principal archaeological consultant and project archaeologist shall develop and distribute for job site posting a document ("ALERT SHEET") summarizing potential finds that could be exposed and the protocols to be followed as well as points of contact to alert in the event of a discovery. The ALERT SHEET and protocols shall be presented as part of the training. The contractor shall be responsible for ensuring that all workers requiring training are in attendance. Training shall be scheduled at the discretion of the Project Sponsor in consultation with the City. Worker training shall be required for all contractors and sub-contractors and documented for each permit and/or phase of permit that requires ground disturbing activities on-site. For work in the Hiller Mound Core, worker training shall also be included for workers who will work on the surface or who will drive across the Hiller Mound Core. • The archaeological consultant shall review, identify, and evaluate cultural resources that may be inadvertently exposed during construction to determine if a discovery is a historical resource and/or unique archaeological resource under CEQA. Significant resources shall be subject to treatment/mitigation that prevents an adverse effect on the resource, in accordance with PRC Section 15064.5. Mitigation could include avoidance, preservation in place, or the scientific removal, analysis, reporting, and curation of any recovered	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		cultural materials. If the discovery constitutes a tribal cultural resource, consultation shall be undertaken with the person the NAHC identifies as the MLD to determine appropriate treatment. • The Project Sponsor and archaeological consultant shall develop an Archaeological Monitoring Plan (AMP)7 to guide archaeological and tribal monitoring of ground-disturbing construction and protect any cultural materials and tribal cultural resources exposed during construction from further damage so they can be identified and evaluated for their potential eligibility for listing in the California Register and properly treated. The AMP's monitoring plan for tribal cultural resources shall be developed in consultation with Native American tribal representatives. The AMP will be submitted to the City of Menlo Park for review and approval prior to issuance of a building permit and/or implementation. **The AMP shall include, at a minimum:** • Background information and context data on the Project and cultural resource; • Monitoring requirements, including worker awareness training; a discussion of specific locations and the intensity of the monitoring effort for areas with potential for the discovery of unexpected cultural materials; and anticipated personnel, including retention of local Native American tribal representative(s) from lists maintained by the NAHC;	

7 *Archaeological monitoring r*efers to the controlled observation and regulation of construction operations on or in the vicinity of a known or potentially significant cultural resource in order to prevent or minimize impact to the resource.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• Protocols for unexpected discoveries during construction, consistent with Modified ConnectMenlo EIR MM CULT-2a; • Pre-historic research design, identifying pertinent archaeological research issues and questions; anticipated property types; and data requirements for addressing each research issue to be used for significance evaluation; • Detailed procedures regarding unexpected significant discoveries made during construction, including a discussion of field and artifact analysis methods to be used. • Treatment of human remains (consistent with state burial law and recommendations of the NAHC MLD and Modified ConnectMenlo EIR MM CULT-4); • Laboratory methods, including artifact cataloging and special analyses. • The plan shall outline provisions for reporting (e.g., Monitoring Closure Report), artifact curation, and potential public outreach in the event of significant finds. • A formal Archaeological Treatment Plan (ATP), which may include data recovery, shall be prepared prior to any grading or ground-disturbing activity. • The ATP, similar to the AMP, shall detail the appropriate procedures, analytical methods, and reports to be completed if data recovery of significant archaeological Native American cultural materials, including Native American burials, is undertaken. Curation at an appropriate repository of recovered archaeological and Native American cultural materials shall be arranged once the extent of the collected	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		materials is known. The ATP will be developed and implemented by the project archaeologist; while the precise treatment for identified resources determined in consultation with the City and, for tribal cultural resources, Native American tribal representatives. • The ATP may be included within the AMP for a combined Archaeological Monitoring and Treatment Plan at the discretion of the archaeological consultant. ***ConnectMenlo Mitigation Measure CULT-2a (Modified) Stop Work if Archaeological Material or Features Are Encountered during Ground-Disturbing Activities.*** ○ If a potentially significant subsurface cultural resource is encountered during ground-disturbing activities on any parcel in the city, all construction activities within a 100-foot radius of the find shall cease until a qualified archeologist determines whether the resource requires further study. All developers in the Study Area shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate DPR forms and evaluated for significance in terms of CEQA criteria by a qualified archeologist in accordance with Project Mitigation Measure CR 2.2.	
Impact CR-3. Human Remains. The Proposed Project could disturb human remains, including those interred outside of dedicated cemeteries.	PS	Implement ***Mitigation Measure CR-2.1 and CR-2.2***, above. ***ConnectMenlo Mitigation Measure CULT-4: (Modified) Comply with State Regulations Regarding the Discovery of Human Remains at the Project Site.*** Procedures of conduct following the discovery of human remains citywide have been mandated by Health and Safety Code Section 7050.5, PRC Section 5097.98, and the California Code of	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The San Mateo County Coroner shall be notified immediately. The coroner shall then determine whether the remains are Native American. If the coroner determines the remains are Native American, the coroner shall notify the NAHC within 24 hours, which will, in turn, notify the person the NAHC identifies as the MLD in connection with any human remains. Further actions shall be determined, in part, by the desires of the MLD. The Project Proponent, the Project Archaeologist, and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects, including those associated with known an unknown Native American burial locations (CEQA Guidelines Section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The MLD will have 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, or the owner does not accept the recommendation of the MLD in accordance with Pub. Res. Code 5097.98(e), the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact CR-4: Tribal Cultural Resources. The Proposed Project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is: a) Listed or eligible for listing in the California Register or local register of historical resources, as defined in PRC Section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native America tribe.	PS	Implement ***Mitigation Measure CR-2.1 and CR-2.2, and ConnectMenlo Mitigation Measure CULT-4 (modified)***, above.	LTS/M
Impact C-CR-1: Cumulative Impacts on Cultural and Tribal Cultural Resources. Cumulative development would result in a less-than-significant cumulative impact on cultural and tribal cultural resources, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on cultural and tribal cultural resources.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.9 Biological Resources			
Impact BIO-1: Direct Impacts on Special-Status Species. The Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations.	LTS	None required	LTS
Impact BIO-2: Indirect Impacts on Special-Status Species. The Proposed Project would result in substantial predation among special-status bird and mammal species that breed in the nearby brackish marshes and may forage, in the case of special-status birds, in the Project area.	PS	***BIO-2.1: Feral Cat Management Program.*** The Project Sponsor shall implement a feral cat management program, similar to the program developed in conjunction with the Peninsula Humane Society and the Society for the Prevention of Cruelty to Animals for the East Campus in 2013. For one week every 3 months (i.e., each quarter), three live trap cages, designed to trap cats, shall be placed around the perimeter of the main Project Site in locations where feral cats are likely to prey upon native wildlife species. Each trap cage shall be monitored and maintained on a daily basis during the week when traps have been set to determine whether a feral cat has been caught and whether the trap has inadvertently captured a non-target species. If a feral cat is caught, a representative from a pest control operator (or a similar service organization/company) shall be contacted and dispatched to transport the trapped cat to the Humane Society of San Mateo County, a local cat shelter, a local cat rescue facility, or other local facility that accepts feral cats. If an animal other than a feral cat is caught in one of the traps, it shall be released immediately at the trap location.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact BIO-3: Impacts on Riparian Habitat and Other Sensitive Natural Communities. Project demolition and construction would affect riparian and other sensitive natural communities.	PS	***BIO-3.1: Avoid and Minimize Impacts on Riparian Habitat and Other Sensitive Natural Communities.*** To the extent feasible, construction activities should avoid or minimize the removal of wetland vegetation or the placement of fill in the wetlands immediately north and northeast of the Project Site. If all direct impacts on wetlands (i.e., vegetation removal and fill) are avoided, Mitigation Measures BIO-3.2 and BIO-3.3 would not need to be implemented. However, if any wetland vegetation needs to be removed from the wetlands, or any fill needs to be placed in the wetlands, Mitigation Measure BIO-3.2 (and Mitigation Measure BIO-3.3 if permanent impacts would occur) shall be implemented. ***BIO-3.2: In-Situ Restoration of Temporary Impacts.*** If impacts on the wetlands immediately north of the Project Site are temporary, resulting in vegetation removal or temporary fill within the wetland but no permanent fill, then the wetland area shall be restored by the Project Sponsor following construction. The herbaceous seasonal wetlands are likely to become recolonized easily without the need for seeding and planting as long as their existing hydrology and topography are restored following temporary impacts. There is some potential for the arroyo willow clumps in the isolated forested wetland to regrow from cut stumps. In such a case, the in-situ restoration shall involve simply protecting the area with exclusion fencing following construction to allow for regrowth of vegetation. For temporary impacts involving removed willow root masses where in-situ restoration is still an option, a more detailed restoration plan shall be developed. The mitigation shall, at a minimum, achieve no net loss of wetland acreage (i.e., jurisdictional wetlands lost to fill shall be replaced through the creation or restoration of wetland habitat of	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		the same type as the affected habitat [either forested or herbaceous seasonal] at a minimum ratio of 1:1 on an acreage basis or as otherwise required by any state or federal permitting agencies) or ecological functions and values through the restoration and enhancement of the affected wetlands to a level equal to or greater than the baseline condition of the existing wetlands. An in-situ restoration approach could involve salvaging wetland plant material prior to construction (e.g., willow cuttings or willow clumps, in the case of the isolated forested wetland) and then replanting the material if the seasonal timing of construction is appropriate. USACE and/or RWQCB approvals may be required to authorize temporary impacts on these features. ***BIO-3.3: Provide Compensatory Mitigation*.** If any permanent fill of the isolated forested wetland or the herbaceous seasonal wetlands occurs, the Project Sponsor shall provide new wetland habitat of the same type (either forested or herbaceous seasonal) to offset this impact, either through the creation, enhancement, or restoration of wetlands in an appropriate location or through the purchase of mitigation credits from a USACE- or RWQCB-approved wetland mitigation bank. The purchase of such credits shall serve as full mitigation for impacts on these wetland features.[8] If Project-specific creation, enhancement, or restoration of wetland habitat is implemented, habitat shall be restored or created at a minimum ratio of 2:1 (compensation: impact) on an acreage basis or as otherwise required by any state or	

[8] Refer to UC Army Corp of Engineers 33 C.F.R. Pt. 325 and California State Water Resources Control Board's State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (April 2, 2019) pages 28 to 29.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		federal permitting agencies. This ratio is not higher because of the relatively low quality of the wetlands on the Project Site relative to the more extensive, less fragmented wetlands elsewhere in the region, and it is not lower because of the temporal loss of wetland functions and values that would result from the lag between impacts on the wetlands and maturation of the mitigation habitat. USACE and/or RWQCB approvals may be required to authorize permanent impacts on this feature. To the extent that compensatory mitigation is not provided by purchasing mitigation credits from a USACE- or RWQCB-approved wetland mitigation bank, then, if feasible, compensation shall be provided by creating, enhancing, or restoring wetland habitat so as to achieve the 2:1 ratio somewhere in San Mateo County or as otherwise required by any state or federal permitting agencies. A qualified biologist shall develop a wetland mitigation and monitoring plan that describes the mitigation, including the following components (or as otherwise modified by regulatory agency permitting conditions): • Summary of habitat impacts and proposed mitigation ratios; • Goal of the restoration to achieve no net loss of habitat functions and values; • Location of mitigation site(s) and description of existing site conditions; • Mitigation design; o Existing and proposed site hydrology; o Grading plan, if appropriate, including bank stabilization or other site stabilization features; o Soil amendments and other site preparation elements, as appropriate;	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		○ Planting plan; ○ Irrigation and maintenance plan; ○ Remedial measures and adaptive management; and • Monitoring plan, including final and performance criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. Success criteria shall include quantifiable measurements of wetland vegetation type (e.g., dominance by natives), the appropriate extent for the restoration location, and the provision of ecological functions and values equal to or exceeding those in the affected wetland habitat. At a minimum, success criteria shall include following: ○ At Year 5 post-mitigation, at least 75 percent of the mitigation site shall be dominated by native hydrophytic vegetation. The wetland mitigation and monitoring plan must be approved by the City and other applicable agencies prior to the wetland impacts and must be implemented within 1 year after the discharge of fill into wetland features. Alternately, offsite mitigation could be provided through the purchase of mitigation credits at an agency-approved mitigation bank, as noted above.	
Impact BIO-4: Impacts on State and/or Federally Protected Wetlands. Project demolition and construction could affect state and/or federally protected wetlands.	PS	Implement ***Mitigation Measures BIO-3.1, BIO-3.2, and BIO-3.3***, above.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact BIO-5: Impacts on Wildlife Movement and Native Wildlife Nursery Sites. The removal of buildings, trees, shrubs, or woody vegetation and the construction of new buildings and installation of lighting that could affect native migratory birds.	PS	***BIO-5.1: Avoidance and Pre-construction Surveys for Nesting Migratory Birds.*** The Project Sponsor shall implement the following measures to reduce impacts on nesting migratory birds: • To the extent feasible, construction activities shall be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31. • If it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted by a qualified ornithologist to ensure that no nests of migratory birds will be disturbed during Project implementation. Surveys shall be conducted no more than 7 days prior to the initiation of construction activities for each construction phase. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, California annual grasslands, buildings) in and immediately adjacent to the impact areas for migratory bird nests. • If an active nest is found within trees or other potential nesting habitats that would be disturbed by construction activities, a construction-free buffer zone (typically 300 feet for raptors and 100 feet for other species) will be established around the nest to ensure that species that are protected under the MBTA and California Fish and Game Code will not be disturbed during Project implementation. The ornithologist shall determine the extent of the buffer.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the Proposed Project may be removed prior to the start of the nesting season (i.e., prior to February 1). This would preclude the initiation of nests in this vegetation and prevent any potential delay for the Proposed Project because of the presence of active nests in these substrates. ***BIO-5.2: Atrium Bird-safe Design Requirements*.** The Project Sponsor shall implement the following measures to reduce impacts on migratory birds due to construction of the atrium: • The Project Sponsor shall treat 100 percent of the glazing on the dome-shaped portions of the atrium's façades (i.e., all areas of the north façade and all areas of the south façade above the Elevated Park) with a bird-safe glazing treatment to reduce the frequency of collisions. This glazing shall have a Threat Factor of 15 or less.[9] Because a Threat Factor is a nonlinear index, its value is not equivalent to the percent reduction in collisions that a glazing product provides. However, products with lower Threat Factors result in fewer bird collisions.	

[9] A material's Threat Factor, as assigned by the American Bird Conservancy, refers to the level of danger posed to birds, based on the birds' ability to perceive the material as an obstruction, as tested using a "tunnel" protocol (a standardized test that uses wild birds to determine the relative effectiveness of various products at deterring bird collisions). The higher the Threat Factor, the greater the risk that collisions will occur. An opaque material will have a Threat Factor of 0, and a completely transparent material will have a Threat Factor of 100. Threat Factors for many commercially available façade materials can be found at https://abcbirds.org/wp-content/ uploads/2021/01/Masterspreadsheet-1-25-2021.xlsx.

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• The Project Sponsor shall treat 100 percent of the glazing on the atrium's east and west façades with a bird-safe glazing treatment to reduce the frequency of collisions. This glazing shall have a Threat Factor of 15 or less. • Interior trees and woody shrubs shall be set back from the atrium's east, west, and non-sloped (i.e., vertical/perpendicular to the ground) portions of the south façades by at least 50 feet to reduce the potential for collisions with these facades due to the visibility of interior trees. This 50-foot distance is greater than the distance used in the project design for the north and sloped portions of the south facades (e.g., 20-25 feet for the north façade) due to the vertical nature of the east, west, and non-sloped portion of the south façades, as opposed to the articulated nature of the north and sloped portions of the south façades (which is expected to reduce the visibility of internal vegetation to some extent), as well as the direct line-of-sight views between interior and exterior vegetation through the east, west, and non-sloped portions of the south façades compared to the north façade (where internal vegetation is elevated above exterior vegetation). Interior trees and shrubs that are not visible through the east, west, and south façades may be planted closer than 50 feet to glass façades. • Because the glass production process can result in substantial variations in the effectiveness of bird-safe glazing, a qualified biologist will review physical samples of all glazing to be used on the atrium to confirm that the bird-safe frit will be visible to birds under various lighting conditions and expected to be effective.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• The Project Sponsor shall monitor bird collisions around the atrium for a minimum of 2 years following construction to identify any collision "hot spots" (i.e., areas where collisions occur repeatedly). A monitoring plan for the atrium shall be developed by a qualified biologist and shall include focused surveys for bird collisions from late April through May (spring migration), September through October (fall migration), and mid-November through mid-January (winter) to maximize the possibility of detecting bird collisions that might occur. Surveys of the atrium shall be conducted daily for 3 weeks during each of these periods (i.e., 21 consecutive days during each season, for a total of 63 surveys per year). In addition, for the 2-year monitoring period, surveys of the atrium shall be conducted the day following nighttime events during which temporary lighting exceed would typical levels (i.e., levels specified in the International Dark-Sky Association's defined lighting zone, LZ-2 [Moderate Ambient], from dusk until 10:00 p.m., or 30 percent below these levels from 10:00 p.m. to midnight). The applicant can assign responsibility for tracking events and notifying the biologist when a survey is needed to a designated individual who is involved in the planning and scheduling of atrium events. The timing of the 63 seasonal surveys (e.g., morning or afternoon) shall vary on the different days to the extent feasible; surveys conducted specifically to follow nighttime events shall be conducted in the early morning. • At a frequency of no less than every 6 months, a qualified biologist shall review the bird collision data for the atrium in consultation with the City to	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		determine whether any potential hot spots are present (i.e., if collisions have occurred repeatedly at the same location). A "*potential hot spot"* is defined as a cluster of three or more collisions that occur within one of the 3-week monitoring periods described above at a given location on the atrium. The "*location"* shall be identified by the qualified biologist as makes sense for the observed collision pattern, and may consist of a single pane of glass, an area of glass adjacent to a landscape tree or light fixture, the 8,990-square-foot vertical façade beneath the Elevated Park, the façade adjacent to the vegetation at the Elevated Park, the atrium's east façade, the atrium's west façade, or another defined area where the collision pattern is observed. "Location" shall be defined based on observations of (1) collision patterns and (2) the architectural, lighting, and/or landscape features that contributed to the collisions and not arbitrarily determined (e.g., by assigning random grids). If any such potential hot spots are found, the qualified biologist shall provide an opinion as to whether the potential hot spots will affect bird populations over the long term to the point that additional measures (e.g., light adjustments, planting of vegetation) will be needed to reduce the frequency of bird strikes at the hot spot location in order to reduce impacts to a less-than-significant level under CEQA (i.e., whether it constitutes an actual "hotspot"). This determination shall be based on the number of birds and the species of birds that collide with the atrium over the monitoring period. In addition, a "hotspot" is automatically defined if a cluster of five or more collisions are identified at a	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		given "location" on the atrium within one of the three-week monitoring periods described above. If a hotspot is identified, additional measures will be implemented at the potential hotspot location at the atrium; these may include one or more of the following options in the area of the hotspot depending on the cause of the collisions: o Adding a visible bird-safe frit pattern, netting, exterior screens, art, printed sheets, interior shades, grilles, shutters, exterior shades, or other features to untreated glazing (i.e., on the façade below the Elevated Park) to help birds recognize the façade as a solid structure. o Installing interior or exterior blinds on buildings within the atrium to prevent light from spilling outward though glazed façades at night. o Reducing lighting by dimming fixtures, redirecting fixtures, turning lights off, and/or adjusting the programmed timing for dimming/shutoff. o Replacing certain light fixtures with new fixtures to increase shielding or redirect lighting. o Adjusting or reducing lighting during events. o Adjusting the timing of events to reduce the frequency during certain times of year (e.g., spring and/or fall migration) when relatively high numbers of collisions occur. o Adjusting landscape vegetation by removing, trimming, or relocating trees or other plants (e.g., moving them farther from glass) or blocking birds' views of vegetation through glazing (e.g., using a screen or other opaque feature).	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• If modifications to the atrium are implemented to reduce collisions at a hot spot, 1 year of subsequent focused monitoring of the hot-spot location shall be performed to confirm that the modifications effectively reduced bird collisions to a less-than-significant level under CEQA. In the event that a hot-spot is detected at a time when there is less than one year remaining of the initial 2-year monitoring period, then this one year of subsequent monitoring of that hot-spot would extend beyond the 2-year monitoring period described above. ***BIO-5.3: Lighting Design Requirements.*** The Project Sponsor shall implement the following measures to reduce lighting impacts on migratory birds**:** • To the maximum extent feasible, up-lighting (i.e., lighting that projects upward above the fixture) shall be avoided in the Project design. All lighting shall be fully shielded to prevent illumination from shining upward above the fixture. If up-lighting cannot be avoided in the Project design, up-lights shall be shielded and/or directed such that no luminance projects above/beyond the objects at which they are directed (e.g., trees and buildings) and no light shines directly into the eyes of a bird flying above the object. If the objects themselves can be used to shield the lights from the sky beyond, no substantial adverse effects on migrating birds are anticipated. • All lighting shall be fully shielded to prevent it from shining outward and toward Bay habitats to the north. No light trespass shall be permitted more than 80 feet beyond the Project Site's northern property line (i.e., beyond the Dumbarton Rail Corridor).	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• Exterior lighting shall be minimized (i.e., outdoor lumens shall be reduced by at least 30 percent, consistent with recommendations from the International Dark-Sky Association [2011]) from 10:00 p.m. until sunrise, except as needed for safety and City code compliance. • Temporary lighting that exceeds minimal site lighting requirements may be used for nighttime social events. This lighting shall be switched off no later than midnight. No exterior up-lighting (i.e., lighting that projects upward above the fixture, including spotlights) shall be used during events. • Lights shall be shielded and directed so as not to spill outward from the elevator/stair towers and into adjacent areas. • Interior or exterior blinds shall be programmed to close on north-facing windows of buildings within the atrium from 10:00 p.m. to sunrise to prevent light from spilling outward. • Accent lighting within the atrium shall not be used to illuminate trees or vegetation. Alternatively, the applicant shall provide documentation to the satisfaction of a qualified biologist that the illumination of vegetation and/or structures within the atrium by accent lighting and/or up-lighting will not make these features more conspicuous to the human eye from any elevation outside the atrium compared to ambient conditions within the atrium. The biologist shall submit a report to the City following completion of the lighting design, documenting compliance with this requirement.	

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		• Exterior lighting shall be minimized (i.e., total outdoor lighting lumens shall be reduced by at least 30 percent or extinguished, consistent with recommendations from the International Dark Sky Association [2011]) from midnight until sunrise, except as needed for safety and compliance with Menlo Park Municipal Code.	
Impact BIO-6: Conflicts with Any Local Policies or Ordinances that Protect Biological Resources. The Project would result in conflicts with the Menlo Park Municipal Code.	PS	Implement ***Mitigation Measures BIO-2.1, BIO-3.1 through BIO-3.3, and BIO-5.2***, above.	LTS/M
Impact C-BIO-1: Cumulative Biological Resources Impacts. Cumulative development would not result in a significant cumulative impact on biological resources, and the Proposed Project would not be a cumulatively considerable contributor to such a cumulative impact.	PS	Implement ***ConnectMenlo Mitigation Measure BIO-***1, above.	LTS/M
3.10 Geology and Soils			
Impact GS-1: Strong Seismic Ground Shaking and Seismically Related Ground Failure. The Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving (1) strong seismic ground shaking and (2) seismically related ground failure, including liquefaction.	LTS	None required	N/A
Impact GS-2: Substantial Soil Erosion. The Proposed Project would not result in substantial soil erosion.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact GS-3: Unstable Soils or Geologic Units. The Proposed Project would not be located on a geologic unit or soil that is unstable or would become unstable as a result of the Proposed Project and potentially result in subsidence, liquefaction, or collapse.	LTS	None required	N/A
Impact GS-4: Expansive Soils. The Proposed Project would not be located on expansive soils, creating substantial direct or indirect risks to life or property.	LTS	None required	N/A
Impact GS-5: Paleontological Resources. The Proposed Project could destroy a unique paleontological resource or site.	PS	***ConnectMenlo Mitigation Measure CULT-3: Conduct Protocol and Procedures for Encountering Paleontological Resources.*** In the event that fossils or fossil-bearing deposits are discovered during ground-disturbing activities anywhere in the City, excavations within a 50-foot radius of the find shall be temporarily halted or diverted. Ground disturbance work shall cease until a City-approved, qualified paleontologist determines whether the resource requires further study. The paleontologist shall document the discovery as needed (in accordance with Society of Vertebrate Paleontology standards [Society of Vertebrate Paleontology 1995]), evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine the procedures that would be followed before construction activities would be allowed to resume at the location of the find. If avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The excavation plan shall be submitted to the City of Menlo Park for review and approval prior to implementation, and all construction activity shall adhere to the recommendations in the excavation plan.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		PALEO-1: Conduct Worker Awareness Training. Before the start of any excavation or grading activities, the construction contractor will retain a qualified paleontologist, as defined by the SVP, who is experienced in teaching non-specialists. The qualified paleontologist will train all construction personnel who are involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils that are likely to be seen during construction, and proper notification procedures should fossils be encountered. Procedures to be conveyed to workers include halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who will evaluate the significance. The qualified paleontologist will also make periodic visits during earthmoving in high sensitivity sites to verify that workers are following the established procedures.	
Impact C-GS-1: Cumulative Geology and Soil Impacts. Cumulative development would result in a less than significant cumulative impact to geology, soils, and seismicity, and thus the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact to geology, soils, and seismicity. Cumulative development would result in a less-than-significant cumulative impact with mitigation to paleontological resources and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact.	PS	Implement ***ConnectMenlo Mitigation Measure CULT-3***, above.	LTS, LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.11 Hydrology and Water Quality			
Impact HY-1: Water Quality. The Proposed Project could violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality.	PS	***HY-1.1: Implement Construction Dewatering Treatment (if necessary).*** If dewatering is needed to complete the Proposed Project, and if water from dewatering is discharged to a storm drain or surface water body, dewatering treatment may be necessary if groundwater exceeding water quality standards is encountered during excavation. Because there is potential for groundwater to be contaminated with VOCs or fuel products at the Project Site, the Project Sponsor would be required to comply with the San Francisco Bay Regional Water Board's VOC and Fuel General Permit (Order No. R2-2018-0050) if groundwater exceeding water quality standards is encountered. If dewatering requires discharges to the storm drain system or other water bodies, the water shall be pumped to a tank and tested using grab samples and sent to a certified laboratory for analysis. If it is found that the water does not meet water quality standards, it shall be treated as necessary prior to discharge so that all applicable water quality objectives (as noted in Table 3.11-2) are met or it shall be hauled offsite instead for treatment and disposed of at an appropriate waste treatment facility that is permitted to receive such water. The water treatment methods selected shall remove contaminants in the groundwater to meet discharge permit requirements while achieving local and state requirements, subject to approval by the San Francisco Bay Regional Water Board. Methods may include retaining dewatering effluent until particulate matter has settled before discharging it or using infiltration areas, filtration techniques, or other means. The contractor shall perform routine inspections of the construction area to	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		verify that water quality control measures are properly implemented and maintained, observe the water (i.e., check for discoloration or an oily sheen), and perform other sampling and reporting activities prior to discharge. The final selection of water quality control measures shall be submitted in a report to the San Francisco Bay Regional Water Board for approval prior to construction. If the results from the groundwater laboratory do not meet water quality standards and the identified water treatment measures cannot ensure that treatment meets all standards for receiving water quality, then the water shall be hauled offsite instead for treatment and disposal at an appropriate waste treatment facility that is permitted to receive such water.	
Impact HY-2: Groundwater Supply and Recharge. The Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management of the basin would be impeded.	LTS	None required	N/A
Impact HY-3: Drainage and Flooding. The Proposed Project would not substantially alter the existing drainage pattern of the Project Site in a manner that would result in substantial erosion or flooding, impede or redirect flood flows, contribute runoff that would exceed the capacity of the stormwater system, or provide substantial additional sources of polluted runoff.	LTS	None required	N/A
Impact HY-4: Pollutant Release due to Project Inundation. In a flood hazard, tsunami, or seiche zones, the Proposed Project would not result in the release of pollutants due to inundation.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact HY-5: Conflict or Obstruct a Water Resource Management Plan. The Proposed Project could conflict with obstruct implementation of a water quality control plan or sustainable groundwater management plan.	PS	Implement ***Mitigation Measure HY-1.1***, above.	LTS/M
Impact C-HY-1: Cumulative Hydrology and Water Quality Impacts. Cumulative development would result in a less than significant cumulative impact to hydrology and water quality, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact to hydrology and water quality.	LTS	None required	N/A
3.12 Hazards and Hazardous Materials			
Impact HAZ-1: Routine Hazardous Materials Use. The Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	None required	N/A
Impact HAZ-2: Upset and Accident Conditions Involving Hazardous Materials. The Propose Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	PS	***ConnectMenlo Mitigation Measure HAZ-4a: Environmental Site Management Plan.*** Construction of any site in the City with known contamination shall be conducted under a Project-specific Environmental Site Management Plan (ESMP) prepared in consultation with the Regional Water Quality Control Board (RWQCB) or the Department of Toxic Substances Control (DTSC), , as appropriate. The purpose of the ESMP is to protect construction workers, the general public, the environment, and future site occupants from subsurface hazardous materials previously identified at the site and address the possibility of encountering unknown contamination or hazards in the subsurface. The ESMP	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
		shall summarize soil and groundwater analytical data collected on the site during past investigations; identify management options for excavated soil and groundwater, if contaminated media are encountered during deep excavations; and identify monitoring, irrigation, or wells that require proper abandonment in compliance with local, state, and federal laws, policies, and regulations. The ESMP shall include measures for identifying, testing, and managing soil and groundwater suspected of or known to contain hazardous materials. The ESMP shall 1) provide procedures for evaluating, handling, storing, testing, and disposing of soil and groundwater during excavation and dewatering activities, respectively; 2) describe required worker health and safety provisions for all workers who could be exposed to hazardous materials, in accordance with state and federal worker safety regulations; and 3) designate the personnel responsible for implementation of the ESMP. ***HAZ-2.1: Phase I Environmental Site Assessment for the Willow Road Tunnel under Dumbarton Rail Corridor and Willow Road.*** For the offsite improvement in the area where the Willow Road Tunnel passes under the Dumbarton Rail Corridor and Willow Road, a Phase I ESA shall be performed by a licensed environmental professional. The Phase I ESA shall identify RECs at the site and indicate whether a Phase II ESA is required in order to evaluate contamination at the site.	
Impact HAZ-3: Exposure to Schools. The Proposed Project would not emit hazardous emissions or involving handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.	PS	Implement ***Mitigation Measure HAZ-2.1 and ConnectMenlo Mitigation Measure HAZ-4a***, above.	LTS/M

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact HAZ-4: Impairment of Emergency Response or Evacuation Plans. The Proposed Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.	LTS	None required	N/A
Impact C-HAZ-1: Cumulative Hazards and Hazardous Materials Impacts. Cumulative development would not result in a significant cumulative impact from hazards and hazardous materials, and the Proposed Project would not be a cumulatively considerable contributor to such a cumulative impact.	PS	Implement ***ConnectMenlo Mitigation Measure HAZ-4a***, above.	LTS/M
3.13 Population and Housing			
Impact POP-1: Unplanned Population Growth. The Proposed Project would not induce substantial unplanned direct or indirect population growth.	LTS	None required	N/A
Impact POP-2: Displacement of People or Housing. The Proposed Project would not displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere.	LTS	None required	N/A
Impact C-POP-1: Cumulative Population and Housing Growth. Cumulative development would result in a less than significant cumulative impact related to population and housing growth, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact regarding population and housing.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
3.14 Public Services and Recreation			
Impact PS-1: Impacts on Fire Services. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered fire service facilities.	LTS	None required	N/A
Impact PS-2: Impacts on Police Services. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered police service facilities.	LTS	None required	N/A
Impact PS-3: Impacts on School Facilities. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered school facilities.	LTS	None required	N/A
Impact PS-4: Impacts on Parks and Recreational Facilities. The Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, nor include the construction of, or require construction or expansion of, recreation facilities that would have an adverse physical effect on the environment.	LTS	None required	N/A
Impact PS-5: Impacts on Library Facilities. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered library facilities.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact C-PS-1: Cumulative Public Services Impacts. Cumulative development would result in a less-than-significant cumulative impact on public services and would not trigger physical impacts associated with new or altered facilities; the Proposed Project would not be a cumulatively considerable contributor.	LTS	None required	N/A
3.15 Utilities and Service Systems			
Impact UT-1: Construction or Relocation of Utilities. The Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which would cause significant environmental effects.	LTS	None required	N/A
Impact UT-2: Water Supply. The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.	LTS	None required	N/A
Impact UT-3: Generation of Wastewater. The Proposed Project would not result in a determination by the wastewater treatment providers that they have inadequate capacity to serve the Proposed Project's projected demand in addition to the providers' existing commitments.	LTS	None required	N/A
Impact UT-4: Generation of Solid Waste. The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact UT-5: Compliance with Solid Waste Regulations. The Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	LTS	None required	N/A
Impact C-UT-1: Cumulative Water Service and Infrastructure Impacts. Cumulative development would result in less-than-significant cumulative impact on water service and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on water service.	LTS	None required	N/A
Impact C-UT-2: Cumulative Wastewater Service and Infrastructure Impacts. Cumulative development would result in a less-than-significant cumulative impact on wastewater service and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on wastewater service.	LTS	None required	N/A
Impact C-UT-3: Cumulative Solid Waste Impacts. Cumulative development would result in a less-than-significant cumulative impact on solid waste service and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on solid waste service.	LTS	None required	N/A
Impact C-UT-4: Cumulative Stormwater Service and Infrastructure Impacts. Cumulative development would result in a less-than-significant cumulative impact on stormwater service, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on stormwater service and infrastructure.	LTS	None required	N/A

Table ES-1. Summary of Impacts and Mitigation Measures

Impacts	Impact Significance without Mitigation	Mitigation Measures	Impact Significance with Mitigation
Impact C-UT-5: Cumulative Natural Gas and Electrical Service Impacts. Cumulative development would result in a less-than-significant cumulative impact on natural gas and electrical, and the Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on natural gas and electrical service and infrastructure.	LTS	None required	N/A
Impact C-UT-6: Cumulative Telecommunication Impacts. The Proposed Project would not be a cumulatively considerable contributor to any significant cumulative impact on telecommunication facilities and infrastructure.	LTS	None required	N/A

Notes:
LTS = Less than significant
LTS/M = Less than significant with mitigation
SU = Significant and unavoidable
N/A = not applicable