

**111 INDEPENDENCE DRIVE PROJECT  
INITIAL STUDY**

**MENLO PARK, CALIFORNIA**

**LSA**

June 2019

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# **111 INDEPENDENCE DRIVE PROJECT INITIAL STUDY**

**MENLO PARK, CALIFORNIA**

Submitted to:

City of Menlo Park  
Community Development Department  
Planning Division  
701 Laurel Street  
Menlo Park, California 94025

Prepared by:

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Project No. CMK1901



June 2019

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## LIST OF ABBREVIATIONS AND ACRONYMS

AB 52	Assembly Bill 52
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
Bay	San Francisco Bay
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH <sub>4</sub>	Methane
City	City of Menlo Park
CO <sub>2</sub>	Carbon dioxide
ConnectMenlo	General Plan Land Use and Circulation Elements
ConnectMenlo Final EIR	ConnectMenlo Final Environmental Impact Report
DPR	California Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
ESLs	Environmental Screening Levels
EV	Electric vehicle
EVA	Emergency vehicle access
FEMA	Federal Emergency Management Agency
GHG	Greenhouse gases

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gsf	Gross square feet
GWh	Gigawatt-hours
I-280	Interstate 280
kWh	Kilowatt-hours
LID	Low Impact Development
MGD	Million gallons per day
MGY	Million gallons per year
MLD	Most Likely Descendant
MPFPD	Menlo Park Fire Protection District
mpg	Miles per gallon
MPMW	Menlo Park Municipal Water
MPPD	Menlo Park Police Department
N <sub>2</sub> O	Nitrous oxide
NAHC	Native American Heritage Commission
NWIC	Northwest Information Center
PCB	Polychlorinated biphenyls
PCE	Peninsula Clean Energy
PG&E	Pacific Gas & Electric
Phase I ESA	Phase I Environmental Site Assessment
R-MU-B	Residential – Mixed Use District – Bonus
SamTrans	San Mateo County Transit District
SB 50	Senate Bill 50
SFPUC	San Francisco Public Utilities Commission
SHPO	State Historic Preservation Office



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SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SR 84	State Route 84
SRA	State Responsibility Area
Stanford HCP	Stanford University Habitat Conservation Plan
SVCW	Silicon Valley Clean Water
TCE	Trichloroethene
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TIF	Transportation Impact Fee
UPRR	Union Pacific Railroad
US 101	US Highway 101
USEPA	United States Environmental Protection Agency
UWMP	Urban Water Management Plan
VMT	Vehicle miles traveled
Water Board	San Francisco Bay Regional Water Quality Control Board
WBSD	West Bay Sanitary District
WTP	Water Treatment Plant
WWTP	Waste Water Treatment Plant

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## 1.0 PROJECT INFORMATION

### 1. Project Title:

111 Independence Drive Project

### 2. Lead Agency Name and Address:

City of Menlo Park  
City Hall – 1st Floor  
701 Laurel Street  
Menlo Park, CA 94025

### 3. Contact Person and Phone Number:

Kaitie Meador, Senior Planner  
City of Menlo Park  
Community Development Department, Planning Division

Phone: 650-330-6731  
Email: KMMeador@menlopark.org

### 4. Project Location:

111 Independence Drive, Menlo Park, San Mateo County  
Assessor's Parcel Number (APN): 055-236-120

### 5. Project Sponsor's Name and Address:

SP Menlo, LLC  
111 Independence Drive  
Menlo Park, CA 94025

### 6. General Plan Designation: Mixed Use Residential, Bayfront Area

### 7. Zoning: Residential – Mixed Use District – Bonus (R-MU-B)

### 8. Description of Project:

This section describes the proposed 111 Independence Drive Project (proposed project) submitted by SP Menlo, LLC (project sponsor) and evaluated in this Initial Study. A description of the proposed project's location, context and objectives is followed by details of the project itself and a summary of required approvals and entitlements.

## Project Site

The following describes the geographic context of the site for the proposed project and provides a brief overview of the existing land uses within and in the vicinity of the site.

### Regional Location and Access

The approximately 0.92-acre triangular project site is located at 111 Independence Drive within the City of Menlo Park, San Mateo County. Menlo Park is located approximately 30 miles south of San Francisco, at the southern end of San Francisco Bay (Bay).

Regional vehicular access to the project site is provided by US Highway 101 (US 101), via the Marsh Road on- and off-ramps located immediately to the north and State Route 84 (SR 84 or the Bayfront Expressway) located to the east.<sup>1</sup> Direct local access is via Independence Drive which borders the site immediately to the north and west, Constitution Drive approximately 0.1 mile to the east, and Chrysler Drive about 0.2 mile to the south of the project site.

The nearest bus stop to the project site is served by the San Mateo County Transit District (SamTrans) Route 270 and is located approximately 0.3 miles to the north on Haven Avenue. The Atherton Caltrain Station is located approximately 2.8 miles west of the site. The Menlo Park Caltrain Station is located approximately 3.7 miles south of the project site.

Figure 1-1 depicts the site's regional and local context. Figure 1-2 is an aerial photograph of the project site and the vicinity.

### Site Characteristics and Current Site Conditions

The generally-level project site (APN 055-236-120) is currently developed with an approximately 15,000-square-foot single-story office building. A small portion (approximately 87.8 square feet) of the Independence Drive right-of-way is located within the project site. The project site provides designated parking for about 35 vehicles. Ingress and egress to the project site is provided by three driveways along Independence Drive.

The existing building was constructed in 1972 and is currently occupied by a commercial business. Vegetation on the project site consists of landscaped areas along the site perimeter fronting Independence Drive. A public utility easement, approximately 10 feet in width, runs along the eastern border of the project site.

Figure 1-3 depicts an aerial view of the project site and Figure 1-4 depicts current site conditions. Figure 1-5 includes photos of the existing building on the site; viewpoint locations are depicted in Figure 1-3.

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<sup>1</sup> The street grid in the immediate vicinity of the project site generally extends northwest-southeast and northeast-southwest. To simplify the direction descriptions used in this document, roadways progressing along the peninsula toward the City of San Francisco (e.g., US 101) are designated northbound-southbound roadways and roadways progressing towards San Francisco Bay (e.g., Marsh Road) are designated eastbound-westbound. All compass directions referenced in this document will use this orientation and north arrows on all figures note this directional convention as "project" north.

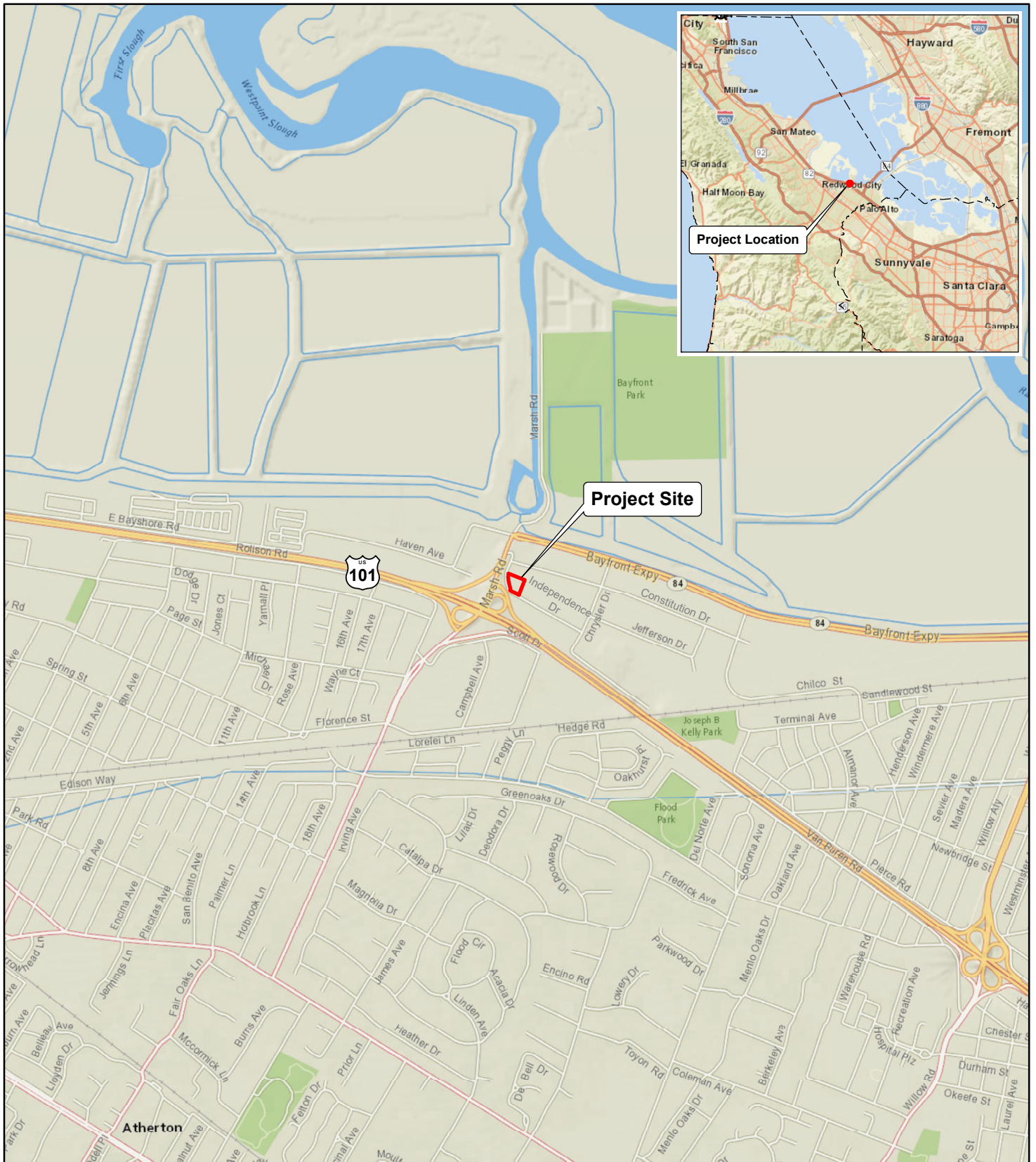


FIGURE 1-1

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111 Independence Drive Project Initial Study  
Project Location and Regional Vicinity Map

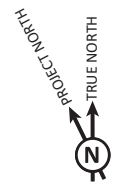
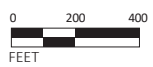
SOURCE: National Geographic (c) 2018; Esri World Street Map (c) 2018.

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FIGURE 1-2

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 Project Site

111 Independence Drive Project Initial Study  
 Aerial Photograph of the Project Site and Surrounding Land Uses

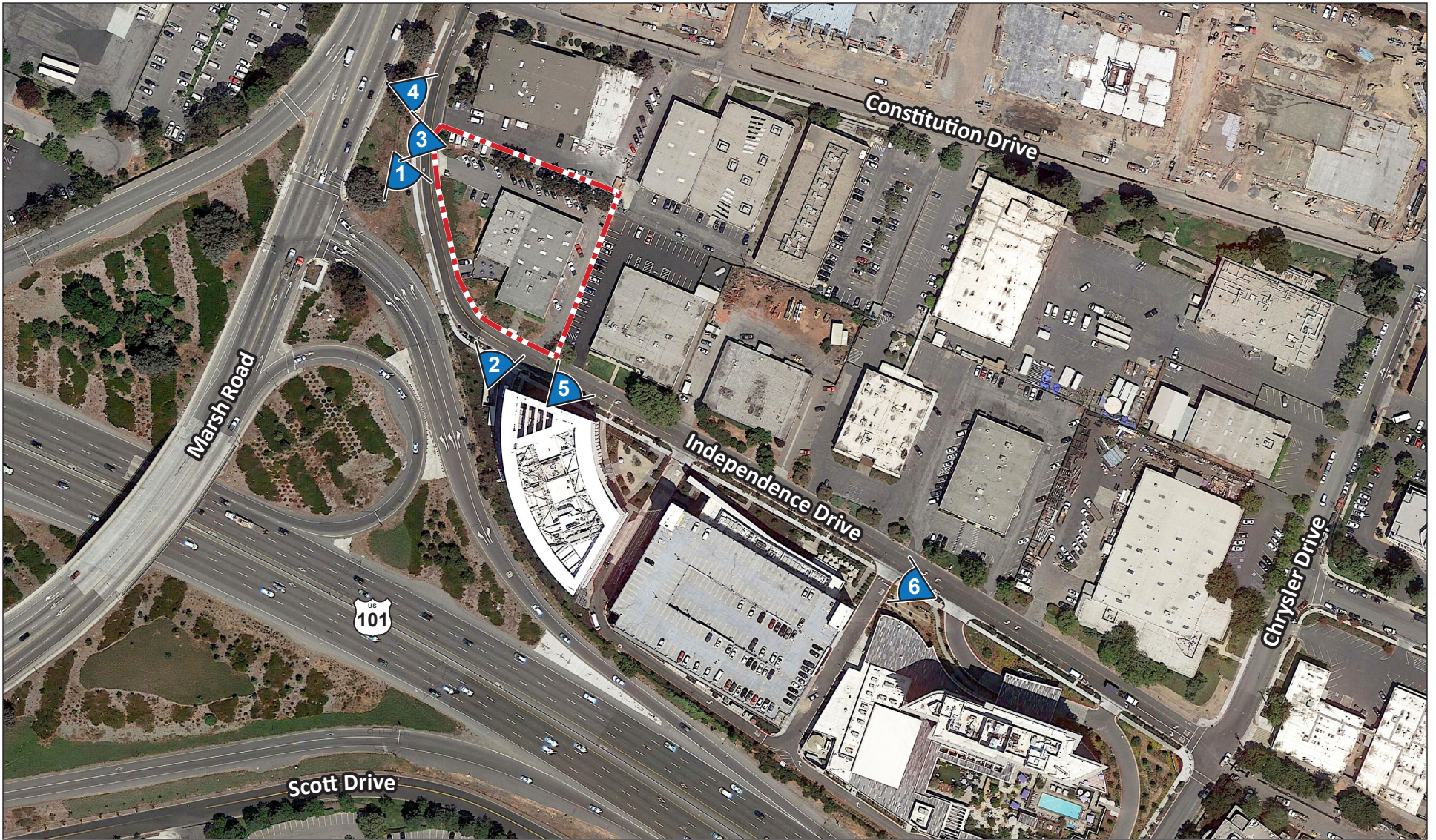


FIGURE 1-3

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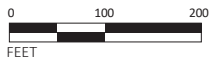


Photo Locations (Figures 1-5, 1-16 through 1-17)

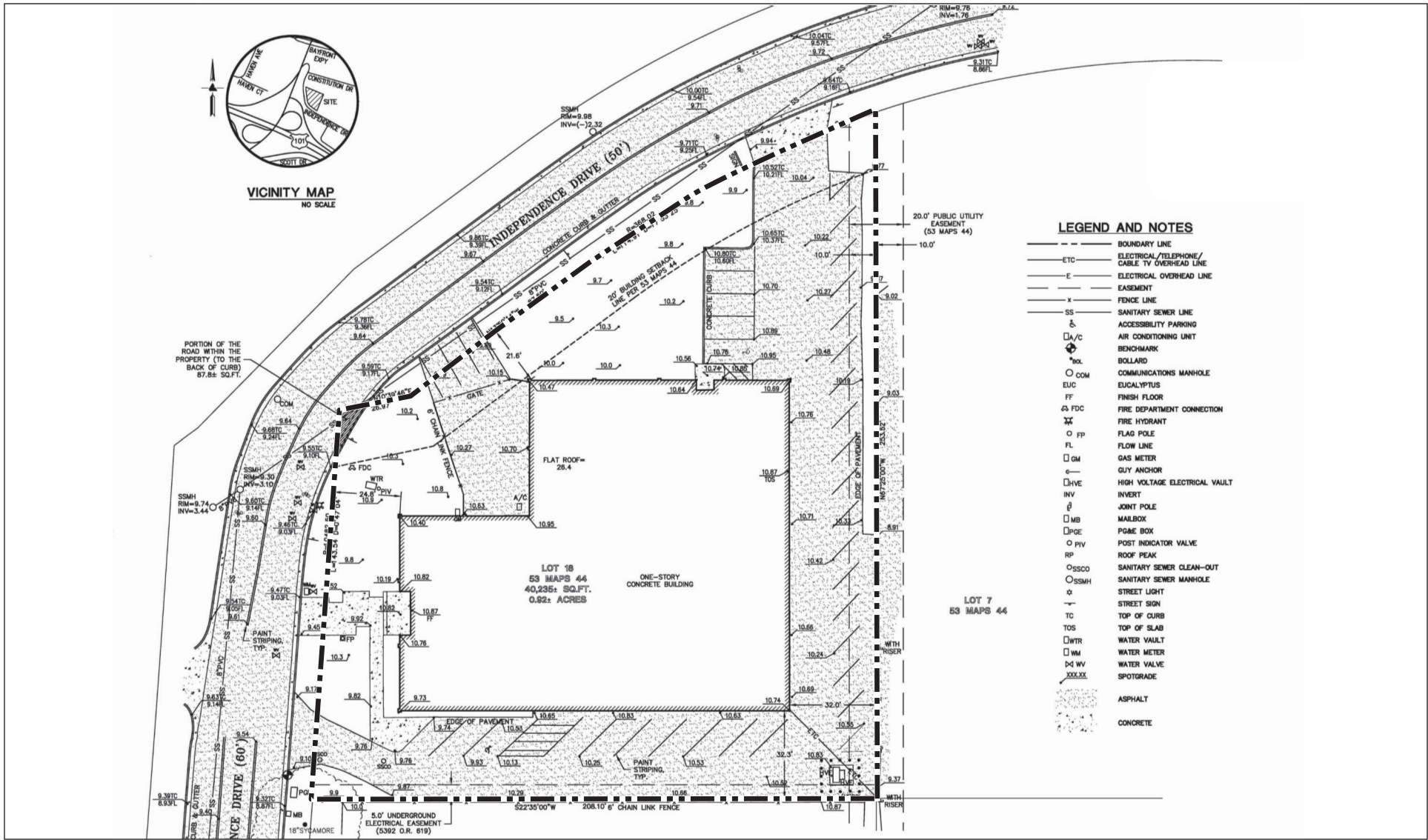


Project Site

111 Independence Drive Project Initial Study  
Photo Locations

SOURCES: GOOGLE EARTH 8/9/18; LSA, 2019,

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LSA FIGURE 1-4



Project Boundary

111 Independence Drive Project Initial Study  
Existing Site Conditions





Photo 1: Existing building, as seen from Independence Drive/Constitution Drive



Photo 2: Existing building, as seen from Independence Drive

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## Regulatory Setting

The project site is designated Mixed Use Residential on the City of Menlo Park's (City) General Plan Land Use Designations Map, which was recently updated as part of the City's General Plan Land Use and Circulation Elements Update (referred to herein as ConnectMenlo). The purpose of the update was to create live/work/play environments and to encourage office, research and development, residential, commercial uses, and hotels, all in close proximity or integrated with one another in the Bayfront Area, which is generally located north of US 101. The Mixed Use Residential designation provides for higher density housing to meet the needs of all income levels. This designation is intended to promote live/work/play environments oriented towards pedestrians, transit, and bicycle use, especially for commuting to nearby jobs.<sup>2</sup> The maximum base residential density is 30 units per acre.

The project site is located within the Residential Mixed Use Bonus (R-MU-B) zoning district.<sup>3</sup> The purpose and intent of the R-MU-B zoning district is to: 1) provide high density housing to nearby employment; 2) encourage mixed use development with a quality living environment and neighborhood-serving retail and services on the ground floor that are oriented to the public, and promote a live/work/play environment with pedestrian activity.<sup>4</sup>

## Background

On November 29, 2016, the Menlo Park City Council certified the ConnectMenlo Final Environmental Impact Report (ConnectMenlo Final EIR)<sup>5, 6</sup> and approved updates to the Land Use and Circulation Elements of the General Plan.<sup>7</sup> ConnectMenlo also included changes to the City's zoning map and rezoned specific properties to reflect the General Plan updates, including the new land uses within the Bayfront Area of the City. The ConnectMenlo Final EIR provided a program-level analysis of the development potential envisioned for the entire City, including the increased development potential in the Bayfront Area. ConnectMenlo specifically identifies new development potential in the Bayfront Area of up to 2.3 million square feet of non-residential space, 400 hotel rooms, 4,500 residential units, 11,570 residents, and 5,500 employees. The buildout potential for future development is expected to occur over a 24-year buildout horizon (from approximately 2016 to 2040).

On December 29, 2016, the City of East Palo Alto filed suit challenging the certification of the ConnectMenlo Final EIR. The City of East Palo Alto alleged that the City of Menlo Park did not comply with the California Environmental Quality Act (CEQA) because the EIR underestimated the

<sup>2</sup> Menlo Park, City of, 2016. *Menlo Park General Plan*. November 29.

<sup>3</sup> Menlo Park, City of, 2019. City of Menlo Park GIS Viewer. Available online at: [cmpweb2.menlopark.org/Html5Viewer/Index.html?configBase=https://cmpweb2/Geocortex/Essentials/REST/sites/Menlo\\_Park/viewers/MPGVH/virtualdirectory/Resources/Config/Default](http://cmpweb2.menlopark.org/Html5Viewer/Index.html?configBase=https://cmpweb2/Geocortex/Essentials/REST/sites/Menlo_Park/viewers/MPGVH/virtualdirectory/Resources/Config/Default) (accessed March 13, 2019).

<sup>4</sup> Menlo Park, City of, 2019. Menlo Park Municipal Code. January 15.

<sup>5</sup> Menlo Park, City of, 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update, Public Review Draft Environmental Impact Report*, SCH#2015062054. June 1.

<sup>6</sup> Menlo Park, City of, 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update, Public Review Final Environmental Impact Report*, SCH#2015062054. October 10.

<sup>7</sup> Menlo Park, City of, 2016. *General Plan: ConnectMenlo, Menlo Park Land Use and Mobility Update*. November 29.

amount of new employment and failed to adequately analyze the traffic impacts that would result from development under ConnectMenlo. To resolve the litigation, the City of Menlo Park and the City of East Palo Alto entered into a settlement agreement. The key terms of the settlement agreement are as follows:

1. Reciprocal Environmental Review for Future Development Projects. Menlo Park will prepare an EIR for any project located in the Office (O), Life Science (LS) or Residential Mixed Use (R-MU) district that exceeds 250,000 net new square feet and would require a use permit, that proposes bonus level development, that proposes a master plan project, or that may have a significant environmental impact. Menlo Park may, with the exception of housing and traffic (which were the focus of East Palo Alto's challenge), simplify the environmental review for future development projects by incorporating analysis and discussions from the ConnectMenlo Final EIR pursuant to CEQA Guidelines Section 15168(d). East Palo Alto will prepare an initial study for future development projects to determine the appropriate level of environmental review and will conduct that review, which can be simplified by incorporating by reference analysis and discussions from its General Plan update referred to as Vista 2035.
2. Reciprocal Traffic Studies. Menlo Park and East Palo Alto will work together to ensure that future development projects' potentially significant traffic impacts on the other jurisdiction are analyzed and mitigated.
3. Reciprocal Study of Multiplier Effect. When the preparation of an EIR is required as described above, Menlo Park or East Palo Alto, as applicable, will conduct a Housing Needs Assessment, which to the extent possible, will include an analysis of the multiplier effect for indirect and induced employment.

This Initial Study was prepared in accordance with the terms of the settlement agreement and CEQA Guidelines Sections 15152 and 15168 and incorporates by reference the information contained in the ConnectMenlo Final EIR. Per CEQA Guidelines Section 15168 later activities occurring under a program EIR may be examined in light of the program EIR and tier from the program EIR as provided for in CEQA Guidelines Section 15152. Per CEQA Guidelines Section 15152, "where an EIR has been prepared and certified for a program... consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program... should limit the EIR... on the later project to effects which: 1) were not examined as significant effects on the environment in the prior EIR; or 2) are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means." The analysis provided in this Initial Study tiers from the ConnectMenlo Final EIR.

### Proposed Project

This section provides a description of the proposed project as identified in the project sponsor's application materials submitted to the City, dated May 29, 2019.<sup>8</sup> The proposed project would result

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<sup>8</sup> SP Menlo LLC, 2019. City of Menlo Park Development Permit Application for the 111 Independence Drive Project. May 29. It should be noted that project plans may be subject to refinement prior to project approval.

in the demolition of existing office space and redevelopment of the project site with an approximately 145,350-gross-square-foot (gsf), eight-story multi-family apartment building with approximately 105 dwelling units and an approximately 712-square-foot potential commercial space, as well as associated open space, circulation and parking, and infrastructure improvements. In addition, the proposed project would include dedication of the 87.8 square feet of Independence Drive that are currently within the project site as well as a public access easement to construct a portion of the public sidewalk within the project site. Individual project components are further described below.

Figure 1-6 through Figure 1-11 depict the currently available conceptual site plans for the first through eighth floors of the proposed building. Figure 1-12 and Figure 1-13 depict conceptual building elevations as seen from surrounding roadways. Figure 1-14 depicts conceptual sections of the proposed building. A conceptual landscaping plan is shown in Figure 1-15.

### Building Program

The proposed project would result in the demolition of existing office square footage and the redevelopment of the project site with an eight-story multi-family apartment building including three levels of above ground parking. The ground floor would be raised 30 inches above grade to accommodate flood plain design requirements. The proposed building would have a maximum height of 95 feet not including parapet walls, mechanical equipment, and elevator and stair overruns. The parapet walls would vary but generally be 5.5 feet in height around the perimeter of the building and elevator and stair overruns would extend up to 99 feet. The average height of the proposed building would be approximately 63.46 feet.

The ground floor of the proposed building would include the first level of the parking garage, bicycle parking and bike shop space, a fitness room, a leasing office, the mailroom, and stairwells and elevators providing access to the residential portion of the building. An approximately 712-square-foot potential commercial space would also be located at the ground level and may include a café/coffee shop.

The second and third floors would also include the parking garage, the program for which is further described below in Section 3.3.3, and 2 residential units on the second floor and 15 residential units on the third floor. The fourth floor would include 17 residential units, an approximately 950-square-foot indoor community space and an approximately 7,311 outdoor courtyard. The fifth through seventh floors of the proposed building would each include 18 residential units, with private porches facing either Independence Drive or the interior of the building available on a portion of the units. The eighth floor of the proposed building would include 17 residential units, and an approximately 890-square-foot outdoor terrace and 554-square-foot indoor kitchenette and seating area.

A total of approximately 73,333 square feet of residential uses (approximately 105 dwelling units) would be located on the second floor and above. Units would average 698 square feet, with 29 studios, 67 one-bedroom units, and 9 two-bedroom units. The project sponsor is currently proposing that a total of 14 residential units (15 percent) be affordable to moderate and low income households. Moderate income households are those earning up to 120 percent of the area median income. This is a deviation from the City's inclusionary housing requirement that units be provided

for low income households, which are those earning between 51 and 80 percent of the area median income. Density above the maximum bonus level residential density and gross floor area above the maximum permitted residential gross floor area and floor area ratio would be achieved through the density bonus provision of the City's Below Market Rate Housing Program. In addition, this program would also allow an exceedance of the maximum average height limit.

The proposed project would be constructed to complement the adjacent Menlo Gateway buildings on Independence Drive, which have a convex curved façade, with a concave curvature to the façade on the upper floors. The base of the proposed building would be a convex curved façade with metal awnings set back from Independence Drive via public open space.

### Open Space and Landscaping

A total of approximately 16,729 square feet of open space would be provided at the ground floor and the fourth and eighth floors of the proposed building. Private residential open space would consist of common courtyards, private balconies, and a roof terrace, totaling approximately 10,346 square feet. Common useable space for residents on the ground floor would include an approximately 3,257-square-foot yard in the northwest corner of the project site, which may include a bocce ball court and dog run. The common outdoor courtyard would be located on the northwestern corner of the fourth floor and would be approximately 7,311 square feet in size. This courtyard would include a pool, dining plaza, seating areas, and other similar features. Private balconies would be provided with some residential units, facing either Independence Drive or the interior of the site. Publicly-accessible open space on the project site would consist of the approximately 6,383-square-foot plaza adjacent to Independence Drive that would provide access to the proposed building and also provide space for outdoor seating.

Approximately 12 new trees would be planted on the project site, including along Independence Drive, along the rear yard and within the fourth floor courtyard. In addition, planter beds would be installed within all of the open space areas mentioned above, as shown on Figure 1-15.

### Access, Circulation and Parking

Pedestrian access to the proposed building would be provided by Independence Drive and from within the site interior. As described above, a residential lobby would be provided on the ground floor, and the residential units would be accessed via two stairwells and two elevators in the northern and southern portions of the proposed building.

An at-grade, three-level, approximately 49,582-square-foot, 115-space parking garage would be located within the proposed building at the northeast corner. The ground floor of the parking garage would provide 40 parking spaces, the second floor would provide 39, and the third floor would provide 36. Of the 115 parking spaces, 5 are required to be ADA-compliant spaces.

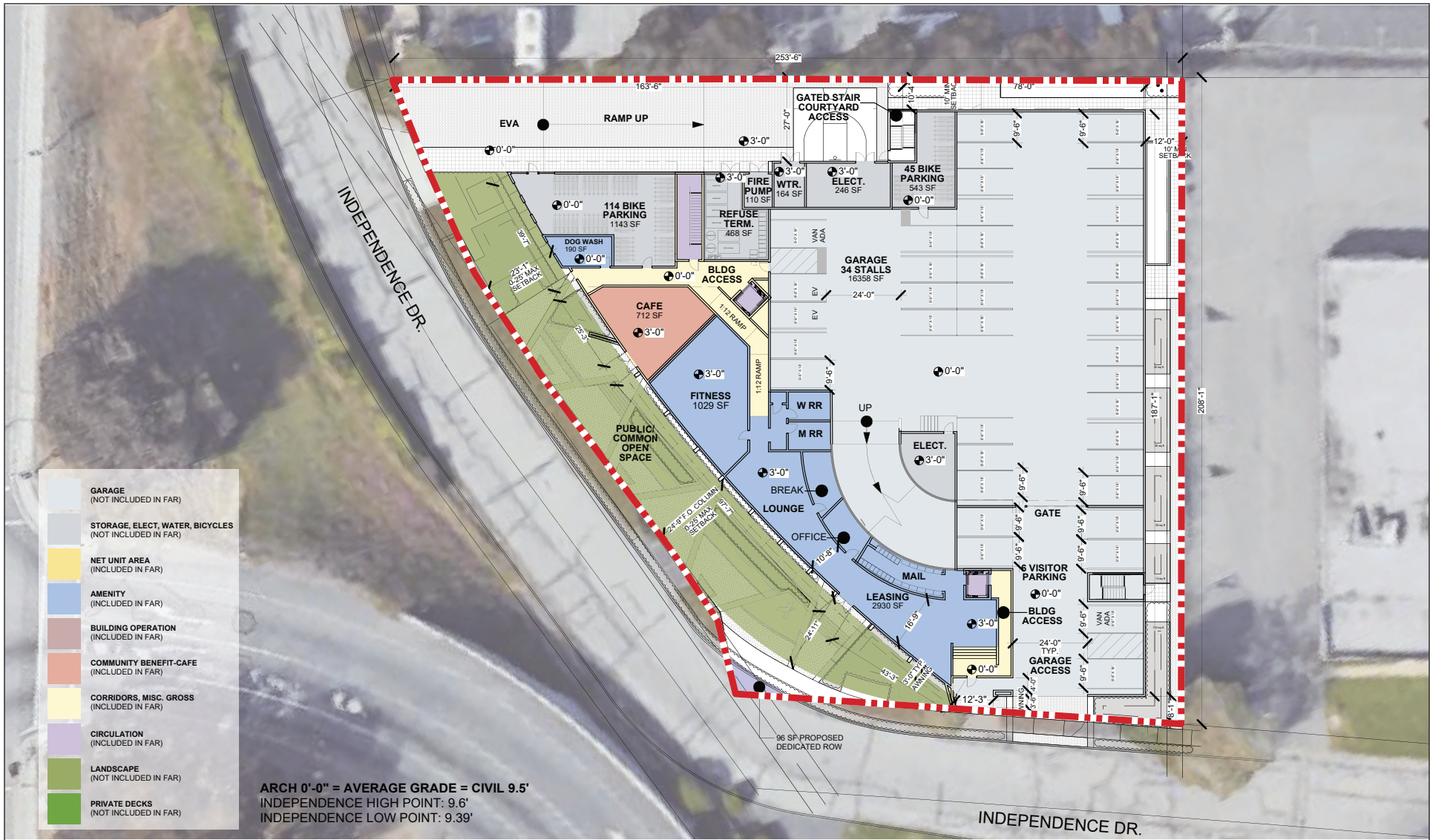


FIGURE 1-6

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NOT TO SCALE



 Project Site

111 Independence Drive Project Initial Study  
 Conceptual Ground Floor Site Plan

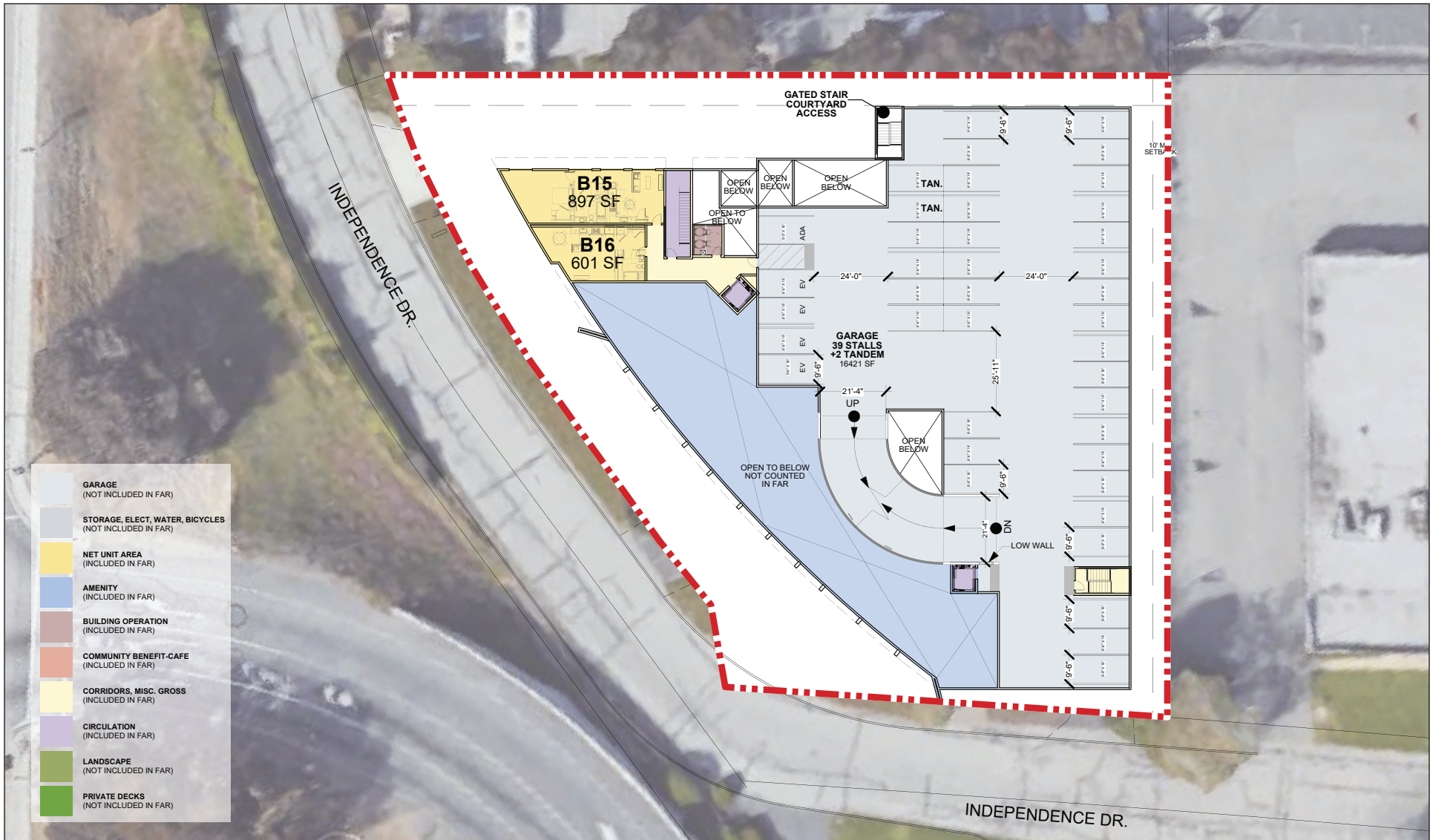



FIGURE 1-7

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 Project Site

111 Independence Drive Project Initial Study  
Conceptual Second Floor Site Plan

SOURCE: BDE ARCHITECTURE, MAY 2019.

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FIGURE 1-8



NOT TO SCALE






FIGURE 1-9

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NOT TO SCALE



 Project Site

111 Independence Drive Project Initial Study  
Conceptual Fourth Floor Site Plan



FIGURE 1-10

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NOT TO SCALE



111 Independence Drive Project Initial Study  
 Conceptual Fifth through Seventh Floor Plan

SOURCE: BDE ARCHITECTURE, MAY 2019.

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	GARAGE (NOT INCLUDED IN FAR)
	STORAGE, ELECT, WATER, BICYCLES (NOT INCLUDED IN FAR)
	NET UNIT AREA (INCLUDED IN FAR)
	AMENITY (INCLUDED IN FAR)
	BUILDING OPERATION (INCLUDED IN FAR)
	COMMUNITY BENEFIT-CAFE (INCLUDED IN FAR)
	CORRIDORS, MISC. GROSS (INCLUDED IN FAR)
	CIRCULATION (INCLUDED IN FAR)
	LANDSCAPE (NOT INCLUDED IN FAR)
	PRIVATE DECKS (NOT INCLUDED IN FAR)

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NOT TO SCALE



Project Site

FIGURE 1-11

111 Independence Drive Project Initial Study  
Conceptual Eighth Floor Plan

SOURCE: BDE ARCHITECTURE, MAY 2019.



SOUTHWESTERN ELEVATION - INDEPENDENCE DRIVE



NORTH ELEVATION

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FIGURE 1-12

NOT TO SCALE

SOURCE: BDE ARCHITECTURE, MAY 2019.

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111 Independence Drive Project Initial Study  
 Conceptual Building Elevations - Southwestern and North



SOUTH ELEVATION - INDEPENDENCE DRIVE



EAST ELEVATION

FIGURE 1-13

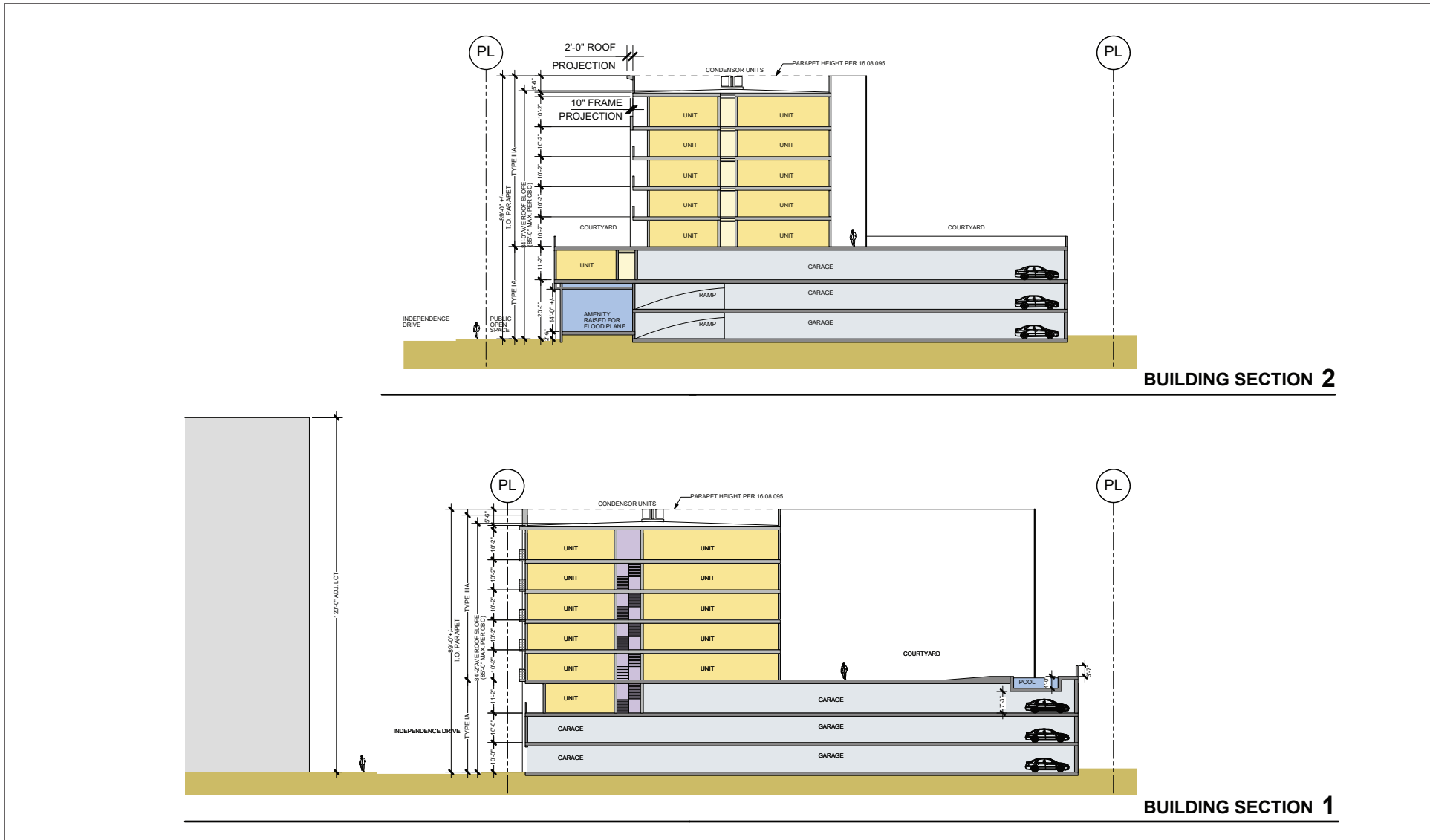
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SOURCE: BDE ARCHITECTURE, MAY 2019.

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111 Independence Drive Project Initial Study  
Conceptual Building Elevations - South and East



**BUILDING SECTION 2**

**BUILDING SECTION 1**

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FIGURE 1-14

NOT TO SCALE

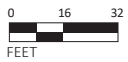
SOURCE: BDE ARCHITECTURE, MAY 2019.

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FIGURE 1-15

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111 Independence Drive Project Initial Study  
Conceptual Landscape Plan

SOURCE: BDE ARCHITECTURE, MAY 2019.

P:\CMK1901 111 Independence Drive\PRODUCTS\Graphics\IS Figures\Figure 1-15.ai (6/4/19)



Access to the parking garage would be via a single two-way entry point at the southeastern corner of the project site from Independence Drive. In addition, the ground floor would also include an access ramp along the northern boundary of the project site to provide emergency vehicle access (EVA).

A total of 175 bicycle parking spaces would be provided throughout the ground level of the project site, including 159 long-term spaces within a designated bicycle storage room within the first floor for residents, and 16 short-term spaces near the entrance to the parking garage at the southern end of the project site.

### Utilities, Infrastructure and Easements

The project site is located in an urban area with existing utilities and infrastructure. The proposed project would be required to install the following utility connections to the satisfaction of the applicable utility providers: water; wastewater; stormwater drainage; gas and power; and telecommunications services. Connections to existing infrastructure would occur within the adjacent public right-of-way.

The proposed project would include the following elements that would reduce the demand for utilities and infrastructure: a landscaped area providing stormwater treatment on the western edge of ground floor; drought-tolerant landscaping; flow-through planters; and energy-efficient appliances and efficient irrigation systems. In addition, as mentioned above, the project sponsor would underground utility poles that border the site.

The existing project site includes approximately 31,496 square feet of impervious surfaces and approximately 8,739 square feet of pervious surfaces. The proposed project would result in a net increase in impervious surface coverage of approximately 2,675 square feet compared to existing conditions.

As noted above, the proposed project would include the dedication of the approximately 87.8-square-foot portion of Independence Drive within the project site for continued use by the City as well as a public access easement to construct a portion of the public sidewalk within the project site.

### Demolition, Grading and Construction

The proposed project would include demolition of the existing office building and surface parking lot on the project site. Construction debris, such as old foundations, pavements, and structures, would be collected and hauled off site for disposal. Approximately 875 cubic yards of demolition waste would be generated by the proposed project.

Up to 100 feet of site soils would be excavated to remove materials that may not be suitable for project development. Up to 1,925 cubic yards of soils would be removed from the site for excavation, utility trenching, and foundations, 350 cubic yards of which would be retained on-site and used as fill, and 1,575 cubic yards of which would be off-hauled. A total of 400 cubic yards of soils would be imported to the site to raise the grade to meet Federal Emergency Management Agency (FEMA) requirements. Excavation depths would be a maximum of 1.5 feet for the proposed

building and parking garage, and 3.5 feet for the bio-retention areas. Foundation footings may extend up to 30 feet below grade and impact pile driving may be required.

If approved, construction of the proposed project is anticipated to begin in approximately May 2020 and would occur over a 21 month period. Demolition activities are anticipated to occur over an approximately 15 day period and grading would occur over a 60 day period. Exterior work, such as foundation installation, building construction, and installation of pavements is expected to occur over a 4 to 5 month period. The proposed project is anticipated to be fully operational and occupied by approximately February 2022.

## 9. Surrounding Land Uses and Setting:

The project site is located in the northern area of the City, within the Bayfront Area near Bedwell Bayfront Park and San Francisco Bay. The Bayfront Area is generally bounded by US 101, San Francisco Bay, and the city limits of Atherton, Redwood City, and East Palo Alto. The site is generally surrounded by a mix of uses, including older buildings and new construction, as depicted in Figure 1-3 and further described below. Figure 1-16 and Figure 1-17 include photos of surrounding land uses; refer to Figure 1-3 for photo viewpoint locations.

- **North of the Project Site.** The project site is immediately bordered to the north by Independence Drive and Marsh Road, which includes on- and off-ramps to US 101 (Photo 6). Across Marsh Road are office and light manufacturing uses.
- **East of the Project Site.** The project site is bordered immediately to the east by a single-story commercial and office building (Photo 3) and Constitution Drive, a two-lane roadway that connects Marsh Road to the Facebook campus to the south. The City has received a development application, which would result in the construction of an approximately 320 unit multi-family residential building and 34,708 square foot commercial building, for the neighboring properties at 115 Independence Drive, and 104 and 110 Constitution Drive. Further east of the project site are additional office buildings, the Constitution Site of the Menlo Gateway project,<sup>9</sup> which is currently under construction and anticipated to be complete in December 2019, SR 84, and the Bedwell Bayfront Park, an approximately 160-acre park managed by the City.
- **South of the Project Site.** The project site is bordered immediately to the south by a single-story office building currently occupied by a commercial use (Photo 4). Further south of the project site are additional commercial and light manufacturing uses. The Facebook campus, consisting of approximately 14 buildings along SR 84, begins approximately 0.5 mile south of the project site. Union Pacific Railroad (UPRR) tracks are also located just south of the Facebook campus. Across the UPRR tracks and approximately 1 mile south of the site is the Belle Haven residential neighborhood, which is generally occupied by single family residences.

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<sup>9</sup> The Menlo Gateway project, approved in 2010, includes three office buildings, three parking structures, a hotel, and a private health club and cafe on 15.9 acres at 100 to 200 Independence Drive (west of the project site) and 101 to 155 Constitution Drive (east of the project site).



Photo 3: Vegetated area adjacent to the Marsh Road/US-101 interchange, north of the project site



Photo 4: 104 Constitution Drive, east of the project site

LSA

FIGURE 1-16



Photo 5: 115 Independence Drive, south of the project site



Photo 6: 100 Independence Drive, west of the project site

LSA

FIGURE 1-17

*111 Independence Drive Project Initial Study*  
Photos of Surrounding Land Uses

- **West of the Project Site.** The project site is bordered immediately to the west by the Independence Site of the Menlo Gateway project, which consists of multiple office buildings (Photo 5) and an 11-story hotel. Further west is US 101 and the Marsh Road off-ramp, across which are commercial and healthcare uses.

**10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**

A number of permits and approvals would be required to allow development of the proposed project. As lead agency for consideration of the proposed project, the City of Menlo Park would be responsible for the majority of the approvals required for project development. Other agencies also may have some authority related the proposed project and its approvals. A list of required permits and approvals, including the discretionary actions described above, which may be required by the City and other agencies, is provided in Table 1.A.

**Table 1.A: Anticipated Permits and Approvals for Project Implementation**

Lead Agency	Permit/Approval
City of Menlo Park	<ul style="list-style-type: none"> <li>● EIR Certification</li> <li>● Use Permit</li> <li>● Below Market Rate Housing Agreement</li> <li>● Architectural Control</li> </ul>
<b>Responsible Agencies</b>	
Pacific Gas & Electric (PG&E)	<ul style="list-style-type: none"> <li>● Undergrounding of electrical infrastructure</li> <li>● Approval of electric/natural gas improvements and connection permits</li> </ul>
California Department of Transportation (Caltrans)	<ul style="list-style-type: none"> <li>● Review of traffic circulation effects and consultation on potential traffic improvements that may affect state highway facilities, ramps, and intersections</li> </ul>
California Regional Water Quality Control Board/San Mateo Countywide Water Pollution Prevention Program	<ul style="list-style-type: none"> <li>● Approval of National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge</li> </ul>
City/County Association of Governments	<ul style="list-style-type: none"> <li>● Review of potential effects on Routes of Regional Significance</li> </ul>
Bay Area Air Quality Management District (BAAQMD)	<ul style="list-style-type: none"> <li>● Permits for onsite generators, boilers, and other utility equipment</li> </ul>
San Mateo County Transportation Authority	<ul style="list-style-type: none"> <li>● Review of potential effect on public transit</li> </ul>
San Mateo County Environmental Health Division	<ul style="list-style-type: none"> <li>● Review of onsite generators</li> </ul>
Menlo Park Fire Protection District	<ul style="list-style-type: none"> <li>● Residential Site Plan review</li> </ul>
West Bay Sanitary District	<ul style="list-style-type: none"> <li>● Approval of wastewater hookups</li> </ul>

Source: LSA (2019).

There will be a fiscal impact analysis conducted regarding the project. In order to qualify for bonus-level development within the R-MU-B zoning district, the proposed project will also be required to complete an appraisal process to identify the value of the community amenities to be provided in exchange for the opportunity to develop at the bonus level.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

A request form describing the proposed project was sent to the Native American Heritage Commission (NAHC) in West Sacramento requesting a list of tribes eligible to consult with the City, pursuant to Public Resources Code section 21080.3.1. On May 24, 2019, the NAHC responded in a letter with a list of tribal contacts. The City sent a letter providing the opportunity for consultation pursuant to Assembly Bill 52 (AB 52) for the project to these individuals. No requests for consultation have been received to date. The consultation process and its conclusion will be further discussed in the EIR.

## 2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist in Chapter 3.0.

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality             |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                  | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning                   | <input type="checkbox"/> Mineral Resources                  |
| <input checked="" type="checkbox"/> Noise          | <input checked="" type="checkbox"/> Population/Housing       | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input checked="" type="checkbox"/> Transportation           | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                            | <input type="checkbox"/> Mandatory Findings of Significance |

### 2.1 DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “Potentially Significant Impact” or “Potentially Significant Unless Mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
Kaitie Meador, Senior Planner

6/11/19  
Date

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### 3.0 CEQA ENVIRONMENTAL CHECKLIST

#### 3.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Pursuant to Public Resources Code Section 21099, certain types of projects located within a transit priority area are exempt from the consideration of environmental impacts related to aesthetics.

The nearest public transit stop to the project site is served by SamTrans Route 270 and is located approximately 0.3 miles to the north on Haven Avenue. Route 270 operates on an hourly timetable and provides access to the Redwood City Transit Center, located approximately 4.5 miles north of the site. The Atherton Caltrain Station is located approximately 2.8 miles west of the site; however, direct local public transit service to this station is not provided within the vicinity of the site. Facebook is currently constructing a new bus stop to serve the Chilco Campus at 180-200 Jefferson Drive, a few blocks from the project site; however, this bus stop serves buses and trams used by Facebook employees only and does not provide public transit service.

Although the proposed project is a residential development located on an infill site, the project is not located within a transit priority area as defined by Public Resources Code section 21099, because the SamTrans Route 270 stop is not defined as a major transit stop (typically defined as stops with 15-minute headways) and because no other major transit stops are located within one half mile or less of the project site. Therefore, the proposed project’s potential impacts related to aesthetics are discussed below.

*a. Would the project have a substantial effect on a scenic vista? (Less-Than-Significant Impact)*

As stated in the ConnectMenlo Final EIR, scenic corridors are considered public views as seen along a linear transportation route and scenic vistas are views of a specific scenic feature. Scenic vistas are generally interpreted as long-range views, while scenic corridors are short-, middle-, and long-range views. The City has not designated any official scenic corridors or vistas. However, the

ConnectMenlo Final EIR considered views of the Santa Cruz Mountain Range, views to the Bay, and views of the foothills and San Francisquito Creek within the City as scenic vistas.

The ConnectMenlo Final EIR determined that more intense development and increases in proposed building heights in the Bayfront Area, where the project site is located, could block views of the Bay and its scenic resources from various vantage points. Due to the natural topography and location of the Bayfront Area at the City's northern border, the far-field views of the Santa Cruz Mountain Range, foothills and San Francisquito Creek would not be impacted by new development occurring within the Bayfront Area. Because the topography in the Bayfront Area is essentially flat, the views from street-level to the scenic resources are currently inhibited by existing conditions such as buildings, structures, overhead utilities, and mature trees/vegetation. As such, the maximum heights currently permitted limit the opportunity for views of scenic vistas from street-level public viewing. Therefore, the height increases permitted with ConnectMenlo, which are limited to certain parcels in the Bayfront Area including the project site, would not cause any further substantial obstruction from the street level view to any scenic resource.

The developed parcels in the Bayfront Area are not considered public Bay-viewing destination points. Public Bay-viewing destination points include the Bayfront Expressway and the San Francisco Bay Trail. No new development is planned for between the Bay and these viewing points; thus, no obstruction of views would occur under ConnectMenlo. Furthermore, potential future development Citywide, including the proposed project, would be subject to the City's existing architectural control process, in accordance with Section 16.68.020 of the Zoning Ordinance and would be required to comply with existing design standards outlined in the Zoning Ordinance. The design standards, which apply to all new construction, ensure development within the R-MU zoning district results in high-quality design.

Therefore, because the project site is located within a developed portion of the Bayfront Area and does not provide public views of the Bay, and because the proposed project would be subject to the City's existing architectural control process, this impact would be less than significant.

*b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Less-Than-Significant)*

As noted in the ConnectMenlo Final EIR, the section of Interstate 280 (I-280) within the City is considered a State scenic highway. However, none of the potential new growth under ConnectMenlo would result in more intense development or increase heights within the I-280 viewshed. The project site is located within the Bayfront Area, which was considered for new growth, and is therefore not located within the viewshed of I-280. In addition, the existing building was built in 1972 and is not considered a historic resource, as noted in Section 3.5, Cultural Resources. Therefore, this impact would be less than significant.

- c. *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that future development occurring under ConnectMenlo would create a shift in uses in the Bayfront Area from light industrial and business park uses to office, technology, research and development, life sciences and mixed-use with multi-family residential and commercial, and involve notable changes in building intensity and height from 35 feet to 120 feet. However, given the existing commercial, industrial, and residential uses surrounding the areas of potential new growth, the gradual development of future projects would continue to be compatible with the existing visual character and quality of the Bayfront Area and its surroundings.

The proposed project would consist of an eight-story multi-family residential building within the Bayfront Area with a maximum height of 95 feet and an average height of 63.46 feet. The maximum allowed average height for the project site is 62.5 feet; however, the project sponsor is requesting an increase in the allowable average through the City's Below Market Rate Housing Program. As noted above, the proposed project would be subject to the City existing architectural control process, which would ensure the proposed project complies with the existing design standards outlined in the Zoning Ordinance. Therefore, the proposed project would have a less-than-significant impact related to scenic quality.

- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Less-Than-Significant Impact)*

As stated in the ConnectMenlo Final EIR, the City contains many existing sources of nighttime illumination. These include street and parking area lights, security lighting, and exterior lighting on existing residential, commercial, and institutional buildings. Additional onsite light and glare is caused by surrounding land uses and traffic, specifically from US 101 and the Bayfront Expressway in the Bayfront Area. In addition to new building, security, and lighting for parking areas, buildout of the Bayfront Area would also include lighting aimed at properly illuminating the overall Bayfront Area. Additionally, new larger buildings with more exterior glazing could result in new sources of glare.

New development in the Bayfront Area, including the proposed project, would be required to comply with General Plan policies that ensure new land uses do not generate excessive light levels that would spill on to adjacent sensitive receptors and reduce light and glare spillover from future development to surrounding land uses. Specifically, Policy LU-2.3 requires that new development with residential units address potential compatibility issues such as light spillover. The proposed project would be required to comply with this policy as part of the site plan review and architectural control process. Therefore, the proposed project would have a less-than-significant impact related to substantial light or glare.

### 3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (No Impact)*

The project site and vicinity are located within an urban area in the City of Menlo Park. There are no agricultural resources located on or near the project site. The project site is classified as “Urban and Built-Up land” by the State Department of Conservation.<sup>10</sup> Therefore, development of the proposed project would not convert agricultural land to non-agricultural uses. The proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.

<sup>10</sup> California Department of Conservation, 2016. California Important Farmland Finder (map). Website: [maps.conservation.ca.gov/dlrp/ciff](https://maps.conservation.ca.gov/dlrp/ciff) (accessed April 10, 2019).

*b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? (No Impact)*

The project site is within the R-MU-B zoning district and is not under a Williamson Act contract.<sup>11</sup> Therefore, the proposed project would not conflict with existing zoning for an agricultural use or a Williamson Act contract.

*c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? (No Impact)*

The developed project site is located within an urban area in the City of Menlo Park and is within the City's R-MU-B zoning district. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland.

*d. Would the project result in the loss of forest land or conversion of forestland to non-forest use? (No Impact)*

Refer to Section 3.2.c. The proposed project would not result in the loss of forest land or conversion of forestland to non-forest uses.

*e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (No Impact)*

Refer to Sections 3.2.a and 3.2.c. The project site is located within an existing urban environment and would not result in the extension of infrastructure into an undeveloped area, the development of urban uses on a previously undeveloped greenfield site, or other physical changes that would result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. The proposed project would not adversely affect agricultural or forestry resources.

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<sup>11</sup> California Department of Conservation, 2012. *San Mateo County Williamson Act FY 2006/2007 (map)*. Available online at: <ftp.consrv.ca.gov/pub/dlrp/wa> (accessed April 10, 2019).

### 3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### *a. through c. (Potentially Significant Impact)*

The ConnectMenlo Final EIR found that future development would result in a substantial long-term increase in criteria air pollutants. The ConnectMenlo Final EIR identified Mitigation Measures AQ-2a, AQ-2b, and AQ-2b2, which require a technical assessment evaluating potential project operation- and construction phase-related air quality impacts and compliance with the Bay Area Air Quality Management District’s (BAAQMD) basic control measures for reducing construction emissions. In addition, based on the proposed project’s location in proximity to US 101, Marsh Road, and SR 84, and consistent with the requirements of Mitigation Measure AQ-3b from the ConnectMenlo Final EIR, a health risk assessment is required to determine the potential health risk to future residents of the project site.

As noted in Section 3.17, a transportation evaluation will be prepared. This evaluation may identify new or more significant impacts related to transportation, and therefore air quality, than was previously analyzed in the ConnectMenlo Final EIR. Development activity associated with implementation of the proposed project could increase pollutant concentrations in Menlo Park through increased vehicle trips and construction. This increase could contribute to existing air pollution in the San Francisco Bay Area Air Basin and has the potential to exceed regional air emission thresholds established by the BAAQMD. Construction activities associated with project development, including building demolition, grading, and ground disturbance, could increase concentrations of particulate matter and could expose sensitive receptors to toxic air contaminants. Therefore, the criteria identified above for topics 3.a through 3.c will be evaluated in an EIR. Mitigation measures will be recommended if necessary.

*d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR concluded that buildout potential analyzed under ConnectMenlo could include potential odor sources that could affect new sensitive receptors, such as composting, greenwaste, and recycling operations; food processing; and painting/coating operations. Responses to odors are subjective, and vary by individual and type of land use. Residential uses are not included in Table 4.2-9 of the ConnectMenlo Final EIR, which lists uses that could be required to undergo environmental review to ensure sensitive land uses are not exposed to objectionable odors, and the proposed project would not be a source of odors. Therefore, the proposed project would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people, and this impact would be less than significant.

### 3.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that the potential for occurrence of special-status species in developed areas is generally very remote in comparison to undeveloped lands with natural habitat that contain essential habitat characteristics for the range of species known to occur in the Menlo Park vicinity. ConnectMenlo included goals, policies, and programs and bird-safe regulations for the Bayfront Area that would help protect special-status species and birds and minimize impacts.

The project site is currently developed and does not include any sensitive habitat, nor is it located near any sensitive habitats, and therefore a project-specific baseline biological resources assessment pursuant to Mitigation Measure BIO-1 from the ConnectMenlo Final EIR would not be required. In addition, the proposed project would be required to comply with the bird-safe design measures included in the building regulations for the Bayfront Area. Therefore, the proposed project would



not result in direct or indirect adverse effects on special-status plant or wildlife species and this impact would be less than significant.

- b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (Less-Than-Significant Impact)*

As stated in the ConnectMenlo Final EIR, sensitive natural communities within the City consist of areas of coastal salt march vegetation in the baylands, native valley oaks in Saint's Patrick's Seminary, and possibly areas of riparian scribes and woodland along San Francisquito Creek and other drainages. The project site is currently developed and is not located within or in the immediate vicinity of one of these areas, and therefore would have a less-than-significant impact related to riparian habitat.

- c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that development could have a significant adverse effect on wetlands by allowing development on previously undeveloped parcels in the Bayfront Area with mapped wetlands, which are along University Avenue. The project site is currently developed and does not support any federally protected wetlands. Compliance with all applicable requirements associated with the protection of water quality in stormwater runoff would further ensure that there are no impacts to wetlands within or beyond the Bayfront Area as a result of the proposed project. Compliance with stormwater quality requirements is discussed in Section 3.10, Hydrology and Water Quality, of this Initial Study.

- d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that development and land use activities consistent with ConnectMenlo would result in a reduction in the remaining natural habitat within the City. However, most wildlife in these areas are already acclimated to human activity in the urbanized portions of the City. As noted above, the project site is currently developed and does not contain, nor is it located near, any sensitive habitats. Ornamental landscaping located throughout the project site would be removed. Vegetation and landscaping generally have the potential to support nests of common native bird species. All native birds and their nests, regardless of their regulatory status, are protected under the federal Migratory Bird Treaty Act and California Fish and Game Code. However, because the project site is located in a busy urban area and vegetation on the project site is limited, potential impacts to nesting birds would be less than significant.

*e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less-Than-Significant Impact)*

The City's Tree Preservation Ordinance requires a permit to remove any protected trees. There are no mature trees on the project site; therefore, the proposed project would not conflict with the City's Tree Preservation Ordinance. The proposed project would include the planting of approximately 12 new trees, as well as the installation of new landscaping that would be in compliance with Municipal Code Chapter 12.44, Water-Efficient Landscaping, and therefore would not conflict with any local policies or ordinances protecting biological resources and this impact would be less than significant.

*f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (No Impact)*

As noted in the ConnectMenlo Final EIR, portions of the City are within the Stanford University Habitat Conservation Plan (Stanford HCP).<sup>12</sup> However, the Stanford HCP only applies to land owned by Stanford University. The project site is not owned by Stanford University, and therefore is not located within the boundaries of an adopted conservation plan. Therefore, the proposed project would not conflict with the provisions of a habitat conservation plan, natural community plan or other approved local, regional or State habitat conservation plan, and no impact would occur.

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<sup>12</sup> Stanford University, 2015. *Stanford University Habitat Conservation Plan*. December 22.

### 3.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (Less-Than-Significant Impact)*

As noted in the ConnectMenlo Final EIR, the two main categories of historical resources that are subject to adverse impacts, and that may be adversely affected by development allowed under ConnectMenlo, are historical archaeological deposits and historical architectural resources. Refer to Section 3.5.b, below for a discussion of archaeological deposits.

There are several recognized historic properties within the City; however, none of these are located within the Bayfront Area, where the project site is located. The ConnectMenlo Final EIR Mitigation Measure CULT-1 requires site-specific historic resources evaluations for individual projects that are proposed on sites with a building more than 50 years old or any site adjoining with a building more than 50 years old. The existing building on the project site was constructed in 1972, and therefore does not meet the 50-year-old threshold.<sup>13</sup> Adjoining properties include buildings that are 50 years or older; however, as noted above, none of the recognized historic properties within the City are located within the Bayfront Area or within the immediate project vicinity. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

*b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less-Than-Significant with Mitigation Incorporated)*

The ConnectMenlo Final EIR determined that it is highly improbable that archaeological deposits associated with the historic period of Menlo Park and Native American prehistoric archeological sites exist on the locations identified for future development, because these locations are concentrated on sites either already developed, and/or in close proximity to existing development, where development will have a lesser impact on historical archeological resources. However, future projects that require substantial excavation reaching significant depths below the ground surface could result in the disturbance of unidentified subsurface materials that have the potential to contain prehistoric archaeological resources, including unrecorded Native American prehistoric archaeological sites. The ConnectMenlo Final EIR identified Mitigation Measure CULT-2a, which is

<sup>13</sup> SP Menlo LLC, 2019. *Request for Evaluation for Potential Historic Significance*. January 27.

presented below, to ensure this impact would be reduced to a less-than-significant level. This mitigation measure would be applicable to the proposed project and would be required to ensure that potential impacts of the proposed project to archaeological deposits would be less than significant.

**Connect Menlo Final EIR Mitigation Measure CULT-2a:** If a potentially significant subsurface cultural resource is encountered during ground disturbing activities, 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 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.

*c. Would the project disturb any human remains, including those interred outside of formal cemeteries? (Less-Than-Significant with Mitigation Incorporated)*

The ConnectMenlo Final EIR determined that human remains associated with pre-contact archaeological deposits could exist within the City and could be encountered at the time potential future development occurs. The associated ground-disturbing activities, such as site grading and trenching for utilities, have the potential to disturb human remains interred outside of formal cemeteries. Any human remains encountered during ground-disturbing activities are required to be treated in accordance with California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA), which state the mandated procedures of conduct following the discovery of human remains. The ConnectMenlo Final EIR identified Mitigation Measure CULT-4, which is presented below, to ensure this impact would be reduced to a less-than-significant level. This mitigation measure would be applicable to the proposed project and would be required to ensure that potential impacts of the proposed project to pre-contact human remains would be less than significant.

**Connect Menlo Final EIR Mitigation Measure CULT-4:** Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The San Mateo County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies

as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

### 3.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? (Less-Than-Significant Impact)*

Energy conservation was evaluated in Section 4.15.5 of the ConnectMenlo Final EIR, consistent with CEQA Guidelines Appendix F. The ConnectMenlo Final EIR did not quantify energy or natural gas demand associated with buildout of ConnectMenlo; however, a brief discussion of energy use and conservation, including the City’s Climate Change Action Plan, was included. The ConnectMenlo Final EIR determined that development pursuant to ConnectMenlo would be subject to new requirements under rule making developed at the State and local level regarding greenhouse gas (GHG) emissions. Specifically, the ConnectMenlo Final EIR found that individual projects would be required to adhere to the Heavy Duty National Program, which has been adopted by the United States Environmental Protection Agency (USEPA). The Heavy Duty National Program establishes fuel efficiency and GHG emission standards in the heavy-duty highway sector, which include combination tractors (semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles (including buses and refuse or utility trucks). In addition, as required by Mitigation Measure AQ-2b1 in the ConnectMenlo Final EIR, individual development projects would be required to comply with the current BAAQMD’s basic control measures for reducing construction emissions, which would also improve the energy efficiency of the project during construction.

The ConnectMenlo Final EIR determined that new development pursuant to ConnectMenlo would be constructed using energy efficient modern building materials and construction practices, in accordance with the CALGreen Building Code, the California Public Utility Commission’s Long Term Energy Efficiency Strategic Plan, and Chapter 12.18 of the Menlo Park Municipal Code which contains the Green Building Ordinance. In addition, the ConnectMenlo Final EIR found that new buildings would also use new modern appliances and equipment, in accordance with the 2006 Appliance Efficiency Regulations.

As discussed in the ConnectMenlo Final EIR, implementation of ConnectMenlo inherently furthers objectives of energy conservation by focusing activities in areas of existing infrastructure and services. In addition, the Land Use, Circulation, and Open Space/Conservation elements of ConenctMenlo contain goals, policies, and programs that would require local planning and development decisions to consider impacts to energy resources. As a part of ConnectMenlo, all new building within the Bayfront Area are required to comply with specific green building requirements

for LEED certification, provide outlets for Electric Vehicle (EV) charging, provide on-site renewable energy generation, and enroll in the USEPA's Energy Star Building Portfolio Manager.

Similar to buildout of ConnectMenlo, the proposed project would increase the demand for energy during construction of the proposed project and would increase the demand for electricity, natural gas, and gasoline during operation of the proposed project. The discussion and analysis provided below is based on data included in the California Emissions Estimator Model (CalEEMod) output, which is included in Appendix A.

The anticipated construction schedule for the proposed project assumes that the proposed project would be built over 21 months. The proposed project would require demolition, grading, site preparation, and building activities during construction. Construction of the proposed project would require energy for the manufacture and transportation of construction materials, preparation of the site for demolition and grading activities, and construction of the project. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. In order to increase energy efficiency on the site during project construction, the project would restrict equipment idling times to 5 minutes or less and would require construction workers to shut off idle equipment, as required by the ConnectMenlo Final EIR Mitigation Measure AQ-2b1. In addition, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be less than significant.

Similar to buildout of ConnectMenlo, energy use consumed during operation of the proposed project would be associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with the proposed project. Energy and natural gas consumption was estimated for the project using default energy intensities by building type in CalEEMod. In addition, the proposed buildings would be constructed to current CALGreen standards, which was included in CalEEMod inputs. Electricity and natural gas usage estimates associated with the proposed project are shown in Table 3.A.

The proposed project would result in energy usage associated with gasoline to fuel project-related trips. Based on the CalEEMod analysis, the proposed project would result in approximately 1,431,105 vehicle miles traveled (VMT) per year. The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.0 mpg in 2015.<sup>14</sup> Therefore, using the USEPA fuel economy estimates for 2015, the proposed project would result in the consumption of approximately 65,050 gallons of gasoline per year. Table 3.A below, shows the estimated potential increased electricity and natural gas demand associated with the proposed project.

<sup>14</sup> U.S. Department of Transportation. "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: [https://www.bts.gov/archive/publications/national\\_transportation\\_statistics/table\\_04\\_23/](https://www.bts.gov/archive/publications/national_transportation_statistics/table_04_23/) (accessed June 2019).

**Table 3.A: Estimated Annual Energy Use of Proposed Project**

Land Use	Electricity Use (kWh per year)	Natural Gas Use (therms per year)	Gasoline (gallons per year)
Residential	447,531	9,256	63,797
Retail	5,240	23	1,253
Parking Structure	99,367	0	0
Open Space	0	0	0
<b>Total</b>	<b>552,138</b>	<b>9,279</b>	<b>65,050</b>

Source: LSA (June 2019).

As shown in Table 3.A, the estimated potential increased electricity demand associated with the proposed project is 552,138 kilowatt-hours (kWh) per year. In 2017, California consumed approximately 288,614 gigawatt-hours (GWh) or 288,614,000,000 kWh.<sup>15</sup> Of this total, San Mateo County consumed 4,367 GWh or 4,367,541,850 kWh.<sup>16</sup> Therefore, electricity demand associated with the proposed project would only be approximately 0.01 percent of San Mateo County’s total electricity demand.

The estimated potential increased natural gas demand associated with the proposed project is 9,279 therms per year, as shown in Table 3.A. In 2017, California consumed approximately 12,571 million therms or 12,571,000,000 therms, while San Mateo County consumed approximately 211 million therms or approximately 211,256,396 therms.<sup>17</sup> Therefore, natural gas demand associated with the proposed project would be less than 0.01 percent of San Mateo County’s total natural gas demand.

In addition, the proposed project would result in energy usage associated with gasoline to fuel project-related trips. As shown above in Table 3.A, vehicle trips associated with the proposed project would consume approximately 65,050 gallons of gasoline per year. In 2015, vehicles in California consumed approximately 15.1 billion gallons of gasoline.<sup>18</sup> Therefore, gasoline demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Consistent with ConnectMenlo requirements, the proposed project would comply with specific green building requirements for LEED certification, provide outlets for EV charging, provide on-site renewable energy generation, enroll in the USEPA’s Energy Star Building Portfolio Manager, use new modern appliances and equipment, and comply with current CALGreen standards, which would help to reduce energy and natural gas consumption. The proposed project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate

<sup>15</sup> California Energy Commission. 2017. Energy Consumption Data Management Service. Electricity Consumption by County. Available online at: <http://www.ecdms.energy.ca.gov/elecbycounty.aspx> (accessed June 2019).

<sup>16</sup> Ibid.

<sup>17</sup> California Energy Commission. 2017. Energy Consumption Data Management Service. Gas Consumption by County. Available online at: <http://www.ecdms.energy.ca.gov/gasbycounty.aspx> (accessed June 2019).

<sup>18</sup> California Energy Commission. 2017. California Gasoline Data, Facts, and Statistics. Available online at: [http://www.energy.ca.gov/almanac/transportation\\_data/gasoline/](http://www.energy.ca.gov/almanac/transportation_data/gasoline/) (accessed April 2019).



renewable energy or energy efficiency measures into building design, equipment use, and transportation. Therefore, construction and operation period impacts related to consumption of energy resources would be less than significant.

*b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Less-Than-Significant Impact)*

As previously stated, the proposed project would be required to comply with the CALGreen Code, which includes provisions related to insulation and design aimed at minimizing energy consumption. In addition, the proposed project would implement Transportation Demand Management (TDM) measures and would help the area change from an auto-oriented corridor to a multi-modal oriented community, with related energy conservation resulting from the more efficient use of transportation, circulation, and infrastructure systems by locating a residential use within a jobs-rich area. Therefore, the proposed project would be consistent with the State's goal of reducing VMT and vehicular GHG emissions as outlined in Senate Bill 743. The proposed project would also be consistent with the ConnectMenlo energy conservation policies, as noted above, and the City's Climate Change Action Plan.

In addition, as indicated above, energy usage on the project site during construction would be temporary in nature and energy usage associated with operation of the proposed project would be relatively small in comparison to the State's available energy sources and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact to regional energy supplies would be minor, the proposed project would not conflict with energy conservation plans. Thus, as shown above, the project would avoid or reduce the inefficient, wasteful, and unnecessary consumption of energy and not result in any irreversible or irretrievable commitments of energy. Therefore, the proposed project would be consistent with applicable plans related to renewable energy and energy efficiency, and this impact would be less than significant.

### 3.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The information presented in this section is based on data and findings provided in the Geotechnical Investigation<sup>19</sup> prepared for the project site, unless otherwise noted.

- a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? (Less-Than-Significant Impact)*

**Fault Rupture.** Surface fault rupture occurs when the ground surface is broken due to fault movement during an earthquake. Fault rupture is generally expected to occur along active fault traces. Areas susceptible to fault rupture are delineated by the California Geological Survey Alquist-Priolo Earthquake Fault Zones and require specific geological investigations prior to development to

<sup>19</sup> Romig Engineers, 2018. *Geotechnical Investigation, Apartment Building, 111 Independence Drive, Menlo Park, California*. December 21.

reduce the threat to public health and safety and to minimize the loss of life and property posed by an earthquake-induced ground failure.

The ConnectMenlo Final EIR determined that no Alquist-Priolo Earthquake Fault Zones have been mapped within the Bayfront Area. There are no mapped faults going through or adjacent to the project site, and the project site is not located within an Earthquake Fault Zone. The closest active fault to the project site is the San Andreas Fault, which is located approximately 6.3 miles southwest. Therefore, the proposed project would have a less-than-significant impact related to fault rupture.

**Ground Shaking.** Seismic ground shaking generally refers to all aspects of motion of the earth's surface resulting from an earthquake, and is normally the major cause of damage in seismic events. The extent of ground shaking is controlled by the magnitude and intensity of the earthquake, distance from the epicenter, and local geologic conditions. The magnitude of a seismic event is a measure of the energy released by an earthquake; it is assessed by seismographs that measure the amplitude of seismic waves. The intensity of an earthquake is a subjective measure of the perceptible effects of a seismic event at a given point.

In the future, the proposed project would likely experience severe ground shaking during moderate and large magnitude earthquakes produced along the San Andreas Fault or other active Bay Area fault zones. Using information from recent earthquakes, improved mapping of active faults, ground motion modeling, and a new model for estimating earthquake probabilities, there is a 72 percent chance that at least one earthquake of Magnitude 6.7 or greater will occur in the Bay Area before 2043. The Hayward Fault, located approximately 13 miles northeast of the project site, has the highest likelihood of an earthquake greater than or equal to Magnitude 6.7 in the Bay Area, estimated at 33 percent.

The risk of ground shaking impacts is reduced through adherence to the design and materials set forth in building codes. The City of Menlo Park has adopted the 2016 California Building Code (Title 24, California Code of Regulations), which provides for stringent construction requirements on projects in areas of high seismic risk. The Geotechnical Investigation prepared for the project site recommends seismic design parameters to be used in accordance with the 2016 California Building Code to account for earthquake ground motions. The Geotechnical Investigation provided a preliminary recommendation that the proposed building be supported on deep foundations that would likely extend to at least 65 feet in depth. Therefore, the project design would be required to comply with 2016 California Building Code Section 1803.5.5, Deep Foundations, which specifies that "where deep foundations will be used, a geotechnical investigation shall be conducted..." As noted in the ConnectMenlo Final EIR, the design and construction for the proposed project is required to conform with, or exceed, current best standards for earthquake resistant construction in accordance with the most current California Building Code and with the generally accepted standards of geotechnical practice for seismic design in Northern California.

Seismic hazards cannot be completely eliminated, even with site-specific geotechnical investigation/design and advanced building practices. However, the seismic design standards of the California Building Code are intended to prevent catastrophic building failure in the most severe

earthquakes currently anticipated. Therefore, compliance with existing building codes would ensure that the potential impacts associated with ground shaking would be less than significant.

**Seismic-Related Ground Failure and Liquefaction.** The potential for different types of ground failure to occur during a seismic event is discussed below. As noted above, the ConnectMenlo Final EIR determined that compliance with existing regulations, including General Plan policies that have been prepared to minimize impacts related to strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landsliding, impacts related to seismic-related ground failure and liquefaction would be less than significant. Because geotechnical and soil conditions can vary by geographic location, a site-specific analysis is presented below.

**Liquefaction.** Soil liquefaction is a phenomenon primarily associated with saturated soil layers located close to the ground surface. During ground shaking, these soils lose strength and acquire a “mobility” sufficient to permit both horizontal and vertical movements. Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie relatively close to the ground surface. However, loose sands that contain a significant amount of fines (silt and clay) may also liquefy. Based on testing at the project site, some of the fine grained soils encountered with a low plasticity may be prone to liquefaction settlement. Total settlement that could occur at the ground surface as a result of liquefaction is estimated to range from approximately 1 to 3.5 inches.

As noted above, the Geotechnical Investigation provided a preliminary recommendation that the proposed building be supported on deep foundations extending to at least 65 feet in depth. Liquefaction is expected to be limited beneath the pile depths at this length. However, final grading, foundation, and building plans must be designed in accordance with the California Building Code, which requires preparation of and compliance with the recommendations of a site-specific geotechnical investigation. These designs would include measures that would address the potential for differential settlement related to liquefaction. Therefore, compliance with the California Building Code would ensure that the potential impacts associated with liquefaction would be less than significant.

**Lateral Spreading.** Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. Upon reaching mobilization, the surficial soils are transported downslope or in the direction of a free face by earthquake and gravitational forces. The project site is not susceptible to lateral spreading due to the lack of a nearby free slope face. Therefore, the proposed project would have a less-than-significant impact related to lateral spreading.

**Surface Settlement.** Settlement can occur when non-saturated, cohesionless soil is densified by earthquake vibrations. The fill and native soils above the ground water at the project site are typically composed of stiff to very stiff clays, and therefore the potential for settlement of these surface soils during a major earthquake is low. In addition, recompaction of any poorly-compacted or undocumented fills encountered during earthwork construction, as recommended by the Geotechnical Investigation, would further reduce the risk of differential compaction during a major earthquake. Therefore, the proposed project would have a less-than-significant impact related to surface settlement.

**Landslides.** Seismically-induced landslides occur as the rapid movement of large masses of soil on unstable slopes during an earthquake. The Seismic Hazard Zones mapped by the California Geological Survey (CGS) delineate areas susceptible to seismically-induced landslides that require additional investigation to determine the extent and magnitude of potential ground failure. According to CGS, the project site is not located within a Seismic Hazard Zone for seismically-induced landslides.<sup>20</sup>

*b. Would the project result in substantial soil erosion or the loss of topsoil? (Less-Than-Significant Impact)*

The Geotechnical Investigation does not identify topsoil on the project site. The project site is developed and has been mapped as an “urban land” area by the Natural Resources Conservation Service.<sup>21</sup> Areas designated as “urban land” have essentially no exposed soil and are covered by streets, parking lots, buildings, and other structures. The redevelopment of the project site would involve demolition and construction activities, such as grading and excavation, which could result in temporary soil erosion when the disturbed soils are exposed to wind or rainfall. However, this would be temporary and limited to the period of grading. Upon completion of construction, the project site would be covered with structures, pavement, and landscaping and would not include areas of exposed soil. In addition, the ConnectMenlo Final EIR determined that compliance with the City’s Engineering Division’s Grading and Drainage Control Guidelines would reduce the impacts from erosion and the loss of topsoil to the extent practicable. Therefore, the proposed project would result in less-than-significant impacts relate to soil erosion or loss of top soil.

*c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Less-Than-Significant Impact)*

As previously discussed in Section 3.2.a, above, the soils at the project site are susceptible to liquefaction and seismically-induced settlement, but they are not susceptible to lateral spreading or landslides. As noted in the ConnectMenlo Final EIR, the proposed project’s required compliance with the California Building Code would reduce the potential risks to people and structures as a result of liquefaction and seismically-induced settlement to a less-than-significant level.

**Subsidence.** Subsidence or collapse can result from the removal of subsurface water resulting in either catastrophic or gradual depression of the surface elevation of the project site. Since the proposed project would connect to the Menlo Park Municipal Water (MPMW) water system, groundwater extraction that could potentially result in subsidence is not expected on the project site.

**Consolidation.** Consolidation of soils is a process by which the soil volume decreases as water is expelled from saturated soils under static loads. As the water moves out from the pore space of the soil, the solid particles realign into a denser configuration that results in settlement. Consolidation

<sup>20</sup> California Geological Survey, 2006. *Seismic Hazard Zones; Palo Alto Quadrangle*. October 18.

<sup>21</sup> Natural Resources Conservation Service. Web Soils Survey, USDA Mapping. Website: [websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx](http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx) (accessed April 26, 2019).

typically occurs as a result of new buildings or fill materials being placed over compressible soils. An analysis of potential consolidation indicates that the underlying soils would be expected to slowly consolidate over a 30 year period and result in about 1.7 to 2.1 inches of differential settlement.

Final grading, foundation, and building plans must be designed in accordance with the California Building Code. These designs would include foundation alternatives, such as conventional shallow spread footing foundations combined with ground improvement methods (e.g., Geopiers or drilled displacement columns) or deeper foundation options (e.g., auger-cast piles) to transfer structural building loads to deeper, dense supporting strata below the soft, compressible clay layers onsite. Therefore, compliance with the existing building codes would ensure that the potential impacts associated with consolidation would be less than significant.

*d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? (Less-Than-Significant Impact)*

Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. Shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percent change of the soil volume.

The ConnectMenlo Final EIR determined that expansive soils are most prevalent in the neighborhoods that lie closest to the Bay. Testing at the project site determined that the near-surface soils encountered at the project site are highly expansive and subject to expansion and contraction during wetting/drying cycles.

As stated in the ConnectMenlo Final EIR, final grading, foundation, and building plans must be designed in accordance with the California Building Code. As noted in Section 3.7.a, the City has adopted the 2016 California Building Code, and the proposed project would be required to comply with the current code in effect. Project designs would include measures to excavate the existing soils that are susceptible to expansion and either replace the materials with engineered fill or further evaluate the possible reuse of the materials as engineered fill. Compliance with the existing building codes would ensure that the potential impacts associated with expansive soils would be less than significant.

*e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? (No Impact)*

The project site would be served by a wastewater conveyance system maintained by the West Bay Sanitary District (WBSD). Wastewater from the WBSD's collection system is conveyed to the Silicon Valley Clean Water (SVCW) Waste Water Treatment Plant (WWTP) in Redwood Shores. Development of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the proposed project would have no impact related to septic tanks or alternative waste water disposal systems.

*f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less-Than-Significant with Mitigation Incorporated)*

The ConnectMenlo Final EIR determined that no known fossils or unique paleontological resources or unique geologic features are present within the study area; however, geological formations underlying Menlo Park have the potential for containing paleontological resources (i.e., fossils).<sup>22</sup> Demolition, site preparation, and construction activities associated with the proposed project could reach significant depths below the ground surface where no such excavation has previously occurred and unrecorded fossils of potential scientific significance and other unique geologic features could exist. The ConnectMenlo Final EIR identified Mitigation Measure CULT-3,<sup>23</sup> which is presented below, to ensure this impact would be reduced to a less-than-significant level. This mitigation measure would be applicable to the proposed project and would be required to ensure that potential impacts of the proposed project to paleontological resources would be less than significant.

**ConnectMenlo Final EIR Mitigation Measure CULT-3:** In the event that fossils or fossil bearing deposits are discovered during ground disturbing activities, 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.

<sup>22</sup> Menlo Park, City of, 2016, op. cit.

<sup>23</sup> In December 2018, after certification of the ConnectMenlo Final EIR, the CEQA Guidelines were revised. As a part of this revision, the consideration of impacts to paleontological resources was moved from Cultural Resources to Geology and Soils. For ease of reference, this document identifies Mitigation Measures consistent with their labelling in the ConnectMenlo Final EIR.

### 3.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. and b. (Potentially Significant Impact)**

The ConnectMenlo Final EIR identified two significant and unavoidable impacts related to GHG emissions as a result of implementation of ConnectMenlo (Impact GHG-1 and GHG-2). The ConnectMenlo Final EIR identified Mitigation Measure GHG-1, which requires the City to update its Climate Action Plan (CAP) prior to January 1, 2020. However, because there are no post-2020 federal and State measures that would assist the City in achieving the efficient target at the ConnectMenlo buildout year of 2040, these impacts remained significant and unavoidable.

Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Furthermore, CH<sub>4</sub> is emitted during the fueling of heavy equipment. Exhaust emissions from on-site operation of the proposed project (i.e., residential-based trips, including commuting) would generate GHG emissions from area and mobile sources as well as indirect emissions from sources associated with energy consumption. As noted in Section 3.17, Transportation, a transportation evaluation of the proposed project will be prepared, which could indicate more significant impacts related to transportation, and therefore GHGs, than were previously analyzed in the ConnectMenlo Final EIR. Mobile-source GHG emissions would also include project-generated vehicle trips associated with activities such as landscaping and maintenance on the project site, and other sources. Therefore, the proposed project could potentially conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The criteria identified above for topics 3.8.a and 3.8.b will be evaluated in the EIR. Mitigation measures will be recommended if necessary.



### 3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less-Than-Significant Impact)*

The proposed project includes the demolition of the existing structure and parking lot on the project site and the construction of new residential apartments, a parking garage, and associated site improvements. The ConnectMenlo Final EIR determined that these types of land uses typically do not involve transport, use, or disposal of significant quantities of hazardous materials. Generally, small quantities of hazardous materials, such as paints, cleaning chemicals, and fertilizers would be used for routine maintenance and landscaping. Therefore a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials would not occur and potential impacts related to operational use of hazardous materials would be less than significant.

During the construction period, hazardous materials such as fuel, lubricants, paint, sealants, and adhesives would be transported to and used at the project site. However, compliance with existing regulations that govern the transportation of hazardous materials and the use and disposal of such materials would ensure that the proposed project would not result in spills or leaks that could

create a significant hazard to the public or the environment during and after construction by ensuring that these materials are properly handled, and if spills or leaks occur, they are properly and promptly cleaned up and the materials disposed of at an appropriate waste-handling facility. Therefore, potential impacts of the proposed project associated with routine transport, use, or disposal of hazardous materials would be less than significant.

*b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less-Than-Significant Impact)*

The public and/or the environment could be affected by the release of hazardous materials from the project site into the environment by: 1) exposing workers and/or the public to potentially contaminated soil and groundwater during construction and/or operation of the project; or 2) exposing workers and/or the public to hazardous building materials (e.g., Polychlorinated Biphenyls [PCBs], lead paint, asbestos) during demolition of the existing commercial structure.

The ConnectMenlo Final EIR determined that future development associated with ConnectMenlo could occur on properties that possibly are contaminated. Future development would be required to comply with existing regulations, including General Plan policies that have been prepared to minimize impacts related to accidents and spills of hazardous materials. In particular, Policy S-1.18, which requires 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.

A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the project site in February 2019.<sup>24</sup> The Phase I ESA reviewed past uses of the project site and surrounding vicinity to evaluate whether past uses or releases of hazardous materials may have impacted the project site. The Phase I ESA indicated that historic land uses of the site included agricultural use and warehousing uses. The Phase I ESA identifies a potential environmental concern related to concentrations of trichloroethene (TCE) in groundwater samples occurring above environmental screening levels (ESLs) within 5 feet of the eastern boundary of the site at 115 Independence Drive. Soil vapor samples at 115 Independence Drive indicate TCE levels below ESLs, and the groundwater samples in 1989 and 1997 indicate that TCE levels within groundwater have been attenuating. Therefore, because the tested soil vapor at the 115 Independence site was below ESLs for TCE, the Phase I ESA considered it unlikely that soils or soil vapor resources at the project site were impacted, and did not consider this to be a recognized environmental concern. Therefore, the proposed project would have a less-than-significant impact related to the release of hazardous materials into the environment.

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<sup>24</sup> Environmental Investigation Services, Inc., 2019. *Phase I Environmental Site Assessment, 111 Independence Drive, Menlo Park, California*. February 4.

*c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (No Impact)*

The proposed project would not involve handling or emissions of acutely hazardous materials, substances, or wastes. There are no schools currently located within 0.25-mile of the project site. The closest existing school, Taft Elementary School, is located approximately 1 mile west of the project site. The Tide Academy, a high school within the Sequoia Union High School District, will begin operation in Fall 2019 at 150 Jefferson Drive, approximately 0.25-mile south of the project site. However, as noted in Sections 3.9.a and 3.9.b, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, and therefore no impact related to hazardous emissions within proximity to a school would occur.

*d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Less-Than-Significant Impact)*

The provisions of Government Code Section 65962.5 require the California Department of Toxic Substances Control (DTSC), the State Water Resources Control Board, the California Department of Health Services, and the California Department of Resources Recycling and Recovery (formerly the California Integrated Waste Management Board) to submit information pertaining to sites associated with solid waste disposal, hazardous waste disposal, leaking underground tank sites, and/or hazardous materials releases to the Secretary of the California Environmental Protection Agency (Cal/EPA). Based on a review of regulatory databases performed as part of the Phase I ESA prepared for the project site, including listed hazardous materials release sites compiled pursuant to Government Code Section 65962.5, the project site is not listed as a hazardous materials release site due to activities and land uses in the past, and this impact would be less than significant.

*e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (No Impact)*

The ConnectMenlo Final EIR determined that the study area would not be subject to any airport safety hazards, and no impact would occur. The project site is located approximately 4 miles north of the Palo Alto Airport and approximately 4.5 miles of the San Carlos Airport. The project site is not located within an airport land use plan, or within 2 miles of a public airport.<sup>25,26</sup> Therefore, no impact would occur.

<sup>25</sup> Santa Clara County Airport Land Use Commission, 2008. *Comprehensive Land Use Plan, Santa Clara County, Palo Alto Airport*. November 19.

<sup>26</sup> City/County Association of Governments of San Mateo County, 2015. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*. October 2015.

*f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that implementation of ConnectMenlo does not include potential land use changes that would impair or physically interfere with the ability to implement the City's Emergency Operation Plan.

The proposed project would be consistent with the policies outlined in ConnectMenlo and would not obstruct emergency evacuation routes. The proposed project would not substantially alter the adjacent roadways and, therefore, would not be expected to impair the function of nearby evacuation routes. Therefore, the proposed project would have a less-than-significant impact on implementation of an adopted emergency response plan or emergency evacuation plan.

*g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less-Than-Significant Impact)*

As noted in the ConnectMenlo Final EIR, the City is located in a highly urbanized area, is not surrounded by woodlands or vegetation, and does not contain areas of moderate, high, or very high Fire Hazard Severity Zones for the Local Responsibility area, nor does it contain any areas of moderate, high, or very high Fire Hazard Severity for the State Responsibility area. Future development within the City, including the proposed project, would be required to comply with the existing regulations as described in Section 4.7.1.1 of the ConnectMenlo Final EIR. In particular, all development in the study area would be constructed pursuant to the California Building Code, California Fire Code, and the Menlo Park Fire Protection District Code. Therefore, because the project site is in an urban area, is not within or adjacent to a wildland fire hazard area, and would be required to comply with existing regulations, the proposed project would not expose people or structures to a significant loss, injury, or death involving wildland fires.

### 3.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Less-Than-Significant Impact)*

As noted in the ConnectMenlo Final EIR, water quality in stormwater runoff is regulated locally by the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), which includes the C.3 provisions set by the San Francisco Bay Regional Water Quality Control Board (Water Board). 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. Incorporation of these measures can even improve on existing conditions.

In addition, all projects must comply with the requirements of the City’s Municipal Code Chapter 7.42, Stormwater Management Program. The City of Menlo Park Public Works Department also requires development or redevelopment projects that replace or introduce more than 10,000 square feet of impervious surfaces to prepare a Hydrology Report that requires site design measures to maximize pervious areas, source control measures to keep pollutants out of stormwater, use of

construction Best Management Practices (BMPs), and post construction treatment measures. Additionally, as part of the Zoning Ordinance update, ConnectMenlo includes design standards for development in the Bayfront Area. These design standards require future development to provide on-site infiltration of stormwater runoff and implement sustainable stormwater features in open space areas.

Construction and demolition activities of the proposed project would involve disturbance, grading, and excavation of soil, which could result in temporary erosion and movement of sediments into the storm drain system, particularly during precipitation events. The potential for chemical releases is present at most construction sites due to the use of paints, solvents, fuels, lubricants, and other hazardous materials associated with heavy construction equipment. Once released, these hazardous materials could be transported to nearby surface waterways in stormwater runoff, wash water, and dust control water, potentially reducing the quality of the receiving waters. The release of sediments and other pollutants during construction and demolition could adversely affect water quality in receiving waters. In order to prevent pollution runoff during the construction period, BMPs from the SMCWPPP would be implemented. These BMPs include, but are not limited to, temporary erosion controls, performing clearing and earth moving activities only during dry weather, and storing, handling, and disposing of construction materials/wastes properly to prevent contact with stormwater.

As noted above, the proposed project would be required to comply with the City's Stormwater Management Program, and would be required to prepare a Hydrology Report. The proposed project would incorporate site design measures to reduce stormwater runoff during the operation period, including directing runoff onto vegetated areas, maximizing permeability by clustering development and preserving open space, and using micro-detention. In addition, the proposed project would also implement source controls to reduce pollution runoff during the operation period, including marking on-site inlets with the words "No Dumping! Flows to Bay," plumbing interior parking garage floor drains to the sanitary sewer, and providing landscaping that is drought and/or disease resistant and minimizes runoff.

Therefore, compliance with existing stormwater control regulations and implementation of site design measures, source control measures, and BMPs would reduce potential construction and operation phase impacts on water quality to a less-than-significant level.

*b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Less-Than-Significant Impact)*

As noted in the ConnectMenlo Final EIR, the San Mateo Subbasin of the Santa Clara Valley Groundwater Basin underlies the City. Development throughout the City associated with implementation of ConnectMenlo could result in an overall decrease in groundwater recharge through the increase in impervious surfaces or dewatering during the construction phase.

The proposed project would result in an increase of impervious surfaces on the project site from 31,496 square feet of existing impervious surface coverage to 34,171 square feet of impervious surface coverage. However, the proposed project would include stormwater control features, as

described above, that would enhance infiltration of stormwater to the subsurface and would therefore increase the amount of groundwater recharge compared to existing conditions.

The proposed project would connect to the MPMW water system and would not use groundwater at the site. Although no use of groundwater is proposed as part of the project, dewatering would likely be required during construction due to the depth of excavations performed and the shallow water table within the Bayfront Area. This dewatering would be temporary and would focus on the uppermost shallow groundwater zone (a zone that contains a relatively small amount of groundwater that is generally not utilized for water supply). Therefore, potential impacts related to depletion of groundwater supplies would be less than significant.

- c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows? (**Less-Than-Significant Impact**)*

The proposed project would not result in the alteration of the course of a stream or river, but would slightly alter the existing drainage pattern on the site with the introduction of a new building footprint and surface pavements. However, the completed project would result in similar impervious surface coverage as existing conditions and the project would reflect pre-project drainage conditions by directing runoff through a new 18-inch storm drain within Independence Drive towards the existing 18-inch storm drain south of the project site and also within Independence Drive that currently serves the project site.

**Erosion.** As described above, the proposed project would reflect pre-project drainage conditions by directing runoff towards the corresponding City drainage facilities that currently serve the project site. As described in the ConnectMenlo Final EIR, all stormwater runoff from the project site would be treated in accordance with the City's Storm Water Management Program, ensuring that storm water is treated for sediments prior to discharge from the site, particularly during construction activities. Consequently, the potential of the proposed project to result in substantial erosion or siltation on- or off-site associated with altering the drainage pattern of the project site would be less than significant.

**On- or Off-Site Flooding.** As noted above, the completed project would reflect pre-project drainage conditions and would result in no net increase in the rate or amount of stormwater runoff, and therefore would not result in on- or off-site flooding. This impact would be less than significant.

**Stormwater Runoff.** As described above and in the ConnectMenlo Final EIR, all stormwater runoff from the project site would be treated in accordance with the City's Storm Water Management Program, which also requires no net increase in the rate or amount of stormwater runoff. Therefore, the proposed project would not create or contribute runoff water exceeding the capacity of the storm drain system or provide an additional source of polluted runoff and this impact would be less than significant.

**Flood Flows.** As noted in Section 3.10.d, the project site is located within a flood zone. However, as discussed above, the proposed project would not substantially alter the drainage pattern on the site and the new building would generally occupy the same footprint as the existing structure on the site. Therefore, the proposed project would not impede flood flows or redirect flood flows in a manner which would result in on- or off-site flooding and this impact would be less than significant.

*d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that compliance with the City's existing stormwater regulations, described above, implementation of LID design guidelines, and engineering review of drainage calculations and development plans by the City's Public Works Department would ensure that there are no significant increases in peak flow rates or stormwater runoff volume.

The project site is located within a special flood zone, as mapped by FEMA, with a base flood elevation of 11 feet.<sup>27</sup> As noted in Section 1.0, Project Description, the grade of the project site would be raised to meet FEMA requirements. Therefore, because the proposed project would be elevated out of the flood zone, comply with existing stormwater regulations, and implement site design measures, source control measures, and SMCWPPP's construction BMPs, the proposed project would not risk release of pollutants due to project inundation, and this impact would be less than significant.

*e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (Less-Than-Significant Impact)*

As noted above, the proposed project would be required to comply with the City's existing stormwater regulations, and would include implementation of site design measures, source control measures, and SMCWPPP's construction BMPs. In addition, the proposed project would connect to the MPMW water system and would not use groundwater at the site, and would raise the grade of the site out of the flood zone. Therefore, the proposed project would not conflict or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, and this impact would be less than significant.

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<sup>27</sup> Federal Emergency Management Agency, 2019. *National Flood Insurance Program, Flood Rate Insurance Map, San Mateo County, California*. Map No. 06081C0306F. April 5.



### 3.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project physically divide an established community? (Less-Than-Significant Impact)*

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. The ConnectMenlo FEIR concluded that implementation of ConnectMenlo would not include any new major roadways or other physical features through existing residential neighborhoods or other communities that would create new barriers in the City, but rather would implement measures to increase connectivity. Therefore, because the proposed project would be consistent with ConnectMenlo, as described below, and would not substantially alter any existing roadways or include any new barriers, this impact would be less than significant.

*b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Less-Than-Significant Impact)*

The project site is located within the R-MU-B zoning district. The intent of the R-MU-B district is to: 1) provide high density housing to nearby employment; 2) encourage mixed use development with a quality living environment and neighborhood-serving retail and services on the ground floor that are oriented to the public, and promote a live/work/play environment with pedestrian activity. The R-MU-B district allows for bonus level development along Independence Drive to be a maximum of 85 feet in height. Additionally, because the project site is located within a special flood zone, as noted in Section 3.10.d, an additional 10-foot increase in maximum building height is allowed, for a total maximum building height of 95 feet. As noted in Section 1.0, Project Description, the proposed project would provide community amenities in order to qualify for development at the bonus level, and would be a maximum of 95 feet in height. In addition, the project sponsor is requesting an increase in the allowable density, gross floor area, and average height from 62.5 feet to 63.46 feet through the City’s Below Market Rate Housing Program. The proposed project would be consistent with the mix and intensity of development contemplated by ConnectMenlo. As noted throughout this document, the proposed project would be consistent with the applicable goals, policies, and programs included in ConnectMenlo, and therefore would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect.

### 3.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (No Impact)*

The ConnectMenlo Final EIR determined that future development associated with ConnectMenlo would not have an impact on mineral resources as there are no mineral resource recovery operations within the City. Therefore, the proposed project would have no impact related to the availability of a known mineral resource.

*b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)*

Refer to Section 3.12.a. The proposed project would have no impact related to locally-important mineral resource recovery sites.

### 3.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Potentially Significant Impact)*

The ConnectMenlo Final EIR determined that all impacts related to noise, during both the construction and operation periods, could be reduced to less-than-significant levels through the implementation of mitigation measures.

Specifically, demolition, site preparation, and construction would require the use of heavy construction equipment including pile drivers, bulldozers, scrapers, loaders, excavators, cranes, and trucks. Demolition and site preparation phases are typically the loudest phases of construction due to the types of equipment used. There are sensitive receptors within 200 feet of the project site, which could be exposed to construction period noise. The ConnectMenlo Final EIR identified Mitigation Measure NOISE-1c, which is presented below, to ensure that construction-period noise impacts would be reduced to a less-than-significant level.

**ConnectMenlo Final EIR 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-1a requires the preparation of an acoustical study for development of new noise-sensitive uses, which include residential uses. The ConnectMenlo Final EIR determined that transportation-related noise, including an increase in traffic level, would be less than significant with compliance with General Plan Policies N-1.6 and N-1.9 and Programs N-1.B and N-1.C. However, as noted in Section 3.17, a transportation evaluation for the proposed project will be prepared, which could result in new or more severe impacts related to transportation, and therefore transportation-related noise, than was previously analyzed in the ConnectMenlo Final EIR. The proposed project could result in an increase in ambient noise levels generated by mobile sources within and around the site, and could expose proposed and existing sensitive land uses in the surrounding neighborhood to unacceptable noise levels. Therefore, impacts related to operation-period noise would be potentially significant, and this topic will be included in the EIR. Mitigation measures will be recommended, as necessary.

*b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels? (Less-Than-Significant with Mitigation Incorporated)*

The proposed project would generate vibration during the construction period. The ConnectMenlo Final EIR identified Mitigation Measure NOISE-2a, which is presented below, to ensure this impact would be reduced to a less-than-significant level. This mitigation measure would be applicable to the proposed project and would be required to ensure that potential impacts of the proposed project related to the generation of vibration would be less than significant.

**ConnectMenlo Final EIR 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 as 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 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 (7:00 AM – 10:00 PM) = 0.032
- Residential Nighttime (10:00 PM – 7:00 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 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.

- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (**Less-Than-Significant Impact**)*

Refer to Section 3.9.e. The project site is not located within the vicinity of a private airstrip or an airport land use plan, or within 2 miles of a public use airport. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels, and this impact would be less than significant.

### 3.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

***a. and b. (Potentially Significant Impact)***

The proposed project would result in the removal of existing office uses and construction of new residential uses on the project site. Pursuant to a settlement agreement between the cities of East Palo Alto and Menlo Park, any project located in the City’s R-MU zone that proposes to develop at the bonus level, like the proposed project, shall prepare an EIR with an analysis of transportation and housing impacts, at a minimum.<sup>28</sup> Therefore, this topic will be included in the EIR, and mitigation measures will be recommended, if necessary.

<sup>28</sup> Menlo Park, City of, 2017. *Staff Report Number 17-305-CC*. December 5.

### 3.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: i. Fire protection? ii. Police protection? iii. Schools? Iv. Parks? V. Other public facilities? (Less-Than-Significant Impact)*

The following section addresses the proposed project’s potential effects on: fire service, police service, schools, parks, and other public facilities. Impacts to public services would occur if the propose project increases demand for services such that new or expanded facilities would be required, and these new facilities would themselves cause environmental impacts.

**Fire Protection.** The ConnectMenlo Final EIR states that future development throughout the City pursuant to ConnectMenlo 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 and the need for new facilities throughout the City. In particular, General Plan Policy S-1.30 requires coordination with the Menlo Park Fire Protection District (MPFPD), which provides fire protection services throughout the City, in the planning process and requires all development applications to be reviewed and approved by the MPFPD prior to approval. The MPFPD indicated that full buildout of ConnectMenlo would require additional staffing to maintain a 1 firefighter per 1,000 residents service ratio. The ConnectMenlo Final EIR determined that adherence to State and City requirements combined with compliance with the MPFPD permitting process and payment of impact fees, which would be used to remodel or rebuild existing fire stations and hire new firefighters, would ensure that implementation of ConnectMenlo would result in a less-than-significant impact related to the need for remodeled or expanded MPFPD facilities.

Primary service to the project site would be provided by Station 77, which is located at 1467 Chilco Street. This station is located approximately 1.3 miles southwest of the project site. Station 77

houses one engine company and is continually staffed by three firefighting personnel.<sup>29</sup> As noted in the ConnectMenlo Final EIR, Station 77 would need to be expanded and additional firefighters would be needed to serve the increased growth within the Bayfront Area. The expansion of Station 77 was already planned and budgeted for prior to ConnectMenlo. Consistent with the findings of the ConnectMenlo Final EIR, the project sponsor would be required to pay impact fees related to fire service, which would provide for rebuilt and remodeled fire facilities and the hiring of additional firefighters. Therefore, ongoing compliance with State and local laws, including the payment of 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. In addition, the proposed project would be consistent with the type and intensity of development assumed for the project site in ConnectMenlo, and therefore would not result in a decrease in the planned service ratio of 1 firefighter per 1,000 residents. Station 5 would also serve the project site and is located approximately 2 miles west of the project site. Station 5 also houses one engine company and is continually staffed by three firefighting personnel.

As noted above, development associated with ConnectMenlo, which includes the proposed project, would be required to comply with State and City requirements as well as the MPFPD permitting process and payment of impact fees. Therefore, the proposed project would not result in the need for remodeled or expanded MPFPD facilities, and this impact would be less than significant.

**Police Protection.** The ConnectMenlo Final EIR states that future development pursuant to ConnectMenlo would be required to comply with existing regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to police protection services. The Menlo Park Police Department (MPPD) indicated that full buildout of ConnectMenlo would require an additional 17 police officers to maintain a staffing ratio of 1.29 officers per 1,000 residents. However, the MPPD confirmed that no expansion or addition of facilities would be required to accommodate the additional sworn officers or equipment. Compliance with General Plan Program LU-1.E would result in the creation of assessment districts and impact fees, which would be required project sponsors to pay development fees that would be used for additional police staffing. These development fees would ensure that implementation of ConnectMenlo would result in a less-than-significant impact related to the need for remodeled or expanded MPFPD facilities. Consistent with the findings of the ConnectMenlo Final EIR, the project sponsor would be required to pay impact fees related to police service, which would provide for the hiring of additional police officers. The proposed project would be consistent with the type and intensity of development assumed for the project site in ConnectMenlo, and therefore would not result in a decrease in the planned service ratio of 1.29 sworn officers per 1,000 residents or the construction or renovation of any existing police facilities.

In addition, as part of the Zoning update, ConnectMenlo includes TDM standards for development in the Bayfront Area. These TDM standards require future development to reduce associated vehicle trips to at least 20 percent below standard generation rates. Each individual project sponsor will be required to prepare a TDM and provide an impact analysis to the satisfaction of the City's

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<sup>29</sup> Menlo Park, City of, 2019. Stations (map). Website: [www.menlofire.org/maps/stations](http://www.menlofire.org/maps/stations) (accessed April 29, 2019).



**Transportation Manager.** The reduction in trips would help to alleviate roadway congestion that could interfere with MPPD access and response times.

The MPPD has indicated that it can address maintaining adequate response times through staffing, rather than facility expansion, and therefore it was determined that implementation of ConnectMenlo would result in a less-than-significant impact related to the need for remodeled or expanded MPPD facilities. Therefore, because the proposed project is consistent with the type and intensity of development for the project site, the proposed project would not result in the need for remodeled or expanded MPPD facilities, and this impact would be less than significant.

**Schools.** The ConnectMenlo Final EIR determined that any development associated with ConnectMenlo would occur incrementally over the 24-year building horizon and would be subject to payment of development impact fees, which under Senate Bill 50 (SB 50) are deemed to be full and complete mitigation. In addition, future development would be required to comply with existing regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to schools. Therefore, because the proposed project would comply with existing regulations prepared to minimize impacts related to schools and would be subject to the mandatory payment of developer impact fees pursuant to SB 50, the proposed project would have a less-than-significant impact related to the need for remodeled or expanded school facilities.

**Parks.** Refer to Section 3.16.a. The proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo and would include private and public open space, and therefore the proposed project would not result in substantial or accelerated physical deterioration of recreational facilities, and this impact would be less than significant.

**Other Public Facilities.** The ConnectMenlo Final EIR determined that 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 that have been prepared to minimize impacts related to public facilities. The City, throughout the 2040 buildout horizon, would implement the General Plan programs that require the adoption of development impact fees to address infrastructure and service needs in the community. Therefore, because the proposed project would be required to pay development impact fees, impacts related to the need for remodeled or expanded public facilities would be less than significant.

### 3.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that the increase in residents associated with future development under ConnectMenlo would lead to an increase in the demand for recreational opportunities and facilities within the City. However, the demand would be distributed throughout the City and would occur incrementally over the 24-year buildout horizon. The City has an adopted goal of maintaining a ratio of 5 acres of developed parkland per 1,000 residents. At full buildout, with an estimated population of approximately 14,150 new residents, the ratio of parkland per 1,000 residents would be approximately 5.2.

In addition to the existing parkland within the City, the proposed project would include a total of 16,746 square feet of open space, which would include common courtyards, a roof terrace, a pool, and a publicly-accessible plaza. Therefore, because the proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo and would include private and public open space, the proposed project would not result in substantial or accelerated physical deterioration of recreational facilities, and this impact would be less than significant.

*b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (No Impact)*

The proposed project would include redevelopment of the project site with residential uses. The proposed project does not include or require the construction or expansion of existing public recreational facilities. Therefore, development of the proposed project and associated recreational opportunities for use by project residents would not result in additional environmental effects beyond those described in this document.

### 3.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*a. through d. (Potentially Significant Impact)*

The ConnectMenlo Final EIR identified significant and unavoidable impacts related to increased delays of peak hour motor vehicle traffic at some study intersections and to routes of regional significance. Per Mitigation Measure TRANS-1b, new development would be required to contribute fair share contributions to the City’s updated Transportation Impact Fee (TIF) program (once adopted) to guarantee funding for identified roadway and infrastructure improvements. Any project proposed prior to the adoption of an updated TIF is required to conduct a project-specific Transportation Impact Analysis (TIA) to determine the impacts and necessary transportation mitigations that are to be funded by that project. Also, the settlement agreement, as noted in Section 1.0, requires a transportation analysis be completed. A transportation evaluation will be prepared for the proposed project and will be included in the EIR. The analysis will consider impacts related to vehicular, bicycle, pedestrian, and transit facilities and access. Mitigation measures will be recommended if necessary.

### 3.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Less-Than-Significant With Mitigation Incorporated)*

As noted in the ConnectMenlo Final EIR, no tribal cultural resources have been identified in the Bayfront Area. However, as noted in Section 3.5, Cultural Resources, impacts from future development in the study area could impact unknown archeological resources including Native American artifacts and human remains. Impacts would be reduced to less-than-significant levels with implementation of Mitigation Measures CULT-2a and CULT-4 from the ConnectMenlo Final EIR.

AB 52 provides for consultation between lead agencies and Native American tribal organizations during the CEQA process. Prior to the release of an Environmental Impact Report or Negative Declaration/Mitigated Negative Declaration for public review, a lead agency must provide the opportunity to consult with local tribes. A request form describing the proposed project was sent to

the NAHC in West Sacramento requesting a list of tribes eligible to consult with the City, pursuant to Public Resources Code section 21080.3.1. On May 24, 2019, the NAHC responded in a letter with a list of tribal contacts. The City sent a letter providing the opportunity for consultation pursuant to AB 52 for the project to these individuals. No requests for consultation have been received to date. The consultation process and its conclusion will be further discussed in the EIR.

### 3.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less-Than-Significant Impact)*

**Water.** As noted in the ConnectMenlo Final EIR, the MPMW receives 100 percent of its potable water from the San Francisco Public Utilities Commission (SFPUC). The City does not own or operate a water treatment plant (WTP). The water purchased from the SFPUC may be treated at one or more WTPs operated by SFPUC. SFPUC periodically makes improvements to its WTPs in order to improve system reliability and accommodate projected growth in its regional service areas. As noted above, the proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo. Therefore, the proposed project would not prompt a need to expand treatment facilities or regional water system conveyance and storage facilities, and this impact would be less than significant.

The proposed project would connect to existing water delivery systems within the vicinity of the project site. It is anticipated that these pipelines would have sufficient capacity to support delivery of water to the proposed project. However, as noted in Table 1.A, the project sponsor would be required to coordinate with the City and the MPFPD to assess water flow requirements, and ensure the existing water delivery infrastructure is sufficient to serve the proposed project.

**Wastewater.** As noted in the ConnectMenlo Final EIR, the SVCW WWTP treats raw wastewater from the City and discharges to the deep water channel of the Bay. The SVCW WWTP has an average dry weather design flow of 29 million gallons per day (MGD) and a peak wet weather flow of 71 MGD. In

general, conveyance systems and treatment plants are designed and constructed to accommodate future capacity expansion including additional base flows due to approved growth plus estimated wet weather flows. The ConnectMenlo Final EIR determined that the increase in wastewater flows from implementation of ConnectMenlo would add to the capacity demands on the WWTP and its conveyance system, however, the effect is not substantial and would be integrated into the ongoing planning and budgeting processes to improve the conveyance system, treatment processes and capacity. As noted above, the proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo. Therefore, the proposed project would not prompt a need to expand the SVCW WWTP, and this impact would be less than significant.

The proposed project would connect to the existing sanitary sewer systems within the vicinity of the site. It is anticipated that these pipelines would have sufficient capacity to support the proposed project's wastewater flows. However, as noted in Table 1.A, the project applicant would be required to coordinate with the West Bay Sanitary to assess wastewater flow requirements, and ensure the existing wastewater infrastructure is sufficient to serve the proposed project.

**Stormwater Drainage.** Refer to Section 3.10. The proposed project would include new connections and upgrades to the existing stormwater infrastructure within the vicinity of the site. Development of the proposed project would result in an increase of impervious surfaces on the site from 31,496 square feet of existing impervious surface coverage to 34,171 square feet of impervious surface coverage. However, the proposed project would include stormwater control features, as described previously, that would reduce the total stormwater runoff from the project site. Runoff would be treated in accordance with the SMCWPPP before flowing to the City's storm drain system.

The proposed project would include the following elements to reduce the demand for and impacts to stormwater infrastructure: a landscaped area providing stormwater treatment on the western edge of ground floor; drought-tolerant landscaping; flow-through planters; and energy-efficient appliances and efficient irrigation systems. Therefore, the proposed project would not require in the relocation or construction of new stormwater drainage facilities that are not already evaluated in this document.

**Electricity, Natural Gas, and Telecommunications.** As noted in the ConnectMenlo Final EIR, new development under ConnectMenlo would continue to be served by Pacific Gas & Electric (PG&E) or Peninsula Clean Energy (PCE) when it commences transmission of energy over PG&E facilities. Buildout of ConnectMenlo would not significantly increase energy demands within the service territory and would not require new energy supply facilities. As noted above, the proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo. Therefore, the proposed project would not prompt a need to expand electricity or natural gas facilities, and this impact would be less than significant.

Similar to electricity and natural gas, the project site is already served with telecommunications infrastructure. Telecommunication service would continue to be provided to the project site with implementation of the proposed project. In addition, the proposed project would include undergrounding of existing utilities, and would be required to coordinate with the applicable telecommunications provider. Therefore, the proposed project would not require the relocation or

construction of new telecommunications infrastructure beyond that which is already analyzed, and this impact would be less than significant.

*b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that there would be an increase in water demand as a result of buildout of ConnectMenlo – average daily demand would be 343 million gallons per year (MGY), which represents 21 percent of the planning level water demand forecasted in the Urban Water Management Plan (UWMP). The ConnectMenlo Final EIR concluded that water supply is adequate to meet increased demands in normal years through the buildout year of 2040.

During single- and multiple-dry years by 2040, MPMW's total annual water demand, including development associated with ConnectMenlo, is estimated to exceed total annual supply by approximately 333 MGY and 506 MGY, respectively. However, with MPMW's Water Shortage Contingency Plan in place, the shortages in multiple dry years would be managed through demand reductions of up to 50 percent.

In addition, as part of the Zoning update, ConnectMenlo 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 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. The ConnectMenlo Final EIR determined that implementation of MPMW's Water Shortage Contingency Plan and green and sustainable building standards would ensure this impact would be less than significant.

As noted above, the proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo. Therefore, there would be sufficient water supplies available to serve the proposed project and reasonably foreseeable future development during normal, single- and multiple-dry years, and this impact would be less than significant.

*c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Less-Than-Significant Impact)*

As noted above, the SVCW WWTP has an average dry weather design flow of 29 MGD and a peak wet weather flow of 71 MGD. The SVCW WWTP has an average currently dry weather flow of 16 MGD. The ConnectMenlo Final EIR determined that full buildout of ConnectMenlo would result in an estimated net increased wastewater generation rate of 309 MGY, or 0.85 MGD, which would not be significant relative to currently available excess dry weather design capacity flow of 13 MGD.



The proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo. Therefore, there would be sufficient wastewater treatment capacity available to serve the proposed project's projected demand in addition to the provider's existing commitments, and this impact would be less than significant.

*d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Less-Than-Significant Impact)*

As noted in the ConnectMenlo Final EIR, the majority (approximately 74.4 percent or 21,658 tons) of solid waste from the City is transported to the Corinda Los Trancos Landfill (Ox Mountain Landfill). The three other landfills that received the second, third, and fourth most waste accounted for 20.5 percent (or 5,966 tons) combined. The ConnectMenlo Final EIR determined that the estimated additional solid waste generated by development associated with the full buildout of ConnectMenlo would be approximately 58.3 tons per day, which represents less than 1.5 percent of the daily capacity of the Ox Mountain Landfill, and less than 2 percent of the permitted daily capacity of the landfill with the smallest daily capacity that could receive waste as a result of implementation.

The ConnectMenlo Final EIR determined that the Ox Mountain Landfill is likely to reach its permitted maximum capacity prior to 2040. However, the other three landfills that serve the City are not estimated to close until 2048, 2077, and 2107. In addition, there are 15 other landfills that received waste from Menlo Park in 2014. If one or more of the four landfills were unavailable in the future, it is likely the City's solid waste volume would be increased at one or more of the other landfills that already serve the City.

As a part of the Zoning Update, ConnectMenlo includes green and sustainable building standards in the Bayfront Area that require all applicants to submit a zero-waste management plan to the City. The zero-waste management plan must clearly outline the applicant's plan to reduce, recycle, and compost waste from demolition, construction and occupancy phases of the building. Zero waste is defined as 90 percent overall diversion of non-hazardous waste from landfill and incineration.

The proposed project would be consistent with the type and intensity of development and population projections assumed for the project site in ConnectMenlo and would be required to comply with existing regulations related to solid waste. Therefore, there would be solid waste capacity available to serve the proposed project, and this impact would be less than significant.

*e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less-Than-Significant Impact)*

Refer to Section 3.19.f. The proposed project would comply with all federal, State, and local solid waste statutes and/or regulations related to solid waste and this impact would be less than significant.

### 3.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? (Less-Than-Significant Impact)*

The ConnectMenlo Final EIR determined that the Bayfront Area, which includes the project site, does not contain areas of moderate, high, or very high Fire Hazard Severity for the Local Responsibility area, nor does it contain any areas of moderate, high, or very high Fire Hazard Severity for the State Responsibility Area (SRA). In addition, as noted in Section 3.9.f, the proposed project would not impair the implementation of, or physically interfere with, and adopted emergency response plan. Therefore, this impact would be less than significant.

*b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (No Impact)*

Refer to Section 3.20.a. Additionally, as noted in Section 1.0, Project Description, the project is generally level, and is bound by existing development on all sides. Therefore, the proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

*c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (No Impact)*

Refer to Section 3.20.a. The proposed project is not located within an SRA for fire service and is not within a very high fire hazard severity zone. Therefore, the proposed project would not require the

installation or maintenance of associated infrastructure, and this impact would be less than significant.

*d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (No Impact)*

Refer to Section 3.20.a and 3.20.b. The project site is generally level and is not located within an SRA for fire service or a very high fire hazard severity zone. Therefore, the proposed project would not expose people or structures to significant risks as a result of post-fire slope instability or drainage and runoff changes.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Less-Than-Significant Impact)*

The project site consists of an infill site in an urban area. The site does not support habitat for special-status plant or animal species. With mitigation, development of the proposed project would not: 1) degrade the quality of the environment; 2) substantially reduce the habitat of a fish or wildlife species; 3) cause a fish or wildlife species population to drop below self-sustaining levels; 4) threaten to eliminate a plant or animal community; 5) reduce the number or restrict the range of a rare or endangered plant or animal; or 6) eliminate important examples of the major periods of California history or prehistory. Therefore, this impact would be less than significant.

b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a 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)? (Potentially Significant Impact)*

As discussed in this Initial Study, potentially significant impacts related to air quality, greenhouse gas emissions, noise, and transportation may result from the proposed project. These impacts, as well as any cumulatively considerable impacts that may result from the proposed project related to these issues, will be evaluated in an EIR. In addition, the topic of population and housing will also be discussed.

*c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (No Impact)*

The proposed project would not result in any environmental effects that would cause substantial direct or indirect adverse effects on human beings.

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## 4.0 LIST OF PREPARERS

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## **APPENDIX A**

### **CALEEMOD OUTPUT SHEETS**

111 Independence Drive Project - Bay Area AQMD Air District, Annual

**111 Independence Drive Project**  
**Bay Area AQMD Air District, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unenclosed Parking with Elevator	111.00	Space	0.10	51,220.00	0
City Park	0.38	Acre	0.30	16,476.00	0
Apartments Mid Rise	106.00	Dwelling Unit	0.51	144,599.00	303
Strip Mall	0.50	1000sqft	0.01	500.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	64
<b>Climate Zone</b>	5			<b>Operational Year</b>	2022
<b>Utility Company</b>	Pacific Gas & Electric Company				
<b>CO2 Intensity (lb/MW hr)</b>	328.8	<b>CH4 Intensity (lb/MW hr)</b>	0.029	<b>N2O Intensity (lb/MW hr)</b>	0.006

**1.3 User Entered Comments & Non-Default Data**

111 Independence Drive Project - Bay Area AQMD Air District, Annual

Project Characteristics - CO2 intensity based on 5-year average (PG&E, 2015)

Land Use - The proposed project would include an 144,599-gross-square-foot (gsf), eight-story multi-family apartment building with 106 dwelling units and a 500-square-foot commercial space, as well as associated open space and parking.

Construction Phase - 21-month construction period

Demolition -

Grading - 1,575 cubic yards of soil would be off-hauled

Mobile Land Use Mitigation -

Area Mitigation -

Vehicle Trips - Defaults

## 111 Independence Drive Project - Bay Area AQMD Air District, Annual

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	30.00
tblConstructionPhase	NumDays	100.00	290.00
tblConstructionPhase	NumDays	10.00	30.00
tblConstructionPhase	NumDays	2.00	30.00
tblConstructionPhase	NumDays	5.00	30.00
tblConstructionPhase	NumDays	1.00	30.00
tblGrading	AcresOfGrading	15.00	0.50
tblGrading	MaterialExported	0.00	1,575.00
tblLandUse	LandUseSquareFeet	44,400.00	51,220.00
tblLandUse	LandUseSquareFeet	16,552.80	16,476.00
tblLandUse	LandUseSquareFeet	106,000.00	144,599.00
tblLandUse	LotAcreage	1.00	0.10
tblLandUse	LotAcreage	0.38	0.30
tblLandUse	LotAcreage	2.79	0.51
tblProjectCharacteristics	CO2IntensityFactor	641.35	328.8
tblVehicleTrips	ST_TR	22.75	0.00
tblVehicleTrips	SU_TR	16.74	0.00
tblVehicleTrips	WD_TR	1.89	0.00

## 2.0 Emissions Summary

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111 Independence Drive Project - Bay Area AQMD Air District, Annual

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	4-6-2020	7-5-2020	0.2831	0.2831
2	7-6-2020	10-5-2020	0.3915	0.3915
3	10-6-2020	1-5-2021	0.4286	0.4286
4	1-6-2021	4-5-2021	0.3802	0.3802
5	4-6-2021	7-5-2021	0.3816	0.3816
6	7-6-2021	9-30-2021	0.3399	0.3399
		Highest	0.4286	0.4286

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.9417	0.0147	1.1257	7.1000e-004		0.0525	0.0525		0.0525	0.0525	4.8325	3.2726	8.1051	9.0100e-003	3.2000e-004	8.4249
Energy	5.0000e-003	0.0428	0.0182	2.7000e-004		3.4600e-003	3.4600e-003		3.4600e-003	3.4600e-003	0.0000	131.8534	131.8534	8.2100e-003	2.4100e-003	132.7770
Mobile	0.1755	0.8618	1.9615	6.9900e-003	0.6039	6.3400e-003	0.6102	0.1621	5.9400e-003	0.1680	0.0000	641.8072	641.8072	0.0237	0.0000	642.4008
Waste						0.0000	0.0000		0.0000	0.0000	10.0115	0.0000	10.0115	0.5917	0.0000	24.8031
Water						0.0000	0.0000		0.0000	0.0000	2.2028	8.1243	10.3271	0.2270	5.4900e-003	17.6374
<b>Total</b>	<b>1.1222</b>	<b>0.9193</b>	<b>3.1055</b>	<b>7.9700e-003</b>	<b>0.6039</b>	<b>0.0623</b>	<b>0.6662</b>	<b>0.1621</b>	<b>0.0619</b>	<b>0.2240</b>	<b>17.0468</b>	<b>785.0575</b>	<b>802.1043</b>	<b>0.8596</b>	<b>8.2200e-003</b>	<b>826.0431</b>



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**2.2 Overall Operational**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.6976	0.0128	0.7905	6.0000e-005		4.6500e-003	4.6500e-003		4.6500e-003	4.6500e-003	0.0000	5.5222	5.5222	1.3300e-003	8.0000e-005	5.5785
Energy	5.0000e-003	0.0428	0.0182	2.7000e-004		3.4600e-003	3.4600e-003		3.4600e-003	3.4600e-003	0.0000	131.8534	131.8534	8.2100e-003	2.4100e-003	132.7770
Mobile	0.1681	0.8083	1.7937	6.2300e-003	0.5326	5.6800e-003	0.5383	0.1430	5.3200e-003	0.1483	0.0000	571.7712	571.7712	0.0218	0.0000	572.3159
Waste						0.0000	0.0000		0.0000	0.0000	10.0115	0.0000	10.0115	0.5917	0.0000	24.8031
Water						0.0000	0.0000		0.0000	0.0000	2.2028	8.1243	10.3271	0.2270	5.4900e-003	17.6374
<b>Total</b>	<b>0.8707</b>	<b>0.8638</b>	<b>2.6025</b>	<b>6.5600e-003</b>	<b>0.5326</b>	<b>0.0138</b>	<b>0.5464</b>	<b>0.1430</b>	<b>0.0134</b>	<b>0.1564</b>	<b>12.2143</b>	<b>717.2711</b>	<b>729.4854</b>	<b>0.8500</b>	<b>7.9800e-003</b>	<b>753.1119</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>22.41</b>	<b>6.03</b>	<b>16.20</b>	<b>17.69</b>	<b>11.80</b>	<b>77.87</b>	<b>17.98</b>	<b>11.80</b>	<b>78.31</b>	<b>30.18</b>	<b>28.35</b>	<b>8.63</b>	<b>9.05</b>	<b>1.12</b>	<b>2.92</b>	<b>8.83</b>

**3.0 Construction Detail**

**Construction Phase**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	4/6/2020	5/15/2020	5	30	
2	Site Preparation	Site Preparation	5/18/2020	6/26/2020	5	30	
3	Grading	Grading	6/29/2020	8/7/2020	5	30	
4	Building Construction	Building Construction	8/10/2020	9/17/2021	5	290	
5	Paving	Paving	9/20/2021	10/29/2021	5	30	
6	Architectural Coating	Architectural Coating	11/1/2021	12/10/2021	5	30	

**Acres of Grading (Site Preparation Phase): 0.5**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0.1**

**Residential Indoor: 292,813; Residential Outdoor: 97,604; Non-Residential Indoor: 750; Non-Residential Outdoor: 250; Striped Parking Area: 3,073 (Architectural Coating – sqft)**

**OffRoad Equipment**

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	197.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	105.00	23.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	21.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

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**3.1 Mitigation Measures Construction**

**3.2 Demolition - 2020**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0130	0.1181	0.1143	1.8000e-004		7.0100e-003	7.0100e-003		6.6900e-003	6.6900e-003	0.0000	15.6113	15.6113	2.9500e-003	0.0000	15.6851
<b>Total</b>	<b>0.0130</b>	<b>0.1181</b>	<b>0.1143</b>	<b>1.8000e-004</b>		<b>7.0100e-003</b>	<b>7.0100e-003</b>		<b>6.6900e-003</b>	<b>6.6900e-003</b>	<b>0.0000</b>	<b>15.6113</b>	<b>15.6113</b>	<b>2.9500e-003</b>	<b>0.0000</b>	<b>15.6851</b>

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**3.2 Demolition - 2020**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	3.6800e-003	1.0000e-005	1.1900e-003	1.0000e-005	1.1900e-003	3.2000e-004	1.0000e-005	3.2000e-004	0.0000	1.0384	1.0384	3.0000e-005	0.0000	1.0391
<b>Total</b>	<b>5.0000e-004</b>	<b>3.6000e-004</b>	<b>3.6800e-003</b>	<b>1.0000e-005</b>	<b>1.1900e-003</b>	<b>1.0000e-005</b>	<b>1.1900e-003</b>	<b>3.2000e-004</b>	<b>1.0000e-005</b>	<b>3.2000e-004</b>	<b>0.0000</b>	<b>1.0384</b>	<b>1.0384</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>1.0391</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0130	0.1181	0.1143	1.8000e-004		7.0100e-003	7.0100e-003		6.6900e-003	6.6900e-003	0.0000	15.6113	15.6113	2.9500e-003	0.0000	15.6851
<b>Total</b>	<b>0.0130</b>	<b>0.1181</b>	<b>0.1143</b>	<b>1.8000e-004</b>		<b>7.0100e-003</b>	<b>7.0100e-003</b>		<b>6.6900e-003</b>	<b>6.6900e-003</b>	<b>0.0000</b>	<b>15.6113</b>	<b>15.6113</b>	<b>2.9500e-003</b>	<b>0.0000</b>	<b>15.6851</b>

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**3.2 Demolition - 2020**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	3.6800e-003	1.0000e-005	1.1900e-003	1.0000e-005	1.1900e-003	3.2000e-004	1.0000e-005	3.2000e-004	0.0000	1.0384	1.0384	3.0000e-005	0.0000	1.0391
<b>Total</b>	<b>5.0000e-004</b>	<b>3.6000e-004</b>	<b>3.6800e-003</b>	<b>1.0000e-005</b>	<b>1.1900e-003</b>	<b>1.0000e-005</b>	<b>1.1900e-003</b>	<b>3.2000e-004</b>	<b>1.0000e-005</b>	<b>3.2000e-004</b>	<b>0.0000</b>	<b>1.0384</b>	<b>1.0384</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>1.0391</b>

**3.3 Site Preparation - 2020**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0103	0.1265	0.0614	1.5000e-004		5.0300e-003	5.0300e-003		4.6300e-003	4.6300e-003	0.0000	12.8388	12.8388	4.1500e-003	0.0000	12.9426
<b>Total</b>	<b>0.0103</b>	<b>0.1265</b>	<b>0.0614</b>	<b>1.5000e-004</b>	<b>2.7000e-004</b>	<b>5.0300e-003</b>	<b>5.3000e-003</b>	<b>3.0000e-005</b>	<b>4.6300e-003</b>	<b>4.6600e-003</b>	<b>0.0000</b>	<b>12.8388</b>	<b>12.8388</b>	<b>4.1500e-003</b>	<b>0.0000</b>	<b>12.9426</b>

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**3.3 Site Preparation - 2020**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.5000e-004	1.8000e-004	1.8400e-003	1.0000e-005	5.9000e-004	0.0000	6.0000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.5192	0.5192	1.0000e-005	0.0000	0.5195
<b>Total</b>	<b>2.5000e-004</b>	<b>1.8000e-004</b>	<b>1.8400e-003</b>	<b>1.0000e-005</b>	<b>5.9000e-004</b>	<b>0.0000</b>	<b>6.0000e-004</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>0.5192</b>	<b>0.5192</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>0.5195</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0103	0.1265	0.0614	1.5000e-004		5.0300e-003	5.0300e-003		4.6300e-003	4.6300e-003	0.0000	12.8387	12.8387	4.1500e-003	0.0000	12.9426
<b>Total</b>	<b>0.0103</b>	<b>0.1265</b>	<b>0.0614</b>	<b>1.5000e-004</b>	<b>2.7000e-004</b>	<b>5.0300e-003</b>	<b>5.3000e-003</b>	<b>3.0000e-005</b>	<b>4.6300e-003</b>	<b>4.6600e-003</b>	<b>0.0000</b>	<b>12.8387</b>	<b>12.8387</b>	<b>4.1500e-003</b>	<b>0.0000</b>	<b>12.9426</b>

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**3.3 Site Preparation - 2020**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.5000e-004	1.8000e-004	1.8400e-003	1.0000e-005	5.9000e-004	0.0000	6.0000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.5192	0.5192	1.0000e-005	0.0000	0.5195
<b>Total</b>	<b>2.5000e-004</b>	<b>1.8000e-004</b>	<b>1.8400e-003</b>	<b>1.0000e-005</b>	<b>5.9000e-004</b>	<b>0.0000</b>	<b>6.0000e-004</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>1.6000e-004</b>	<b>0.0000</b>	<b>0.5192</b>	<b>0.5192</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>0.5195</b>

**3.4 Grading - 2020**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0114	0.0000	0.0114	6.2200e-003	0.0000	6.2200e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0130	0.1181	0.1143	1.8000e-004		7.0100e-003	7.0100e-003		6.6900e-003	6.6900e-003	0.0000	15.6113	15.6113	2.9500e-003	0.0000	15.6851
<b>Total</b>	<b>0.0130</b>	<b>0.1181</b>	<b>0.1143</b>	<b>1.8000e-004</b>	<b>0.0114</b>	<b>7.0100e-003</b>	<b>0.0184</b>	<b>6.2200e-003</b>	<b>6.6900e-003</b>	<b>0.0129</b>	<b>0.0000</b>	<b>15.6113</b>	<b>15.6113</b>	<b>2.9500e-003</b>	<b>0.0000</b>	<b>15.6851</b>



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**3.4 Grading - 2020**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.2000e-004	0.0288	5.7900e-003	8.0000e-005	1.6600e-003	9.0000e-005	1.7600e-003	4.6000e-004	9.0000e-005	5.5000e-004	0.0000	7.5488	7.5488	3.9000e-004	0.0000	7.5585
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	3.6800e-003	1.0000e-005	1.1900e-003	1.0000e-005	1.1900e-003	3.2000e-004	1.0000e-005	3.2000e-004	0.0000	1.0384	1.0384	3.0000e-005	0.0000	1.0391
<b>Total</b>	<b>1.3200e-003</b>	<b>0.0292</b>	<b>9.4700e-003</b>	<b>9.0000e-005</b>	<b>2.8500e-003</b>	<b>1.0000e-004</b>	<b>2.9500e-003</b>	<b>7.8000e-004</b>	<b>1.0000e-004</b>	<b>8.7000e-004</b>	<b>0.0000</b>	<b>8.5872</b>	<b>8.5872</b>	<b>4.2000e-004</b>	<b>0.0000</b>	<b>8.5975</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0114	0.0000	0.0114	6.2200e-003	0.0000	6.2200e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0130	0.1181	0.1143	1.8000e-004		7.0100e-003	7.0100e-003		6.6900e-003	6.6900e-003	0.0000	15.6113	15.6113	2.9500e-003	0.0000	15.6851
<b>Total</b>	<b>0.0130</b>	<b>0.1181</b>	<b>0.1143</b>	<b>1.8000e-004</b>	<b>0.0114</b>	<b>7.0100e-003</b>	<b>0.0184</b>	<b>6.2200e-003</b>	<b>6.6900e-003</b>	<b>0.0129</b>	<b>0.0000</b>	<b>15.6113</b>	<b>15.6113</b>	<b>2.9500e-003</b>	<b>0.0000</b>	<b>15.6851</b>

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**3.4 Grading - 2020**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.2000e-004	0.0288	5.7900e-003	8.0000e-005	1.6600e-003	9.0000e-005	1.7600e-003	4.6000e-004	9.0000e-005	5.5000e-004	0.0000	7.5488	7.5488	3.9000e-004	0.0000	7.5585
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-004	3.6000e-004	3.6800e-003	1.0000e-005	1.1900e-003	1.0000e-005	1.1900e-003	3.2000e-004	1.0000e-005	3.2000e-004	0.0000	1.0384	1.0384	3.0000e-005	0.0000	1.0391
<b>Total</b>	<b>1.3200e-003</b>	<b>0.0292</b>	<b>9.4700e-003</b>	<b>9.0000e-005</b>	<b>2.8500e-003</b>	<b>1.0000e-004</b>	<b>2.9500e-003</b>	<b>7.8000e-004</b>	<b>1.0000e-004</b>	<b>8.7000e-004</b>	<b>0.0000</b>	<b>8.5872</b>	<b>8.5872</b>	<b>4.2000e-004</b>	<b>0.0000</b>	<b>8.5975</b>

**3.5 Building Construction - 2020**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0448	0.4603	0.3842	5.9000e-004		0.0272	0.0272		0.0250	0.0250	0.0000	52.0315	52.0315	0.0168	0.0000	52.4522
<b>Total</b>	<b>0.0448</b>	<b>0.4603</b>	<b>0.3842</b>	<b>5.9000e-004</b>		<b>0.0272</b>	<b>0.0272</b>		<b>0.0250</b>	<b>0.0250</b>	<b>0.0000</b>	<b>52.0315</b>	<b>52.0315</b>	<b>0.0168</b>	<b>0.0000</b>	<b>52.4522</b>

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**3.5 Building Construction - 2020**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.6300e-003	0.1380	0.0347	3.3000e-004	7.8400e-003	6.7000e-004	8.5200e-003	2.2700e-003	6.4000e-004	2.9100e-003	0.0000	31.3136	31.3136	1.6200e-003	0.0000	31.3540
Worker	0.0181	0.0130	0.1341	4.2000e-004	0.0431	2.9000e-004	0.0434	0.0115	2.7000e-004	0.0118	0.0000	37.7985	37.7985	9.1000e-004	0.0000	37.8214
<b>Total</b>	<b>0.0227</b>	<b>0.1509</b>	<b>0.1688</b>	<b>7.5000e-004</b>	<b>0.0510</b>	<b>9.6000e-004</b>	<b>0.0520</b>	<b>0.0138</b>	<b>9.1000e-004</b>	<b>0.0147</b>	<b>0.0000</b>	<b>69.1121</b>	<b>69.1121</b>	<b>2.5300e-003</b>	<b>0.0000</b>	<b>69.1754</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0448	0.4603	0.3842	5.9000e-004		0.0272	0.0272		0.0250	0.0250	0.0000	52.0314	52.0314	0.0168	0.0000	52.4521
<b>Total</b>	<b>0.0448</b>	<b>0.4603</b>	<b>0.3842</b>	<b>5.9000e-004</b>		<b>0.0272</b>	<b>0.0272</b>		<b>0.0250</b>	<b>0.0250</b>	<b>0.0000</b>	<b>52.0314</b>	<b>52.0314</b>	<b>0.0168</b>	<b>0.0000</b>	<b>52.4521</b>

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**3.5 Building Construction - 2020**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.6300e-003	0.1380	0.0347	3.3000e-004	7.8400e-003	6.7000e-004	8.5200e-003	2.2700e-003	6.4000e-004	2.9100e-003	0.0000	31.3136	31.3136	1.6200e-003	0.0000	31.3540
Worker	0.0181	0.0130	0.1341	4.2000e-004	0.0431	2.9000e-004	0.0434	0.0115	2.7000e-004	0.0118	0.0000	37.7985	37.7985	9.1000e-004	0.0000	37.8214
<b>Total</b>	<b>0.0227</b>	<b>0.1509</b>	<b>0.1688</b>	<b>7.5000e-004</b>	<b>0.0510</b>	<b>9.6000e-004</b>	<b>0.0520</b>	<b>0.0138</b>	<b>9.1000e-004</b>	<b>0.0147</b>	<b>0.0000</b>	<b>69.1121</b>	<b>69.1121</b>	<b>2.5300e-003</b>	<b>0.0000</b>	<b>69.1754</b>

**3.5 Building Construction - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0721	0.7426	0.6755	1.0600e-003		0.0416	0.0416		0.0383	0.0383	0.0000	93.0763	93.0763	0.0301	0.0000	93.8289
<b>Total</b>	<b>0.0721</b>	<b>0.7426</b>	<b>0.6755</b>	<b>1.0600e-003</b>		<b>0.0416</b>	<b>0.0416</b>		<b>0.0383</b>	<b>0.0383</b>	<b>0.0000</b>	<b>93.0763</b>	<b>93.0763</b>	<b>0.0301</b>	<b>0.0000</b>	<b>93.8289</b>

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**3.5 Building Construction - 2021**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.7900e-003	0.2234	0.0558	5.8000e-004	0.0140	4.9000e-004	0.0145	4.0600e-003	4.6000e-004	4.5200e-003	0.0000	55.4737	55.4737	2.7300e-003	0.0000	55.5419
Worker	0.0300	0.0207	0.2190	7.2000e-004	0.0772	5.0000e-004	0.0777	0.0205	4.6000e-004	0.0210	0.0000	65.2292	65.2292	1.4600e-003	0.0000	65.2658
<b>Total</b>	<b>0.0368</b>	<b>0.2441</b>	<b>0.2748</b>	<b>1.3000e-003</b>	<b>0.0912</b>	<b>9.9000e-004</b>	<b>0.0922</b>	<b>0.0246</b>	<b>9.2000e-004</b>	<b>0.0255</b>	<b>0.0000</b>	<b>120.7029</b>	<b>120.7029</b>	<b>4.1900e-003</b>	<b>0.0000</b>	<b>120.8076</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0721	0.7426	0.6755	1.0600e-003		0.0416	0.0416		0.0383	0.0383	0.0000	93.0762	93.0762	0.0301	0.0000	93.8288
<b>Total</b>	<b>0.0721</b>	<b>0.7426</b>	<b>0.6755</b>	<b>1.0600e-003</b>		<b>0.0416</b>	<b>0.0416</b>		<b>0.0383</b>	<b>0.0383</b>	<b>0.0000</b>	<b>93.0762</b>	<b>93.0762</b>	<b>0.0301</b>	<b>0.0000</b>	<b>93.8288</b>

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**3.5 Building Construction - 2021**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.7900e-003	0.2234	0.0558	5.8000e-004	0.0140	4.9000e-004	0.0145	4.0600e-003	4.6000e-004	4.5200e-003	0.0000	55.4737	55.4737	2.7300e-003	0.0000	55.5419
Worker	0.0300	0.0207	0.2190	7.2000e-004	0.0772	5.0000e-004	0.0777	0.0205	4.6000e-004	0.0210	0.0000	65.2292	65.2292	1.4600e-003	0.0000	65.2658
<b>Total</b>	<b>0.0368</b>	<b>0.2441</b>	<b>0.2748</b>	<b>1.3000e-003</b>	<b>0.0912</b>	<b>9.9000e-004</b>	<b>0.0922</b>	<b>0.0246</b>	<b>9.2000e-004</b>	<b>0.0255</b>	<b>0.0000</b>	<b>120.7029</b>	<b>120.7029</b>	<b>4.1900e-003</b>	<b>0.0000</b>	<b>120.8076</b>

**3.6 Paving - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0108	0.1008	0.1064	1.7000e-004		5.3000e-003	5.3000e-003		4.9300e-003	4.9300e-003	0.0000	14.0887	14.0887	4.1000e-003	0.0000	14.1913
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0108</b>	<b>0.1008</b>	<b>0.1064</b>	<b>1.7000e-004</b>		<b>5.3000e-003</b>	<b>5.3000e-003</b>		<b>4.9300e-003</b>	<b>4.9300e-003</b>	<b>0.0000</b>	<b>14.0887</b>	<b>14.0887</b>	<b>4.1000e-003</b>	<b>0.0000</b>	<b>14.1913</b>

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**3.6 Paving - 2021**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.3000e-004	5.7000e-004	6.0600e-003	2.0000e-005	2.1300e-003	1.0000e-005	2.1500e-003	5.7000e-004	1.0000e-005	5.8000e-004	0.0000	1.8036	1.8036	4.0000e-005	0.0000	1.8046
<b>Total</b>	<b>8.3000e-004</b>	<b>5.7000e-004</b>	<b>6.0600e-003</b>	<b>2.0000e-005</b>	<b>2.1300e-003</b>	<b>1.0000e-005</b>	<b>2.1500e-003</b>	<b>5.7000e-004</b>	<b>1.0000e-005</b>	<b>5.8000e-004</b>	<b>0.0000</b>	<b>1.8036</b>	<b>1.8036</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>1.8046</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0108	0.1008	0.1064	1.7000e-004		5.3000e-003	5.3000e-003		4.9300e-003	4.9300e-003	0.0000	14.0887	14.0887	4.1000e-003	0.0000	14.1913
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0108</b>	<b>0.1008</b>	<b>0.1064</b>	<b>1.7000e-004</b>		<b>5.3000e-003</b>	<b>5.3000e-003</b>		<b>4.9300e-003</b>	<b>4.9300e-003</b>	<b>0.0000</b>	<b>14.0887</b>	<b>14.0887</b>	<b>4.1000e-003</b>	<b>0.0000</b>	<b>14.1913</b>

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**3.6 Paving - 2021**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	8.3000e-004	5.7000e-004	6.0600e-003	2.0000e-005	2.1300e-003	1.0000e-005	2.1500e-003	5.7000e-004	1.0000e-005	5.8000e-004	0.0000	1.8036	1.8036	4.0000e-005	0.0000	1.8046
<b>Total</b>	<b>8.3000e-004</b>	<b>5.7000e-004</b>	<b>6.0600e-003</b>	<b>2.0000e-005</b>	<b>2.1300e-003</b>	<b>1.0000e-005</b>	<b>2.1500e-003</b>	<b>5.7000e-004</b>	<b>1.0000e-005</b>	<b>5.8000e-004</b>	<b>0.0000</b>	<b>1.8036</b>	<b>1.8036</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>1.8046</b>

**3.7 Architectural Coating - 2021**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.0312					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.2800e-003	0.0229	0.0273	4.0000e-005		1.4100e-003	1.4100e-003		1.4100e-003	1.4100e-003	0.0000	3.8299	3.8299	2.6000e-004	0.0000	3.8365
<b>Total</b>	<b>1.0345</b>	<b>0.0229</b>	<b>0.0273</b>	<b>4.0000e-005</b>		<b>1.4100e-003</b>	<b>1.4100e-003</b>		<b>1.4100e-003</b>	<b>1.4100e-003</b>	<b>0.0000</b>	<b>3.8299</b>	<b>3.8299</b>	<b>2.6000e-004</b>	<b>0.0000</b>	<b>3.8365</b>



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**3.7 Architectural Coating - 2021**

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	6.7000e-004	7.0700e-003	2.0000e-005	2.4900e-003	2.0000e-005	2.5100e-003	6.6000e-004	1.0000e-005	6.8000e-004	0.0000	2.1042	2.1042	5.0000e-005	0.0000	2.1054
<b>Total</b>	<b>9.7000e-004</b>	<b>6.7000e-004</b>	<b>7.0700e-003</b>	<b>2.0000e-005</b>	<b>2.4900e-003</b>	<b>2.0000e-005</b>	<b>2.5100e-003</b>	<b>6.6000e-004</b>	<b>1.0000e-005</b>	<b>6.8000e-004</b>	<b>0.0000</b>	<b>2.1042</b>	<b>2.1042</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>2.1054</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.0312					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.2800e-003	0.0229	0.0273	4.0000e-005		1.4100e-003	1.4100e-003		1.4100e-003	1.4100e-003	0.0000	3.8299	3.8299	2.6000e-004	0.0000	3.8365
<b>Total</b>	<b>1.0345</b>	<b>0.0229</b>	<b>0.0273</b>	<b>4.0000e-005</b>		<b>1.4100e-003</b>	<b>1.4100e-003</b>		<b>1.4100e-003</b>	<b>1.4100e-003</b>	<b>0.0000</b>	<b>3.8299</b>	<b>3.8299</b>	<b>2.6000e-004</b>	<b>0.0000</b>	<b>3.8365</b>

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**3.7 Architectural Coating - 2021**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	6.7000e-004	7.0700e-003	2.0000e-005	2.4900e-003	2.0000e-005	2.5100e-003	6.6000e-004	1.0000e-005	6.8000e-004	0.0000	2.1042	2.1042	5.0000e-005	0.0000	2.1054
<b>Total</b>	<b>9.7000e-004</b>	<b>6.7000e-004</b>	<b>7.0700e-003</b>	<b>2.0000e-005</b>	<b>2.4900e-003</b>	<b>2.0000e-005</b>	<b>2.5100e-003</b>	<b>6.6000e-004</b>	<b>1.0000e-005</b>	<b>6.8000e-004</b>	<b>0.0000</b>	<b>2.1042</b>	<b>2.1042</b>	<b>5.0000e-005</b>	<b>0.0000</b>	<b>2.1054</b>

**4.0 Operational Detail - Mobile**

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**4.1 Mitigation Measures Mobile**

- Increase Density
- Increase Diversity
- Improve Walkability Design
- Improve Destination Accessibility
- Increase Transit Accessibility
- Integrate Below Market Rate Housing
- Improve Pedestrian Network

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1681	0.8083	1.7937	6.2300e-003	0.5326	5.6800e-003	0.5383	0.1430	5.3200e-003	0.1483	0.0000	571.7712	571.7712	0.0218	0.0000	572.3159
Unmitigated	0.1755	0.8618	1.9615	6.9900e-003	0.6039	6.3400e-003	0.6102	0.1621	5.9400e-003	0.1680	0.0000	641.8072	641.8072	0.0237	0.0000	642.4008

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	704.90	677.34	621.16	1,591,319	1,403,544
City Park	0.00	0.00	0.00		
Strip Mall	22.16	21.02	10.22	31,248	27,561
Unenclosed Parking with Elevator	0.00	0.00	0.00		
<b>Total</b>	<b>727.06</b>	<b>698.36</b>	<b>631.38</b>	<b>1,622,568</b>	<b>1,431,105</b>

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15
Unenclosed Parking with	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.576985	0.039376	0.193723	0.112069	0.016317	0.005358	0.017943	0.025814	0.002614	0.002274	0.005874	0.000887	0.000768
City Park	0.576985	0.039376	0.193723	0.112069	0.016317	0.005358	0.017943	0.025814	0.002614	0.002274	0.005874	0.000887	0.000768
Strip Mall	0.576985	0.039376	0.193723	0.112069	0.016317	0.005358	0.017943	0.025814	0.002614	0.002274	0.005874	0.000887	0.000768
Unenclosed Parking with Elevator	0.576985	0.039376	0.193723	0.112069	0.016317	0.005358	0.017943	0.025814	0.002614	0.002274	0.005874	0.000887	0.000768

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	82.3465	82.3465	7.2600e-003	1.5000e-003	82.9758
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	82.3465	82.3465	7.2600e-003	1.5000e-003	82.9758
NaturalGas Mitigated	5.0000e-003	0.0428	0.0182	2.7000e-004		3.4600e-003	3.4600e-003		3.4600e-003	3.4600e-003	0.0000	49.5070	49.5070	9.5000e-004	9.1000e-004	49.8012
NaturalGas Unmitigated	5.0000e-003	0.0428	0.0182	2.7000e-004		3.4600e-003	3.4600e-003		3.4600e-003	3.4600e-003	0.0000	49.5070	49.5070	9.5000e-004	9.1000e-004	49.8012

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**5.2 Energy by Land Use - NaturalGas**

**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	925426	4.9900e-003	0.0426	0.0182	2.7000e-004		3.4500e-003	3.4500e-003		3.4500e-003	3.4500e-003	0.0000	49.3842	49.3842	9.5000e-004	9.1000e-004	49.6777
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Strip Mall	2300	1.0000e-005	1.1000e-004	9.0000e-005	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1227	0.1227	0.0000	0.0000	0.1235
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>5.0000e-003</b>	<b>0.0428</b>	<b>0.0182</b>	<b>2.7000e-004</b>		<b>3.4600e-003</b>	<b>3.4600e-003</b>		<b>3.4600e-003</b>	<b>3.4600e-003</b>	<b>0.0000</b>	<b>49.5070</b>	<b>49.5070</b>	<b>9.5000e-004</b>	<b>9.1000e-004</b>	<b>49.8012</b>

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**5.2 Energy by Land Use - NaturalGas**

**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	925426	4.9900e-003	0.0426	0.0182	2.7000e-004		3.4500e-003	3.4500e-003		3.4500e-003	3.4500e-003	0.0000	49.3842	49.3842	9.5000e-004	9.1000e-004	49.6777
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Strip Mall	2300	1.0000e-005	1.1000e-004	9.0000e-005	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1227	0.1227	0.0000	0.0000	0.1235
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>5.0000e-003</b>	<b>0.0428</b>	<b>0.0182</b>	<b>2.7000e-004</b>		<b>3.4600e-003</b>	<b>3.4600e-003</b>		<b>3.4600e-003</b>	<b>3.4600e-003</b>	<b>0.0000</b>	<b>49.5070</b>	<b>49.5070</b>	<b>9.5000e-004</b>	<b>9.1000e-004</b>	<b>49.8012</b>

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**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	447531	66.7453	5.8900e-003	1.2200e-003	67.2554
City Park	0	0.0000	0.0000	0.0000	0.0000
Strip Mall	5240	0.7815	7.0000e-005	1.0000e-005	0.7875
Unenclosed Parking with Elevator	99366.8	14.8197	1.3100e-003	2.7000e-004	14.9330
<b>Total</b>		<b>82.3465</b>	<b>7.2700e-003</b>	<b>1.5000e-003</b>	<b>82.9758</b>

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**5.3 Energy by Land Use - Electricity**

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	447531	66.7453	5.8900e-003	1.2200e-003	67.2554
City Park	0	0.0000	0.0000	0.0000	0.0000
Strip Mall	5240	0.7815	7.0000e-005	1.0000e-005	0.7875
Unenclosed Parking with Elevator	99366.8	14.8197	1.3100e-003	2.7000e-004	14.9330
<b>Total</b>		<b>82.3465</b>	<b>7.2700e-003</b>	<b>1.5000e-003</b>	<b>82.9758</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Use only Natural Gas Hearths



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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.6976	0.0128	0.7905	6.0000e-005		4.6500e-003	4.6500e-003		4.6500e-003	4.6500e-003	0.0000	5.5222	5.5222	1.3300e-003	8.0000e-005	5.5785
Unmitigated	0.9417	0.0147	1.1257	7.1000e-004		0.0525	0.0525		0.0525	0.0525	4.8325	3.2726	8.1051	9.0100e-003	3.2000e-004	8.4249

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1031					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.5702					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.2446	5.6300e-003	0.3368	6.7000e-004		0.0482	0.0482		0.0482	0.0482	4.8325	1.9849	6.8175	7.7700e-003	3.2000e-004	7.1061
Landscaping	0.0239	9.1000e-003	0.7889	4.0000e-005		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	1.2877	1.2877	1.2500e-003	0.0000	1.3188
<b>Total</b>	<b>0.9417</b>	<b>0.0147</b>	<b>1.1257</b>	<b>7.1000e-004</b>		<b>0.0525</b>	<b>0.0525</b>		<b>0.0525</b>	<b>0.0525</b>	<b>4.8325</b>	<b>3.2726</b>	<b>8.1051</b>	<b>9.0200e-003</b>	<b>3.2000e-004</b>	<b>8.4249</b>

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**6.2 Area by SubCategory**

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1031					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.5702					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	4.3000e-004	3.6600e-003	1.5600e-003	2.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	4.2346	4.2346	8.0000e-005	8.0000e-005	4.2597
Landscaping	0.0239	9.1000e-003	0.7889	4.0000e-005		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	1.2877	1.2877	1.2500e-003	0.0000	1.3188
<b>Total</b>	<b>0.6976</b>	<b>0.0128</b>	<b>0.7905</b>	<b>6.0000e-005</b>		<b>4.6600e-003</b>	<b>4.6600e-003</b>		<b>4.6600e-003</b>	<b>4.6600e-003</b>	<b>0.0000</b>	<b>5.5222</b>	<b>5.5222</b>	<b>1.3300e-003</b>	<b>8.0000e-005</b>	<b>5.5785</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	10.3271	0.2270	5.4900e-003	17.6374
Unmitigated	10.3271	0.2270	5.4900e-003	17.6374

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	6.90633 / 4.35399	10.0372	0.2257	5.4600e-003	17.3068
City Park	0 / 0.452763	0.2363	2.0000e-005	0.0000	0.2382
Strip Mall	0.0370363 / 0.0226996	0.0535	1.2100e-003	3.0000e-005	0.0925
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>10.3271</b>	<b>0.2270</b>	<b>5.4900e-003</b>	<b>17.6374</b>

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**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	6.90633 / 4.35399	10.0372	0.2257	5.4600e-003	17.3068
City Park	0 / 0.452763	0.2363	2.0000e-005	0.0000	0.2382
Strip Mall	0.0370363 / 0.0226996	0.0535	1.2100e-003	3.0000e-005	0.0925
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>10.3271</b>	<b>0.2270</b>	<b>5.4900e-003</b>	<b>17.6374</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	10.0115	0.5917	0.0000	24.8031
Unmitigated	10.0115	0.5917	0.0000	24.8031

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	48.76	9.8978	0.5850	0.0000	24.5215
City Park	0.03	6.0900e-003	3.6000e-004	0.0000	0.0151
Strip Mall	0.53	0.1076	6.3600e-003	0.0000	0.2665
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>10.0115</b>	<b>0.5917</b>	<b>0.0000</b>	<b>24.8031</b>

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**8.2 Waste by Land Use**

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	48.76	9.8978	0.5850	0.0000	24.5215
City Park	0.03	6.0900e-003	3.6000e-004	0.0000	0.0151
Strip Mall	0.53	0.1076	6.3600e-003	0.0000	0.2665
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>10.0115</b>	<b>0.5917</b>	<b>0.0000</b>	<b>24.8031</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

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Equipment Type	Number
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**11.0 Vegetation**

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