3. Revisions to the Draft EIR

This chapter presents text revisions to the Draft EIR that were made in response to public, agency, and organization comments, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modification, amplifications and clarifications of the Draft EIR. In each case, the revised page and location on the page is presented, followed by the textual, tabular, or graphical revision. Underline text represents language that has been added to the EIR; text with ~~strikethrough~~ has been deleted from the EIR.

None of the revisions constitutes significant new information as defined in CEQA Guidelines Section 15088.5; therefore, the Draft EIR does not need to be recirculated.

CHAPTER 1, INTRODUCTION

The first paragraph under Section 1.2, Environmental Review Process, on page 1-2 of the Draft EIR is hereby amended as follows:

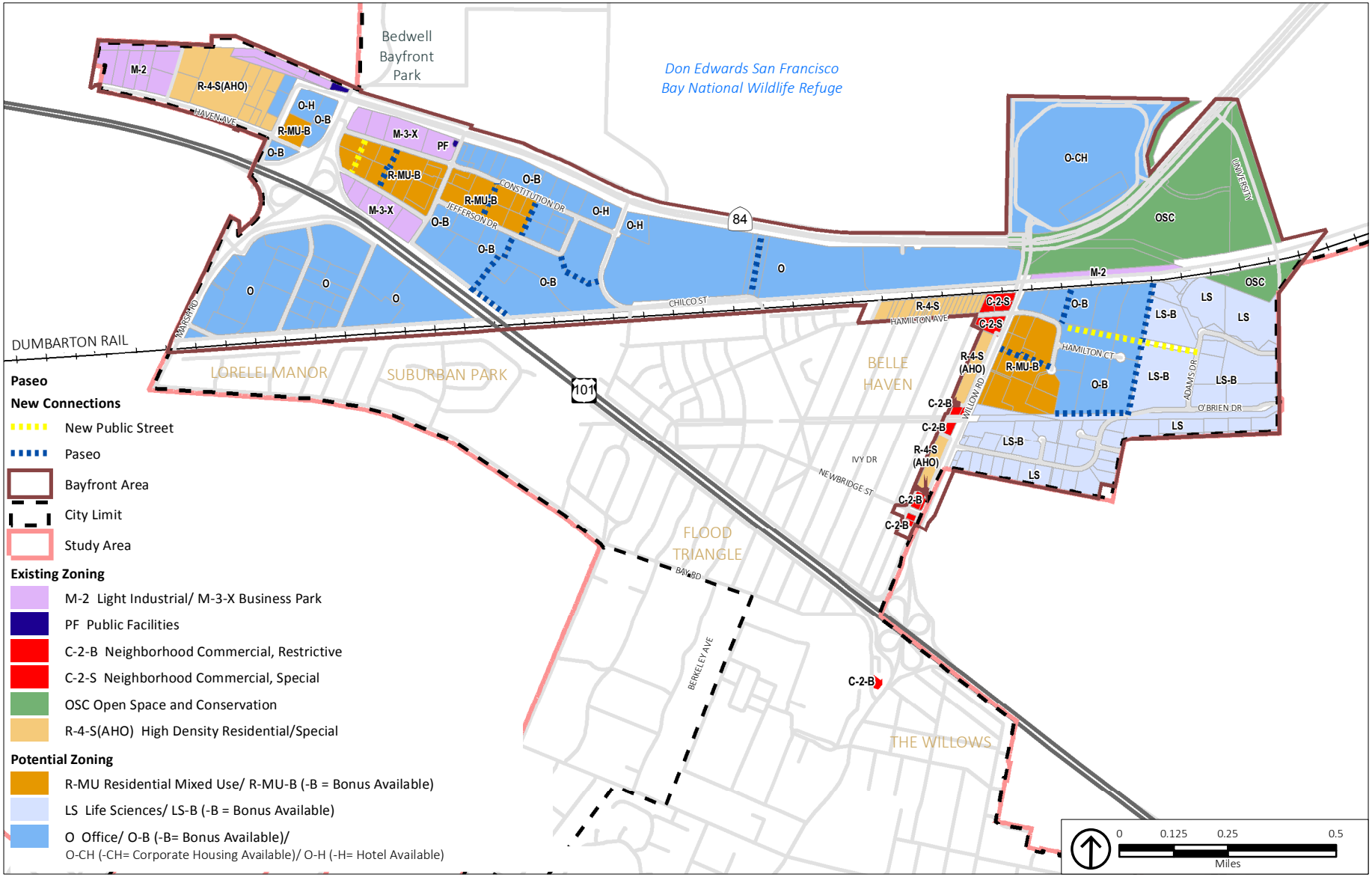
Pursuant to CEQA Section 21080(d) and CEQA Guidelines Section 15063, the City determined that the proposed project could result in potentially significant environmental impacts and that an EIR would be required. In compliance with CEQA Section ~~21080.4~~ 21092 and CEQA Guidelines 15082(a), the City circulated the Notice of Preparation (NOP) of an EIR for the proposed project to the Office of Planning and Research (OPR) State Clearinghouse (SCH) and interested agencies and persons on June 18, 2015 for a 30-day review period. A public Scoping Meeting was held on September 21, 2015 at 7:00 p.m. at the Menlo Park City Council Chambers. The NOP and scoping process solicited comments from responsible and trustee agencies, as well as interested parties regarding the scope of the Draft EIR. Appendix A of this Draft EIR contains the NOP, as well as the comments received by the City in response to the NOP.

CHAPTER 3, PROJECT DESCRIPTION

Figure 3-8 on page 3-25 of the Draft EIR is hereby amended as shown on the revised figure.

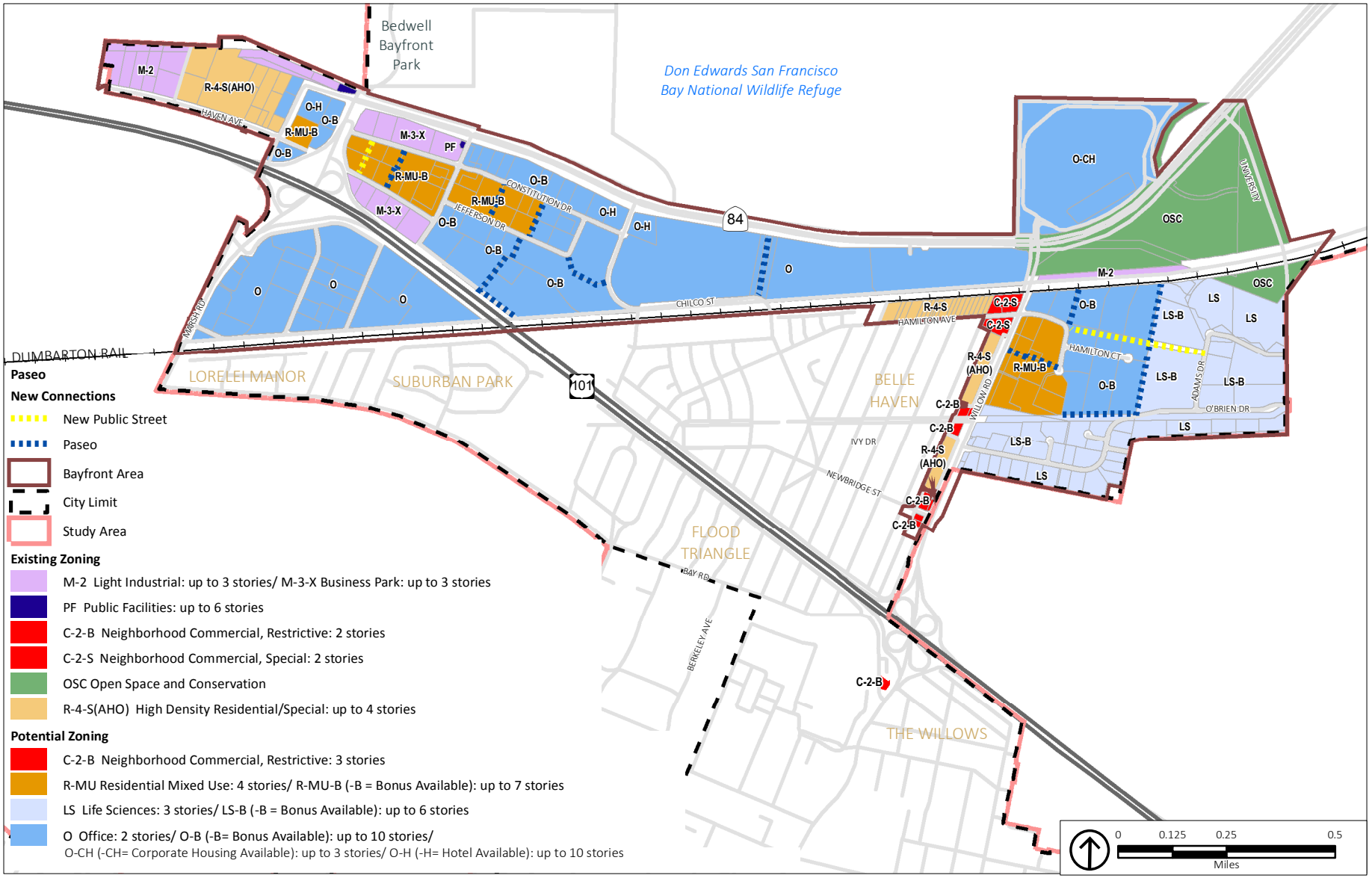
CHAPTER 4.1, AESTHETICS

Figure 4.1-1 on page 4.1-10 of the Draft EIR is hereby amended as shown on the revised figure.



Source: City of Menlo Park; PlaceWorks, 2016.

Figure 3-8
Bayfront Area Proposed Zoning Map



Source: City of Menlo Park; PlaceWorks, 2016.

Figure 4-1.1
Bayfront Area Potential Zoning and Height Limit Map

REVISIONS TO THE DRAFT EIR

Table 4.1-2 on page 4.1-11 of the Draft EIR is hereby amended as follows:

TABLE 4.1-2 PROPOSED BUILDING HEIGHT BY ZONE IN THE BAYFRONT AREA

Zoning District	Maximum Building Height (Feet)	Maximum Building Height With Bonus Level (Feet)
R-4-S(AHO) (High-Density Residential District, Special, Affordable Housing Overlay)	40	n/a
C-2-B (Neighborhood Commercial, Restrictive)	40 ~~30~~	n/a
C-2-S (Neighborhood Commercial, Special)	To Be Determined by Planning Commission	
P-F (Public Facilities)	n/a	
M-2 (General Industrial)	35	n/a
M3 (Commercial Business Park)	45	n/a
O (Office)	45; hotels 120 feet and 10 stories	120 feet and 6 stories
LS (Life Science)	45	110 feet (6 stories)
R-MU (Mixed Use Residential)	50	85[a]

Source: City of Menlo Park, PlaceWorks. 2016. Note: Potential 10 ft. height increase for flood protection would not affect impact potential.
a: The Draft EIR conservatively analyzed a maximum height of 85 feet in order to provide flexibility for potential height increases needed to accommodate sea level rise and flood zone requirements per the direction of the Planning Commission on May 23, 2016 (http://menlopark.org/DocumentCenter/View/10249).

CHAPTER 4.2, AIR QUALITY

Mitigation Measure AQ-2a on page 4.2-40 of the Draft EIR is hereby amended as follows:

Mitigation Measure AQ-2a: ~~Prior to issuance of building permits, development project applicants that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines shall prepare and submit to the City of Menlo Park a technical assessment evaluating potential project operation-phase-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If operational-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the City of Menlo Park Community Development Department shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities.~~ Prior to issuance of a building permits, all development projects in the city that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines shall prepare and submit to the City's Planning Division a technical assessment evaluating potential project-related operational air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology for assessing air quality impacts. If operational-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the project applicant is required to incorporate mitigation measures into the development project to reduce air

pollutant emissions during operation. The identified measures shall be incorporated into all appropriate construction documents, subject to the review and approval of the Planning Division prior to building permit issuance.

Mitigation Measure AQ-2b1 on page 4.2-42 of the Draft EIR is hereby amended as follows:

Mitigation Measure AQ-2b1: ~~As part of the City's development approval process, the City shall require applicants for future development projects to comply with the current Bay Area Air Quality Management District's 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).~~ 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).

Mitigation Measure AQ-2b2 on page 4.2-42 of the Draft EIR is hereby amended as follows:

Mitigation Measure AQ-2b2: ~~Prior to issuance of building permits, development project applicants 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 in 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, the City of Menlo Park shall require that applicants for new development projects 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) submitted to the City and shall be verified by the City's Planning Division.~~ 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, 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. Division.

REVISIONS TO THE DRAFT EIR

Mitigation Measure AQ-3a on page 4.2-47 of the Draft EIR is hereby amended as follows:

Mitigation Measure AQ-3a: ~~Applicants for future non-residential land uses within the city that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Menlo Park prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), $PM_{2.5}$ concentrations exceed 0.3 µg/m^3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. Mitigation measures may include but are not limited to:~~

- ~~Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.~~
- ~~Electrifying warehousing docks.~~
- ~~Requiring use of newer equipment and/or vehicles.~~
- ~~Restricting off-site truck travel through the creation of truck routes.~~

~~Mitigation measures identified in the project-specific HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of a proposed project~~. As part of the discretionary review process for development applications, applicants for all non-residential projects within the City that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City's Planning Division. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), $PM_{2.5}$ concentrations exceed 0.3 µg/m^3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. Mitigation measures may include but are not limited to:

- Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.
- Electrifying warehousing docks.
- Requiring use of newer equipment and/or vehicles.
- Restricting off-site truck travel through the creation of truck routes.

Mitigation measures identified in the project-specific HRA shall be incorporated into the site development plan as a component of a proposed project, subject to the review and approval of the Community Development Department.

REVISIONS TO THE DRAFT EIR

Mitigation Measure AQ-3b on page 4.2-50 of the Draft EIR is hereby amended as follows:

Mitigation Measure AQ-3b: ~~Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in Menlo Park within 1,000 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Menlo Park prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), $PM_{2.5}$ concentrations exceed 0.3 µg/m^3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:~~

- ~~Air intakes located away from high volume roadways and/or truck loading zones.~~
- ~~Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.~~

~~Measures identified in the HRA shall be included in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Building Division and/or Planning Division.~~ As part of the discretionary review process, applicants for all residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) anywhere in the City within 1,000 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City's Planning Division. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), $PM_{2.5}$ concentrations exceed 0.3 µg/m^3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Measures identified in the HRA shall be incorporated into the site development plan as a component of the proposed project subject to the review and approval of the Community Development Department. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City, subject to the review and approval of the Community Development Department.

CHAPTER 4.3, BIOLOGICAL RESOURCES

Mitigation Measure BIO-1 under Section 4.3.3, Impact Discussion, on page 4.3-23 and referenced on pages 4.3-25 through 4.3-29, of the Draft EIR is hereby amended as follows:

Mitigation Measure BIO-1: ~~Prior to individual project approval, the City shall require project applicants to prepare and submit project-specific baseline biological resources assessments on sites containing natural habitat with features such as mature and native trees or unused structures that could support special-status species and other sensitive biological resources, and common birds protected under Migratory Bird Treaty Act (MBTA). The baseline biological resources assessment shall be prepared by a qualified biologist. The biological resource assessment shall provide a determination on whether any sensitive biological resources are present on the property, including jurisdictional wetlands and waters, essential habitat for special-status species, and sensitive natural communities. If sensitive biological resources are determined to be present, appropriate measures, such as preconstruction surveys, establishing no-disturbance zones during construction, and applying bird-safe building design practices and materials, shall be developed by the qualified biologist to provide adequate avoidance or compensatory mitigation if avoidance is infeasible. Where jurisdictional waters or federally and/or State-listed special-status species would be affected, appropriate authorizations shall be obtained by the project applicant, and evidence of such authorization provided to the City prior to issuance of grading or other construction permits. An independent peer review of the adequacy of the biological resource assessment may be required as part of the CEQA review of the project, if necessary, to confirm its adequacy~~. As part of the discretionary review process for development projects on sites in the M-2 Area, the City shall require all project applicants to prepare and submit project-specific baseline biological resources assessments (BRA) if the project would occur on or within 10 feet of a site(s) containing natural habitat with features such as mature and native trees or unused structures that could support special-status species and other sensitive biological resources, and active nests of common birds protected under Migratory Bird Treaty Act (MBTA). Sensitive biological resources triggering the need for the baseline BRA may include: wetlands, occurrences or suitable habitat for special-status species, sensitive natural communities, and important movement corridors for wildlife such as creek corridors and shorelines. The baseline BRA shall be prepared by a qualified biologist. The baseline BRA shall provide a determination on whether any sensitive biological resources are present on or within 10 feet of the property, including jurisdictional wetlands and waters, essential habitat for special-status species, and sensitive natural communities. The baseline BRA shall include consideration of possible sensitive biological resources on undeveloped lands within 10 feet of the property as well, particularly lands of the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge). If sensitive biological resources are determined to be present, appropriate measures, such as preconstruction surveys, establishing no-disturbance zones during construction, and applying bird-safe building design practices and materials, shall be developed by the qualified biologist to provide adequate avoidance or compensatory mitigation if avoidance is infeasible. Where jurisdictional waters or federally

and/or State-listed special-status species would be affected, appropriate authorizations shall be obtained by the project applicant, and evidence of such authorization provided to the City prior to issuance of grading or other construction permits. For properties that are within 10 feet of undeveloped lands, particularly permanent open space lands of the Refuge, this shall include consideration of the potential effects of additional light, glare, and noise generated by the project, as well as the possibility for increased activity from humans and/or domesticated pets and their effects on the nearby natural habitats. The City of Menlo Park Planning Division may require an independent peer review of the adequacy of the baseline BRA as part of the review of the project to confirm its adequacy. Mitigation measures identified in the project-specific BRA shall be incorporated as a component of a proposed project and subsequent building permit, subject to the review and approval of the Community Development Department.

CHAPTER 4.4, CULTURAL RESOURCES

Mitigation Measure CULT-1 on page 4.4-15 of the Draft EIR is hereby amended as follows:

Mitigation Measure CULT-1: At the time that individual projects are proposed on any site citywide with a building more than 50 years old or any site adjoining a property with a building more than 50 years old, the City shall require the project applicant to prepare a site-specific evaluation to determine if the project is subject to completion of a site-specific historic resources study. If it is determined that a site-specific historic resources study is required, the study shall be prepared by a qualified architectural historian meeting the Secretary of the Interior's Standards for Architecture or Architectural History. At a minimum, the study shall consist of a records search of the California Historical Resources Information System, an intensive-level pedestrian field survey, an evaluation of significance using standard National Register Historic Preservation and California Register Historic Preservation evaluation criteria, and recordation of all identified historic buildings and structures on California Department of Parks and Recreation 523 Site Record forms. The study shall describe the historic context and setting, methods used in the investigation, results of the evaluation, and recommendations for management of identified resources. If applicable, the specific requirements for inventory areas and documentation format required by certain agencies, such as the Federal Highway Administration and California Department of Transportation (Caltrans), shall be adhered to.

If the project site or adjacent properties are found to be eligible for listing on the California Register, the project shall be required to conform to the current *Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Restoring Historic Buildings,* which require the preservation of character defining features which convey a building's historical significance, and offers guidance about appropriate and compatible alterations to such structures.

Mitigation Measure CULT-2a on page 4.4-17 of the Draft EIR is hereby amended as follows:

Mitigation Measure CULT-2a: 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 California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of the California Environmental Quality Act (CEQA) criteria by a qualified archeologist. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to the City of Menlo Park, Northwest Information Center (NWIC), and State Historic Preservation Office (SHPO), if required.

Mitigation Measure CULT-2b on page 4.4-18 of the Draft EIR is hereby amended as follows:

Mitigation Measure CULT-2b: As part of the City's application approval process and prior to project approval, the City shall consult with those Native American Tribes with ancestral ties to the Menlo Park city limits regarding General Plan Amendments in the city and land use policy changes. Upon receipt of an application for proposed project that requires a General Plan ~~a~~Amendment or a land use policy change, the City shall submit a request for a list of Native American Tribes to be contacted about the proposed project to the Native American Heritage Commission (NAHC). Upon receipt of the list of Native American Tribes from the NAHC, the City shall submit a letter to each Tribe on the provided list requesting consultation with the Native American Tribe about the proposed project via the via the City's preferred confirmation of receipt correspondence tracking method (e.g., Federal Express, United States Postal Service Certified Mail, etc.).

Mitigation Measure CULT-3 on page 4.4-19 of the Draft EIR is hereby amended as follows:

Mitigation Measure CULT-3: 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 procedures that would be followed before construction activities are 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.

CHAPTER 4.7, HAZARDS AND HAZARDOUS MATERIALS

The fifth bulleted item under subheading "California Environmental Protection Agency," on page 4.7-3 of the Draft EIR is hereby amended as follows:

- California ~~Uniform~~ Fire Code: Hazardous Material Management Plans and Inventory Statements.

REVISIONS TO THE DRAFT EIR

The paragraph under subheading "California Fire Code," on page 4.7-5 of the Draft EIR is hereby amended as follows:

Part 9 of the ~~CBC~~CFC contains the California Fire Code (CFC). The CFC adopts by reference the 2012 International Fire Code (ICF) with necessary State amendments. Updated every three years, the CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Typical fire safety requirements include: installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

Mitigation Measure HAZ-4a on page 4.7-26 of the Draft EIR is hereby amended as follows:

Mitigation Measure HAZ-4a: Construction ~~at the sites~~ of any site in the City with known contamination, shall be conducted under a project-specific Environmental Site Management Plan (ESMP) that is 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 to address the possibility of encountering unknown contamination or hazards in the subsurface. The ESMP shall summarize soil and groundwater analytical data collected on the project 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 other wells requiring 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 project excavation and dewatering activities, respectively; 2) describe required worker health and safety provisions for all workers potentially exposed to hazardous materials in accordance with State and federal worker safety regulations; and 3) designate personnel responsible for implementation of the ESMP.

Mitigation Measure HAZ-4b on page 4.7-26 of the Draft EIR is hereby amended as follows:

Mitigation Measure HAZ-4b: For those sites throughout the city with potential residual contamination in soil, gas, or groundwater that are planned for redevelopment with an overlying occupied building, a vapor intrusion assessment shall be performed by a licensed environmental professional. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into an occupied building, project design shall include vapor controls or source removal, as appropriate, in accordance with regulatory agency requirements. Soil vapor mitigations or controls could include vapor barriers, passive venting, and/or active venting. The vapor intrusion assessment and associated vapor controls or source removal can be incorporated into the ESMP (Mitigation Measure HAZ-4a).

REVISIONS TO THE DRAFT EIR

CHAPTER 4.8, HYDROLOGY AND WATER QUALITY

The text under subheading "Chapter 7.35, Water Conservation," on page 4.8-9 of the Draft EIR is hereby amended as follows:

The purpose of this chapter is to promote water conservation and provide the City with the flexibility to respond to a drought emergency. In May 2016, Governor Brown issued an executive order directing the SWRCB to adjust and extend its emergency water conservation regulations through the end of January 2017 in recognition of differing water supply conditions for various communities. On May 18, 2016, the SWRCB adopted a regulation that requires locally developed conservation standards based upon each agency's specific circumstances. These standards require local water agencies to ensure a three-year supply assuming three more dry years like those experienced by California from 2012 to 2015. Water agencies that would face shortages under three additional dry years are required to meet a conservation standard equal to the shortage amount.[12] ~~Upon the adoption of emergency water conservation regulations by the SWRCB and within the timelines prescribed by the SWRCB, or drought-related actions imposed by the San Francisco Public Utilities Commission, the City Council of Menlo Park shall adopt by resolution a water conservation plan that mandates those water conservation measures. On May 5, 2015, the City adopted water regulations to adhere to the Governor's April 2015 Executive Order, which imposes restrictions to achieve an aggregate statewide 25 percent reduction in potable water use through February 2016. The SWRCB adopted an extended emergency regulation on February 2, 2016 that continues restrictions on urban water use through October 2016 while providing urban water suppliers more flexibility in meeting their conservation requirements. To respond to these restrictions, the City now limits watering days and times, requires hoses to be fitted with automatic shutoff nozzles for washing vehicles, sidewalks, and driveways, and requires restaurant to serve water only upon request. There are additional water conservation measures that can be found on the City's website under Drought Response Plan Guidelines.[12]~~

Footnote 12 at the bottom of page 4.8-9 of the Draft EIR is hereby amended as follows:

[12]City of Menlo Park, Municipal Water District, 2016. *Water Regulations*, https://www.menlopark.org/356/Water-regulations, accessed on September 29, 2016.~~Municipal Water District, 2015. *Drought Response Plan Application*, http://www.menlopark.org/DocumentCenter/View/7795 accessed on November 17, 2015.~~

The first and second paragraphs under subheading "Storm Drain System," on page 4.8-11 of the Draft EIR are hereby amended as follows:

The City's storm drain system is maintained by the Menlo Park Public Works Department and consists of 17 individual systems that serve 17 drainage areas, according to a study conducted in 2003 by BKF Engineers.[19] The area north of Middlefield Road drains to the Bay through either the Belle Haven Storm Drain system or through the City of East Palo Alto storm drain lines. The area south of Middlefield Road drains to either Atherton Channel on the northwest or San Francisquito Creek on the southeast. Significant portions of the storm drain system are not capable of providing conveyance of a 10-year storm event.[20] Therefore, each new development or redevelopment project in the Bayfront area will be required to evaluate whether stormwater from the site will exceed the capacity of the existing storm drain system

as part of the CEQA process and propose mitigation measures and storm drain improvements to prevent the potential for flooding.

Common issues within the City include undersized storm drain lines, bubble-up storm drain systems, and areas without storm drains. The City conducted a study in 2013 evaluating deficiencies in the storm system design and limited flow capacity along Middlefield Road and proposed alternatives to reduce flooding.[22] Currently funded projects under the 2014-2019 Capital Improvement Plan include the Bay Levee Project, Chrysler Pump Station improvements, Pope/Chaucer Bridge replacement, installation of trash capture devices throughout the City, and Willow Place Bridge abutment repairs.[23] Future ~~i~~improvements subject to funding include design of a storm drain system to address flooding along Middlefield Road from San Francisquito Creek to Ravenswood Avenue ~~as well as drainage channel improvements to Atherton Channel are planned in the future~~. The Atherton Channel flood control project is discussed in further detail in the *Flood Hazard Areas* section of this chapter.

The bottom of page 4.8-11 of the Draft EIR is hereby amended to include the following footnote:

[21] BKF Engineers, 2003. *City-Wide Storm Drainage Study. Figure B1 – Identified Problem Areas.*

Footnote 21 at the bottom of page 4.8-11 of the Draft EIR is hereby amended as follows:

~~21~~22City of Menlo Park, Public Works Department. Middlefield Road Storm Drain Study. Accessed on November 17, 2015 at http://www.vwww.menloparklibrary.org/departments/pwk/cip/streets/resurfacing/middlefieldstromdrain.html.

The bottom of page 4.8-11 of the Draft EIR is hereby amended to include the following footnote:

[23] City of Menlo Park. *Five-Year Capital Improvement Plan FY 2014-2019.*

The eighth paragraph under subheading "Flood Hazard Areas," on page 4.8-19 of the Draft EIR is hereby amended as follows:

Cities and unincorporated communities in San Mateo County, including Menlo Park, generate runoff that flows into the Bayfront Canal via the Atherton Channel and six other drainage basins. Historically, flooding has occurred in the neighborhoods near the Bayfront Canal (Redwood City) and Atherton Channel (Menlo Park and Atherton), particularly during storms that coincide with high tides.[35] The Bayfront Canal and Atherton Channel do not have enough detention capacity to prevent flooding in low lying areas. In addition, during storms that coincide with high tides, the Canal and Channel cannot discharge sufficient stormwater flows to the Bay because of tide gate limitations. ~~The Bayfront Canal and~~ Improvements have recently been completed for the Atherton Channel ~~Improvement Project will include installing a culvert to direct water to the Ravenswood Ponds; making open channel improvements upstream and downstream of the culvert; and installing water control structures within and around the Ravenswood Ponds to allow the flow from the culvert to move between the ponds and ultimately to the Bay~~ between Middlefield Road and Fair Oaks Avenue in the City of Atherton to improve drainage conditions.[36] The ~~project will be implemented by the Association of Bay Area Governments (ABAG) and is expected to be completed in January 2018. In addition, the City of Redwood City is partnering with the Coastal Conservancy to integrate the Salt Pond Restoration Project with the Bayfront Canal/Atherton Channel Flood Improvement~~

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~~Project.[37] When complete, this project would restore 15,100 acres of industrial salt ponds to tidal wetlands and other habitats and serve as stormwater detention for the Bayfront Canal and Atherton Channel drainage areas.~~ City of Menlo Park contributes approximately 36 percent of the total flow to Atherton Channel.[38] Although this will alleviate the potential for flooding associated with the Atherton Channel, a regional solution is required for both this channel and the Bayfront Canal to eliminate flooding associated with peak stormwater flow rates in the Bayfront Canal, combined with high tides in Flood Slough.

Footnote 33 at the bottom of page 4.8-19 of the Draft EIR is hereby amended as follows:

~~[33] Bay Area Integrated Regional Water Management Plan, 2016. Bayfront Canal Flood Management and Habitat Restoration Project. Accessed on May 5, 2016 at http://bairwmp.org/projects/bayfront-canal-flood-management-and-habitat-restoration-project.~~

Footnote 34 at the bottom of page 4.8-19 of the Draft EIR is hereby amended as follows:

~~[34][36] Moffat & Nichol, 2014. *Bayfront Canal Flood Improvements – Project Description.* Dated March 6, 2014~~
City of Atherton, 2016. *Marsh Road Retaining Wall Repair*. Accessed at http://www.ci.atherton.ca.us/marshroad on August 26, 2016.

The bottom of page 4.8-19 of the Draft EIR is hereby amended to include the following footnote:

[38] NV5, 2015. *Town of Atherton Townwide Drainage Study Update.* Dated April 2015.

The first paragraph under subheading "Sea Level Rise," beginning on page 4.8-19 and continuing on page 4.8-20 of the Draft EIR is hereby amended as follows:

A rise in average global temperatures due largely to an increase in greenhouse gas (GHG) emissions is expected to be accompanied by a rise in global sea levels. California Executive Order S-13-2008 states that all state agencies planning construction projects in areas vulnerable to sea level rise must consider a range of sea level rise scenarios for the years 2050 and 2100 to assess project vulnerability and to the extent feasible, reduce expected risks to sea level rise.[39] The State of California's current guidance incorporates the most recent scientific findings from the National Research Council (NRC).[40] The NRC predicts a range for San Francisco Bay sea level rise of 5 to 24 inches by 2050 and 17 to 66 inches by 2100. The BCDC predicts a sea level rise of 16 inches by 2050 and 55 inches by 2100.[41] Based on the NRC data, San Mateo County has developed inundation scenarios that show areas of the city that would be inundated from different sea level rise increases coupled with various extreme tide events.[42] Figure 4.8-4 shows a sea level rise of 24 inches coupled with the 100-year storm surge event (a total of 66 inches) and a sea level rise of 66 inches coupled with the 100-year storm surge event (a total of 108 inches).

The bottom of page 4.8-21 of the Draft EIR is hereby amended to include the following footnote:

[42] Sea Change San Mateo County, 2016. *Draft Report: Adapting to Rising Tides: San Mateo County Bayshore Sea Level Rise & Overtopping Analysis.* Dated March 2016.

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The fifth and sixth paragraphs under subheading "Sea Level Rise," on page 4.8-21 of the Draft EIR are hereby amended as follows:

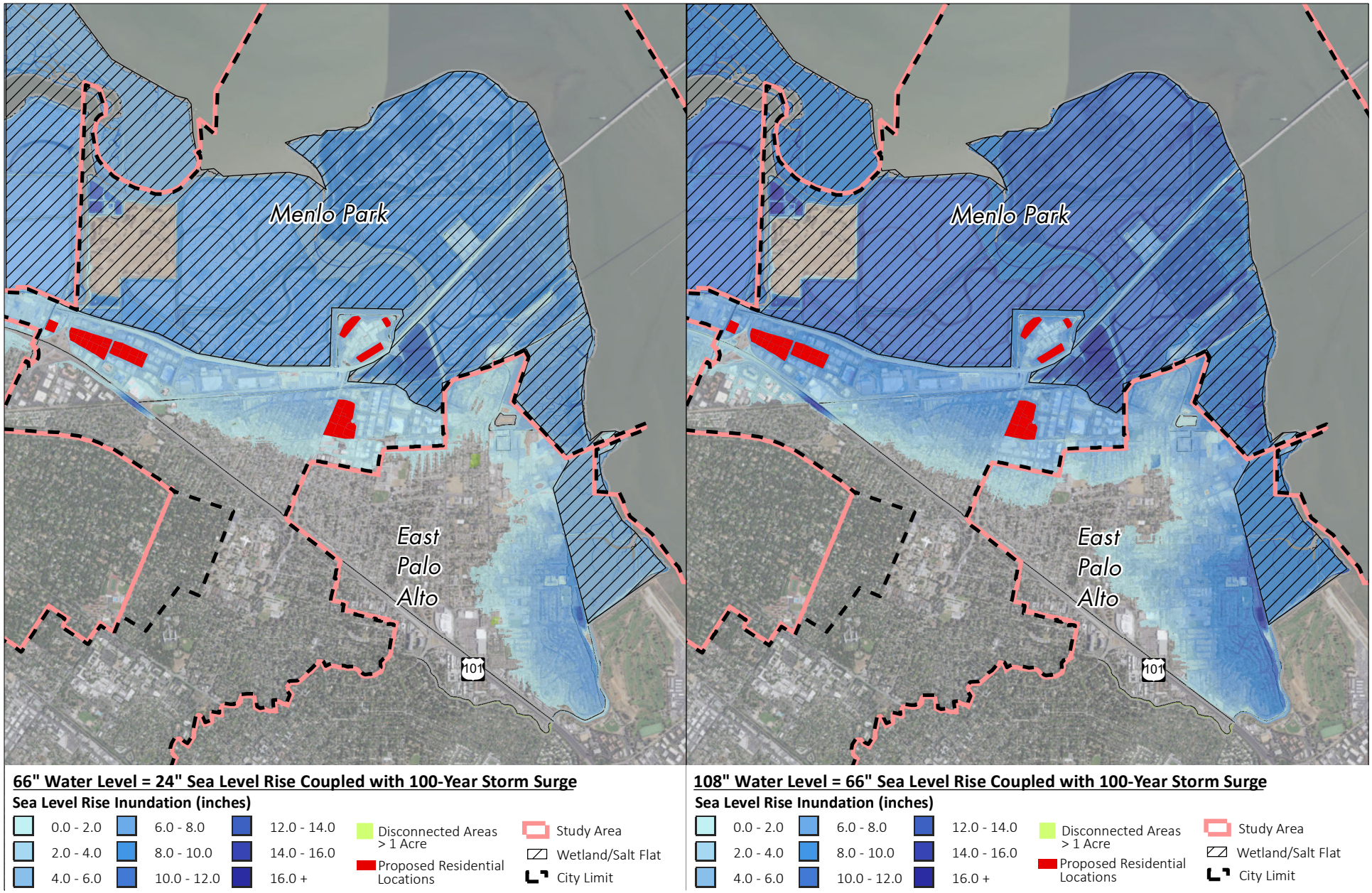
San Mateo County is currently conducting a sea level rise vulnerability assessment with a broad coalition of civic leaders, elected officials, and concerned citizens to better understand and prepare for the potential impacts of sea level rise related to flooding and inundation, storm and tide surge, salt water intrusion, and shoreline erosion.[46] San Mateo County is considered to be the most vulnerable county in the Bay Area in terms of sea level rise. Results of the assessment will include detailed inundation maps and recommended adaptation measures. As ~~a member of the SFCJPA, the City of Menlo Park is also participating in~~ part of the SAFER Bay Project (Strategy to Advance Flood protection, Ecosystems, and Recreation), the SFCJPA ~~which is intended to protect nearly 5,000 properties from tidal flooding and restore more than 1,000 acres of historic marshlands as well as~~ is evaluating different infrastructure alternatives to protect Menlo Park, East Palo Alto, and Palo Alto from extreme tides coupled with ~~address the impact of~~ sea level rise.

Figure 4.8-4 shows the projected sea level rise for Menlo Park for a 24-inch sea level rise coupled with a 100-year storm surge (a total of 66 inches) and a 66-inch sea level rise coupled with a 100-year storm surge (a total of 108 inches). As shown on this figure, the Bayfront area is within the inundation zone for a sea level rise of 24 inches coupled with the 100-year storm surge as well as the area of the City south of the railroad easement, east of Highway 101, and north of Newbridge Street. The 66-inch sea level rise coupled with the 100-year storm surge would extend further south past Newbridge Street and the inundation depth in the Bayfront area would increase. ~~the area north of US 101 and the Bayfront Area are vulnerable to flooding with the projected sea level rise.~~

Figure 4.8-4, Sea Level Rise, on page 4.8-22 of the Draft EIR has been revised as shown.

The second paragraph under subheading "Operational Impacts," on page 4.8-28 of the Draft EIR is hereby amended as follows:

Water quality in stormwater runoff is regulated locally by the SMCWPPP, which include the C.3 provisions set by the San Francisco Bay RWQCB. Adherence to these regulations requires new development or redevelopment projects to incorporate treatment measures, an agreement to maintain them, and other appropriate source control and site design features that reduce pollutants in runoff to the maximum extent practicable. Many of the requirements consider Low Impact Development (LID) practices such as the use of on-site infiltration through landscaping and vegetated swales that reduce pollutant loading. In areas of shallow groundwater, other LID features such as rain gardens, bioretention areas, pervious pavement, and flow-through planters would be appropriate. Incorporation of these measures can even improve on existing conditions. Also, all development or redevelopment projects that create or replace one acre or more of impervious surface and are located in a hydromodification area must implement hydromodification management measures (i.e., post-project runoff rates shall not exceed estimated pre-project rates and durations). The portion of Menlo Park south of State Route 82 (El Camino Real) is within a hydromodification area and would be subject to these requirements.



Source: City of Menlo Park; PlaceWorks, 2015; San Mateo County Sea Level Rise Technical Memorandum, 2016.

Figure 4.8-4
Sea Level Rise

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The last two paragraphs under Impact Discussion HYDRO-2 beginning at the bottom of page 4.8-31 and continuing onto page 4.8-32 of the Draft EIR are hereby amended as follows:

In addition, as part of the Zoning update, the project includes green and sustainable building standards in the Bayfront Area. These standards require all new buildings within the Bayfront Area to be maintained without the use of well water and include dual plumbing systems for the use of recycled water. Under the Zoning update, no potable water shall ~~not~~ be used for decorative features, unless the water is recycled, and single pass cooling systems are prohibited. Also, future development with a gross floor area of 100,000 square feet or more must submit a proposed water budget for review by the City's Public Works Director prior to certification of occupancy. New buildings with 250,000 square feet of gross floor area or more are required to use an alternate water source for all City-approved non-potable applications. These measures would help to reduce any demands put on groundwater that may be required outside of the Bayfront Area.

Future development under the proposed project, as part of the City's project approval process, would be required to comply with existing federal, State and local regulations discussed above, such as compliance with the C.3 provisions of the MRP which promote infiltration BMPs, and the minimal use of groundwater for water supply within the city. Future development would also be required to adhere to the General Plan goals and policies that have been prepared to minimize impacts related to water supply. Furthermore, the City, throughout the 2040 buildout horizon, would implement the General Plan program that requires monitoring pumping groundwater to reduce impacts to groundwater. In addition, if substantial construction dewatering is required and disposal would be to land or surface water, an individual Waste Discharge Requirements (WDR) permit must be obtained from the RWQCB that specifies maximum rates and volume of groundwater that may be discharged. Minor construction dewatering would be covered under the SWRCB's Construction General Permit. Accordingly, the adoption of the proposed project would result in *less-than-significant* impacts with respect to groundwater supply and/or groundwater recharge.

The third paragraph under Impact Discussion HYDRO-3 beginning at the bottom of page 4.8-32 and continuing onto page 4.8-33of the Draft EIR is hereby amended as follows:

There also are required post-construction control measures to minimize the potential for erosion and siltation. A Storm Water Management Plan must be submitted to the City with site design measures to limit impervious surfaces, planting new interceptor trees, minimizing surface parking areas, and directing roof runoff into cisterns or rain barrels or onto vegetated areas. Regulated projects subject to water treatment measures would require LID features, such as harvesting and reuse, infiltration, evapotranspiration, bioretention, flow-through planters, tree well filters, and media filters. Systems must be designed to treat stormwater runoff volume equal to 80 percent of the annual runoff from the site or a flow design basis of 0.2 inches per hour (in/hr) intensity. In addition, these regulated projects must include an operations and maintenance (O&M) plan and maintenance agreement for review and approval by the City. All projects would also be required to meet the requirements of the City's Municipal Code Chapter 7.42, *Stormwater Management Program* and the City's Grading and Drainage Guidelines, which are more stringent that the C.3 provisions of the MS4 Permit. New development and redevelopment project applicants must also submit an Impervious Surface Worksheet and C.3/C.6 Development Review Checklist to the City for review and approval prior to the issuance of grading permits.

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The second paragraph under Impact Discussion HYDRO-5 beginning at the bottom of page 4.8-34 and continuing onto page 4.8-37 of the Draft EIR are hereby amended as follows:

However, the existing development potential in the city and the new development potential as part of ConnectMenlo involves parcels in the Bayfront Area that have already been developed and are covered with impervious surfaces. The City of Menlo Park has very stringent stormwater requirements that exceed the C.3 provisions of the MRP, i.e., post-development stormwater volumes must not exceed pre-development volumes for all projects adding net new impervious surface, regardless of whether the project is regulated. Thus, the capacity of the existing or planned storm drain system would not be exceeded. Each new development or redevelopment project would be required as part of the CEQA process to demonstrate that stormwater runoff from their site would not result in an exceedance of the capacity of the existing or future storm drain system. In addition, implementation of LID design guidelines and engineering review of drainage calculations and development plans by the Menlo Park Public Works Department would further ensure that there are no significant increases in peak flow rates or runoff volumes.

The bottom of page 4.8-36 of the Draft EIR is hereby amended to include the following footnote:

[55] WRECO, 2016. *Hydrologic and Hydraulic Study Report, Facebook Menlo Park West Campus, Menlo Park, California.* Dated March 2016.

The second paragraph under subheading "Sea Level Rise," on page 4.8-41 of the Draft EIR is hereby amended as follows:

Menlo Park is partnering with San Mateo County in conducting a sea level rise vulnerability assessment with a broad coalition of civic leaders, elected officials, and concerned citizens to better understand and prepare for the potential impacts of sea level rise related to flooding and inundation, storm and tide surge, salt water intrusion, and shoreline erosion.[62] As shown on Figure 4.8-4, the Bayfront Area and areas of Menlo Park east of Highway 101, west of Willow Road and north of Newbridge Street are ~~is~~ susceptible to sea level rise when coupled with a 100-year storm event. There is the potential for 4,500 new residential units within the Bayfront area and 2.3 million square feet of non-residential land uses. As part of the City's Zoning Code update, new development within the Bayfront Area will be required to elevate the first floor 24 inches above FEMA's base flood elevation (BFE). Therefore, seal level rise will be taken into account with proposed new development or redevelopment.

The last paragraph under Impact Discussion HYDRO-11 on page 4.8-45 of the Draft EIR is hereby amended as follows:

Areas within the M-2 Area are susceptible to impacts from sea level rise, as are other coastal projects within the San Francisquito Watershed. Existing regulations and requirements by the City of Menlo Park, FEMA, and the BCDC require actions to be taken for new development or redevelopment projects to protect against flood levels and sea level rise would place people and/or structures within floodplain areas. Projects within BCDC jurisdiction (i.e., within 100 feet of the shoreline) would require a site-specific sea level risk assessment. In addition, as part of the proposed project's Zoning update for the M-2 Area, the first flood elevation of all new buildings must be elevated 24 inches above the FEMA base flood

elevation to account for sea level rise and projects must also pay any required fees or proportionate fair share of the funding of sea level rise projects. The City of Menlo Park will also be developing an Adaptation to Climate Change study to identify measures for sea level rise protection.

New projects within the Bayfront area, which is the only area slated for future development in the ConnectMenlo plan, would not increase stormwater flows or volumes for these projects (i.e., a City of Menlo Park requirement) and must elevate structures to account for sea level rise. Therefore, these projects would not contribute to a cumulative increase in flood levels or exacerbate the impact of sea level rise. For these reasons, impacts from future development under the General Plan on hydrology and water quality are not cumulatively considerable and the cumulative impact would be *less than significant.*

CHAPTER 4.9, LAND USE AND PLANNING

Mitigation Measure LU-2 on page 4.9-14 of the Draft EIR is hereby amended as follows:

Mitigation Measure LU-2: ~~Prior to project approval, as part of the project application process,~~ As part of the discretionary review process for development projects, all ~~future~~proposed development anywhere 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.

The first paragraph under Impact Discussion LU-4, on page 4.9-24 of the Draft EIR is hereby amended as follows:

As discussed in Chapter 4, Environmental Evaluation, of this Draft EIR, this EIR takes into account growth projected by the proposed project within the study area, Menlo Park City Limits and SOI, in combination with impacts from projected growth in the rest of San Mateo County and the surrounding region, as forecast by the ABAG. The geographic context for the cumulative land use and planning effects~~, which~~ occur from potential future development under the proposed project combined with effects of development on lands adjacent to the city within East Palo Alto, Palo Alto, Stanford, Atherton, North Fair Oaks, and Redwood City, and the unincorporated areas of San Mateo County within the SOI.

CHAPTER 4.10, NOISE

Mitigation Measure NOISE-1a on page 4.10-24 of the Draft EIR is hereby amended as follows:

Mitigation Measure NOISE-1a: To meet the requirements of Title 24 and General Plan Program N1.A, project applicants shall perform acoustical studies prior to issuance of building permits for citywide development of new noise-sensitive uses. New residential dwellings, hotels, motels, dormitories, and school classrooms must meet an interior noise limit of 45 dBA CNEL or L_{dn}. Developments in areas exposed to more than 60 dBA CNEL must demonstrate that the structure has been designed to limit

interior noise in habitable rooms to acceptable noise levels. Where exterior noise levels are projected to exceed 60 dBA CNEL or L_{dn} at the façade of a building, a report must be submitted with the building plans describing the noise control measures that have been incorporated into the design of the project to meet the 45 dBA noise limit. ~~Project applicants must perform acoustical studies for all new multi-family residential projects within the projected Ldn 60 dB noise contours, so that noise mitigation measures can be incorporated into project design and site planning.~~ Project applicants for all new multi-family residential projects subject to the review and approval of the Community Development Department, prior to building permit issuance, must perform acoustical studies within the projected Ldn 60 dB noise contours, so that noise mitigation measures can be incorporated into project design and site planning, subject to the review and approval of the Community Development Department.

Mitigation Measure NOISE-1b on page 4.10-24 of the Draft EIR is hereby amended as follows:

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 NOISE-1c on page 4.10-24 of the Draft EIR is hereby amended as follows:

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:

- Construction activity is limited to the daytime hours between 8:00 a.m. to 6:00 p.m. on Monday through Friday, as prescribed in the City's municipal code.
- 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 NOISE-2a on page 4.10-28 of the Draft EIR is hereby amended as follows:

Mitigation Measure NOISE-2a: To prevent architectural damage citywide as a result of construction-generated vibration:

- Prior to 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 inch/second, which is the level that can cause architectural damage for typical residential construction. If maximum levels would exceed these thresholds, alternative methods such static rollers, non-explosive blasting, and drilling piles as opposed to pile driving shall be used

To prevent vibration-induced annoyance as a result of construction-generated vibration:

- Individual projects that involve vibration-intensive construction activities, such as blasting, pile drivers, jack hammers, and 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 allied discipline and who is able to demonstrate a minimum of two years of experience in preparing technical assessments in acoustics and/or groundborne vibrations. ~~The study shall be submitted to and approved by the City during subsequent project-level environmental review.~~ The study is subject to review and approval of the Community Development Department.

Vibration impacts to nearby receptors shall not exceed the vibration annoyance levels (in RMS inches/second) as follows:

- Workshop = 0.126
- Office = 0.063
- Residential Daytime (7AM–10PM)= 0.032
- Residential Nighttime (10PM to 7 AM) = 0.016

If construction-related vibration is determined to be perceptible at vibration-sensitive uses, additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., nonexplosive blasting methods, drilled piles as opposed to pile driving, preclusion for using vibratory rollers, use of small- or medium-sized bulldozers, etc.). ~~Vibration reduction measures shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the project.~~ 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 NOISE-2b on page 4.10-29 of the Draft EIR is hereby amended as follows:

Mitigation Measure NOISE-2b: To reduce long-term vibration impacts of future development citywide ~~at~~ on existing or potential future sensitive uses:

- Locate sensitive uses away from vibration sources.
- Design industrial development to minimize vibration impacts on nearby uses. Where vibration impacts may occur, reduce impacts on residences and businesses through the use of setbacks

and/or structural design features that reduce vibration to levels at or below the guidelines of the Federal Transit Administration near rail lines and industrial uses.

Work with the railroad operators (e.g., Caltrain, Union Pacific, etc.) to reduce, to the extent possible, the contribution of railroad train noise and vibration to Menlo Park's noise environment.

The first paragraph under subheading "Transportation-Related Noise," on page 4.10-30 of the Draft EIR is hereby amended as follows:

As a result of implementation of the proposed project and ongoing regional growth~~, it is anticipated that there would be~~ there is potential for substantial permanent increases to the ambient noise levels throughout Menlo Park, ~~and that these increases~~ which would primarily result from increases to transportation-related noise, especially that of automobile traffic. Because Menlo Park has only one railway with limited service, does not host any airports or heliports, and is not located within the 55 dBA CNEL contour of any airports or heliports, increases in ambient noise levels from rail and air traffic are not anticipated. Nevertheless, increases to ambient noise from car traffic would result in a substantial permanent increase in ambient noise levels. Development of land uses under implementation of the proposed project, as well as development in adjacent communities, would result in increases in traffic that would cause substantial permanent increases in ambient noise levels in the city. Table 4.10-10 shows major roadway segments in Menlo Park with estimated increases in the ambient noise level at a distance of 50 feet from the roadway centerline.

CHAPTER 4.11, POPULATION AND HOUSING

The first paragraph under subheading "Population," on page 4.11-3 of the Draft EIR is hereby amended as follows:

The City of Menlo Park is home to ~~32,896~~33,449 residents with an average of 2.6 persons per household, according to current ~~California Department of Finance~~ United States Census Bureau, American Community Survey 2015 estimates. Between 20~~0~~10 and 201~~4~~5, Menlo Park saw a population increase of ~~7~~ four percent, compared to a six percent increase in San Mateo County and a ~~9~~seven percent increase in the ~~Combined Counties and the larger~~ nine-county Bay Area.[5] Unlike growth in the region, Menlo Park's growth is marked by an increase in household size rather than an increase in the total number of households. Between 20~~0~~10 and 2014, the average household size increased from 2.4 to 2.6 persons per household or nearly ~~8~~ eight percent. Household growth in ~~the Combined Counties~~ San Mateo County and the Bay Area only grew by one and three ~~2~~ percent, respectively, during the same time period. However, average household size in Menlo Park (2.6) is still smaller than ~~the Combined~~ San Mateo County ~~ies~~ and the Bay Area (2.~~9~~8 and 2.~~8~~7, respectively).[6]

Between 20~~0~~10 and 201~~0~~4, the number of single person households and households with two or more persons without children under 18 years of age decreased in Menlo Park. At the same time, the number of households with children increased, which reflects the increase in average household size. The ~~Combined Counties and~~ Bay Area also experienced an increase in the number of households with children under 18, but, counter to trends in Menlo Park, also saw an increase in the number of single person

households.[7] In San Mateo County, the number of households with children under 18 decreased by one percent between 2010 and 2014.

The first paragraph under subheading "Housing," page 4.11-3 of the Draft EIR is hereby amended as follows:

In ~~2010~~2014, Menlo Park contained ~~13,085~~13,046 housing units, with a ~~5.60~~5.0 percent vacancy rate.[8] Of the occupied housing units, approximately 56 percent were owner occupied and 44 percent were renter occupied. The vacancy rate and occupancy-by-tenure proportions were similar at the county level, with the estimated ~~2010~~2014 county vacancy rate at approximately ~~five~~ one percent, and occupied units being approximately 59 percent owner occupied and 41 percent renter occupied.[9] By comparison, in 2014 the nine-county Bay Area as a whole had a vacancy rate of 6 percent, with occupancy-by-tenure proportions of 55 percent owner-occupied and 45 percent renter-occupied.[10]

In ~~2010~~2014, approximately ~~55~~54 percent of Menlo Park's homes were detached single-family homes, eight percent were attached single-family homes, ~~37~~38 percent were multi-family homes, and ~~less than one percent were~~ no mobile home~~s~~ units were present in the city. These housing characteristics are similar to the countywide proportion of ~~57~~ five percent detached single-family homes, ~~9~~ eight percent attached single-family homes, ~~32~~six percent multi-family homes, and one percent mobile homes.[11]

Footnote 5 at the bottom of page 4.11-3 of the Draft EIR is hereby amended as follows:

[5]~~California Department of Finance, 2014. Census 2000.~~ US Census Bureau, Quick Facts 2015.

Footnote 6 at the bottom of page 4.11-3 of the Draft EIR is hereby amended as follows:

[6]~~Census, 2000 & 2010.~~US Census Bureau, 2010 -2014 American Community Survey, Tables DP-1 and S1101.

Footnote 7 at the bottom of page 4.11-3 of the Draft EIR is hereby amended as follows:

[7]US Census Bureau, 20~~0~~10 - 201~~0~~4 American Community Survey, Tables DP-1 and S-1101.

The bottom of page 4.11-3 of the Draft EIR is hereby amended to include the following footnote:

[8] US Census Bureau, 2010 Census, Table DP-1.

The bottom of page 4.11-3 of the Draft EIR is hereby amended to include the following footnote:

[9]US Census Bureau, 2010 Census, Table DP-1.

The bottom of page 4.11-3 of the Draft EIR is hereby amended to include the following footnote:

[10] US Census Bureau, 2010 - 2014 American Community Survey, Table DP-04.

Footnote 10 at the bottom of page 4.11-4 of the Draft EIR is hereby amended as follows:

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~~10~~11 Association of Bay Area Governments, ~~2009~~ 2013. ~~*Projections and Priorities 2009: Building Momentum, Projections through 2035.*~~*Plan Bay Area*, *Projections 2013*, Subregional Study Area Table, San Mateo County; City of Menlo.

The first standard of significance under Section 4.11.2, Standards of Significance," on page 4.11-5 of the Draft EIR is hereby amended as follows:

1. Induce substantial unexpected population growth, or growth ~~for which inadequate planning has occurred~~, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

The first paragraph under subheading "Regional Planning," on page 4.11-16 of the Draft EIR is hereby amended as follows:

For the purposes of this discussion on regional growth, population, households, and employment projections are considered in a cumulative context because ~~they are compared to~~ the 2040 buildout conditions ~~that~~ include all development potential in the city.

Table 4.11-2 under the subheading "Regional Planning," on page 4.11-17 of the Draft EIR is hereby amended as follows:

TABLE 4.11-2 PROPOSED PROJECT PLUS CUMULATIVE DEVELOPMENT ESTIMATED POPULATION, HOUSEHOLD, AND EMPLOYMENT

				Change 2015-2040
Menlo Park	Project Plus Cumulative	Existing 2015	Citywide Buildout 2040[d]	Growth Rate Percent[e]
Population	17,450[a]	32,900	50,350	53%
Households	6,780[b]	13,100	19,880	52%
Employees	22,350[c]	30,900	53,250	72%

Notes: Percent rounded to the nearest whole number.
a. 17,450 = 2,580 (Current General Plan) + 11,570 (proposed Bayfront Area) + 3,300 (cumulative projects).
b. 6,780 = 1,000 (Current General Plan) + 4,500 (proposed Bayfront Area) + 1,280 (cumulative projects).
c. 15,800 = 4,400 (Current General Plan) + 5,500 (proposed Bayfront Area) + 12,450 (cumulative projects).
d. Buildout 2040 is the 2015 existing conditions together with the project plus cumulative development.
e. This is the percentage of growth between the Existing 2015 conditions and the Citywide Buildout 2040.
Source: Association of Bay Area Governments, *Plan Bay Area*, *Projections 2013*, Subregional Study Area Table, San Mateo County; City of Menlo Park; PlaceWorks, 2015.

The second and third paragraphs following Table 4.11-2 under the subheading "Regional Planning," on page 4.11-17 of the Draft EIR are hereby amended as follows:

As shown in Table 4.11-2, implementation of the proposed project plus cumulative development would result in a total of 6,780 new households in the study area for a total of 19,880 households for the buildout horizon year 2040. Therefore, population in the study area could increase by 17,450 residents for a total of 50,350 residents by 2040. By comparison, as shown in Table 4.11-1 further above, ABAG anticipates 1,870 new households and 5,500 new residents in the study area, for a total of 16,360

households and 43,200 residents by 2040. The proposed project plus cumulative development therefore, represents a 38 percent rate increase for population (53 percent compared to 15 percent from existing conditions) and a ~~40~~39 percent increase for households (~~53~~52 percent compared to 13 percent from existing conditions) above what was projected in the regional growth forecasts.

With respect to employees, implementation of the proposed project plus cumulative development would result in a total of up to 22,350 new employees in the study area for a total of 53,250 employees by 2040. By comparison, as shown in Table 4.11-1 further above, ABAG anticipates 4,230 new employees by 2040 in the study area. Therefore, the proposed project plus cumulative development would result in a 59 percent rate increase for employees (72 percent compared to 13 percent from existing conditions) when compared to regional growth projections.

CHAPTER 4.12, PUBLIC SERVICES

The first paragraph under the subheading "Budget" on page 4.12-7 of the Draft EIR is hereby amended as follows:

The MPFPD FY 2015/2016 Adopted District Budget & CA-TF3 US&R Budget (MPFPD Budget) is $37.5 million, which is a 22 percent decrease from the FY 2014/2015 adjusted budget. For the FY 2015/2016 adopted budget, $3.5 million is budgeted for the construction and improvement of stations. Specifically, $1.5 million is budgeted to complete Station No. 2 construction and $1.6 million to start Station No. 6 construction. As of June 30, 2015, the MPFPD has set aside $21.8 million for the construction and replacement of stations, including $6.9 million for the construction of Station 6. However, as of June 30, 2015, the projected unfunded amount for capital improvement projects is $29 million.[1] To help with the unfunded amount for capital improvement projects, the MPFPD completed a NEXUS Impact Fee study.[2] The MPFPD Board of Directors has approved the NEXUS Impact Fee study. ~~; and once adopted by the City of Menlo Park, which is anticipated prior to the approval of the proposed project, all new development applicants in the MPFPD service area will be required to pay applicable impact fees~~. However, the City has not imposed the fee and no effective date for the impact fee has been identified by the City. Future development in Menlo Park would be responsible for the payment of property taxes of which a portion goes to the MPFPD to support the ability of the MPFPD to provide adequate services to its service area.

The first and second paragraphs under the Impact statement PS-1 on page 4.12-8 of the Draft EIR are hereby amended as follows:

As described in Chapter 3, Project Description, of this Draft EIR, the proposed project would introduce 14,150 new residents and 3,300 employees resulting in a service population of 17,450 by the buildout horizon year 2040. These changes would likely result in an increase in the number of calls for fire protection, and emergency medical services, which could result in expansion or construction of new or physically altered fire protection facilities resulting in significant environmental impacts.

As described above in Section 4.12.1.1, Environmental Setting, under the subheading "Existing Conditions," the MPFPD conducted a comprehensive FCA of all eight facilities, including the Administration Office, Fire Station's 1 through 6, and Fire Station 77. According to the MPFPD's Budget for

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the FY 2015/2016, the capital improvements are planned for each station. In addition, to these planned improvements, the MPFPD indicated that they would need to hire more personnel and increase the daily staffing ratio from the current 0.86 firefighter per 1,000 residents to 1 firefighter per 1,000 residents, and to remodel or rebuild Fire Station 77 to keep up with future demand. As stated in the FY 2015/2016 MPFPD Budget, the MPFPD has capital improvement plans in place to expand its facilities to accommodate future demand under existing conditions including Station 77. The FY 2015/2016 MPFPD Budget indicates that the need to expand Station 77 under existing conditions, which predates the proposed project. Therefore, the proposed project does not in and of itself require this expansion.

The third paragraph under Impact Discussion PS-1 on page 4.12-9 of the Draft EIR is hereby amended as follows:

General Plan buildout would occur over a 24-year horizon, which would result in an incremental increase in demand for fire protection services to be accommodated by the MPFPD. ~~The MPFPD requires developers in their service area to pay impact fees to help implement the MPFPD's capital improvement plans, which include specific improvements to ensure the MPFPD can adequately serve its service area and population. Applicants of new construction or improvements projects in Menlo Park are required to pay all applicable fees to the MPFPD as identified on the Fee Schedule. Because the Fee Schedule is likely subject to change over the 24-year buildout of the proposed project, project applicants are required to pay the fees per the Fee Schedule that is in place at the time of project approval.~~

The last paragraph under Impact Discussion PS-1 on page 4.12-12 of the Draft EIR is hereby amended as follows:

Future development under the proposed project, as part of the City's project approval process, would be required to comply with existing regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to fire protection services. The City, throughout the 2040 buildout horizon, would implement the General Plan programs that require the continued review of the Safety Element to incorporate the most up to date information in order to prevent natural and human hazards, and require the City's continued coordination with MPFPD to establish circulation standards, adopt an emergency response routes map, and equip all new traffic signals with pre-emptive traffic signal devices for emergency services. Additionally, the City will continue to annually update the Capital Improvement Program to identify priority projects that could improve the transportation network; thus, improving the circulation network, which facilitates MPFPD's overall access and ability to maintain adequate response times. Furthermore, the implementation of proposed project would help to minimize traffic congestion that could impact fire protection services and provide additional funding to support adequate fire protection services. Adherence to the State and City requirements combined with compliance with the MPFPD permitting process and payment of ~~impact fees~~ property taxes to support the ability of the MPFPD to provide adequate services to its service area would ensure that the adoption of the proposed project would result in *less-than-significant* impacts with respect to the need for remodeled or expanded MPFPD facilities.

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The second paragraph under Impact Discussion PS-2 on page 4.12-12 of the Draft EIR is hereby amended as follows:

As discussed under PS-1 above, the proposed project on its own does not create a need for new or physically altered facilities in order for the MPFPD to provide fire protection services to its service area. The expansion of Station 77 would be required to serve the increased growth potential in the Bayfront Area in conjunction with other future growth. The expansion of Station 77 is already planned and budgeted for prior to the proposed project becoming reasonably foreseeable. As discussed under PS-1, the ongoing compliance with State and local laws, including the payment of property taxes ~~developer fees~~ to support the ability of the MPFPD to provide adequate services to its service area, including the expansion of Station 77, would minimize impacts related to fire protection services. The expansion of Station 77 would occur in an existing urbanized area, which would reduce the potential for significant and unavoidable environmental impacts. Any environmental impacts related to the expansion of Station 77 would be project-specific, and would require permitting and review in accordance with CEQA, as necessary, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. In some cases, fire station expansion projects in highly urban settings, such as the Bayfront Area, can qualify for a categorical exemption under CEQA Guidelines Section 15301.[1] This EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development. For these reasons, the adoption of the proposed project, which would introduce incremental growth over a 24-year buildout, when considered with cumulative projects, would result in *less-than-significant* impacts with respect to the need for remodeled or expanded fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Footnote 35 at the bottom of page 4.12-14 of the Draft EIR is hereby amended to include the following footnote:

[35] The service population for this staffing ratio uses a service population of 42,046, which represents existing population and 1/3 of existing employees in the City of Menlo Park. Personal communication between Ricky Caperton, Associate, PlaceWorks and David Bertini, Commander, Menlo Park Police Department on November 18, 2015.

The first and second paragraphs under Impact Discussion PS-4 on page 4.12-15 is hereby amended as follows:

As described in Chapter 3, Project Description, of this Draft EIR, the proposed project would introduce 14,150 new residents and 3,300 employees resulting in a service population of 17,450 by the buildout horizon year 2040. These changes would likely result in an increase in the number of calls for police protection, and emergency medical services, which could result in expansion or construction of new or physically altered police facilities resulting in significant environmental impacts.

[1] *City of Hayward v. Board of Trustees of the California State University*. Court of Appeal of the State of California, First Appellate District, Division Three. Filed on November 30, 2015. Available at www.courts.ca.gov/opinions/documents/A131412A.PDF. Accessed on May 29, 2016.

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The MPPD indicated that they would like to maintain 1 officer per 1,000 service population. As such, the MPPD would need to hire an additional seventeen sworn officers[38] and purchase commensurate equipment for those officers, in order to accommodate the level of growth and expansion of the proposed project. At full buildout, the additional seventeen officers would ~~increase~~ ensure the current staffing ratio of 1~~.14~~ officer per 1,000 service population[38] would generally be maintained ~~to 1.29 officers per 1,000 service population~~ with a ratio of 1.09 officers per 1,000 service population.[39] The MPPD has confirmed that no expansion or addition of facilities would be required to accommodate the additional sworn officers or equipment.[40]

The bottom of page 4.12-15 of the Draft EIR is hereby amended to include the following footnote:

[38] 17,450 (service population) / 1,000 = 17.45 (# of officers needed to maintain a 1:1,000 ratio).

Footnote 38 at the bottom of page 4.12-15 of the Draft EIR is hereby amended as follows:

~~[39] Personal communication between Ricky Caperton, Associate, PlaceWorks and David Bertini, Commander, Menlo Park Police Department on November 18, 2015.~~

Footnote 39 at the bottom of page 4.12-15 of the Draft EIR is hereby amended as follows:

[39] 65 officers (Current staff of 48 officers plus the additional 17 new hires) divided by [42,046 (existing service population) + 17,450 (proposed project service population) = 59,496] or ~~50.35~~ 59.50 service population (Menlo Park population at 2040 buildout/1,000) = ~~1.29~~1.09 sworn officers per 1,000 service population.

The Impact Statement PS-4 on page 4.12-18 of the Draft EIR is hereby amended as follows:

PS-4 Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would ~~not~~ result in less-than-significant cumulative impacts with respect to police services.

The paragraph under subheading "The Quimby Act," on page 4.12-19 of the Draft EIR is hereby amended as follows:

The Quimby Act of 1975 authorizes Cities and Counties to pass ordinances requiring developers to set aside land, donate conservation easements or pay fees for park improvements. The Quimby Act sets a standard park space to population ratio of up to 3 acres of park space per 1,000 persons. Cities with a ratio of higher than three acres per 1,000 persons can set a standard of up to 5 acres per 1,000 persons for new development. The calculation of a city's park space to population ratio is based on a comparison of the population count of the last federal census to the amount of ~~city-owned~~ parkland in the city. A 1982 amendment (AB 1600) requires agencies to clearly show a reasonable relationship between the public need for a recreation facility or park land, and the type of development project upon which the fee is imposed.

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The subheading under the heading "Existing Conditions," on page 4.12-20 of the Draft EIR is hereby amended as follows:

~~City-owned p~~ Parks and ~~f~~Facilities in the City

Table 4.12-3 under the subheading "Menlo Park City School District," on page 4.12-30 of the Draft EIR is hereby amended as follows:

TABLE 4.12-3 CURRENT CAPACITY AND ENROLLMENT FOR THE MPCSD SCHOOLS IN MENLO PARK

Schools	Capacity[a]	2014/15Enrollment[b]	Difference
Encinal Elementary	720	792	(72)
Laurel Elementary	360	465	(105)
Oak Knoll Elementary	720	766	(46)
ELEMENTARY SCHOOLS TOTAL	*1,800*	*2,023*	*(223)*
Hillview Middle School	1,100	881	219
MIDDLE SCHOOLS TOTAL	*1,100*	*~~833~~ 881*	*219*

Notes:
a. School Capacity and enrollment data from Menlo Park City School District forecast update, 2015.
b. Enrollment from California Department of Education, DataQuest, 2015.

The first paragraph at the top of page 4.12-36 of the Draft EIR is hereby amended as follows:

This analysis assumes that 34 ~~55~~ single-family units and 5,466 ~~5,428~~ multi-family units, of the total 5,500 residential units, in the following school impact discussion. The 34 ~~55~~ single-family units are derived from the development potential under the existing General Plan and could therefore be built anywhere in Menlo Park on qualifying lots that are designated for single-family housing. There are parcels that satisfy the designation and size criteria within the MPCSD, LLSD, Ravenswood CSD, and SUHSD; therefore, for the purposes of this analysis, it is assumed that the students generated from the 34 ~~55~~ single-family units could attend each of these school districts. However, it is unlikely that all of the 34 ~~55~~ single-family units would be built within one school district service area; therefore, this represents a conservative analysis. The remainder of the potential new housing was assigned to the applicable school district based on allowed density under the existing General Plan zoning designations, and the proposed zoning designations in the Bayfront Area. A breakdown of residential units proposed within each of the school districts that serve the study area and their potential impacts are discussed below.

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The first sentence and Table 4.12-8 under subheading "Menlo Park City School District," on page 4.12-36 of the Draft EIR is hereby amended as follows:

As shown in Table 4.12-8, ~~983~~747 residential units could result in ~~418~~320 new students by the horizon year 2040.

TABLE 4.12-8 STUDENT GENERATION FOR THE MPCSD SCHOOLS IN MENLO PARK

Housing Unit Type	Housing Units	Student Generation Rate	Students
Single-Family Dwelling Units	34 ~~55~~	0.18	6 ~~10~~
Multi-Family Dwelling Units	713~~928~~	0.44	314~~408~~
Total Units	747~~983~~		
Total Students			320~~418~~

Source: City of Menlo Park 2015; Menlo Park City School District, November 2015, Enrollment Projection Study Report.

The first sentence and Table 4.12-10 under subheading "Las Lomitas School District," on page 4.12-38 of the Draft EIR is hereby amended as follows:

As shown in Table 4.12-10, a total of 152 ~~173~~ units could result in 61 ~~69~~ students by the horizon year 2040.

TABLE 4.12-10 STUDENT GENERATION FOR THE LLSD SCHOOLS IN MENLO PARK

Housing Unit Type	Housing Units	Student Generation Rate	Students
Single-Family Dwelling Units	34 ~~55~~	0.4	14 ~~22~~
Multi-Family Dwelling Units	118	0.4	47
Total Units	152 ~~173~~		
Total Students			61 ~~69~~

Source: City of Menlo Park, 2015; Personal communication between Ricky Caperton, Associate, PlaceWorks and Carolyn Chow, Chief Business Officer, Las Lomitas School District on October 28, 2015.

The first sentence and Table 4.12-11 under subheading "Ravenswood City School District," on page 4.12-39 of the Draft EIR is hereby amended as follows:

As shown in Table 4.12-11, 3,706 ~~3,727~~ units could result in 2,070 ~~2,078~~ new students by the horizon year 2040.

TABLE 4.12-11 STUDENT GENERATION FOR THE RAVENSWOOD CSD SCHOOLS IN MENLO PARK

Housing Unit Type	Housing Units	Student Generation Rate	Students
Single-Family Dwelling Units	34 ~~55~~	0.39	13 ~~22~~
Multi-Family Dwelling Units	3,672	0.56	2,056
Total Units	**3,706 ~~3,727~~**		
Total Students			**2,070 ~~2,078~~**

Note: Under the proposed project ~~1,000~~ 1,500 of the residential units assigned to the Ravenswood CSD could be dormitory-style units that would not accommodate families with children, so this is a conservative estimate.
Source: City of Menlo Park, 2015; Personal communication between Ricky Caperton, Associate, PlaceWorks and Kevin Sved, Chief Business Officer, Ravenswood City School District on November 16, 2015.

The first sentence and Table 4.12-12 under subheading "Sequoia Union High School District," on page 4.12-39 of the Draft EIR is hereby amended as follows:

As shown in Table 4.12-12, 5,500 ~~5,483~~ units could result in 1,100 ~~1,097~~new students by the horizon year 2040.

TABLE 4.12-12 STUDENT GENERATION FOR THE SUHSD SCHOOLS IN MENLO PARK

Housing Unit Type	Housing Units	Student Generation Rate	Students
Single-Family Dwelling Units	34 ~~55~~	0.20 ~~0.39~~	7 ~~11~~
Multi-Family Dwelling Units	5,466~~5,428~~	0.20 ~~0.56~~	1, 093 ~~1,086~~
Total Units	**5,500~~5,483~~**		
Total Students			**1,100~~1,097~~**

Note: Under the proposed project 1,500 of the residential units assigned to the SUHSD could be dormitory-style units that would not accommodate families with children, so this is a conservative estimate.
Source: City of Menlo Park, 2015; Personal communication between Ricky Caperton, Associate, PlaceWorks and Anilisa Manolache, Chief Facilities Officer, Sequoia Union High School District on December 4, 2015.

The third paragraph on page 4.12-45 of the Draft EIR is hereby amended as follows:

General Plan buildout would occur over a 24-year horizon, which would result in an incremental increase in demand for ~~fire protection~~ library services to be accommodated by the Menlo Park Library. The Menlo Park Library includes long-range strategies to ensure adequate library facilities are provided to sufficiently meet the demands of the existing and future residents of Menlo Park. Additionally, the increased property taxes from new development in Menlo Park that could occur under the proposed project would result in additional funding being available to the Menlo Park Library to support the provision of adequate services.

CHAPTER 4.13, TRANSPORTATION AND CIRCULATION

The second paragraph under heading "4.13, Transportation and Circulation," on page 4.13-1 of the Draft EIR is hereby amended as follows:

The information in this chapter is based in part on travel demand modeling, transportation impact analysis and identification of mitigations conducted by TJKM Transportation Consultants. The analyses were conducted in accordance with the standards and methodologies set forth by the City of Menlo Park (City), Caltrans, ~~and~~ City/County Association of Governments of San Mateo County (C/CAG) and adjacent cities. The technical appendices are included in Appendix K, Transportation Data, of this Draft EIR.

The first sentence under subheading "Existing Bicycle Facilities," on page 4.13-12 of the Draft EIR is hereby amended as follows:

The ~~City's~~ existing bicycle facilities in the study area are identified on Figure 4.13-2. Menlo Park has an existing bicycle network with connections to neighboring city facilities.

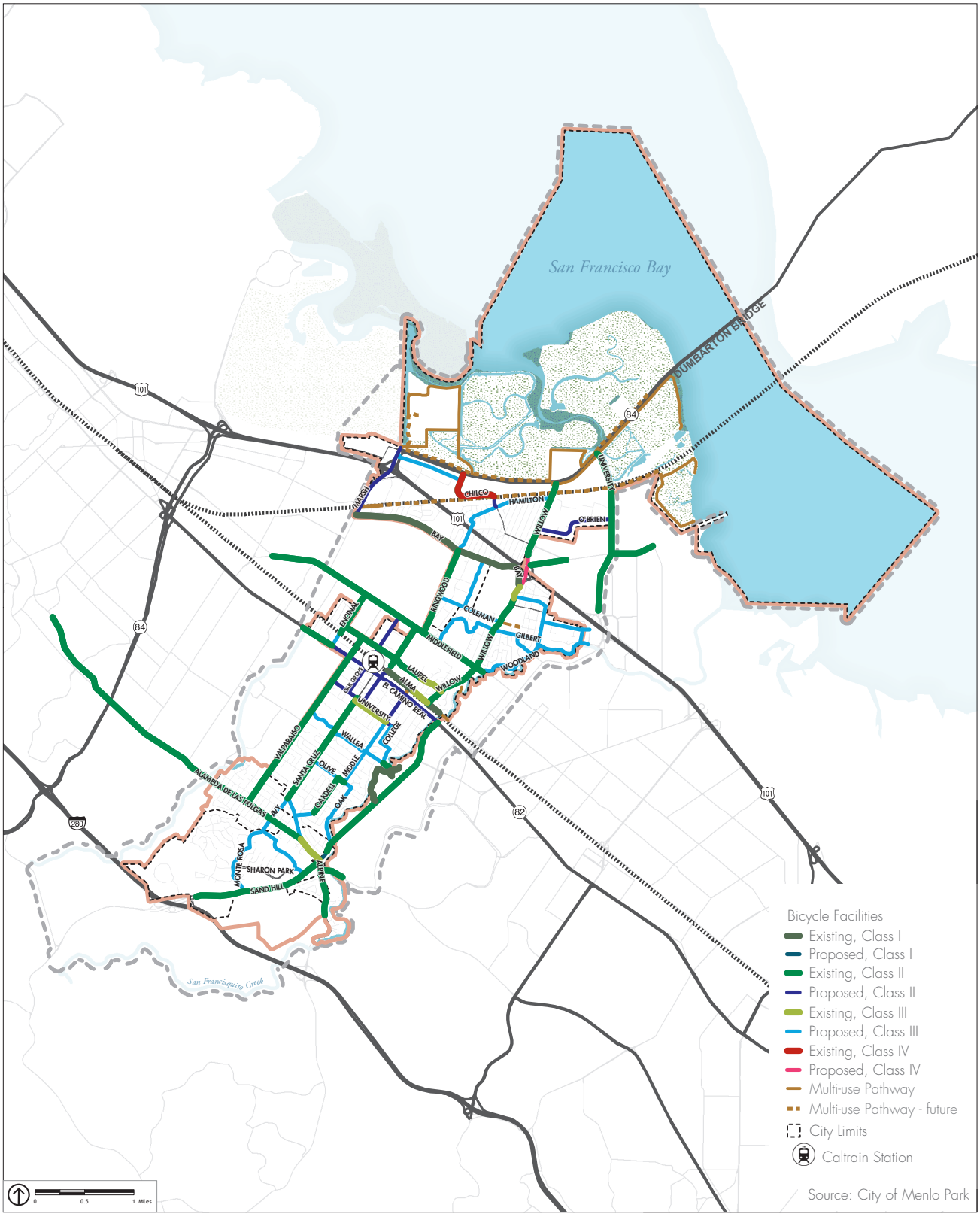
Figure 4.13-2 on page 4.13-14 of the Draft EIR is has been revised as shown on the following page.

The first paragraph under subheading "Existing Pedestrian Facilities," on page 4.13-15 of the Draft EIR is hereby amended as follows:

A survey of the existing pedestrian facilities was prepared as part of the City of Menlo Park's 2009 Sidewalk Plan. Existing pedestrian facilities within ~~the study area~~ the City of Menlo Park are shown on Figure 4.13-3. The existing pedestrian facilities within ~~the study area~~ the City of Menlo Park include off-street paths, sidewalks along roadways, pedestrian signals, and crosswalks. Specifically in the Bayfront Area, the existing pedestrian facilities are limited, with many streets in the area having partial or no sidewalks. The only street segment with sidewalks on both sides of the street is on the Marsh Road overpass at US 101. The Dumbarton Rail Corridor and US 101 also limit pedestrian access and isolate the project site and Belle Haven areas from the rest of the community.

The second paragraph under subheading "Existing Transit Facilities," on page 4.13-15 of the Draft EIR is hereby amended as follows:

Transit service and facilities, including bus routes, major bus stops, Caltrain tracks, and the Caltrain station are shown on Figure 4.13-4 and listed in Table 4.13-1. ~~A description of e~~ Each major transit provider and the transit facilities in proximity to the Bayfront Area that have the potential to be affected by the proposed project's new development potential are described below.



Source: TJKM, 2016.

Figure 4.13-2
Bicycle Facilities - Existing and Proposed

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The text under subheading "Caltrain Short-Range Transit Plan," on page 4.13-20 of the Draft EIR is hereby amended as follows:

Planned short-range improvements to Caltrain focus on four ~~a~~ strategies: Capital Contingency & Support, maintaining a ~~y called the~~ State of Good Repair, implementing Caltrain Modernization and investing in Reliability & Enhancements to improve system performance ~~which will concentrate on a systematic approach in optimizing the current system's condition and performance~~. ~~These p~~Planned improvements include upgrading signaling and communications systems, replacing old bridges, track and station rehabilitation, ~~enhancing approach speeds and flexibility at the San Francisco terminus, and eliminating all of the remaining hold-out stations.~~ and rehabilitating the diesel rolling stock. Additionally, the Caltrain Modernization program includes a series of major capital investments to electrify and upgrade service, including Communications Based Overlay Signal System Positive Train Control (CBOSS PTC), electrification of the corridor between San Francisco and San Jose and the partial replacement of Caltrain's diesel trains with electric trains. ~~Hold-out stations are areas where trains are required to wait while another train is in the main station and therefore increase service delays. Planned long-range improvements to Caltrain include electrification of the entire line to improve operating efficiency and provide environmental benefits.~~ Caltrain planning efforts are being curtailed by their current financial constraints.

Footnote 15 at the bottom of page 4.13-20 of the Draft EIR is hereby amended as follows:

[15] Peninsula Corridor Joint Powers Board (Caltrain), ~~2008~~2015. *Short Range Transit Plan ~~2008-2017~~2015-2024.*

The first paragraph under subheading "Airport Land Use Comprehensive Plans," on page 4.13-21 of the Draft EIR is hereby amended as follows:

The City of Menlo Park does not host any public or private airports or airstrips. Menlo Park is located approximately 6 miles to the northwest of ~~Moffet~~ Moffett Federal Airfield, 14 miles to the northwest of the San Jose International Airport, 15 miles to the southeast of San Francisco International Airport, and 18 miles to the south of Oakland International Airport.

The text below subheading "Vehicle Miles Traveled," on page 4.13-25 of the Draft EIR is hereby amended as follows:

In anticipation of the expected implementation of SB 743 and the transition to VMT analysis to determine environmental impacts rather than level of service, this analysis includes a discussion of VMT per ~~capita~~ service population for each scenario. VMT is a measure of the amount of miles travelled for a proposed development or area.

As discussed above in Section 4.13.1.1, Regulatory Framework, SB 743 requires impacts to transportation network performance to be viewed through a filter that promotes the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. VMT per ~~capita,~~ service population, or other efficiency metric was identified as the preferred metric in the Draft CEQA Guidelines for Transportation Analysis published in January 2016.

VMT refers to trips multiplied by the trip distances. For purposes of the proposed project, all trips that either start or end in Menlo Park are accounted for in the VMT analysis. Generally, trips have two ends, in that every trip has an origin and a destination. The VMT estimate is based on total vehicle for trips occurring wholly within the city, and one-half of all vehicle miles for trips that begin or end outside the city. The other one-half of trips that begin or end outside the city is attributed to the location of that trip. Trips that are only passing through the city are not accounted for in Menlo Park's VMT estimate. However, the location of the trip origin and destination accounts for the VMT attributable for that trip.

VMT per ~~capita~~ service population is the VMT of the development or the area divided by the population and the number of jobs in the development or area. VMT estimates are sensitive to changes in land use. Generally, land uses that reflect a more balanced jobs-housing ratio result in lower per ~~capita~~ service population VMT.

The first paragraph under subheading "Study Intersections," on page 4.13-26 of the Draft EIR is hereby amended as follows:

The 64 study intersections are shown in Table 4.13-4 by intersection number, name, control type and jurisdiction. The level-of-service threshold for each intersection is also listed.

The text under subheading "Vehicle Miles Traveled," on page 4.13-33 of the Draft EIR is hereby amended as follows:

The MPM model was utilized to provide an estimate of VMT for vehicle trips beginning and/or ending in Menlo Park. The VMT estimate is based on total vehicle for trips within the city, and one-half of all vehicle miles for trips that begin or end outside the city. Per ~~capita~~ service population VMT is based on VMT divided by the population (both residents and number of jobs within the city). Table 4.13-6 summarizes the estimated daily VMT per ~~capita~~ service population under 2014 Existing conditions. As shown, the VMT per ~~capita~~ service population under 2014 Existing conditions is 15 miles per person. In comparison to the regional average, VMT per person described in the 2013 *Plan Bay Area* EIR is 20.8 miles per person.

Table 4.13-6 under subheading "Vehicle Miles Traveled" on page 4.13-33 of the Draft EIR is hereby amended as follows:

TABLE 4.13-6 2014 EXISTING DAILY VEHICLE MILES TRAVELED (VMT) PER ~~CAPITA~~ SERVICE POPULATION

Analysis Scenarios	VMT	Residents	Jobs	VMT Per ~~Capita~~ Service Population
Existing Conditions	934,722	32,900	30,900	15

Source: TJKM Transportation Consultants, January 2016.

The first sentence under subheading "Roadway Segments Daily Traffic Volumes," on page 4.13-33 of the Draft EIR is hereby amended as follows:

The 2014 Existing daily traffic volumes on ~~all~~ the study segments are shown in Table 4.13-5 above.

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Intersection # 57 in Table 4.13-7, Unacceptable Peak Hour Intersection Level of Service Operations Under 2014 Existing Conditions, on page 4.13-42 of the Draft EIR is hereby amended as follows:

TABLE 4.13-7 UNACCEPTABLE PEAK HOUR INTERSECTION LEVEL OF SERVICE OPERATIONS UNDER 2014 EXISTING CONDITIONS

No.	Intersection	LOS Threshold	AM		PM		Notes
			LOS	Delay (sec)	Los	Delay (sec)	
57	University Ave. and Woodland Ave	D	E	58.6	~~F~~ E	71.2	n/a

The text under subheading "Vehicle Miles Traveled," on page 4.13-43 of the Draft EIR is hereby amended as follows:

The MPM model was utilized to provide an estimate of VMT for vehicle trips beginning and/or ending in Menlo Park. The VMT estimate is based on total vehicle trips within the city, and one-half of all vehicle miles for trips that begin or end outside the city. Per ~~capita~~ service population VMT is based on VMT divided by the population (both residents and number of jobs within the city). Table 4.13-8 compares the estimated daily VMT per ~~capita~~ service population under 2014 Existing scenario and the 2040 No Project scenario. As shown, the VMT per ~~capita~~ service population under 2040 No Project increases to 19 miles per person as compared to 2014 Existing conditions with 15 miles per person. This is due to the growth in jobs outpacing planned residential growth, exacerbating the jobs-to-housing ratio within the city.

Table 4.13-8 under subheading "Vehicle Miles Traveled" on page 4.13-44 of the Draft EIR is hereby amended as follows:

TABLE 4.13-8 DAILY VEHICLE MILES TRAVELED (VMT) PER ~~CAPITA~~ SERVICE POPULATION COMPARISON: 2014 EXISTING AND 2040 NO PROJECT

Analysis Scenarios	VMT	Residents	Jobs	VMT Per ~~Capita~~ Service Population
2014 Existing	934,722	32,900	30,900	15
2040 No Project	1,655,624	38,780	47,750	19

Source: TJKM Transportation Consultants, January 2016.

The text under subheading "Vehicle Miles Traveled Standards," on page 4.13-56 of the Draft EIR is hereby amended as follows:

For purposes of this analysis, impacts on VMT are considered potentially significant if:

- The proposed project results in citywide VMT per ~~capita~~ service population that would exceed 15 percent below VMT per ~~capita~~ service population for the region. For purposes of this analysis, data from the 2013 *Plan Bay Area* EIR was used to determine the regional average VMT per ~~capita~~ service

population at 20.8 miles per person. The threshold is therefore 15 percent of 20.8 miles, or 17.7 miles per person.

The subheading "2040 Plus Project Conditions" has been added to page 4.13-57 as follows:

Section 4.13.3.1 2040 Plus Project Conditions

Mitigation Measure TRANS-1a on page 4.13-62 of the Draft EIR is hereby amended as follows:

Mitigation Measure TRANS-1a: Widen impacted roadway segments at appropriate locations throughout the city to add travel lanes and capacity to accommodate the increase in net daily trips.

Mitigation Measure TRANS-1b on page 4.13-70 of the Draft EIR is hereby amended as follows:

Mitigation Measure TRANS-1b: The City of Menlo Park shall update the existing Transportation Impact Fee (TIF) program to guarantee funding for citywide roadway and infrastructure improvements that are necessary to mitigate impacts from future projects based on the then current City standards. The fees shall be assessed when there is new construction, an increase in square footage in an existing building, or the conversion of existing square footage to a more intensive use. The fees collected shall be applied toward circulation improvements. The fees shall be calculated by multiplying the proposed square footage, dwelling unit, or hotel room by the appropriate rate. Transportation Impact fees shall be included with any other applicable fees payable at the time the building permit is issued. The City shall use the Transportation Impact Fees to fund construction (or to recoup fees advanced to fund construction) of the transportation improvements identified below, among other things that at the time of potential future development may be warranted to mitigate traffic impacts. It should be noted that any project proposed prior to the adoption of an updated TIF will be required to conduct a project-specific Transportation Impact Assessment to determine the impacts and necessary transportation mitigations that are to be funded by that project.

As part of the update to the TIF program, the City shall also prepare a "nexus" study that will serve as the basis for requiring development impact fees under Assembly Bill (AB) 1600 legislation, as codified by California Code Government Section 66000 et seq., to support implementation of the proposed project. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the improvements and facilities required to mitigate the impacts of new development pursuant to the proposed project. The following examples of improvements and facilities would reduce impacts to acceptable level of service standards and these, among other improvements, could be included in the TIF program impact fees nexus study:

- Sand Hill Road (westbound) and I-280 Northbound On-ramp (#1): Modify the signal-timing plan during the PM peak hour to increase the maximum allocation of green time to the westbound approach during the PM peak hour.
- Sand Hill Road (eastbound) and I-280 Northbound Off-ramp (#2): Add an additional northbound right-turn lane on the off-ramp to improve operations to acceptable LOS D during the AM peak hour.

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- El Camino Real and Ravenswood Avenue (#28): One eastbound right-turn lane on Menlo Avenue to improve conditions.
- Willow Road and Newbridge Street (#33): Implement measures on Chilco Street south of Constitution Drive to reduce or prevent cut-through traffic through the Belle Haven neighborhood, such as peak-hour turn restrictions from Constitution Drive to southbound Chilco Street, and measures to enhance east/west circulation from Willow Road via O'Brien Drive and the proposed mixed-use collector street opposite Ivy Drive, extending east to University Avenue, to discourage use of Newbridge Street.
- Willow Road and Hamilton Avenue (#36): Provide primary access to potential future development sites east of Willow Road via O'Brien Drive and/or the proposed Mixed-Use Collector that would intersect Willow Road between Hamilton Avenue and O'Brien Drive. Implement measures on Chilco Street south of Constitution Drive to prevent cut-through traffic through the Belle Haven neighborhood, such as peak-hour turn restrictions from Constitution Drive to southbound Chilco Street. Although the provision of an eastbound left-turn lane on Hamilton Avenue where it approaches Willow Road would reduce the delay, this potential mitigation is not recommend because it would encourage cut-through traffic via Chilco Street and Hamilton Avenue, potentially affecting the Belle Haven neighborhood. Therefore, to avoid facilitating the use of Chilco Street and Hamilton Avenue as cut-through routes in the adjacent residential neighborhood, mitigating this traffic impact is not recommended at this time, consistent with City policies that discourage cut-through traffic in residential neighborhoods. The improvements should be incorporated into the updated fee program for ongoing consideration.
- Bayfront Expressway and Willow Road (#37): Evaluate the potential for grade separation to allow conflicting movements to occur simultaneously. The evaluation must consider traffic improvements, along with potential secondary impacts caused by potential right-of-way acquisition, impacts to adjacent wetlands and the Dumbarton Rail corridor, as well as potential impacts or benefits for multi-modal accommodation. If found feasible, the updated fee program should incorporate fair-share contributions from future development towards grade separation.
- Bayfront Expressway and University Avenue (#38): Evaluate the potential for grade separation to allow conflicting movements to occur simultaneously. The evaluation must consider traffic improvements, along with potential secondary impacts caused by potential right-of-way acquisition, impacts to adjacent wetlands and the Dumbarton Rail corridor, as well as potential impacts or benefits for multi-modal accommodation. If found feasible, the updated fee program should incorporate fair-share contributions from future development towards grade separation.
- Chilco Street and Constitution Drive (#45): Install a traffic signal and signalized crosswalks at the intersection. Construct three southbound lanes on the one-block segment of Chilco Street, between Bayfront Expressway and Chilco Street, to include two southbound left-turn lanes to accommodate the volume of left-turning vehicles entering the project site. In addition, during the AM peak hour, provide a "split-phase" signal operation on Chilco Street. Construct a northbound left-turn lane on Chilco Street approaching Constitution Drive. Construct two outbound lanes on Chilco Street between Constitution Drive and Bayfront Expressway. If the Facebook Campus Expansion Project is approved, this mitigation measure would be required to be constructed as a requirement of that project.

- Chrysler Drive and Constitution Drive (#46): Construct a southbound left-turn on Chrysler Drive, approaching Constitution Drive.
- University Avenue and Adams Drive (#47): Install a traffic signal at this intersection.
- University Avenue and Bay Road (#51): Realign the eastbound and westbound approaches to allow replacement of the east/west "split-phase" signal on Bay Street with standard protected signal phases in order to allow eastbound and westbound pedestrian crossings to occur simultaneously, which would allow for an increase in green time allocated to northbound/southbound movements on University Avenue and reduce peak-hour delay at this intersection. This intersection is located in the City of East Palo Alto and under the control of Caltrans. If this measure if found feasible by the City of East Palo Alto, the improvements should be incorporated into the City of Menlo Park's updated fee program to collect fair-share contributions from future development towards such improvements.
- University Avenue and Donohoe Street (#54): Mitigating this impact would require providing additional westbound lane capacity on Donohoe Street, including an extended dual left-turn pocket, dedicated through lane, and dual right-turn lanes; providing a southbound right-turn lane on University Avenue and lengthening the northbound turn pockets. However, this mitigation is likely to be infeasible given right-of-way limitations, proximity to existing US 101 on- and off-ramps, and adjacent properties. In addition, this intersection is located in the City of East Palo Alto and under the control of Caltrans. If this measure if found feasible by the City of East Palo Alto, the improvements should be incorporated into the City of Menlo Park's updated fee program to collect fair-share contributions from future development towards such improvements.
- University Avenue and US 101 Southbound Ramps (#56): Mitigating this impact would require modifications to the US 101 Southbound On/Off Ramps and at this location This intersection is located in the City of East Palo Alto and under the control of Caltrans. If this measure if found feasible by the City of East Palo Alto, the improvements should be incorporated into the City of Menlo Park's updated fee program to collect fair-share contributions from future development towards such improvements.
- Chilco Street and Hamilton Avenue (#60): Installation of a traffic signal would mitigate this impact to less than significant levels, but would have the undesirable secondary effect of encouraging the use of Chilco Street as a cut-through route, which conflicts with City goals that aim to reduce cut-through traffic in residential neighborhoods. Therefore, to avoid facilitating cut-through traffic, mitigating this traffic impact by increasing capacity is not recommended at this time, but should be incorporated into the updated fee program for ongoing consideration.

The first and second paragraphs under subheading "Vehicle Miles Traveled" on page 4.13-73 of the Draft EIR is hereby amended as follows:

The MPM model was utilized to provide a comparison of estimated VMT for trips beginning or ending in Menlo Park. Table 4.13-13 compares the VMT forecast for the 2014 Existing scenario to the 2040 Plus Project scenario, and shows the resulting change in VMT per ~~person~~ service population based on the anticipated total number of Menlo Park residents and jobs under each scenario. VMT is also shown under 2040 No Project conditions for informational purposes.

REVISIONS TO THE DRAFT EIR

As previously stated in Section 4.13.2, Standards of Significance, VMT related impacts will be considered potentially significant if the proposed project results in citywide VMT per ~~capita~~ service population that would exceed ~~15 percent below~~ the City's existing VMT per ~~capita for the region~~ service population. As discussed under Section 4.13.1.3, Traffic Analysis Scenarios, the VMT estimates in the MPM are sensitive to changes in land use and in general, land uses that reflect a more balanced jobs-housing ratio in the MPM result in lower per ~~capita~~ service population VMT. Therefore, while the proposed project would introduce new development potential in Menlo Park, as shown in Table 4.13-13, VMT under the 2040 Plus Project condition would be less than VMT under the 2040 No Project condition and 2014 Existing conditions~~, as well as exceeding 15 percent below the 2013 *Plan Bay Area EIR* regional average of 17.7 miles per person~~. The reduction in VMT per capita under the 2040 Plus Project scenario is due to the planned addition of housing in a jobs-rich area, which results in changes in trip-making behavior, travel characteristics and resulting trip lengths.

Table 4.13-13 under subheading "Vehicle Miles Traveled" on page 4.13-73 of the Draft EIR is hereby amended as follows:

TABLE 4.13-13 DAILY VEHICLE MILES TRAVELED (VMT) PER ~~CAPITA~~ SERVICE POPULATION COMPARISON: 2014 EXISTING AND 2040 PLUS PROJECT

Analysis Scenarios	VMT	Residents	Jobs	VMT Per ~~Capita~~ Service Population
2014 Existing	934,722	32,900	30,900	15
2040 No Project	1,655,624	38,780	47,750	19
2040 Plus Project	1,449,337	50,350	53,250	14

Source: TJKM Transportation Consultants, 2016.

The first paragraph directly following Table 4.13-13 on page 4.13-73 of the Draft EIR is hereby amended as follows:

As previously stated in Section 4.13.2, Standards of Significance, VMT related impacts will be considered potentially significant if the proposed project results in citywide VMT per capita that would exceed 15 percent below VMT per ~~capita~~ service population for the region. As discussed under Section 4.13.1.3, Traffic Analysis Scenarios, the VMT estimates in the MPM are sensitive to changes in land use and in general, land uses that reflect a more balanced jobs-housing ratio in the MPM result in lower per capita VMT. Therefore, while the proposed project would introduce new development potential in Menlo Park, as shown in Table 4.13-13, VMT under the 2040 Plus Project condition would be less than VMT under the 2040 No Project condition and 2014 Existing conditions, as well as exceeding 15 percent below the 2013 *Plan Bay Area EIR* regional average of 17.7 miles per person. The reduction in VMT per capita under the 2040 Plus Project scenario is due to the planned addition of housing in a jobs-rich area, which results in changes in trip-making behavior, travel characteristics and resulting trip lengths.

Mitigation Measure TRANS-6a on page 4.13-86 of the Draft EIR is hereby amended as follows:

Mitigation Measure TRANS-6a: The City of Menlo Park shall update the Transportation Impact Fee (TIF) program to provide funding for citywide bicycle and pedestrian facilities that are necessary to mitigate

impacts from future projects based on the then current City standards. The fees shall be assessed when there is new construction, an increase in square footage in an existing building, or the conversion of existing square footage to a more intensive use. The fees collected shall be applied toward improvements that will connect development sites within the area circulation system, including the elimination of gaps in the citywide pedestrian and bicycle network. The fees shall be calculated by multiplying the proposed square footage, dwelling unit, or hotel room by the appropriate rate. Transportation Impact fees shall be included with any other applicable fees payable at the time the building permit is issued. The City shall use the transportation Impact fees to fund construction (or to recoup fees advanced to fund construction) of the transportation improvements identified in this mitigation measure, among other things that at the time of potential future development may be warranted to mitigate traffic impacts. It should be noted that any project proposed prior to the adoption of an updated TIF will be required to conduct a project-specific Transportation Impact Assessment to determine the impacts and necessary pedestrian or bicycle facilities mitigations that are to be funded by that project.

As part of the update to the TIF program, the City shall also prepare a "nexus" study that will serve as the basis for requiring development impact fees under Assembly Bill (AB) 1600 legislation, as codified by California Code Government Section 66000 et seq., to support implementation of the proposed project. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the bicycle and pedestrian improvements and facilities required to mitigate the traffic impacts of new development pursuant to the proposed project. The following examples of pedestrian and bicycle improvements would reduce impacts to acceptable standards, and these, among others improvements, could be included in the updated TIF program, also described under TRANS-1:

- US 101 Pedestrian & Bicycle Overcrossing at Marsh Road, and Marsh Road Corridor Pedestrian & Bicycle Improvements (Haven Avenue to Marsh Road/Bay Road): Provide pedestrian and bicycle circulation between the Bayfront Area east of US 101 with the area circulation system west of US 101 along Marsh Road, including access to schools and commercial sites west of Marsh Road that are accessed via Bay Road and Florence Street. Improvements should facilitate pedestrian and bicycle circulation between Haven Avenue and across US 101 near Marsh Road. The recommended improvement would include a dedicated pedestrian and bicycle crossing adjacent to Marsh Road. Alternatively, the provision of continuous sidewalks with controlled pedestrian crossings and Class IV protected bicycle lanes on the Marsh Road overpass, if feasible, could mitigate this impact.
- Ringwood Avenue Corridor Pedestrian & Bicycle Improvements (Belle Haven to Middlefield Road): Eliminate pedestrian and bicycle facility gaps on primary access routes to the Ringwood Avenue bicycle/pedestrian overcrossing of US 101 (located near the terminus of Ringwood Avenue and Market Place). Improvements should include complete sidewalks on the north side of Pierce Road and bicycle facility improvements on the proposed Ringwood Avenue-Market Place-Hamilton Avenue bicycle boulevard (see Street Classification Map in Chapter 3, Project Description). These improvements would also enhance pedestrian and bicycle access to Menlo-Atherton High School.
- University Avenue Pedestrian Improvements: Eliminate gaps in the sidewalk network on those portions of University Avenue that are within the Menlo Park City limits. The TIF Program should also include a contribution towards elimination of sidewalk gaps outside the City limits (within the

City of East Palo Alto) to ensure that continuous sidewalks are provided on the west University Avenue between Adams Drive and the Bay Trail, located north of Purdue Avenue.

- Willow Road Bikeway Corridor (Bayfront Expressway to Alma Street): Provide a continuous bikeway facility that eliminates bicycle lane gaps, provides Class IV bicycle lanes on the US 101 overpass and where Willow Road intersects US 101 northbound and southbound ramps, and upgrades existing Class II bicycle lanes to Class IV protected bicycle lanes where feasible, particularly where the speed limit exceeds 35 miles per hour (mph).
- Willow Road Pedestrian Crossings (Bayfront Expressway to Newbridge Street): Provide enhanced pedestrian crossings of Willow Road at Hamilton Avenue, Ivy Drive (including proposed new street connection opposite Ivy Drive), O'Brien Drive and Newbridge Street. Enhanced crossings should include straightened crosswalks provided on each leg, high visibility crosswalk striping, accessible pedestrian signals, and pedestrian head-start signal timing (leading pedestrian intervals) where feasible. These enhanced crossings would provide improved access between the Belle Haven neighborhood and potential future development between Willow Road and University Avenue.
- Dumbarton Corridor Connections: Through separate projects, Samtrans is currently considering the potential for a bicycle/pedestrian shared-use trail along the Dumbarton Corridor right-of-way between Redwood City and East Palo Alto, through Menlo Park. If found feasible, the City's TIF Program should incorporate walking and bicycling access and connections to the proposed trail, including a potential rail crossing between Kelly Park and Onetta Harris Community Center and Chilco Street and pedestrian and bicycle improvements on streets that connect to the Dumbarton Corridor: Marsh Road, Chilco Street, Willow Road, and University Avenue.

Mitigation Measure TRANS-6b on page 4.13-88 of the Draft EIR is hereby amended as follows:

Mitigation Measure TRANS-6b: The City of Menlo Park shall update the existing Shuttle Fee program to guarantee funding for citywide operations of City-sponsored shuttle service that is necessary to mitigate impacts from future projects based on the then current City standards. The fees shall be assessed when there is new construction, an increase in square footage in an existing building, or the conversion of existing square footage to a more intensive use. The fees collected shall be applied toward circulation improvements and right-of-way acquisition. The fees shall be calculated by multiplying the proposed square footage, dwelling unit, or hotel room by the appropriate rate. Shuttle fees shall be included with any other applicable fees payable at the time the building permit is issued. The City shall use the Shuttle fees to fund operations of City-sponsored shuttle service to meet the increased demand.

As part of the update to the Shuttle Fee program, the City shall also prepare a "nexus" study that will serve as the basis for requiring development impact fees under Assembly Bill (AB) 1600 legislation, as codified by California Code Government Section 66000 et seq., to support implementation of the proposed project. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the transit improvements and facilities required to mitigate the transit impacts of new development pursuant to the proposed project. The types of transit-related improvements and facilities that would reduce impacts to acceptable standards including increasing the fleet of City-sponsored Shuttles and adding additional transit stop facilities within one-quarter mile from residential

and employment centers. These, among other improvements, could be included in the Shuttle Fee program impact fees nexus study.

CHAPTER 4.14, UTILITIES AND SERVICE SYSTEMS

The first paragraph under subheading "Water Supply," on page 4.14-15 of the Draft EIR is hereby amended as follows:

The major water supply source for both the MPMWD and the Cal Water BGD is the ~~San Francisco~~ Hetch Hetchy Regional Water System (RWS), operated by the SFPUC, under the 2009 "Water Supply Agreement between the City and County of San Francisco and Wholesale Customers in Alameda County, San Mateo County, and Santa Clara County."

Mitigation Measure UTIL-10 on page 4.14-56 is hereby amended as follows:

Mitigation Measure UTIL-10: The City shall continue its reduction programs and diversion requirements in an effort to further reduce solid waste that is diverted to the landfill and lower its per capita disposal rate citywide. In addition, the City shall ensure any waste management firm it contracts with has access to a ~~seek~~ new landfill site(s) to replace the Ox Mountain landfills, at such time that this landfill is closed.

CHAPTER 5, ALTERNATIVES TO THE PROPOSED PROJECT

The text under the citywide totals for the Reduced Non-Residential Intensity Alternative shown in Table 5-1 on page 5-4 of the Draft EIR is hereby amended as follows:

Non-Residential Square Feet	1.8 million	*2.3 million*	*1.8 million*	*~~2.9~~ 3million*	*3.5 million*

The third paragraph under subheading "Description," on page 5-6 of the Draft EIR is hereby amended as follows:

As shown in Table 5-1, the No Project Alternative would result in 1.8 million square feet of non-residential space, 1,000 residential units, and up to three hotels ~~no anticipated hotel development~~. The No Project Alternative would result in a population increase of 2,580 new residents, and 3,400 new employees in the city.

The third paragraph under subheading "Population and Housing," on page 5-12 of the Draft EIR is hereby amended as follows:

Under the No Project Alternative, future development would continue to occur in the study area under the City's existing General Plan; however, less non-residential and residential development would occur ~~and would not result in hotel development~~. As shown above in Table 5-1, population and housing growth

in the Bayfront Area would be significantly less than anticipated under the proposed project. Because no new development potential would occur under the No Project Alternative, no regional growth would occur where adequately planning has not also occurred.

The first paragraph under subheading "Description," on page 5-16 of the Draft EIR is hereby amended as follows:

Under the Reduced Non-Residential Intensity Alternative, all non-residential development under the proposed project would be reduced by 50 percent. In addition to the residential development and the 50 percent reduced non-residential development under the proposed project, the Reduced Non-Residential Intensity Alternative would include the ongoing development potential under the existing General Plan. Potential development under the existing General Plan would not be reduced. As shown above in Table 5-1 under the "Reduced Non-Residential Intensity Alternative" column, this alternative would result in ~~2.9~~ 3 million square feet of non-residential space, 200 hotel rooms, and 5,500 residential units, which could result in up to 14,150 new residents and 7,150 new jobs. All other components under the proposed project as described under Section 3.7 of Chapter 3, Project Description, of this Draft EIR, would occur, such as an update to the City's Zoning Ordinance for the Bayfront Area to ensure consistency with the General Plan Update and previously adopted ordinances and policies.

APPENDIX K, TRANSPORTATION DATA

Appendix K, Transportation Data, is hereby amended to include additional information on the modeling assumptions and Dynamic Traffic Assignments, and an index showing the intersection correspondence between the numbering shown in the Draft EIR and the numbering system used in the VISTRO traffic analysis software program.