4. Environmental Evaluation

This chapter of the Draft EIR is made up of 14 sub-chapters, which evaluate the direct, indirect, and cumulative environmental impacts of the proposed project. In accordance with Appendix G, Environmental Checklist Form, and Appendix F, Energy Conservation, of the California Environmental Quality Act (CEQA) Guidelines, the potential environmental effects of the proposed project are analyzed for potential significant impacts in the following 14 environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Circulation
- Utilities and Service Systems

FORMAT OF THE ENVIRONMENTAL ANALYSIS

Each sub-chapter is organized into the following sections:

- Environmental Setting offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared, and an overview of federal, State, regional, and local laws and regulations relevant to each environmental issue.
- Thresholds of Significance refer to the quantitative or qualitative standards, performance levels, or criteria used to evaluate the existing setting with and without the proposed project to determine whether the impact is significant. These thresholds are based primarily on the CEQA Guidelines, and also may reflect established health standards, ecological tolerance standards, public service capacity standards, or guidelines established by agencies or experts.
- Impact Discussion gives an overview of the potential impacts of the proposed project and explains why impacts are found to be significant or less than significant prior to mitigation. This subsection also includes a discussion of cumulative impacts related to the proposed project. Impacts and mitigation measures are numbered consecutively within each topical analysis and begin with an acronym or abbreviated reference to the impact section.

The following identifiers are used for individual topics:

- AES - Aesthetics
- AQ - Air Quality
- BIO - Biological Resources
- CULT - Cultural Resources
- GEO - Geology, Seismicity, and Soils
- GHG - Greenhouse Gas Emissions and Sustainability
- HAZ - Hazards and Hazardous Materials
- HYDRO - Hydrology and Water Quality
- LU - Land Use
- NOISE - Noise
- POP – Population and Housing
- PS - Public Services and Recreation
- TRANS - Transportation and Circulation
- UTIL - Utilities and Service Systems

THRESHOLDS OF SIGNIFICANCE

As noted above, significance criteria are identified before the impact discussion subsection, under the subsection, "Thresholds of Significance." For each impact identified, a level of significance is determined using the following classifications:

- *Significant (S)* impacts include a description of the circumstances where an established or defined threshold would be exceeded.
- *Less-than-significant (LTS)* impacts include effects that are noticeable, but do not exceed established or defined thresholds, or are mitigated below such thresholds.
- *No impact* describes circumstances where there is no adverse effect on the environment.

For each impact identified as being significant, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measure(s) would reduce the impact to a less-than-significant level successfully, this is stated in the EIR. *Significant and unavoidable (SU)* impacts are described where mitigation measures would not diminish these effects to less-than-significant levels. The identification of a program-level significant and unavoidable impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with the applicable regulations and meet applicable thresholds of significance.

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the City of Menlo Park, acting as the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on the setting. The analysis in the Draft Environmental Impact Report (EIR) is based on scientific and factual data

which has been reviewed by the lead agency and represents the lead agency's independent judgment and conclusions.[1]

PROPOSED PROJECT

As discussed in Chapter 3, Project Description, of the Draft EIR, the proposed project includes the 2040 horizon year buildout potential, the proposed General Plan land use designation changes, and new policies and programs, and the proposed Zoning Ordinance Update. Much of the current General Plan and its goals, policies, and programs are being carried directly into the proposed project with the changes focused on the Bayfront Area.

2040 HORIZON DEVELOPMENT POTENTIAL

The 2040 horizon development potential under the proposed project includes the net increase of maximum development potential for the Bayfront Area (the development potential in the remainder of the city is remaining constant), plus the remaining development potential citywide under the current General Plan. As shown in Table 3-2 in Chapter 3, Project Description of this Draft EIR, this combined projected new growth for the 2040 horizon year includes 4.1 million square feet of non-residential space, 400 hotel rooms and 5,500 residential units, and up to 14,150 new residents and 9,900 new employees. This represents a net new development potential in the Bayfront Area of 2.3 million square feet of non-residential space, 400 hotel rooms and 4,500 residential units, and up to 11,570 new residents and 5,500 new employees. Note that these numbers do not include the Facebook Expansion project, which is currently undergoing separate project-level review;[2] however, the Facebook Expansion project is addressed as a cumulative project in the cumulative analysis of this Draft EIR.

For the purposes of this EIR, population is calculated by applying the 2.57 persons per household generation rate, which is the Association of Bay Area Government's (ABAG's) estimated generation rate for the 2040 horizon year in Menlo Park.[3] Employment is calculated by applying employment generation factors that are based on land use type as follows:

- 1 employee per 155 to 450 square feet in the Office district
- 1 employee per 450 to 549 square feet in the Life Science district
- 1 employee per 349 square feet in the Commercial district
- 0.75 employee per room for Hotel

Given the proposed project consists of a long-term policy document that is intended to guide future development activities and City actions, and because no specific development projects are proposed as part of the project, it is reasonable to assume that future development in the study area would occur incrementally or gradually over the 24-year buildout horizon (e.g., 2016 to 2040). However, while this assumption describes the long-range nature of the proposed project, it does not prohibit or restrict when development can occur over the horizon period.

[1] California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15064(b).
[2] Facebook Campus Expansion Project EIR, State Clearinghouse Number 2015062056.
[3] Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

EVALUATION OF GENERAL PLAN POLICIES

The new policies and programs include both substantive and non-substantive changes. Substantive changes include the addition, removal, or functional revisions (e.g., not purely semantic) in ways that have the potential to result in a physical impact on the environment. Discussions of how substantive policy changes may result in adverse physical changes are included in the analyses under each impact criterion in the Impact Discussion sections, in Chapters 4.1 through 4.14 of this Draft EIR. Non-substantive changes include the renumbering of policies and programs or minor text revisions, which do not have the potential to result in a physical change to the environment. These non-substantive policy and program changes are not included in the analyses under each impact criterion in the Impact Discussion sections.

The City Council has directed that the General Plan and Zoning update be largely self-mitigating through the incorporation of policies and programs that have been designed to protect, preserve, and enhance environmental resources. These policies and programs are fully enforceable at the discretion of the decision-makers and, as a result, there are few impacts that would occur solely on the basis of the new policies and programs.[4] As described in Chapter 3, Project Description, the new and existing policies and programs that were carried through to the updated Land Use and Circulation Elements and Zoning promote sustainability and complete neighborhoods, encourage healthy communities, protect biological resources, and address climate change, complete streets, multi-modal transportation, and community circulation benefits from private development, transportation system safety and efficiency, and community transit services.

BASELINE

As discussed in Chapter 3, Project Description, of this Draft EIR, although many of the goals, policies and programs of the existing General Plan are being affirmed and incorporated into the proposed project, this EIR does not evaluate the proposed project relative to the full potential buildout allowed by the existing General Plan, but rather evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA Guidelines Section 15126.2. The following describes the environmental analysis scenarios applied in this EIR. The baseline represents the existing conditions on the ground ("physical conditions") at the time the Notice of Preparation was issued on June 18, 2015, per CEQA Guidelines Section 15125. As described in Table 3-2 in Chapter 3 the baseline includes the following existing conditions:

- Non-residential: 14.6 million square feet
- Hotel: 570 rooms
- Residential: 13,100 units
- Population: 32,900
- Employees: 30,900

[4] Public Resources Code, Section 21081.6(b) and California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15126.4(a)(2).

CUMULATIVE IMPACT ANALYSIS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable projects causing related impacts. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Used in this context, cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

In the case of a General Plan, cumulative effects occur when future development under the General Plan is combined with existing and potential future development in the surrounding areas, or in some instances in the entire region.

Where the incremental effect of a project is not "cumulatively considerable," a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the effect is not cumulatively considerable. The cumulative impact discussions in Chapters 4.1 through 4.14 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, city, county, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing aesthetic impacts, the pertinent geographic study area is the vicinity of the areas of new development under the proposed project from which the new development can be publicly viewed and may contribute to a significant cumulative visual effect. In assessing macro-scale air quality impacts, on the other hand, all development within the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions is the best tool for determining the cumulative effect.

Section 15130 of the CEQA Guidelines permits two approaches for completion of the cumulative impact analysis, the first is the "list" approach, which permits the use of a list of past, present, and probable future projects producing related or cumulative impacts, including projects both within and outside the city. The second is the "projections" approach, which allows the use of a summary of projections contained in an adopted plan or related planning document, such as a regional transportation plan, or in an EIR prepared for such a plan. The projections may be supplemented with additional information such as regional modeling. A reasonable combination of the two approaches may also be used.

The cumulative impact analysis in this Draft EIR relies on a projections approach supplemented by the list approach that, when considered with the effects of the proposed project, may result in cumulative effects.

PROJECTIONS APPROACH

The projections approach takes into account growth from the proposed project within the study area (i.e., 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.[5] In each section of Chapter 4, the cumulative impacts discussion is based on the cumulative development described in this chapter.

LIST APPROACH

The list approach includes cumulative projects (i.e., pending applications, recently approved, or under construction) in the study area. These are listed in Table 4-1 and identified on Figure 4-1. As shown in the table and on Figure 4-1, out of the 27 listed projects, six are located in the Bayfront Area. In addition to the cumulative projects in the study area shown above, there are three regional projects that are within proximity to the study area, which are currently in various stages of progress. These include the Dumbarton Trail project, the South Bay Salt Pond Restoration – Phase 2 at Ravenswood project, and the SAFER Bay project. A brief description of each of these projects is provided below.

DUMBARTON TRAIL PROJECT

Under this project, the Dumbarton Trail would be constructed for use by bicyclists and pedestrians. As shown on Figure 4-1, the trail would run adjacent to the current Dumbarton Rail Corridor along the southern border of the Bayfront Area. The Dumbarton Rail Corridor is owned by the San Mateo County Transit District. The Dumbarton Trail would be designed to be compatible with future rail service in the Dumbarton Rail Corridor and would connect users to the San Francisco Bay and the transit center in Redwood City.

SOUTH BAY SALT POND RESTORATION, PHASE 2 AT RAVENSWOOD PROJECT

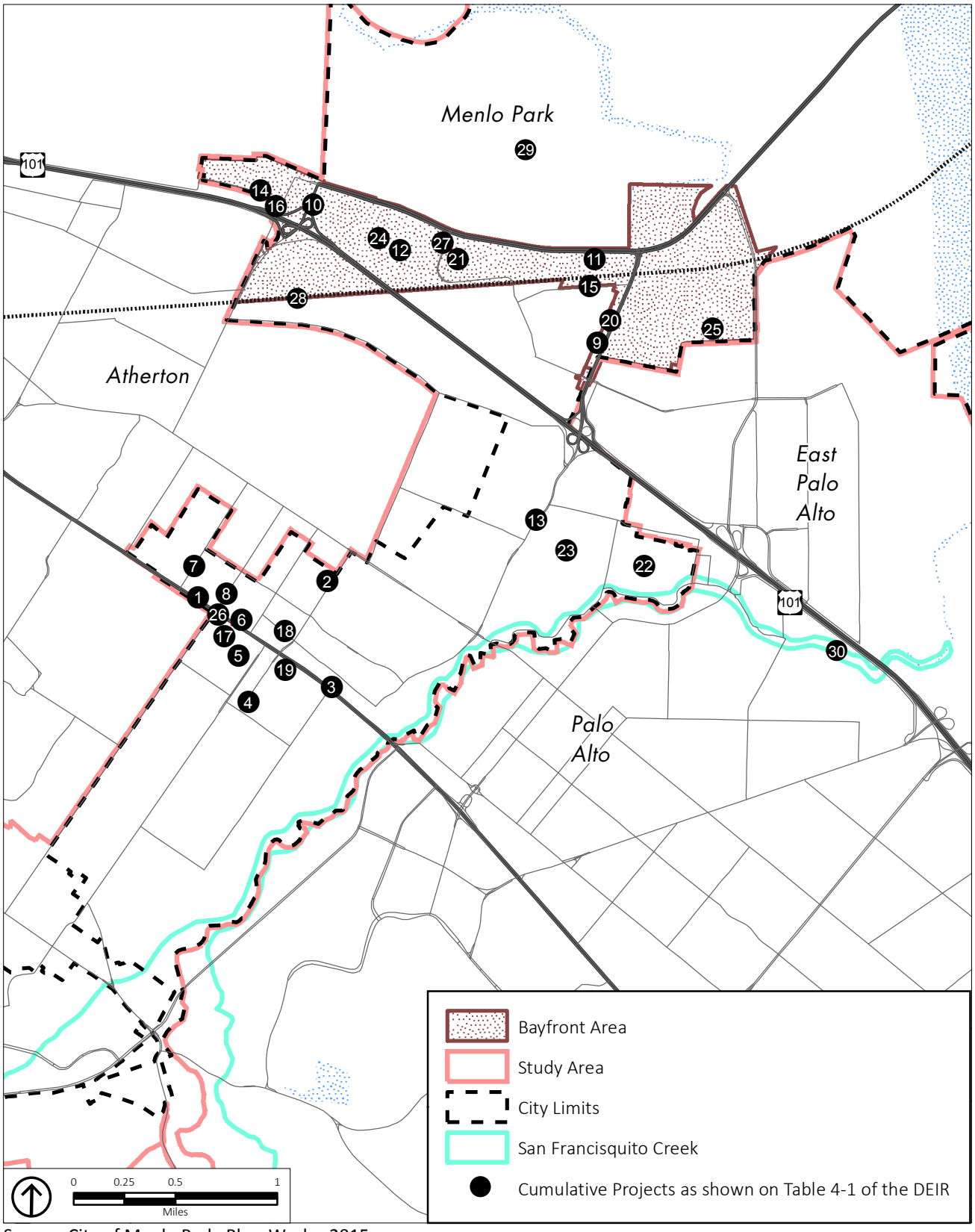
The South Bay Salt Pond (SBSP) Restoration Project is a two-phase project that would restore tidal marsh habitat, reconfigure managed pond habitat, and maintain or improve flood protection. The project would also provide recreation opportunities and public access to 15,100 acres of land, formerly used as salt-evaporation ponds, purchased from and donated by Cargil, Inc. Phase I implementation, completed in 2015, included the construction of 3,040 acres of tidal or muted tidal wetlands,[6] 710 acres of enhanced managed pond, and 7 miles of new public access. Phase II of the SBSP Restoration Project is ongoing and involves the restoration of the Alviso-Island Ponds, Alviso-Mountain View Ponds, Alviso-A8 Ponds, and the Ravenswood Ponds. [7] The Ravenswood ponds are bordered by Menlo Park's Bedwell Bayfront Park to the west, State Route 84 and the Bayfront Area to the south, Ravenswood Slough to the east, and Greco Island to the north. The Phase II Ravenswood ponds project consists of four ponds, the levees surrounding each pond, the fringe marsh outside of the levees, and the All-American Canal (AAC). The South Bay Salt Pond Restoration Project Draft EIR/S was made available for public review until October 30, 2015, and the Final EIS/R was made available for public review until May 26, 2016.[8]

[5] Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

[6] Note: Muted tidal wetlands are areas where culverts or other obstructions reduce the range of tidal water that enters the wetland but still allow frequent inundation.

[7] Draft EIS/R, Phase II, http://www.southbayrestoration.org/planning/phase2/documents/SBSP%20Restoration%20Project%20-%20Executive%20Summary.pdf, accessed on October 28, 2015.

[8] South Bay Salt Pond Restoration Project, http://www.southbayrestoration.org/planning/phase2/, accessed on October 28, 2015.



Source: City of Menlo Park; PlaceWorks, 2015.

Figure 4-1
Cumulative Projects Location Map

ENVIRONMENTAL EVALUATION

TABLE 4-1 CUMULATIVE PROJECTS LIST

Map No.	Project Name/Address	Land Use	Size	Units	Location
1	1460 El Camino Real	Residential	16	du	West Menlo Park/Downtown/ El Camino Real
		Office	26,800	sf	
		Commercial	-12,016	sf	
2	SRI 333 Ravenswood Avenue	R&D Campus	3,000	employees	West Menlo Park/Downtown/ El Camino Real
		R&D Campus	1,780	employees	
3	Stanford 500 El Camino Real	Residential	170	du	West Menlo Park/Downtown/ El Camino Real
		Office	199,500	sf	
		Retail	10,000	sf	
		Auto Dealer (Tesla)	-27,932	sf	
4	840 Menlo Avenue	Residential	3	du	West Menlo Park/Downtown/ El Camino Real
		Office	6,936	sf	
5	702 Oak Grove Avenue	Residential	4	du	West Menlo Park/Downtown/ El Camino Real
		Office	3,469	sf	
		Residential	-4	du	
6	1295 El Camino Real	Residential	15	du	West Menlo Park/Downtown/ El Camino Real
		Office/Retail/Service	1,906	sf	
		Office/Retail/Service	-6,471	sf	
7	Roger Reynolds 133 Encinal Avenue	Residential	24	du	West Menlo Park/Downtown/ El Camino Real
		Retail	-6,166	sf	
8	Marriott Residence Inn 555 Glenwood Avenue	Hotel	138	rooms	West Menlo Park/Downtown/ El Camino Real
		Senior Living	138	rooms	
9	Police/City Service Center 1283 Willow Road	Office	3,800	sf	Northeast of U.S. 101
		Retail	5,096	sf	
10	Menlo Gateway 100-155 Constitution Drive & 100-190 Independence Drive	Office	694,664	sf	Northeast of U.S. 101
		Health Club	41,000	sf	
		Restaurant	6,947	sf	
		Hotel	250	rooms	
		Hotel	197,050	sf	
		Office	-133,690	sf	
		Office	-63,360	sf	
11	Facebook West (Building 20) 1 Facebook Way	Office	433,656	sf	Northeast of U.S. 101
		Office	-127,246	sf	
12	Commonwealth Corporation Center 151 Commonwealth - Sobrato 162 & 164 Jefferson Drive	Office	259,920	sf	Northeast of U.S. 101
		Office	-19,173	sf	
		Warehouse	-55,627	sf	
		Manufacturing	-163,058	sf	

TABLE 4-1 CUMULATIVE PROJECTS LIST

Map No.	Project Name/Address	Land Use	Size	Units	Location
13	Veteran's Health Administration (VA) Medical Center Core 605 Willow Road	Residential	60	du	Southwest of U.S. 101
14	Anton Menlo 3639 Haven Avenue	Residential	394	du	Bayfront Area
		Manufacturing	-36,471	sf	
		Warehousing	-40,837	sf	
15	Greenheart 777 Hamilton Avenue	Residential	195	du	Northeast of U.S. 101
		Manufacturing	-47,999	sf	
16	Greystar 3645 Haven Avenue	Residential	146	du	Bayfront Area
		Warehousing	-15,000	sf	
17	Greenheart 1300 El Camino Real	Residential	202	du	West Menlo Park/Downtown/ El Camino Real
		Office	210,000	sf	
		Retail	7,000	sf	
		Dance Studio	-3,800	sf	
		Fast Food Restaurant	-1,200	sf	
		Hardware Storage	-5,000	Sf	
18	Lane Partners 1020 Alma Street	Office	25,004	sf	West Menlo Park/Downtown/ El Camino Real
		Retail	-10,272	sf	
		Retail	172	sf	
19	Minkoff Group 650-660 Live Oak Avenue	Office	16,811	sf	West Menlo Park/Downtown/ El Camino Real
		Residential	17	du	
		Residential	-2	du	
		Office	-5,996	sf	
20	MidPen Sequoia Belle Haven 1221 Willow Road	Residential	90	du	Northeast of U.S. 101
		Residential	-48	du	
21	Facebook Building 23 300 Constitution Drive	Office	180,108	sf	Bayfront Area
		Warehouse	-184,438	sf	
22	Laurel Upper School former O'Connor/ German American International School 275 Elliott Drive	School	360	students	Southwest of U.S. 101
		School	280	students	
23	German American International School former Menlo Oaks School 475 Pope Street	School	400	students	Southwest of U.S. 101
		School	532	students	
24	New Magnate High School 150 Jefferson Drive	School	400	students	Bayfront Area
		Light Industrial	47,434	sf	

ENVIRONMENTAL EVALUATION

TABLE 4-1 CUMULATIVE PROJECTS LIST

Map No.	Project Name/Address	Land Use	Size	Units	Location
25	1315 O'Brien Drive	R&D	113,382	sf	Bayfront Area
		Warehouse	61,338	sf	
		Manufacturing	45,796	sf	
		Office	-56,002	sf	
		Warehouse	-162,839	sf	
26	Hotel 1400 El Camino Real	Hotel	63	rooms	West Menlo Park/Downtown/ El Camino Real
		Hotel	33,713	sf	
		Gas Station	-1,932	sf	
27	Facebook Campus Expansion Project 301-306 Constitution Drive	Office	962,400	sf	Bayfront Area
		Hotel	200	rooms	
		Manufacturing	-431,698	sf	
		R&D	-86,121	sf	
		Office	-318,019	sf	
28	Dumbarton Trail Project	Recreational	n/a	n/a	Dumbarton Rail Corridor
29	South Bay Salt Pond Restoration, Phase 2 at Ravenswood Project	Restoration	n/a	n/a	North of Bayfront Expressway adjacent to Bayfront Area
30	SAFER Bay Project	Flood Protection	n/a	n/a	San Francisquito Creek
31	University Heights Annexation	No new development	n/a	n/a	Southwest of U.S. 101
32	Stanford-owned land Annexation	Office	39,010	sf	Southwest of U.S. 101
		Total Non-residential	***1.4***	***msf***	
		Total Hotel	***320***	***rooms***	
		Total Residential	***1,280***	***du***	
		Total Population	***3,300***		
		Total Employment	***5,900***		

Notes: sf = square feet, du = dwelling units, msf = million square feet, R&D = research and design

- Table includes all projects in City of Menlo Park that have filed a complete development application for 5 or more net new residential units or 5,000 sf or more of net new commercial.
- Table includes pending and approved projects that were not occupied when traffic counts were performed.
- For residential projects, occupancy is based on date of final building inspection.
- For commercial projects, occupancy is based on date of final building inspection of applicable tenant improvements.
- Some projects involve the demolition of existing structures. Demolished buildings are only listed for projects that receive credit for traffic purposes.

SAFER BAY PROJECT

The San Francisquito Creek Joint Powers Authority (SFCJPA) is a regional government agency engaged in a series of improvements to existing or construction of new flood protection facilities to reduce the likelihood that floodwaters will exit the San Francisquito Creek.[9] Recently, SFCJPA secured local, State, and federal funding in an effort to protect properties in the tidal floodplain north of the Creek in southern San Mateo County. The SAFER Bay project includes a feasibility study, project design, and an EIR for the construction of new levees and flood control measures. The SAFER Bay project aims to protect 5,000 properties and major infrastructure from tidal flooding, restore more than 1,000 acres of marshland, and connect communities through expansive trails.[10] In 2015, the SAFER Bay project gathered data and public comments for the potential alternative alignments. The design and development stage of the EIR for the preferred alternative is anticipated to begin in 2016.[11]

CUMULATIVE BUILDOUT PROJECTIONS

The cumulative buildout based on the projections and list approach, as described above, are shown in Table 4-2. The buildout numbers in Table 4-2 are a summary of the buildout projections in Table 3-2 in Chapter 3, Project Description, which provides a more detailed breakdown of the projection totals by category.

TABLE 4-2 CUMULATIVE BUILDOUT PROJECTIONS

	Cumulative Projects[a]	+	Proposed Project[b]	=	Cumulative Buildout Projections[c]
Non-Residential Square Feet	1.5 million		4.1 million		5.6 million
Hotel Rooms[d]	520		400		920
Residential Units	1,280		5,500		6,780
Population[e]	3,300		14,150		17,450
Employees	12,450		9,900		22,350

Notes: *Numbers are estimates and rounded for the purposes of this programmatic environmental review.*

a. Includes reasonably foreseeable projects (i.e., pending applications, recently approved, or under construction) in the study area, including the current Facebook Campus Expansion Project, as listed in Table 4-1.

b. This represents the current General Plan plus the proposed Bayfront Area development potential, which represents increased development potential for the Bayfront Area only, but does not include the Facebook Campus Expansion Project, which is shown in the Cumulative Projects column.

c. The Cumulative Buildout Projections represent the total of the two previous columns.

d. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the Facebook Campus Expansion Project and Proposed Bayfront Area Development Potential non-residential square feet.

e. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) Projections 2013, Subregional Study Area Table.

[9] San Francisquito Creek Joint Powers Authority, http://sfcjpa.org/web/about/agency-overview/, accessed on October 28, 2015.

[10] San Francisquito Creek Joint Powers Authority, SAFER Bay Presentation, http://seachangesmc.com/wp-content/uploads/2015/09/Materman-SAFER-Bay-slides-6-5-15.pdf, accessed on October 28, 2015.

[11] San Francisquito Creek Joint Powers Authority, http://sfcjpa.org/, accessed on January 27, 2016.

CUMULATIVE BUILDOUT SETTING

The following provides a summary of the cumulative impact setting for each impact area:

- Aesthetics: The cumulative setting for visual impacts includes 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.
- Air Quality: Cumulative air quality impacts could occur from a combination of the proposed project combined with regional growth within the San Francisco Bay Area Air Basin.
- Biological Resources: The geographic scope of the cumulative analysis for biological resources considers the surrounding incorporated and unincorporated lands, and the region.
- Cultural Resources: Cumulative impacts to cultural resources could occur from development planned under the proposed project and in the region.
- Geology, Soils, and Seismicity: Potential cumulative geological impacts could arise from a combination of the development of the proposed project together with future development in the immediate vicinity of adjoining jurisdictions.
- Greenhouse Gas Emissions: The cumulative impact analyses for greenhouse gas (GHG) emissions is related to the ongoing development in the City of Menlo Park and the entire region. Because GHG emissions are not confined to a particular air basin but are dispersed worldwide, the cumulative analysis focuses on the global impacts.
- Hazards and Hazardous Materials: This chapter analyzes potential cumulative hazardous impacts that could arise from a combination of the development of the proposed project together with regional growth.
- Hydrology and Water Quality: The geographic context used for the cumulative assessment of water quality and hydrology impacts is the Atherton Channel watershed and the San Francisquito Creek watershed, which encompasses the southeastern portion of the study area, and San Francisco Bay.
- Land Use and Planning: The geographic context for the cumulative land use and planning effects include from potential future development under the proposed project combined with effects of development on land within the region.
- Noise: Traffic noise levels are based on cumulative traffic conditions that take into account cumulative development in the region. See Table 4-1 and 4-2.
- Population and Housing: Impacts from cumulative growth are considered in the context of consistency with regional planning efforts. See Table 4-1 and 4-2.
- Public Services and Recreation: Cumulative impacts are considered in the context of the growth from development under the proposed project within the city combined with the estimated growth in the service areas of each service provider. See Table 4-1 and 4-2.

- Transportation and Circulation: The analysis of the proposed project addresses cumulative impacts to the transportation network in the City of Menlo Park and the surrounding area through a modeling process that applies regional traffic data. The projected 2040 traffic impacts General Plan buildout are calculated using data from the City/County Association of Governments of San Mateo County (CCAG) model that is based on the larger South Bay Santa Clara Valley Transportation Authority (VTA) model. The VTA model is, in turn, derived from the region-wide Bay Area Metropolitan Transportation Commission (MTC) Model, which incorporates county and regional growth projections from ABAG. These larger regional models are augmented by land use data from the City of Menlo Park for areas known as Traffic Analysis Zones (TAZ's) within the City to account for growth in Menlo Park under the proposed project. This modeling process is referred to as the Menlo Park Model (MPM).
- Utilities and Service Systems: Cumulative impacts are considered in the context of the growth from development under the proposed General Plan within the city (see Table 4-1 and 4-2) combined with the estimated growth in each utility's service area.

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