

## 5 ALTERNATIVES TO THE PROPOSED PLAN COMPONENTS

The purpose of this chapter is to inform the public and decision makers of feasible alternatives to the proposed Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinance amendments, together referred to as the “Plan Components.” Consistent with Section 15126.6(a) of the State CEQA Guidelines, this chapter includes the identification and evaluation of alternatives to the proposed Plan Components that are designed to reduce the significant environmental impacts associated with future development under the Plan Components. This chapter includes a reasonable range of alternatives, which could feasibly attain the objectives of the Plan Components.

### *A. Overview of Selected Alternatives*

For the purposes of this Environmental Assessment (EA) the “No Project” Alternative is required as part of the “reasonable range of alternatives” that could feasibly attain most or all of the objectives of the Plan Components. Each alternative is analyzed against the significance thresholds considered in Chapter 4, Environmental Evaluation. This chapter assesses whether the impacts of the alternatives would be greater than, less than, or similar to those of the Plan Components.

The alternatives to the Plan Components are:

- “ **The No Project Alternative:** Under this alternative, the City’s Housing Element would not be updated to fulfill the Regional Housing Needs Allocation (RHNA) for the current planning period (2007 to 2014) as well as the previous planning period (1999 to 2006). The policies and programs of the current General Plan would remain in effect and no associated Zoning Ordinance amendments would occur.
- “ **Reduced Density Alternative:** Under this alternative, the overall number of potential housing units that would be permitted by adopting and implementing the Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinances amendments would be reduced by 25 percent. All other aspects of the Plan Components would remain the same.

### *B. No Project Alternative*

#### **1. Principal Characteristics**

Under this alternative, the City’s Housing Element would not be updated to fulfill the RHNA for the current planning period (2007 to 2014) as well as the previous planning period (1999 to 2006). Future development on the five identified housing sites would continue to be subject to existing land use designations as

CITY OF MENLO PARK  
 HOUSING ELEMENT UPDATE, GENERAL PLAN CONSISTENCY UPDATE,  
 AND ZONING ORDINANCE AMENDMENTS ENVIRONMENTAL ASSESSMENT  
 ALTERNATIVES TO THE PROPOSED PLAN COMPONENTS

TABLE 5-1 COMPARISON OF IMPACTS FROM PLAN COMPONENTS ALTERNATIVES

<b>Topic</b>	<b>No Project Alternative</b>	<b>Reduced Density Alternative</b>
Aesthetics	=	=
Air Quality	<	<
Biological Resources	=	=
Cultural Resources	>	=
Geology and Soils	=	=
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 Traffic	<	<
Utilities and Service Systems	<	<
< <	Substantially reduced impact in comparison to the Plan Components	
<	Slightly reduced impact in comparison to the Plan Components	
=	Similar impacts in comparison to the Plan Components	
>	Slightly greater impact in comparison to the Plan Components	
> >	Substantially greater impact in comparison to the Plan Components	

per the existing General Plan and regulations per the existing Zoning Ordinance, which, as described below, would allow for a total of approximately 30 units through second unit and infill housing development<sup>1</sup> and additional industrial development on the Haven Avenue and Hamilton Avenue locations.

a. Housing Sites

*i. Housing Site 1 - 700 block of Willow Road*

The City does not need to take any action to rezone Site 1 (Veterans Affairs Campus) due to a Federal pre-emption of the City's land use authority. Therefore, while the Plan Components accounts for a 60-unit development on Site 1, the same development could occur at this location under the No Project Alternative.

*ii. Housing Sites 2 and 3 - 1200 and 1300 block of Willow Road*

Potential housing Sites 2 and 3 (MidPen's Gateway Apartments) are currently at capacity under the existing General Plan and Zoning Ordinance; therefore, no changes to these sites are anticipated under the No Project Alternative.

*iii. Housing Site 4 - 700-800 blocks of Hamilton Avenue*

Housing Site 4 (Hamilton Avenue) has vacant land; therefore this site could include additional development under the existing General Plan and Zoning Ordinance, but would not include new residential units.

*iv. Housing Site 5 - 3600 block of Haven Avenue<sup>2</sup>*

Housing Site 5 (Haven Avenue) is underutilized; therefore this site could include additional development under the existing General Plan and Zoning Ordinance, but would not include new residential units.

b. Second Units

Second units would continue to be permitted, but the second unit program that modifies the City's existing regulations to reduce obstacles and encourage second unit development (e.g. smaller parcel size and flexible height limits) under the Plan Components would not be adopted. Therefore, it is estimated that the second units would continue to be developed at the same rate as in the past. For the purposes of this EA a 0.6-unit a year average that was derived from the eight second units built or approved between 1999 to 2012/13 years

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<sup>1</sup> 30 units = (17 net potential dwelling units on lots 10,000 square feet or greater in the infill around downtown area) + (13 second units [average of .6 units a year]). The second units were determined applying 0.6-unit a year average derived from the eight second units built or approved between 1999 to 2012/13 years (see Table 3-2 in Chapter 3, Project Description).

<sup>2</sup> Housing Site 5 does not include the properties owned by Tyson, Integris, and Deerfield.

(see Table 3-2 in Chapter 3, Project Description) was applied to the No Project Alternative for an estimated total of 13 units to be built by 2035.

c. Infill Units Around Downtown

Similar to the second unit program, the infill program to promote infill housing opportunities focused on lots 10,000 square feet or greater in areas surrounding in the El Camino Real/Downtown Specific Plan area would not be implemented. The infill program could include modifications to encourage infill housing such as increasing maximum Floor Area Ratio (FAR) and maximum density, flexibility in required parking standards dependent on tenancy (e.g. senior housing) and/or location (e.g. proximity to transit services), development of “density unit equivalents,” the creation of multi-family and mixed-use design guidelines and the consideration of fee reduction or waivers. Therefore, it is estimated that the infill units would continue to be developed at the same rate as in the past. Thus, 17 net potential dwelling units on lots 10,000 square feet or greater in the infill around downtown area would occur under the No Project Alternative.

Accordingly, under the No Project Alternative, future residential units on the five potential housing sites, infill units around the downtown area and second units on existing residential lots would not be anticipated to be developed at the same rate as they would under the Plan Components. The future housing sites would not accommodate up to 900 units at 30 or more units per acre; therefore, the City’s lower income households housing needs would not be met. As described in Chapter 3, Project Description, the City must re-zone sites to accommodate a minimum of 454 housing units for lower income (very low income and low income) households at 30 dwelling units per acre to meet its remaining RHNA.

Any future demolition or construction that could occur under the existing General Plan and Zoning designations would be subject to separate environmental review at the discretion of the City.

As throughout Chapter 4, Environmental Evaluation, of this EA, the alternatives analysis in this chapter is based on estimated horizon development in 2035.

## **2. Impact Discussion**

The No Project Alternative would have the following impacts relative to the Plan Components:

a. Aesthetics and Visual Resources

Under this alternative the existing land use and zoning designations of the future housing sites would not change. As discussed above, similar to the Plan Components, demolition and new construction could occur on the potential housing sites.

The Plan Components would not result in significant impacts associated with obstruction of views of ridge-lines, degradation of the existing visual character, and introduction of new sources of light and glare. Additionally, the Plan Components would not substantially damage scenic resources within a State scenic highway corridor. As with the Plan Components, the No Project Alternative would permit new residential development. However, new residential development would occur with reduced density and only on the sites that are currently designated with residential land uses. In addition, this alternative would allow land use development consistent with Public Facilities and Limited Industry designations. Accordingly, development allowed by the No Project Alternative could alter the existing setting in a manner similar to that of the Plan Components.

Under the No Project Alternative the future housing on Site 1 (Veterans Affairs Clinic) would be the same as that under the Plan Components; therefore aesthetic impacts would be similar. No additional development is anticipated on Sites 2 and 3 (MidPen's Gateway Apartments) under the No Project Alternative; thus impacts to visual resources would be slightly less than those under the Plan Components.

Under the No Project Alternative, the current General Plan and Zoning Ordinance would not be amended to include additional policies that reinforce scenic resource protection in Menlo Park by preserving Heritage Trees, including during construction activities; integrate creeks, utility corridors, and other significant natural and scenic features into development plans; ensuring that new residential developments would be designed to be compatible with Menlo Park's residential character; blend well-designed new housing into the community; and encouraging well-designed mixed-use and second unit development. While the existing General Plan contains policies related to the protection of scenic resources, as stated above, these policies have been expanded and strengthened in the General Plan. Nonetheless, the additional development that could occur on Site 4 (Hamilton Avenue) and the new development on Site 5 (Haven Avenue) combined with the reduced residential units that could be built around the downtown area and in second unit locations would generally be less than that permitted under the Plan Components. Therefore, this combined with similar and less aesthetic impacts on Sites 1 (Veterans Affairs Campus) and Sites 2 and 3 (MidPen's Gateway Apartments), the No Project Alternative would overall result in *similar* impacts related to visual resources, in comparison to the Plan Components.

b. Air Quality

The horizon-year development levels anticipated for the No Project Alternative are less than those of the Plan Components. The Plan Components would result in significant and unavoidable air quality impacts with regard to implementation of the goals, policies, and programs under the Plan Components. Because the No Project Alternative would involve less horizon-year development and therefore less additional traffic, the impacts to air quality would be less than those of the Plan Components. While the potential future residential development under the Plan Components would not release toxic air contaminants (TACs), various industrial and commercial processes (e.g. manufacturing, dry cleaning) allowed under the existing General Plan would be expected to release TACs resulting in community risk and hazards from placement of new sources of air toxics near sensitive receptors. Because this would occur under both the No Project Alternative as well as the Plan Components, the impacts under both scenarios would be similar and compliance with current guidelines (e.g. Bay Area Air Quality Management District CEQA Guidelines) for new residential and industrial development would be required either way. Similar to the Plan Components, development under the No Project Alternative would occur under the guidance of the General Plan and the City's Climate Action Plan. Accordingly, the No Project Alternative would have *slightly reduced* air quality impacts than those of the Plan Components.

c. Biological Resources

Under the Plan Components, potential impacts to special-status plant and animal species, riparian habitat, wetlands, and biological resource plans and policies would be less than significant. In addition, the Plan Components include important new policies and actions to preserve, protect, maintain, and enhance biological resources in the EA Study Area. Under the No Project Alternative, development on the identified housing sites, infill areas around the downtown, and second unit locations would still be permitted, but with fewer units (30 units vs. 1,318 units). Since all of the potential locations of future housing under the Plan Components and under this alternative would be concentrated on sites either already developed and/or in close proximity to existing residential and residential-serving development where development will have a lesser impact on biological resources, impacts to biological resources would be similar in both scenarios.

However, as stated above, under this alternative, no new policies to protect biological resources would be adopted. While the existing General Plan contains policies related to the protection of biological resources, these policies have been expanded in the General Plan to require new development to minimize the disturbance of natural habitats and vegetation, and requires revegetation of disturbed natural habitat areas with native or non-invasive naturalized species; enforce landscaping practices that prohibit the use of invasive and non-native species; and require baseline assessments for development near sensitive habitats. Nonetheless,

because development under the No Project Alternative as well as that permitted under the Plan Components would occur on lands with existing development overall impacts to biological resource would be *similar* in comparison to the Plan Components.

d. Cultural Resources

Under the Plan Components, potential impacts to historical resources would be less than significant with implementation of Mitigation Measure CULT-1. While less development would occur on the future housing sites, infill around the downtown area and locations for second units under the No Project Alternative than under the Plan Components, which could reduce the extent of potential cultural resource impacts, the policies in the amended General Plan aimed at protecting cultural resources would also not be adopted. The existing General Plan currently contains policies related to the protection of cultural resources; however, these policies have been expanded and improved the General Plan policies to further preserve historical and cultural resources to the maximum extent practical; require significant historic or prehistoric artifacts be examined by a qualified consulting archaeologist or historian for appropriate protection and preservation; protect prehistoric or historic cultural resources either on site or through appropriate documentation as a condition of removal; and identify historic resources for the historic district in the Zoning Ordinance and require design review of proposals affecting historic buildings. In addition, Mitigation Measure CULT-1, which requires that individual projects that are proposed for residential development on any infill or second unit housing sites around the downtown area prepare site-specific historic resources evaluations, would not be required.

Therefore, although substantially less development would occur under the No Project Alternative, the amended General Plan policies aimed at protecting cultural resources would not be adopted and cultural resource impacts in comparison to the Plan Components would be *slightly greater* than those under the Plan Components.

e. Geology, Soils, and Seismicity

Under both the No Project Alternative and the Plan Components, consistency with the policies of the General Plan and compliance with the California Building Code (CBC) as new development occurs would ensure that impacts associated with geologic and seismic hazards would be less than significant.

The Plan Components introduce expanded and strengthened policies and programs that further minimize risk to life, environment, and property from natural hazards by integrating hazard data (geotechnical, flood, fire, etc.) and risk evaluations into the development review process and maintain, develop and adopt up-to-

date standards to reduce the level of risk from natural and human-caused hazards; modify the Zoning Ordinance as needed when new information on natural hazards becomes available and to provide for hazard reduction measures as a part of the design criteria for development review; require site-specific geologic and geotechnical studies for land development or construction in areas of potential land instability; and require that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards. Although the No Project Alternative would not include the adoption of the new seismic safety policies in the General Plan, the existing General Plan includes similar policies related to seismic and geologic hazards to those in the amended General Plan. Therefore, overall the No Project Alternative would be *similar* to the Plan Components.

f. Greenhouse Gas Emissions

The Plan Components would result in a significant and unavoidable greenhouse gas (GHG) impact because ongoing activities in the EA Study area and the Plan Components would conflict with Executive Order S-03-05's goal to reduce GHG emissions by 80 percent below 1990 levels by 2050. As described in Chapter 4.6, Greenhouse Gas Emissions, transportation emissions from VMT are the largest contributor to emissions in the EA Study Area. Under horizon-year conditions, less development compared to that of the Plan Components would occur, and subsequently VMT levels and GHG emissions would be less.

While the existing General Plan does include some goals, policies and programs aimed at reducing GHG emissions, the Plan Components would promote a sustainable energy supply and implement City's Climate Action Plan to reduce greenhouse gas emissions and improve the sustainability of actions by City government, residents, and businesses in Menlo Park, including promoting land use patterns that reduce the number and length of motor vehicle trips, and promotion of recycling, reduction and reuse programs; promote and/or establish environmentally sustainable building practices or standards in new development; promote the installation of renewable energy technology; and undertake annual review and updates, as needed, to the City's Climate Action Plan. The No Project Alternative would not include General Plan goals, policies, and programs to reduce GHG emissions. Therefore, this alternative would result in a *slightly greater* GHG emission impacts in comparison to the Plan Components.

g. Hazards and Hazardous Materials

Under the Plan Components, consistency with the policies of the General Plan and compliance with the existing regulations and procedures as new development occurs would ensure that impacts associated with hazards and hazardous materials would be less than significant. Furthermore, under the Plan Components, the introduction of residential land uses on Site 5 (Haven Avenue) would be mitigated to a less-than-



significant level through Mitigation Measure HAZ-1. In addition, because the Plan Components are not located within two miles of an airport, airstrip, or airport land use plan, the Plan Components would not be exposed to airport hazard impacts.

The existing General Plan contains policies and programs related to hazards, but these policies have been expanded and strengthened in the General Plan by, for example, by requiring that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards; requiring that sites planned for housing be cleared of hazardous materials (paint, solvents, chlorine, etc.) and the hazardous materials disposed in compliance with State and Federal laws; and requiring developers to conduct an investigation of soils, groundwater and buildings affected by hazardous-material potentially released from prior land uses in areas historically used for commercial or industrial uses, and to identify and implement mitigation measures to avoid adversely affecting the environment or the health and safety of residents or new uses. Although the No Project would not include these strengthened policies, development would be required to comply with existing regulations and procedures related to hazards and hazardous materials, and no housing would be introduced on Site 5 (Haven Avenue). Therefore, the No Project Alternative would be *similar* to the Plan Components.

#### h. Hydrology and Water Quality

Less development would occur in the EA Study Area under this alternative than under the Plan Components, which could reduce the area of impervious surfaces, thereby potentially lessening water quality and groundwater impacts, and reducing the exposure of people to flooding and failure of a dam or levee. However, since all of the potential locations of future housing under the Plan Components would be concentrated on sites with existing development, it is likely these impacts would not be significantly different than those of the Plan Components.

As under the Plan Components, new development under the No Project Alternative would need to comply with the National Pollution Discharge Elimination System (NPDES) General Permit, which requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land, and construction on smaller sites that are part of a larger project. Existing regulations and procedures, such as the City of Menlo Park Engineering Division's Grading and Drainage Control Guidelines and FEMA's flood zone mapping, would still apply.

Under the No Plan Component Alternative, policies of the existing General Plan would remain in place. The existing General Plan includes policies related to water conservation, flooding, and storm drainage.

However, under the Plan Components policies related to these topics would be expanded and strengthened by requiring that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards; considering sea level rise in siting new facilities or residences within potentially affected areas; requiring that new community facilities located within dam inundation zones evaluate the potential for flooding and the impact on evacuation during the development approval process; and considering the threat of flooding and tsunamis in planning and management practices to minimize risk to life, environment and property and maintain up-to-date tsunami hazard zones maps and flood maps. Although the No Project would not include these strengthened policies, development would be required to comply with existing regulations and procedures related to hydrology and water quality. Therefore, the No Project Alternative would be *similar* to the Plan Components.

i. Land Use and Planning

The Plan Components would not result in any land use impacts. Future development permitted under the Plan Components would not divide an established community, conflict with a habitat conservation plan, or create a land use conflict. The General Plan policies that ensure new development are compatible with existing land uses, encourage the provision of open space and/or quality gathering and outdoor spaces, and balance development with preservation of land for open space uses would also apply to future development under the No Project Alternative. Therefore, land use and planning impacts under the No Project Alternative would be *similar* to those under the Plan Components.

j. Noise

The Plan Components include amended policies that require the City to analyze in detail the potential noise impacts of any actions that the City may take or act upon which could significantly alter noise level in the community; encourage the use of construction methods, state-of-the-art noise abating materials and technology and creative site design including, but not limited to, open space, earthen berms, parking, accessory buildings, and landscaping to buffer new and existing development from noise and to reduce potential conflicts between ambient noise levels and noise-sensitive land uses; and strive to achieve acceptable interior noise levels and exterior noise levels for backyards and/or common usable outdoor areas in new residential development, and reduce outdoor noise levels in existing residential areas. Under the No Project Alternative, new development would occur under the existing General Plan, which calls for less intensive development on the housing sites, infill areas around downtown, and on locations where second units could be constructed, but would permit land use development consistent with Public Facilities (Site 1 [Veterans Affairs Campus]) and Limited Industry (Site 4 [Hamilton Avenue] and Site 5 [Haven Avenue]) designations, which in general have the potential to generate more noise than residential land uses and associated traffic.

The No Project Alternative would not include the new policies addressing noise impacts. However, because the No Project Alternative would result in substantially fewer residential units, noise impacts would be *slightly reduced* when compared to those of the Plan Components.

k. Population and Housing

The future housing under the No Project Alternative would generate less population (76 vs. 3,361 new residents) and housing (30 vs. 1,318 units) in the EA Study Area than that of the Plan Components under horizon-year conditions. Since the Plan Components would not exceed the Association of Bay Area Governments' (ABAG's) most recent projections for population or housing in Menlo Park, accordingly the No Plan Component Alternative would also not exceed the ABAG projections. Furthermore, given that the future residential development on infill sites around downtown and potential housing Sites 2 and 3 (MidPen's Gateway Apartments) could involve the demolition and replacement of existing housing units, which would result in the temporary displacement of some residents under both the Plan Components and No Project Alternative, impacts to the displacement of substantial numbers of existing housing and people would be the same under both scenarios. Therefore, because neither the Plan Components nor the No Project Alternative would result in significant impacts to population or housing, the No Project Alternative would be *similar* to the Plan Components.

l. Public Services and Recreation

As stated above in Section, B.2.k, the No Plan Alternative would result in less horizon-year development as compared to the Plan Components. Therefore, the No Project Alternative would generate less demand for police, fire protection, school, library, and park and recreation services. The No Project Alternative would result in significantly less development and as a result public services and recreation impacts from development guided under the goals, policies, and programs of the existing General Plan would be *slightly reduced* when compared to those of the Plan Components.

m. Transportation and Traffic

The horizon-year development levels anticipated for the No Project Alternative are less than those of the Plan Components. As shown in Chapter 4.13, Transportation and Traffic, the Plan Components would cause roadway intersections and roadway and freeway segments to degrade below acceptable level of service standards, creating significant and unavoidable impacts. The No Project Alternative would not create the additional trips produced under the Plan Component and would not result in the significant and unavoidable impacts of the Plan Components. Therefore, because the No Plan Component Alternative would per-

mit significantly less residential development, the impacts with respect to level of service standards are considered *slightly reduced* under horizon-year conditions.

The Plan Components would not result in significant impacts related to air traffic, roadway hazards, or alternative transportation. Although the No Project Alternative would have similar impacts related to air traffic and roadway hazards, it would not include the new General Plan goals, policies, and programs that promote land use patterns that reduce the number and length of motor vehicle trips.

Overall, while the General Plan transportation policies would be the same as those under found in the Plan Components, because the No Project Alternative would have reduced impacts related to roadway intersections and segments and this alternative would result in a *slightly reduced* transportation and traffic impacts in comparison to the Plan Components.

n. Utilities and Service Systems

As stated above in Section, B.2.k, the horizon-year development levels anticipated for the No Project Alternative are less than those of the Plan Components. Therefore, the No Project Alternative would generate less demand for water supply, wastewater, stormwater, solid waste, and energy supplies, services, and facilities.

The No Project would result in significantly less development and therefore, impacts to utilities and services systems from development guided under the goals, policies and programs of the existing General Plan would be *slightly reduced* from those of the Plan Components.

**C. Reduced Density Alternative**

**1. Principal Characteristics**

Under this alternative, the overall number of potential housing units that would be permitted by adopting and implementing the Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinances amendments would be reduced by 25 percent. This would result in a total of 988 housing units, which represents 330 fewer housing units than the Plan Components. As a result, the Reduced Density Alternative would result in the generation of 2,520 new residents to Menlo Park.

The General Plan goals, policies and programs, and associated Zoning Ordinance amendments would be the same as those of the Plan Components.

## 2. Impact Discussion

The Reduced Density Alternative would have the following impacts relative to the Plan Components:

### a. Aesthetics and Visual Resources

Under this alternative, fewer residential units would be developed; however, residential development would still occur throughout the EA Study Area and the potential for adverse impacts to visual resources would still occur. As with the Plan Components, the Reduced Density Alternative would be guided by the existing and additional new General Plan policies that reinforce scenic resource protection in Menlo Park by preserving Heritage Trees, including during construction activities; integrate creeks, utility corridors, and other significant natural and scenic features into development plans; ensuring that new residential developments would be designed to be compatible with Menlo Park's residential character; blend well-designed new housing into the community; and encouraging well-designed mixed-use and second unit development.

Accordingly, as with the Plan Components, development under the Reduced Density Alternative would not result in significant impacts associated with blocking views of ridgelines, degrading the existing visual character, or introducing new sources of light and glare, and would not substantially damage scenic resources within a State scenic highway corridor. Therefore, the Reduced Density Alternative would result in *similar* impacts related to visual resources in comparison to the Plan Components.

### b. Air Quality

The horizon-year development levels anticipated for the Reduced Density Alternative are less than those of the Plan Components. The Plan Components would result in significant and unavoidable air quality impacts with regard to implementation of the goals, policies, and programs under the Plan Components. Because the Reduced Density Alternative would involve less horizon-year development and therefore less additional traffic, the impacts to air quality would be less than those of the Plan Components. Under the Reduced Density Alternative future development would occur under the guidance of the General Plan and the City's Climate Action Plan, accordingly, the Reduced Density Alternative would have *slightly reduced* air quality impacts than those of the Plan Components.

### c. Biological Resources

Under the Plan Components, potential impacts to special-status plant and animal species, riparian habitat, wetlands, and biological resource plans and policies would be less than significant. In addition, as with the Plan Components, the Reduced Density Alternative would be subject to the new General Plan policies related to the protection of biological resources, which would require new development to minimize the dis-

turbance of natural habitats and vegetation, and requires revegetation of disturbed natural habitat areas with native or non-invasive naturalized species; enforce landscaping practices that prohibit the use of invasive and non-native species; and require baseline assessments for development near sensitive habitats.

However, under the Reduced Density Alternative, development on the identified housing sites, infill areas around the downtown and second unit locations would still be permitted, but with fewer units (988 units vs. 1,318 units). Since all of the potential locations of future housing under the Plan Components and under this alternative would be concentrated on sites either already developed, and/or in close proximity to existing residential and residential-serving development, where development will have a lesser impact on biological resources, impacts to biological resources would be similar in both scenarios. Therefore, the Reduced Density Alternative would result in *similar* impacts related to biological resources in comparison to the Plan Components.

d. Cultural Resources

Less development would occur on the future housing sites, infill around the downtown area and locations for second units under the Reduced Density Alternative than under the Plan Components, which could reduce the extent of potential cultural resource impacts. However, similar to the Plan Components, the policies in the General Plan that have been expanded and improved in the General Plan to further preserve historical and cultural resources to the maximum extent practical; require significant historic or prehistoric artifacts be examined by a qualified consulting archaeologist or historian for appropriate protection and preservation; protect prehistoric or historic cultural resources either on site or through appropriate documentation as a condition of removal; and identify historic resources for the historic district in the Zoning Ordinance and require design review of proposals affecting historic building would also be adopted. Therefore, the Reduced Density Alternative would result in *similar* cultural resource impacts in comparison to the Plan Components.

e. Geology, Soils, and Seismicity

Under both the Reduced Density Alternative and the Plan Components, consistency with the policies of the General Plan and compliance with the CBC as new development occurs would ensure that impacts associated with geologic and seismic hazards would be less than significant.

Similar to the Plan Components, the Reduced Density Alternative would introduce expanded and strengthened policies and programs that further minimize risk to life, environment, and property from natural hazards by integrating hazard data (geotechnical, flood, fire, etc.) and risk evaluations into the development

review process and maintain, develop and adopt up-to-date standards to reduce the level of risk from natural and human-caused hazards; modify the Zoning Ordinance as needed when new information on natural hazards becomes available and to provide for hazard reduction measures as a part of the design criteria for development review; require site-specific geologic and geotechnical studies for land development or construction in areas of potential land instability; and require that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards. Therefore, the Reduced Density Alternative would be *similar* to the Plan Components.

f. Greenhouse Gas Emissions

The Plan Components would result in a significant and unavoidable GHG impact because the ongoing activities in the city and the Plan Components would conflict with Executive Order S-03-05's goal to reduce GHG emissions by 80 percent below 1990 levels by 2050. As described in Chapter 4.6, Greenhouse Gas Emissions, transportation emissions from VMT are the largest contributor to emissions in the EA Study Area. Under horizon-year conditions, less development compared to that of the Plan Components would occur, and therefore VMT levels and GHG emissions would be less.

While the existing General Plan does include some goals, policies and programs aimed at reducing GHG emissions, the Plan Components would promote a sustainable energy supply and implement City's Climate Action Plan to reduce greenhouse gas emissions and improve the sustainability of actions by City government, residents, and businesses in Menlo Park, including promoting land use patterns that reduce the number and length of motor vehicle trips, and promotion of recycling, reduction and reuse programs; promote and/or establish environmentally sustainable building practices or standards in new development; promote the installation of renewable energy technology; and undertake annual review and updates, as needed, to the City's Climate Action Plan. The Reduced Density Alternative would include the General Plan goals, policies, and programs to reduce GHG emissions. Therefore, this alternative would result in a *slightly reduced* GHG emission impacts in comparison to the Plan Components.

g. Hazards and Hazardous Materials

Similar to the Plan Components, under the Reduced Density Alternative, consistency with the policies of the General Plan, compliance with the existing regulations and procedures as new development occurs and recommended Mitigation Measure HAZ-1 for Site 5 (Haven Avenue) would be required; thus ensuring that impacts associated with hazards and hazardous materials would be less than significant. In addition, because the development that would occur under both the Plan Components and the Reduced Density Alternative would not be located within two miles of an airport, airstrip, or airport land use plan, new development

under both scenarios would not be exposed to airport hazard impacts. The General Plan policies and programs related to hazards, which have been expanded and strengthened in the amended General Plan requiring that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards; considering sea level rise in siting new facilities or residences within potentially affected areas; requiring that new community facilities located within dam inundation zones evaluate the potential for flooding and the impact on evacuation during the development approval process; and considering the threat of flooding and tsunamis in planning and management practices to minimize risk to life, environment and property and maintain up-to-date tsunami hazard zones maps and flood maps would apply to the Reduced Density Alternative same as the Plan Components. Therefore, overall the hazards and hazardous materials impacts under the Reduced Density Alternative would be *similar* to those of the Plan Components.

#### h. Hydrology and Water Quality

Less development would occur in the EA Study Area under this alternative than under the Plan Components, which could reduce the area of impervious surfaces and thereby potentially lessen water quality and groundwater impacts and reduce the exposure of people to flooding and failure of a dam or levee. However, since all of the potential locations of future housing under the Plan Components would be concentrated on sites with existing development, it is likely these impacts would not be significantly different than those of the Plan Components.

As under the Plan Components, new development under the Reduced Density Alternative would need to comply with the NPDES General Permit, which requires the preparation of a SWPPP for projects that disturb one acre or more of land, and construction on smaller sites that are part of a larger project. Existing regulations and procedures, such as the City of Menlo Park Engineering Division's Grading and Drainage Control Guidelines and FEMA's flood zone mapping, would still apply.

While the existing General Plan includes policies related to water conservation, flooding, and storm drainage, under the Reduced Density Alternative, policies under the Plan Components related to hydrology and water quality would be expanded and strengthened by promoting water conservation and preserving the maximum amount of on-site open space by applying efficient and sustainable design practices. Additionally, policies aimed at preventing hazardous conditions associated with flooding would also be adopted. Accordingly, even though fewer residential units would be permitted under the Reduced Density Alternative, hydrology and water quality impacts in comparison to the Plan Components would be *similar*.



i. Land Use and Planning

Under the Reduced Density Alternative, same as the Plan Components, future residential development would not result in any land use impacts. Future development permitted under the Plan Components and the Reduced Density Alternative would not divide an established community, conflict with a habitat conservation plan, or create a land use conflict. The General Plan policies that ensure new development, including infill around the downtown area and secondary units, are compatible with existing land uses, encourage the provision of open space and/or quality gathering and outdoor spaces, and balance development with preservation of land for open space uses would also apply to future development under the Reduced Density Alternative. Accordingly, the land use and planning impacts under the Reduced Density Alternative would be *similar* to those of the Plan Components.

j. Noise

Less development would occur on the future housing sites, infill around the downtown area and locations for second units under the Reduced Density Alternative than under the Plan Components, which could reduce the extent of noise impacts related to residential generated traffic. However, similar to the Plan Components, the policies in the General Plan that have been expanded and improved in the General Plan that require the City to analyze in detail the potential noise impacts of any actions that the City may take or act upon which could significantly alter noise level in the community; encourage the use of construction methods, state-of-the-art noise abating materials and technology and creative site design including, but not limited to, open space, earthen berms, parking, accessory buildings, and landscaping to buffer new and existing development from noise and to reduce potential conflicts between ambient noise levels and noise-sensitive land uses; and strive to achieve acceptable interior noise levels and exterior noise levels for backyards and/or common usable outdoor areas in new residential development, and reduce outdoor noise levels in existing residential areas. These policies would also apply to new development under the Reduced Density Alternative. However, because the Reduced Density Alternative would result in 330 fewer residential units, noise impacts would be *slightly reduced* when compared to those of the Plan Components.

k. Population and Housing

The future housing under the Reduced Density Alternative would induce less population (2,520 vs. 3,361 new residents) and housing (988 vs. 1,318 units) in the EA Study Area than that of the Plan Components under horizon-year conditions. Since the Plan Components would not exceed ABAGs most recent projections for population or housing in Menlo Park, the Reduced Density Alternative would not exceed the ABAG projections. Furthermore, given that the future residential development on infill sites around downtown and potential housing Sites 2 and 3 (MidPen's Gateway Apartments) could involve the demolition and

replacement of existing housing units, which would result in the temporary displacement of some residents under both the Plan Components and Reduced Density Alternative, impacts to the displacement of substantial numbers of existing housing and people would be the same under both scenarios. Therefore, because neither the Plan Components nor the Reduced Density Alternative would result in significant impacts to population or housing, the Reduced Density Alternative would be *similar* to the Plan Components.

l. Public Services and Recreation

As stated above in Section, C.2.k, the Reduced Density Alternative would result in less horizon-year development as compared to the Plan Components. Therefore, the Reduced Density Alternative would generate less demand for police, fire protection, school, library, and park and recreation services. Therefore, because the Reduced Density Alternative would result in 330 fewer residential units, impact to public services and recreation impacts would be *slightly reduced* from those of the Plan Components.

m. Transportation and Traffic

The horizon-year development levels anticipated for the Reduced Density Alternative are less than those of the Plan Components. As shown in Chapter 4.13, Transportation and Traffic, the Plan Components would cause roadway intersections and roadway and freeway segments to degrade below acceptable level of service standards, creating significant and unavoidable impacts. The Reduced Density Alternative would also create additional trips. While these trips would be less, they would likely result in impacts to similar to those produced under the Plan Components. Therefore, because the Reduced Density Alternative would permit less residential development, the impacts with respect to level of service standards are considered *slightly reduced* under horizon-year conditions.

The Plan Components would not result in significant impacts related to air traffic, roadway hazards, or alternative transportation. Furthermore, the Reduced Density Alternative would have similar impacts related to air traffic and roadway hazards and it would include the new General Plan goals, policies, and programs that promote land use patterns that reduce the number and length of motor vehicle trips.

Overall, because the Reduced Density Alternative would have similar impacts related to roadway intersections and segments, and include the alternative transportation policies and measures found in the Plan Components, this alternative would result in a *slightly reduced* transportation and traffic impacts as a result of introducing 330 fewer residential units in comparison to the Plan Components.

n. Utilities and Service Systems

As stated above in Section, C.2.k, the horizon-year development levels anticipated for the Reduced Density Alternative are the less than those of the Plan Components. Therefore, the Reduced Density Alternative would generate a less demand for water supply, wastewater, stormwater, solid waste, and energy supplies, services, and facilities. The Reduced Density Alternative would result in less development and impacts to utilities and services systems from future residential development would be *slightly reduced* from those of the Plan Components.

*D. Ability to Meet Plan Components Objective*

This section describes how each alternative would meet the Plan Components objectives, described in Chapter 3 of this EA, and repeated here for reference:

**1. Plan Components Objectives:**

- “ **Ensure Overall Community Quality of Life:** Develop a vision for Menlo Park that supports sustainable local, regional, and State housing, transportation, and environmental goals, while maintaining the high quality of life, small town feel, and village character of Menlo Park, which make it distinctive and enjoyable to its residents.
- “ **Address Housing Needs:** Assess housing needs and provide a vision for housing within the city to satisfy the needs of a diverse population to comply with State law and provide the City’s regional fair share of land available for residential development.
- “ **Provide a Variety of Housing Choices:** Provide a variety of housing opportunities proportionally by income to accommodate the needs of people who currently work or live in Menlo Park, such as teachers, young people just getting started, and seniors who want to down-size, who either cannot find homes or cannot afford market-rate housing in Menlo Park.
- “ **Address the City’s Share of Regional Housing Needs:** Ensure General Plan and Zoning capacity for an adequate number of new housing units to meet the Regional Housing Need Allocation at all income levels for the current (2007 to 2014) and prior (1999 to 2006) planning periods.
- “ **Ensure New Development Compatibility:** Ensure that development of new housing is sensitive to and compatible with adjacent neighborhoods.
- “ **Preserve Existing Housing:** Maintain the existing housing stock.

- “ **Provide Effective Housing Policies and Programs:** Continue existing and develop new programs and policies to meet the projected affordable housing need, including the needs of persons living with disabilities and other special needs households at extremely low, very low, low, and moderate income levels.
- “ **Remove Constraints that Unduly Impact Housing Development:** Evaluate potential constraints to housing development and encourage new housing in locations supported by existing or planned infrastructure, while maintaining existing neighborhood character.
- “ **Ensure Appropriate Zoning for Special Needs Housing:** Provide housing for seniors, person living with disabilities, female-headed households, large families, homeless, and other persons with special housing needs, including zoning for emergency shelter, transitional, and supportive housing opportunities.
- “ **Provide Design Guidance for New Development to Fit with Community Character:** Develop design guidelines or similar tools to ensure development of housing for all income levels while maintaining community character.
- “ **Provide Adequate Sites for Higher Density Housing Consistent with the City’s RNHA Requirements:** Identify appropriate housing sites, within specified areas proximate to transportation, shopping, and schools, and the accompanying zoning required to accommodate housing development for higher density residential development and to encourage affordable housing development.
- “ **Comply with the Settlement Agreement:** Present a Housing Element that meets the requirements of the Settlement Agreement and is completed within the timeframe established in the Settlement Agreement.
- “ **Achieve Housing Element Certification:** Obtain certification of the City’s Housing Element by the State’s Department of Housing and Community Development as substantially in compliance with State Housing Element law.
- “ **Assure Consistency of All General Plan Elements:** Make all elements of the General Plan consistent with the Housing Element update.
- “ **Provide Incentives to Encourage Affordable Housing:** Establish an Affordable Housing Overlay Zoning designation and other policies and programs to encourage affordable housing development.
- “ **Ensure Implementation of Housing Element and General Plan Programs:** Complete amendments to the Menlo Park Zoning Ordinance and other programs in a timely manner consistent with the Housing Element and the General Plan.

- “ **Implement City Actions in Support of Affordable Housing Development:** Implement policies and programs in the Housing Element in support of affordable housing, including the allocation of funds from the City’s below market rate housing fund and support of developments determined by the City to be viable for Low Income Housing Tax Credit funding.

## **2. No Project Alternative**

Under the No Project Alternative, the Plan Components would not be adopted and implemented, and therefore this alternative does not meet any of the Plan Components objectives.

## **3. Reduced Density Alternatives**

This alternative would provide the required number of homes to ensure General Plan and Zoning capacity for an adequate number of new housing units to meet the RHNA at all income levels for the current (2007 to 2014) and prior (1999 to 2006) planning periods and would adopt and implement the goals, policies and programs of the Plan Components. Accordingly, this alternative would meet all of the objectives.

### ***E. Environmentally Superior Alternative***

In addition to the discussion and comparison of impacts of the Plan Components and the alternatives, Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets Plan Components objectives. The Plan Components under consideration cannot be identified as the Environmentally Superior Alternative. As shown in Table 5-1, the Reduced Density Alternative is the Environmentally Superior Alternative as it would result in reduced air quality, GHG emissions, noise, public services and recreation, transportation and traffic, and utilities and services systems impacts when compared to the Plan Components.

CITY OF MENLO PARK  
HOUSING ELEMENT UPDATE, GENERAL PLAN CONSISTENCY UPDATE,  
AND ZONING ORDINANCE AMENDMENTS ENVIRONMENTAL ASSESSMENT  
ALTERNATIVES TO THE PROPOSED PLAN COMPONENTS