

CITY OF MENLO PARK HOUSING ELEMENT UPDATE

Addendum to the Program Subsequent Environmental Impact Report

Prepared for
City of Menlo Park

November 2023



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TABLE OF CONTENTS

City of Menlo Park Housing Element Update Addendum to the Program Subsequent EIR

	<u>Page</u>
Introduction	1
CEQA Requirements for an EIR Addendum	1
Certified SEIR	2
Revised HEU.....	3
Introduction	3
Proposed Revisions to the 2023 HEU.....	5
Impact Analysis.....	6
Aesthetics	9
Air Quality	10
Biological Resources	11
Cultural Resources	12
Energy.....	14
Geology, Soils, and Seismicity.....	14
Greenhouse Gas Emissions	15
Hazards and Hazardous Materials.....	17
Hydrology and Water Quality	18
Land Use and Planning.....	19
Noise and Vibration.....	21
Population and Housing	22
Public Services and Recreation	24
Transportation.....	24
Tribal Cultural Resources.....	27
Utilities and Service Systems.....	28
Wildfire	30
Conclusion	31
Figures	
Figure 1 Housing Opportunity and Land Use Strategy Sites.....	7
Tables	
Table 1 Proposed Unit Count Changes by TAZ.....	8

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Introduction

In 2016, the City of Menlo Park (City) updated its General Plan, including the Land Use and Circulation Elements (referred to as *ConnectMenlo*) and certified a Program Environmental Impact Report for the General Plan update (*ConnectMenlo* EIR) (State Clearinghouse No. 20150622054). On January 31, 2023, the City of Menlo Park City Council adopted an updated 2023-2031 6th Cycle Housing Element to its General Plan and certified a Subsequent Environmental Impact Report (SEIR) which incorporated and relied on the previously certified *ConnectMenlo* EIR. The SEIR assessed the environmental effects of further updates to the City's General Plan; notably, adoption of an update to the General Plan Housing Element in accordance with the requirements of State law. The SEIR also supported adoption of an update to the General Plan Safety Element and a new Environmental Justice Element and was written to support later adoption of amendments to the City's General Plan Land Use Element, El Camino Real/Downtown Specific Plan, Zoning Ordinance, and Zoning Map intended to implement the 2023-2031 6th Cycle Housing Element.

Since the SEIR's certification, the City has determined that further enhancements to the adopted 2023 Housing Element Update (HEU) are needed to provide additional housing opportunities in the city and to further the City's commitment to the provision of affordable housing through amendments to the City's General Plan Land Use Element, El Camino Real/Downtown Specific Plan, Zoning Ordinance, and Zoning Map. This Addendum assesses whether the proposed revisions to the 2023 HEU would create any new or substantially greater significant environmental impacts than those that were assessed in the SEIR.

The SEIR analyzed whether implementation of the goals, policies, programs, zoning changes, and housing strategies contained within the 2023 HEU would result in significant impacts to the environment. The SEIR imposed mitigation measures to reduce the significant impacts that were identified. This Addendum finds that the proposed enhancements to the 2023 HEU would not result in any new or substantially greater significant impacts than those that were identified and assessed in the SEIR and the *ConnectMenlo* EIR. This Addendum also reaffirms that the SEIR's mitigation measures, which would reduce significant impacts, would continue to be implemented as part of the revised HEU. Consequently, in accordance with the California Environmental Quality Act ("CEQA") Guidelines Sections 15162 and 15164, a subsequent EIR is not required for the proposed amendments to the City's General Plan Land Use Element, El Camino Real/Downtown Specific Plan, Zoning Ordinance, and Zoning Map and the City Council may adopt this Addendum in fulfillment of its obligations under CEQA.

CEQA Requirements for an EIR Addendum

As described in State CEQA Guidelines Section 15164, a lead agency shall prepare an addendum to a previously adopted EIR if some changes or additions are necessary but none of the conditions identified in State CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred. The following identifies the standards set forth in State CEQA Guidelines

Section 15162, for which the preparation of a subsequent EIR or negative declaration would be required:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Thus, if the revised 2023 HEU would not result in any of the circumstances listed in Section 15162 (i.e., no new or substantially greater significant impacts), an Addendum to the SEIR would be appropriate and no subsequent EIR would be required. As demonstrated in the analysis herein, this assessment concludes that an Addendum to the SEIR is appropriate.

Certified SEIR

The City of Menlo Park certified an SEIR for the 2023 HEU (State Clearinghouse No. 20150622054) on January 31, 2023.¹ The SEIR concluded that, at a program level, the impacts of future development and policies included in the HEU would all be reduced to less-than-significant levels, except for:

Air Quality Impact AQ-2: Implementation of the HEU would result in a cumulatively considerable net increase of criteria air pollutants for which the project region is in non-

¹ The Draft and Final SEIRs can be viewed at the following location: <https://menlopark.gov/Government/Departments/Community-Development/Planning-Division/Comprehensive-planning/Housing-Element/2023-2031-Housing-Element-Update>.

attainment under an applicable federal or state ambient air quality standard (*Significant and Unavoidable Impact, with Mitigation*).

Cultural Resources Impact CR-1: Implementation of the HEU could cause a substantial adverse change in the significance of an architectural historic resource pursuant to CEQA Guidelines Section 15064.5. (*Significant and Unavoidable Impact, with Mitigation*)

Cultural Resources Impact CR-4: Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, could result in a significant cumulative impact with respect to historic architectural resources (*Significant and Unavoidable Impact, with Mitigation*)

Transportation Impact TRANS-1: Implementation of the HEU would conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, bicycle, and pedestrian facilities. (*Significant and Unavoidable Impact*)

Transportation Impact TRANS-2: Implementation of the HEU would exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

Transportation Impact TRANS-5: Implementation of the HEU, in combination with cumulative development, would conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, bicycle, and pedestrian facilities. (*Significant and Unavoidable Impact*)

Transportation Impact TRANS-6: Implementation of the HEU, in combination with cumulative development, would exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

No feasible mitigation measures were identified for these impacts that could reduce impacts to less-than-significant levels. Therefore, the City Council approved a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 when certifying the SEIR to explain why the HEU was being approved, despite significant and unavoidable impacts.

Revised HEU

Introduction

2023 Housing Element Update

State law requires every city and county in California to have an adopted comprehensive long-range general plan with specific contents in order to provide a vision for the jurisdiction's future. The general plan is an overarching policy document that informs local decisions about land use and development.

The City began the process to update its Housing Element in 2020. The City maintains an ongoing commitment to providing meaningful community engagement and has been using social

media, posters and flyers, a website, in-person engagement, one-on-one interviews and listening sessions, surveys, and meetings to share information and gather insights for the update of the Housing Element. The HEU was adopted on January 31, 2023 and included several principal provisions, as summarized below.

Housing Goals, Policies and Programs

The adopted 2023 HEU includes updated goals, policies, and programs to address the maintenance, preservation, improvement, and development of housing and to affirmatively further fair housing in the City. The updates to the goals, policies, and programs in the HEU were informed by a review of the implementation and effectiveness of the previous Housing Element (adopted in 2015), as well as updated information on demographic and economic trends, existing housing and market conditions, and special housing needs experienced by disabled persons, elderly households, large family households, single female-headed households, and homeless persons. The HEU's goals, policies, and programs were also crafted to address an updated assessment of non-governmental and governmental constraints to the development, conservation, and rehabilitation of housing in the City, and to affirmatively further fair housing.

Housing Sites Inventory

The 2023 HEU identified specific sites appropriate for development of housing (in particular affordable units), and the City would rezone those sites, as necessary, to meet the requirements of State law. The final housing opportunity sites inventory was refined based on additional community input and analysis. The SEIR evaluated potential environmental effects of adding up to 4,000 new residential units in the City within the HEU's eight-year planning period through 2031 via a variety of strategies in addition to possible pipeline projects and accessory dwelling units.

Housing Sites Inventory Strategies

While pipeline projects (i.e., projects for which a development application has been received or are otherwise reasonably foreseeable) are generally located on the north side of US-101, the 2023 HEU identified additional housing sites that were geographically dispersed throughout the City, primarily located in City Council Districts 2, 3, 4, and 5—generally, the areas south of US-101. The sites were identified as being available for multifamily housing through a combination of rezoning, increased densities, and/or updates to the Zoning Ordinance based on the following general strategies:

- **“Re-use” of sites from the City’s previous Housing Element.** The Housing Sites Inventory would reuse selected sites from the 5th Cycle Housing Element (2025-2023) with densities to allow at least 30 dwelling units per acre (du/ac) and possibly more. Consistent with State law, sites that were “re-used” would either be up-zoned (increasing allowable residential density) or would be zoned to allow by-right (ministerial review) development for projects that include at least 20 percent affordable units (units affordable to low and very low-income households).
- **Increase the permitted densities within the El Camino Real/Downtown Specific Plan area and modify associated development standards.** The 2023 HEU's Housing Sites Inventory included sites in the El Camino Real/Downtown Specific Plan area. The HEU allowed at least 30 dwelling units per acre (du/ac) as the base level density, and potentially

increased the maximum bonus level density to 80 dwelling units per acre depending on the location within the Specific Plan area. Under the HEU, bonus level development would require a developer to provide a public benefit in exchange for higher density development potential. The intent of this strategy was also to remove the existing residential cap of 680 units permitted in the Specific Plan area and to modify development standards such as height and/or parking ratios to allow greater development potential on parcels.

- **Modify the Affordable Housing Overlay.** The 2023 HEU provided that Specific Plan area and sites in the Housing Sites Inventory would be rezoned to include the Affordable Housing Overlay (AHO) provided in Menlo Park Municipal Code Chapter 16.98. The HEU called on the City to amend the Code to allow for densities up to 100 du/ac for 100 percent affordable housing developments (meaning 100 percent of units would be available to low and very low-income residents). This strategy also included provisions for increased residential densities for mixed-income developments (market-rate units and affordable units combined) where the percentage of affordable housing exceeds the City's Below Market Rate requirement as provided in Menlo Park Municipal Code Chapter 16.96.
- **Modify Retail/Commercial Zoning Districts.** The Housing Sites Inventory included some sites in the C-1, C-1-A, C-1-C, C-2, C-2-A, C-2-B, C-2-S, C-4, and P zoning districts and required the City to modify Code provisions regarding retail/commercial zoning districts to allow for residential uses that would allow 30 du/ac and include other potential modifications to the development standards to encourage the production of mixed-use developments (residential and non-residential uses combined).
- **Remove the minimum lot size for R-3 zoned properties located around downtown.** The Housing Sites Inventory included some R-3 zoned sites around downtown and required the City to modify applicable Code provisions to remove the 10,000 square-foot minimum lot size, which would allow all sites in the R-3 area around downtown a residential density of up to 30 du/ac.

Proposed Revisions to the 2023 HEU

This Addendum assesses the effects of adopting several enhancements to the 2023 HEU as currently adopted and assessed in the SEIR. The City is considering additional Specific Plan and zoning modifications for increased densities as part of revising the 2023 HEU, as requested by the City Council. The general changes that would be implemented for the Housing Element-related Specific Plan and zoning updates, as summarized in the housing strategies discussed above, would be:

- Increase the permitted densities in the El Camino Real/Downtown Specific Plan area from current maximum base densities of up to 50 du/ac and bonus densities of up to 60 du/ac to maximum base densities of up to 60 du/ac and bonus densities of up to 100 du/ac or more, with corresponding increases in floor area ratio (FAR) and height.
- Modify the Affordable Housing Overlay to allow more than 100 du/ac for 100 percent affordable housing developments (meaning 100 percent of units would be available to residents at the low-income and lower affordability levels) when used in combination with state density bonus law, and a potential increase in densities for mixed-income developments where the percentage of affordable housing exceeds the City's Below Market Rate (BMR) housing requirement.

In addition, the City is considering modifying the zoning of the Sharon Heights Shopping Center (located at 325 Sharon Park Drive) to allow a height increase from the existing 30 feet maximum to an up to 80 feet maximum, with a potential corresponding increase in density from a maximum of 30 du/ac to up to 100 du/ac or more.

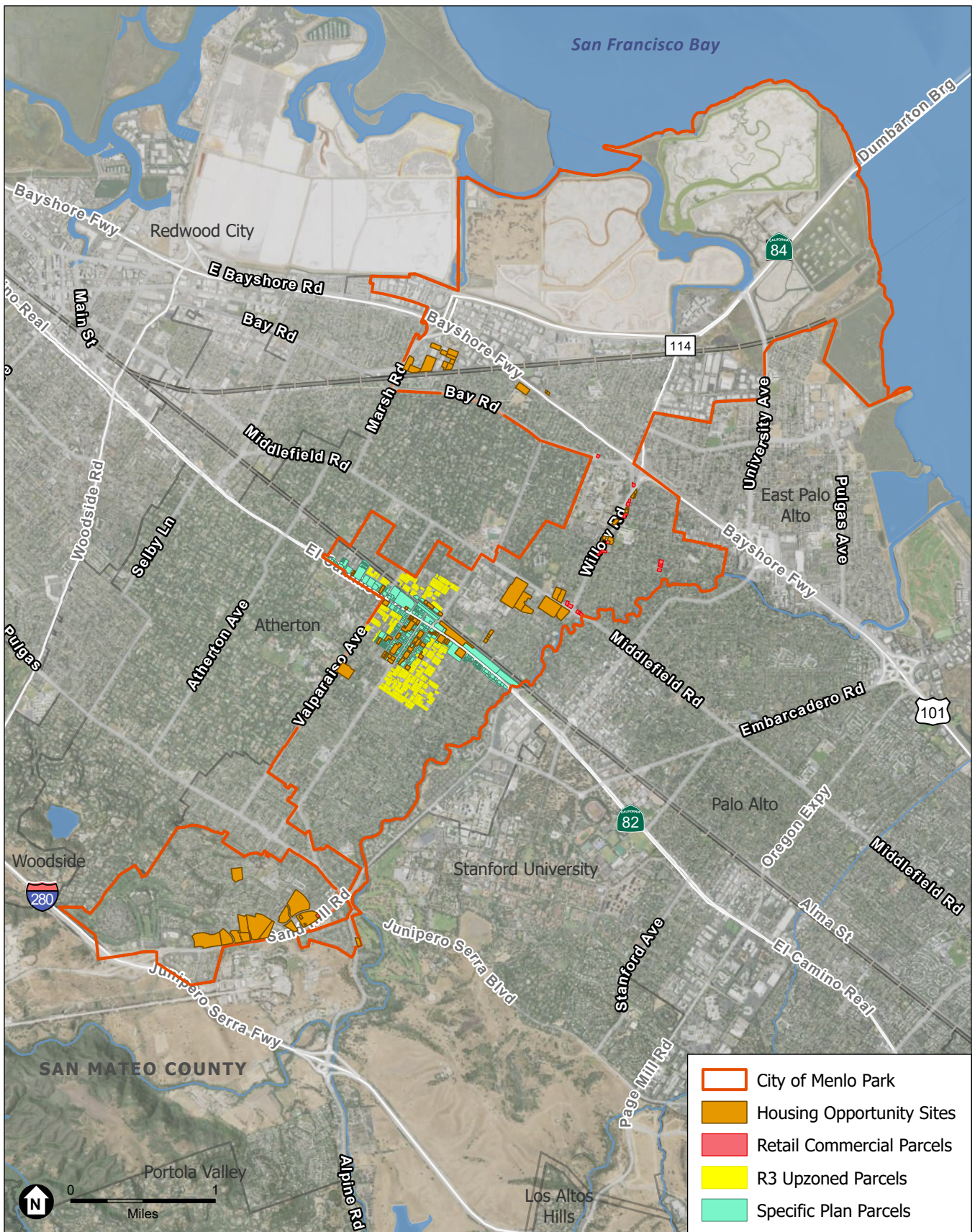
Collectively, these Specific Plan and zoning changes would result in a potential net increase of 862 dwelling units through 2031, with a portion of the increase (142 units) in City Council District 5, which includes Sharon Heights, and 720 units elsewhere in the City. **Figure 1** shows the locations of the various opportunity sites and land use strategy sites identified in the HEU. **Table 1** provides additional detail concerning the potential changes to unit counts by transportation analysis zone (TAZ). In three TAZs, the revised number of units decreased compared to the original unit count due to the removal of certain inventory sites based on City Council direction and reduced expectations for housing development in those TAZs.

Impact Analysis

As described above, the revised housing sites inventory and land use strategies are expected to result in potential production of approximately 862 additional units above the 4,499 units² evaluated in the SEIR, for a total of 5,361 units. The analysis in this Addendum addresses whether these changes to the HEU and/or new circumstances relevant to the project would, as compared to the previously certified SEIR, result in a new significant impact or significant impacts that are substantially more severe than the significant impacts previously disclosed. The Addendum also considers if there is new information of substantial importance showing that the revised project would have one or more significant effects not previously discussed. Finally, the Addendum considers whether any previously examined significant effects would be substantially more severe than the significant effects identified in the SEIR, necessitating preparation of a subsequent EIR or negative declaration.

This Addendum evaluates each topic addressed in the SEIR. The SEIR determined that there would be no impact to agricultural, forestry, and mineral resources potentially resulting from the HEU. In accordance with CEQA Guidelines Section 15128, the SEIR included a brief discussion indicating the reasons why these topics were not discussed in detail (SEIR Section 4.18). Accordingly, this Addendum does not include impact analysis sections for agricultural, forestry, and mineral resources since there would be no change that would necessitate preparation of these analyses.

² As shown in Table 3-5 of the SEIR, the 2023 HEU as evaluated in the SEIR would provide for 4,000 additional units, 85 ADU's, and 414 pending project units, for a total of 4,499 units.



SOURCE: Esri, 2022; M-Group, 2022; ESA, 2022

Menlo Park Housing Element Update SEIR Addendum

Figure 1
Housing Opportunity and Land Use Strategy Sites

TABLE 1: PROPOSED UNIT COUNT CHANGES BY TAZ

TAZ	Original Unit Count	Revised Unit Count	Change
3001	75	111	36
3003	283	422	139
3004	8	13	5
3006	100	90	-10
3007	0	0	0
3009	28	0	-28
3016	11	18	7
3019	76	76	0
3020	0	0	0
3021	41	51	10
3022	21	21	0
3023	160	200	40
3024	185	310	125
3025	313	518	205
3026	199	199	0
3027	371	421	50
3028	60	73	13
3029	54	54	0
3030	83	96	13
3031	60	82	22
3033	41	62	21
3034	0	0	0
3035	22	37	15
3036	0	0	0
3037	177	245	68
3038	0	0	0
3039	11	17	6
3040	18	18	0
3041	56	67	11
3044	49	72	23
3046	155	230	75
3048	780	810	30
3049	3	3	0
3050	18	18	0
3051	133	193	60
3056	30	45	15
3057	74	81	7
3058	38	56	18
3060	25	25	0
3061	85	85	0
3062	427	280	-147
3063	10	10	0
3064	8	17	9
3065	0	0	0
3066	0	0	0
3074	0	0	0
3080	99	123	24
TOTAL	4,387	5,249	862

Aesthetics

In the same manner as the 2016 *ConnectMenlo* EIR, the SEIR determined that aesthetic impacts from the 2023 HEU would be less than significant. This finding was supported by the absence of designated scenic vistas, scenic resources, and State Scenic Highways in the vicinity of the housing development sites. Further, the housing development sites would all be located in areas that are already fully urbanized, and future development associated with the 2023 HEU would be consistent with the already-urbanized setting. In addition, the SEIR found that potential future development in the City 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 and identified in the El Camino Real/Downtown Specific Plan. In addition, the SEIR identified General Plan goals and policies (see Section 4.1.3 of the SEIR) that require local planning and development decisions to consider impacts to aesthetic resources, including scenic vistas.

With respect to potential impacts from new sources of substantial light and glare, the SEIR found that numerous General Plan policies and development regulations are already in place to avoid significant impacts from light and glare. These include general best management practices that require lighting that is context sensitive in style and intensity required under the California Green Building Standards Code of the California Code of Regulations, Title 24, Part 11. The SEIR found that new development in the City would also 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. For example, Policy LU-2.3 requires that the City allow mixed-use projects with residential units if the project design addresses potential compatibility issues such as light spillover. Policy LU-4.3 requires the City to limit parking, traffic, and other impacts of mixed-use and nonresidential development on adjacent uses and promote high-quality architectural design and effective transportation options. Policy LU-6.8 requires the City to encourage extensive and appropriate landscaping in public and private development to maintain the City's tree canopy, which would buffer new development with landscaping and trees. Policy OSC-1.15 requires the protection of Heritage Trees, including during construction activities, through enforcement of the Heritage Tree Ordinance (Chapter 13.24 of the Municipal Code). The preservation of mature trees with substantial tree canopies would diffuse the overall amount of light generated by new development and glare generated by windows of multistory buildings in the areas of Menlo Park with mature trees. Accordingly, the SEIR determined that impacts related to adverse light and glare would be less than significant, and no mitigation would be required.

The revisions to the HEU being assessed in this Addendum would not change these findings. The sites under consideration for higher density development are the same as those evaluated in the SEIR, so the same conclusions as to the absence of scenic resources and the existing urbanized development context remain the same. While the greater development densities under consideration for certain areas could increase building heights, the same General Plan policies and development regulations would still apply to any development in the City and would effectively address the potential for adverse aesthetic effects. Therefore, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related

to aesthetics than previously disclosed in the *ConnectMenlo* EIR or the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects related to aesthetics not previously discussed in the two previous EIRs. For these reasons, impacts related to aesthetics from the proposed HEU revisions would not require the preparation of a subsequent negative declaration or EIR.

Air Quality

In the same manner as the 2016 *ConnectMenlo* EIR, the 2023 SEIR determined that the 2023 HEU would not conflict with or obstruct implementation of the 2017 Bay Area Clean Air Plan, which is the currently applicable air quality plan for the project area. This finding was based on the HEU's required compliance with applicable Clean Air Plan regulations related to transportation, energy, building construction and operation, and water conservation. These same requirements would apply to the revised HEU. The SEIR concluded that the HEU would generally result in dense multifamily housing with many units being located close to transit and/or bicycle/pedestrian facilities and would support the primary goals of the Clean Air Plan through continued implementation of numerous existing regulations that have been established for new developments throughout the City of Menlo Park. These same conclusions are applicable to the revised HEU and would remain unchanged from the conclusions reached in the SEIR.

The SEIR found that the 2023 HEU would result in a cumulatively considerable net increase of criteria air pollutants for which the region is in non-attainment. The SEIR determined that the HEU's effects related to growth in vehicle miles traveled (VMT) in relation to population growth would be positive, and that the HEU's operation effects would also be positive based on the HEU's higher residential densities and subsequent reductions in VMT and most operational emissions. However, the SEIR also determined that criteria pollutant emissions during construction could exceed applicable thresholds, particularly for larger projects. The SEIR therefore conservatively determined that the HEU's effects could be significant and unavoidable, even with mitigation. These same findings would apply to the revised HEU. The HEU's air quality benefits related to VMT reductions and favorable operational effects would still occur. However, criteria emissions exceedances during construction could still occur at similar levels documented in the SEIR.

With respect to exposure of sensitive receptors to pollution concentrations, both the 2016 *ConnectMenlo* EIR and the SEIR found that impacts in this regard would be less than significant. This is a function of the housing opportunity sites locations and their lack of proximity to sources of toxic air contaminants (TACs) such as high-volume roadways and other sources. To conservatively address any worst-case scenarios that could arise during a project's construction, the SEIR prescribed mitigations for future HEU residential projects that could be potentially located near sensitive receptors and exceed applicable standards. The SEIR determined that implementation of these measures would effectively reduce TAC emissions from off-road, diesel construction equipment, and that the impact would be less than significant with mitigation. These same mitigations would also apply to the revised HEU, and the impact would accordingly be less than significant, the same as that found in the SEIR.

Both the 2016 *ConnectMenlo* EIR and the SEIR found that the HEU would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. This is a function of the fact that the residential uses associated with the HEU would not include uses such as wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants that are known to create substantial odor sources. Since the revised HEU would also not include these types of odor-producing uses, this same finding would also apply to the revised HEU, the same as that found in the SEIR.

In summary, the air quality impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. While the increase in potential new units could result in additional construction, the incremental increase in emissions would not materially change the impact conclusions or mitigations in the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to air quality than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to air quality from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Biological Resources

The SEIR found that impacts to biological resources would be less than significant. This is largely a function of the urbanized nature of the HEU's housing opportunity sites and the general lack of sensitive resources thereon. However, the SEIR conservatively carried over the mitigations from the 2016 *ConnectMenlo* EIR that prescribed biological resources assessments of individual residential projects and listed required protocols and processes for avoiding significant effects to biological resources such as sensitive species, riparian communities, sensitive natural communities, wildlife corridors, native nursery sites, and wetlands that could be present on individual sites. The revised HEU would not introduce any new sites that have not already been evaluated in the SEIR, so it can therefore be determined that these same findings would still be applicable and that the revised HEU's impacts would be less than significant with mitigation, the same as that found in the SEIR.

The *ConnectMenlo* EIR and the SEIR both determined that there would be no conflict with local policies and ordinances protecting biological resources. Both EIRs noted that with adherence to General Plan goals and policies in the Land Use Element, Open Space/Conservation Element, the Noise and Safety Element, the City's Tree Preservation Ordinance, and Municipal Code Chapters 12.44, Water-Efficient Landscaping and 13.4, Heritage Trees, no conflicts with local plans and policies would occur, resulting in a less than significant impact. As above, the revised HEU would not introduce any new sites that have not already been evaluated in the SEIR, so it can

therefore be determined that these same findings would still be applicable and that the revised HEU's impacts would be less than significant with mitigation, the same as that found in the SEIR.

In summary, the biological resources impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to biological resources than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to biological resources from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Cultural Resources

Historical Resources

The 2016 *ConnectMenlo* EIR evaluated potential impacts to historical resources including historic buildings. It determined that although General Plan polices were in place to identify and protect historic buildings, there was still a potential for future development to cause a significant impact on historical resources. Mitigation Measure CULT-1 was prescribed, which required evaluation and recordation of buildings more than 50 years old and required that the character-defining features of buildings deemed eligible for the California Register of Historical Resources be preserved. The measure essentially precludes demolition of eligible structures, which the City concluded was unlikely to present a substantial constraint on development in the Bayfront Area (the area north of US-101 that was the focus of *ConnectMenlo*) since the area was determined to contain no such structures. However, as determined in the SEIR, development under the HEU would have the potential to result in more severe impacts since it covers the entire City of Menlo Park, whereas the *ConnectMenlo* EIR was restricted to the Bayfront Area. As described in the SEIR, of the 74 potential housing opportunity sites, one includes a National Register-listed property³, 10 are vacant (no buildings are present), and 24 have buildings that are historic-era that have not yet been evaluated. It is also likely that there are additional historic resources outside of the housing opportunity sites, but within the boundary of the City. Furthermore, in the future additional sites and buildings may qualify for consideration (i.e., 45 years old or older) as historic resources at the time they are proposed for redevelopment.

The SEIR prescribed mitigation to address this potentially significant impact. The measures required evaluations of age-eligible buildings, identification of character-defining features, and recordation of identified historic resources prior to demolition or alteration. Ultimately, however,

³ As indicated in Section 4.4.2 of the SEIR, the NRHP-listed property is the Menlo Park Department of Veterans Affairs Medical Center complex at 795 Willow Road. Proposals have been advanced to place housing on undeveloped portions of the site, or in parking areas. No direct impacts to listed structures are proposed at the site.

the SEIR found that even with implementation of these requirements, historic resources could still be lost, which would result in a significant and unavoidable impact.

Since the revised HEU concerns the same sites as those evaluated in the SEIR, this same finding is therefore also applicable to the revised HEU. That is, the loss of identified historic resources resulting from residential development under the revised HEU would have a significant and unavoidable impact, even with mitigation. This finding is identical to that found in the SEIR.

Archaeological Resources

The 2016 *ConnectMenlo* EIR determined that impacts to archaeological resources would be less than significant, with mitigation. This finding was based on the lack of known archaeological resources in the Bayfront Area, which was a focus of the *ConnectMenlo* project, together with standard compliance regulations concerning the treatment of previously unknown archaeological resources if discovered during project construction. The *ConnectMenlo* EIR prescribed mitigations to ensure compliance with these requirements and thus determined that the project's effects would be less than significant, with mitigation.

The SEIR noted that the 2016 mitigation measures did not conform with current best practices with respect to inadvertent discovery of archaeological resources and human remains. The measures were therefore updated to conform to the most current standards, and included requirements related to cultural resources investigations, subsequent treatment protocols, and the treatment of resources and human remains if found during construction. The SEIR ultimately determined that the HEU's impacts would be less than significant, with mitigation.

Since the revised HEU concerns the same sites as those evaluated in the SEIR, this same finding is therefore also applicable to the revised HEU. That is, the impacts to archaeological resources and human remains from residential development under the revised HEU would be less than significant, with mitigation. This finding is identical to that found in the SEIR.

Conclusion

In summary, the cultural resources impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to cultural resources than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to cultural resources from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Energy

Preparation of the 2016 *ConnectMenlo* EIR predated the inclusion of energy as a topic in Appendix G of the CEQA Guidelines. While some elements of energy use were evaluated in Section 4.14, *Utilities and Service Systems*, of that EIR, the issues discussed were considerably different from those now listed under the revised Appendix G checklist. Therefore, the SEIR did not evaluate the HEU's impacts against those evaluated in the *ConnectMenlo* EIR. Rather, the SEIR evaluated the HEU's effects as measured against the thresholds defined in the Appendix G checklist in effect at the time of the SEIR's preparation. That analysis found that the HEU's impacts with respect to wasteful, inefficient, or unnecessary consumption of energy resources and conflicts with state and local plans for renewable energy or energy efficiency would be less than significant. This finding was based on compliance with applicable local and State policies and regulations, such as those related to energy-efficient construction equipment, building codes, and household appliances. The SEIR also found that the HEU's favorable effects related to VMT would further reduce the HEU's energy impacts. Finally, the SEIR also noted that the HEU would also be required to comply with greenhouse gas emissions mitigations (see the analysis of that topic below), which would ensure that all future projects proposed for development under the HEU would be consistent with the BAAQMD's updated GHG thresholds and would further reduce use of gasoline and diesel fuels during operation.

These same findings would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply, as would compliance with prescribed GHG mitigations. The energy impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to energy use than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to energy from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Geology, Soils, and Seismicity

Both the 2016 *ConnectMenlo* EIR and the SEIR determined that required compliance with numerous existing laws, regulations, and General Plan policies that govern the required geotechnical testing of geotechnical conditions at building sites and the development of geotechnical recommendations to address seismic shaking and seismic-induced ground failures would ensure structures are designed to withstand seismic shaking and seismic-induced ground failures. Accordingly, both EIRs determined that project implementation would result in less-than-significant impacts with respect to the seismic shaking and seismic-induced ground failures. These same requirements and findings would also apply to implementation of the revised HEU.

Similarly, the *ConnectMenlo* EIR and the SEIR both determined that required compliance with numerous existing laws, regulations, and General Plan policies that govern construction activities and the design of erosion prevention measures would prevent substantial soil erosion or the loss of topsoil. Accordingly, both EIRs determined that project implementation would result in less-than-significant impacts with respect to substantial soil erosion or the loss of topsoil. These same findings apply to implementation of the revised HEU.

Both the *ConnectMenlo* EIR and the SEIR also determined that compliance with existing laws, regulations, and standard design and engineering protocols would effectively address potential effects related to unstable geologic units, unstable soils, expansive soils, landslides, lateral spreading, subsidence (i.e., settlement), liquefaction, and collapse. These same findings apply to implementation of the revised HEU.

The *ConnectMenlo* EIR and the SEIR also evaluated project effects on paleontological resources, and both EIRs found that the impact would be less than significant. The analysis in both documents pointed to existing regulations that address impacts to these resources, and also prescribed mitigations to address inadvertent finding of paleontological resources during construction. The prescribed measure would provide a mechanism to stop work in the event that a paleontological resource is discovered and enable an evaluation of the discovery by a qualified paleontologist. The paleontologist would be qualified to determine the significance of the find and would prepare and implement an excavation plan to preserve the paleontological resource, if significant. Both EIRs determined that implementation of the prescribed measure would reduce the significance of the impact to a Less than Significant Impact, with Mitigation. This same finding would apply to implementation of the revised HEU.

Each of the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The geology and soils impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to geology and soils than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to geology and soils from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Greenhouse Gas Emissions

The 2016 *ConnectMenlo* EIR determined that the proposed General Plan Update would result in a substantial increase in GHG emissions from existing conditions by the proposed General Plan horizon year 2040 and would not achieve the 2040 efficiency target, based on a trajectory to the 2050 goal of an 80 percent reduction from 1990 levels pursuant to Executive Order (EO) S-03-05.

The EIR determined that additional state and federal actions would be necessary to ensure that state and federally regulated sources (i.e., sources outside the City's jurisdictional control) take similar aggressive measures to ensure the deep cuts needed to achieve the 2050 target. The *ConnectMenlo* EIR identified mitigation measures requiring the City to update its Climate Action Plan prior to January 1, 2020 to address the GHG reduction goals and set targets to comply with EO B-30-15 and EO S-03-05 for GHG sectors that the City has direct or indirect jurisdictional control over. The City adopted an updated 2030 Climate Action Plan in July 2020.

The SEIR determined that GHG emissions from housing development allowed under the HEU and development of associated infrastructure to support that development would result in both direct and indirect emissions from construction and operational activities. Direct GHG emissions would be generated during construction including emissions from the combustion of fuel (e.g., gasoline and diesel) in construction equipment and vehicles. Indirect GHG emissions during construction would be generated from electricity used to power any electric construction equipment, lighting at construction sites and for conveyance of water used for dust suppression activities. Upon completion of construction, housing projects would generate direct GHG emissions from area sources (such as landscaping equipment), on-road motor vehicle trips, and natural gas usage in homes. While the City's Reach Codes prohibit natural gas in all new construction for space and water heating, the code allows certain exceptions for cooking appliances and fireplaces in residences. Indirect operational GHG emissions would be generated from the increase in electricity use associated with building energy use along with water and wastewater treatment and conveyance. The SEIR's evaluation of GHG impacts used the Bay Area Air Quality Management District's (BAAQMD) updated GHG thresholds to address the two main direct sources of GHG emissions in land use development projects: building energy use and motor vehicle trips.

The SEIR's analysis described the City's Reach Code requirements that essentially preclude the use of natural gas in future residential projects. The SEIR noted that since the Reach Codes provide for exceptions to this rule, any project proposing natural gas usage (relying on the Reach Code exception) could result in a CEQA finding of a significant unavoidable impact (inconsistency with BAAQMD prohibition), which would therefore require that an EIR be prepared for the project. The City would then be required to establish a finding of overriding considerations to support project approval.

The SEIR discussed requirements to avoid wasteful, inefficient, or unnecessary electrical usage, such as those contained within Title 24 energy efficiency standards, CALGreen Tier 2 standards, and the inherent location of many of the HEU sites in areas with access to transit which would also ensure that electricity usage associated with building energy use and transportation would not be wasteful, inefficient, or unnecessary. The SEIR also pointed to the HEU's consistency with the SB 743 VMT Reduction Target of 15 percent below the regional average.

The SEIR then determined that, with mitigation, implementation of the HEU would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The SEIR evaluated the HEU's consistency with the CARB 2017 Scoping Plan, SB 32, EO S-3-05, Plan Bay Area, and Menlo Park's Climate Action Plan. The SEIR

conservatively prescribed mitigation to ensure that all future HEU projects would be consistent with BAAQMD's updated GHG significance thresholds. Compliance with these thresholds would mean that these projects would not generate GHG emissions that would conflict with the State's GHG reduction goals or plans and policies in place to achieve these goals.

Each of the findings described above would also apply to the revised HEU. The same compliance with established policies, regulatory requirements, and mitigations would still apply. The GHG impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to GHG emissions than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to GHG emissions from the revised HEU would not require the preparation of a subsequent negative declaration or EIR.

Hazards and Hazardous Materials

Both the 2016 *ConnectMenlo* EIR and the SEIR determined that required compliance with numerous existing laws, regulations, and General Plan policies that govern the testing, handling, removal, and disposal of hazardous materials would limit the potential for creation of hazardous conditions due to the routine use or accidental release of hazardous materials. Both EIRs also determined that the required compliance with numerous existing laws, regulations, and General Plan policies that govern the testing, handling, removal, and disposal of hazardous materials would limit the potential for creation of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. These same findings would apply to implementation of the revised HEU.

The SEIR evaluated each of the HEU's housing opportunity sites in relation to areas of known hazardous materials contamination. The SEIR noted that there are known hazardous materials release sites on or adjacent to potential housing opportunity and land use strategy sites. These hazardous materials release sites could contain contaminated soil and/or groundwater as a result of previous land uses. During construction, potential to encounter previously unknown contaminated soil would be present, and, if dewatering is needed, groundwater. Under such a scenario, construction workers, the public, and the environment could be exposed to hazardous materials and the impact could be potentially significant. As with the above discussions, the SEIR noted that there are numerous regulations covering the transportation, use, storage, and disposal of hazardous materials during construction activities. The required compliance with these regulations would reduce exposure to hazardous materials. As was also done in the *ConnectMenlo* EIR, the SEIR prescribed mitigations to further ensure that contaminated materials are properly handled and that any development on sites near known release sites would be

required to implement an Environmental Site Management Plan and a Vapor Intrusion Assessment. Per standard regulatory requirements, development would not be allowed to occur until a No Further Action Required determination was made by applicable regulatory agencies. Thus, significant impacts related to hazardous materials would be avoided and the impact would be less than significant. This same finding would apply to implementation of the revised HEU.

Finally, the SEIR evaluated the HEU's impacts on emergency response and emergency evacuation, finding again that existing City codes and other requirements would lessen the HEU's effects on emergency response and evacuation, particularly during construction. This same finding would apply to implementation of the revised HEU.

The revisions to the HEU being assessed in this Addendum would not change these findings. The sites under consideration for higher density development are the same as those evaluated in the SEIR, so the same conclusions related to hazardous materials and emergency evacuation and response remain the same. Therefore, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to hazards and hazardous materials than previously disclosed in the *ConnectMenlo* EIR or the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects related to hazards and hazardous materials not previously discussed in the two previous EIRs. For these reasons, impacts from the proposed HEU revisions would not require the preparation of a subsequent EIR or negative declaration.

Hydrology and Water Quality

Hydrological and water quality related impacts were evaluated in both the 2016 *ConnectMenlo* EIR and the SEIR. Both EIRs found that impacts would be less than significant, with the findings principally based on compliance with established regulations, best management project, and development standards. For instance, construction projects that result in one or more acres of ground disturbance, or less than one acre but would be part of a larger plan of development or sale, would be required to obtain coverage under the NPDES Construction General Permit. Preparation of a SWPPP, along with its implementation during construction, is required to comply with the NPDES Construction General Permit. Moreover, development projects would be subject to controls and requirements described in the Menlo Park Municipal Code. Specifically, development projects would be required to submit a grading and drainage plan and an erosion and sediment control plan and implement best management practices (BMPs) to control stormwater runoff during construction. If subsurface excavation would require dewatering of groundwater, coverage under the construction dewatering general permit or waste discharge requirements would also be required. Additional requirements related to project operation would also be in effect, such stormwater management requirements and Low Impact Development design measures for stormwater capture and pretreatment. These requirements would reduce impacts to less than significant levels, and these same requirements would also apply to the revised HEU. It thus follows that the revised HEU would result in the same less than significant effects.

The *ConnectMenlo* EIR concluded that implementation of the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that a net deficit in aquifer volume or a lowering of the local groundwater table level would

occur. Although the *ConnectMenlo* EIR was drafted before the Sustainable Groundwater Management Act went into effect, the requirements for groundwater sustainability planning are not applicable for the San Mateo Plain subbasin, which is a very low priority groundwater subbasin. These findings were also found in the SEIR, and therefore also apply to the revised HEU.

The SEIR evaluated effects related to flood zones, tsunami hazard areas, and dam inundation zones and determined that impacts would be less than significant would not risk release of pollutants due to project inundation and determined that impacts would be less than significant because none of the housing opportunity sites are located in those hazard areas. Since the revised HEU does not propose any new housing opportunity or land use strategy sites that differ from those assessed in the SEIR, the SEIR's previous findings would also be applicable to the revised HEU.

In summary, each of the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The hydrology and water quality impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to hydrology and water quality than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to hydrology and water quality from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Land Use and Planning

Both the 2016 *ConnectMenlo* EIR and the SEIR found that neither project would physically divide an established community. The *ConnectMenlo* EIR and the SEIR listed a number of General Plan policies related to future development, and determined that existing and proposed goals, policies, programs, and zoning regulations would provide the long-term planning framework for orderly development of the City. Both EIRs determined that future development would generally retain the existing roadway patterns and could include circulation improvements such as new streets, paseos, access points, sidewalks and bike paths that would improve circulation. The analysis noted that these improvements would not include any new major roadways or other physical features through parcels designated for residential use or other communities that would create new barriers in the City. Therefore, both EIRs found that the projects would not divide an existing established community. These same findings apply to implementation of the revised HEU. Development of new housing units under the revised HEU would promote coordinated land use patterns within the City, and would conform to the City's revised zoning allowances, in response to the City's Regional Housing Needs Allocation (RHNA) and State law, which requires the City to identify sufficient housing sites to accommodate the City's RHNA.

As with the development assessed in the *ConnectMenlo* EIR and the SEIR, development under the revised HEU would not alter the physical layout of the City such that movement within or across the housing sites or the City would be obstructed. Like the HEU analyzed in the SEIR, the revised HEU does not propose any roadways, such as freeways, that would divide the City or isolate individual neighborhoods within it. In addition, future development would occur per the requirements established under Title 16 of Menlo Park's Municipal Code, and as part of the City's project approval process, would be required to comply with existing regulations and General Plan policies. Based upon each of these considerations, implementation of the revised HEU would not physically divide an established community, and the impact would therefore be less than significant. This is the same determination as that found in the SEIR.

The *ConnectMenlo* EIR and the SEIR also found that the project would not 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. Both EIRs noted that the analysis addressed future development consistency with the General Plan and how each project was consistent with other applicable land use plans, policies, and regulations that focus on land use and planning. As with the General Plan and zoning updates discussed in the *ConnectMenlo* EIR, the proposed updates associated with the HEU are intended to ensure consistency between the General Plan and Zoning Ordinance. Because the General Plan is the overriding planning document for the City, and because the HEU includes amending the General Plan and Zoning Ordinance to increase consistency, consistency impacts in this regard would be less than significant.

To ensure consistency with the General Plan, the SEIR prescribed mitigation to require that consistency with the General Plan be demonstrated for each residential project that could be advanced under the HEU. The mitigation required that prior to individual project approval, as part of the project application process, future development in Menlo Park be required to demonstrate consistency with the applicable goals, policies, and programs in the General Plan and the supporting Zoning standards. A future project would be consistent with the General Plan and Zoning standards if, considering all its aspects, it would further the goals, policies, and programs of the General Plan and supporting Zoning standards and not obstruct their attainment. These same requirements would apply to the revised HEU.

Each of the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The land use and planning impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to land use and planning than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these

reasons, impacts related to land use and planning from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Noise and Vibration

The 2016 *ConnectMenlo* EIR found that the project would have a substantial adverse effect with respect to future projects in Menlo Park resulting in construction-related noise that could exceed noise limits required under the City's regulations, which considered commercial and industrial development and the possibility of impact pile driving. To address this potential impact, the *ConnectMenlo* EIR identified Mitigation Measure NOISE-1c to require project applicants to 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. Specifically, the mitigation measure required a mechanism by which the owner/developer would be responsible for requiring contractors to implement a menu of measures to limit construction-related noise.

The SEIR found that the above impacts could be effectively mitigated through refined mitigation. These would include restrictions on construction hours (already required under the City's Noise Ordinance), demonstration of construction noise abatement measures, installation of sound barriers if needed, maintenance of construction equipment, and other requirements. The SEIR ultimately found that construction noise impacts of subsequent projects would be reduced to less than significant with mitigation by incorporating best construction noise management practices as outlined in the prescribed mitigation. These same requirements would also apply to the revised HEU.

The SEIR also found that operational noise impacts would be less than significant. This finding was based on the low levels of noise associated with residential development, and compliance with City requirements for maximum noise levels for roof-mounted equipment such as HVAC systems. Specifically, such mechanical equipment (air conditioning equipment, ventilation fans, vents, ducting, or similar equipment) is prohibited from generating a noise level in excess of 50 dBA at a distance of 50 feet from such equipment. In addition, such equipment is required to be screened from view as observed at an eye level horizontal to the top of the roof-mounted equipment, except for the SP-ECR/D district which has unique screening requirements. Based on these requirements, the SEIR found that operational noise impacts would be less than significant. These same requirements would apply to the revised HEU, and it thus follows that the revised HEU's effects would also be similar.

The SEIR then assessed groundborne vibration effects from the HEU's implementation and also determined that those impacts would be less than significant. The analysis found that construction activities at distances of 25 feet or further from the nearest existing buildings would be well below the threshold of 0.25 PPV to avoid structural damage to historic and older buildings. Based on established building setbacks and other requirements, the low likelihood of use of heavy equipment most likely to produce excessive levels of vibration, and other requirements, groundborne vibration impacts would be less than significant. For these reasons, project-related construction and operational groundborne vibration impacts would be less than significant. These same findings would also apply to the revised HEU.

The SEIR also evaluated impacts associated with increased roadway noise that could result from implementation of the HEU. Modeling was conducted to determine the likely effects of increased automobile traffic brought about by development of residential projects made possible by the HEU. The analysis found that increases in noise levels would range from 0.1 dBA to 0.9 dBA. The SEIR noted that the smallest increase in loudness perceptible by the human ear is 3 dBA and increases of 5 dBA or greater are clearly perceptible. The HEU's increase in traffic noise levels would be well below those amounts. It was therefore determined that adoption of the HEU would have a less than significant impact with respect to operational roadway noise.

The SEIR also evaluated noise effects from airport operations. The SIR noted that a small portion of Menlo Park falls within two miles of Palo Alto Airport, but that no portion of the City is covered by the airport's influence area, nor is it within the airport's 55 dB noise contour. All other airports are located 4 or more miles away from the City. As such, there would be no noise impacts from airport operations. This same finding would also apply to the revised HEU.

In summary, each of the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The noise and vibration impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to noise and vibration impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to noise and vibration impacts from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Population and Housing

Both the 2016 *ConnectMenlo* EIR and the SEIR determined that impacts from substantial unplanned population growth, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) would be less than significant. In both EIRs, it was determined that additional development in the City would occur in a manner that would be consistent with the City's General Plan, as amended. For the HEU, it was also noted that development of new housing units would be conducted in response to the City's RHNA allocation, which is in itself a plan to meet the housing needs of the area's current and future planned population. Ultimately, development of new housing units under the HEU would promote coordinated land use patterns within the City, and would conform to the City's revised zoning allowances, in response to the ABAG's RHNA allocation and State law, which requires the City to identify sufficient housing sites to accommodate the City's RHNA allocation. By definition, such development would be "planned" rather than unplanned and would

conform to the City's zoning code and General Plan as amended, as well as the ABAG RHNA Plan. This same finding would also apply to the revised HEU.

The SEIR also determined that the HEU would not displace substantial numbers of people or housing that would necessitate construction of replacement housing elsewhere. The SEIR noted that much of the developable area of the City is already developed, and nearly all the parcels identified for upzoning as part of the HEU are already developed with some sort of use, typically office or commercial. However, the City's General Plan contains a number of policies to limit the conversion of existing residential areas to non-residential uses. Policy LU-2.7, for example, limits the loss in the number of residential units or conversion of existing residential units to nonresidential uses. Policy H4.1 requires City planning efforts to identify opportunity sites and areas where a special effort will be made to provide affordable housing consistent with other General Plan policies. The policy identified specific characteristics that housing opportunity sites must possess, and these characteristics were incorporated into the sites identified as part of the HEU. Policy H4.8 directs the City to retain and expand multi-family and higher density sites, and to avoid rezoning multi-family residential land for other uses or to lower densities without redesignating equivalent land for multi-family development. Policy H-4.12 directs the City to distribute higher density residential developments throughout the City, particularly near public transit and major transportation corridors in the City.

The SEIR determined that the HEU would support each of these policies, in that the HEU would not redesignate or rezone an existing residential area to a nonresidential use. In general, just the opposite would occur, since the HEU would generally upzone existing sites to accommodate more housing. Therefore, there would be no conversion of housing uses to non-housing uses and residential displacements would not occur. Ultimately, the number of housing units in the City would increase and would help to address the region's housing needs. As such, the effect would generally be beneficial in nature, and the impact would be less than significant. This same finding would also apply to the revised HEU.

In summary, each of the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The population and housing impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to population and housing impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to population and housing impacts from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Public Services and Recreation

The 2016 *ConnectMenlo* EIR and the SEIR both found that the project would not result in the need for new or physically altered fire protection, police, school, recreational, or library facilities, the construction of which could cause significant environmental impacts. While both EIRs acknowledged that both projects would introduce new residents and employees over the life of the projects, and that those increases would likely result in heightened demand for public service facilities, both EIRs concluded that compliance with existing regulations, payment of impact fees and taxes, incremental development of the new units over time across a wide area of the city, compliance with environmental requirements, and the likelihood that some developments would include open spaces and recreational facilities of their own, would ensure that the overall impact would be less than significant. These same findings would also apply to the revised HEU. The public services and recreation impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to public services and recreation impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to public services and recreation impacts from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Transportation

The 2016 *ConnectMenlo* EIR found that the development potential under *ConnectMenlo* would generate new transit riders, bicyclists, and pedestrians, and that implementation of *ConnectMenlo* and other existing City standards and regulations would include goals, policies, and programs that provide for an integrated network of bicycle and pedestrian facilities as well as for the needs of transit users. Further, the EIR found that future development would be concentrated on sites either already developed and/or in close proximity to existing development, and would be served by existing transit, bicycle, and pedestrian infrastructure. However, since much of the anticipated development under the *ConnectMenlo* project would occur in the Bayfront Area, including properties located north of US-101 that are not adequately connected to the pedestrian and bicycle circulation network locally or south of US-101, and properties bordering existing streets such as Constitution Drive that lack continuous sidewalks, the *ConnectMenlo* EIR found that implementation of *ConnectMenlo* would not provide adequate pedestrian or bicycle facilities to connect to the area-wide circulation system. Mitigation Measure TRANS-6a was provided to update the City's Transportation Impact Fee (TIF) program to secure a funding mechanism for future pedestrian and bicycle improvements to mitigate impacts from future projects (based on the current standards at the time the *ConnectMenlo* EIR was certified) but did not reduce the impact to less than significant levels because the nexus study (pursuant to AB 1600) had not yet

been prepared, the City could not guarantee improvements, and no additional mitigation measures were feasible and available. For these reasons, the EIR concluded that implementation of *ConnectMenlo* would not provide adequate pedestrian or bicycle facilities to connect to the area-wide circulation system and the impact was considered significant and unavoidable.

Subsequently, the City's TIF program was updated and approved by the City Council. The City's Transportation Master Plan has also been updated, and the City Council approved the updated plan on November 17, 2020. However, the identified bicycle and pedestrian improvements would not be fully funded by the TIF. The SEIR therefore determined that the *ConnectMenlo* impact would remain. The SEIR determined that while most of the HEU's units would be located south of US-101, the units included in the HEU north of US-101 (in the Bayfront area) would contribute to the identified impact that was caused by the proposed development in the Bayfront area. Therefore, the SEIR determined that the HEU's impact on bicycle and pedestrian facilities would also be significant and unavoidable. This same finding would also apply to the revised HEU.

With respect to transit impacts, the *ConnectMenlo* EIR found that implementation of *ConnectMenlo* would generate a substantial increase in transit riders that could not be adequately serviced by existing public transit services, and the implementation of *ConnectMenlo* would generate demand for transit services at sites more than one-quarter mile from existing public transit routes. Mitigation Measure TRANS-6b was provided to update the City's existing Shuttle Fee program to guarantee funding for operations of City sponsored shuttle service that is necessary to mitigate impacts from future projects based on the then-current City standards. Implementation of Mitigation Measure TRANS-6b was found to reduce the impacts but not to a less than significant level. As the nexus study (pursuant to AB 1600) had not yet been prepared, the City could not guarantee improvements, and no additional mitigation measures were feasible and available. For these reasons, the impacts to transit were considered significant and unavoidable. However, the State's current guidance regarding implementation of SB 743 indicates that increased transit demand is no longer considered an adverse effect under CEQA. As such, a finding of a less than significant impact was determined for the HEU in the SEIR, and this same finding would also apply to the revised HEU.

The *ConnectMenlo* EIR found that implementation of *ConnectMenlo* would result in increased peak hour traffic delay at intersections on Bayfront Expressway, University Avenue, and Willow Road that could decrease the performance of transit service and increase the cost of transit operations. Mitigation Measure TRANS-6c was provided to potentially result in the provision of transit service on the Dumbarton Corridor to mitigate the impact. However, because provision of Dumbarton transit service would require approval of other public agencies and would not be under the jurisdiction of the City of Menlo Park, implementation of this mitigation could not be guaranteed. No additional mitigation measures were found to be feasible and available. For these reasons, the impacts to transit were considered significant and unavoidable. However, with the transition to using VMT rather than LOS, vehicle delay is no longer considered an adverse effect under CEQA, which instead considers whether transit routes would be blocked, or whether there would be safety issues or conflicts with applicable plans. While the HEU proposed development potential above and beyond *ConnectMenlo* without any increase in transit service, the development would not physically block transit routes, create an obvious safety issue, or conflict with an

applicable transit plan and therefore the SEIR found that the HEU's impact on transit facilities would also be less than significant. This same finding would also apply to the revised HEU.

With respect to impacts related to VMT, the 2016 *ConnectMenlo* EIR preceded implementation of SB 743 and therefore a finding relative to VMT was not made. The SEIR evaluated VMT within the context of current State guidelines and determined that higher densities proposed under the HEU and their general proximity to quality transit facilities would have a beneficial effect to VMT and that VMT could generally be expected to meet applicable targets. However, the SEIR determined that future individual development projects allowed by the HEU that are subject to additional review and do not screen out of a VMT analysis would require a separate, project-specific VMT analysis. This analysis, which would be based on characteristics of the proposed project and its location, could result in exceedances of the VMT criteria of 15 percent below the regional average VMT per capita, particularly for housing sites that have limited access to transit. For this reason, the impact of the HEU was conservatively considered Potentially Significant, requiring mitigation. The SEIR prescribed mitigation that requires individual multifamily housing development proposals that do not screen out from VMT impact analysis to provide a quantitative VMT analysis using the methods outlined by the City's most recent VMT guidelines. Projects found to result in a significant impact would be required to implement travel demand management measures and/or physical measures (i.e., improving multimodal transportation network, improving street connectivity) to reduce VMT. The measure provided a list of potential VMT reduction measures. Ultimately, the SEIR determined that the prescribed VMT reduction measures would lessen an individual project's VMT impacts, but that the effectiveness of the measures in reducing an individual project's VMT impact to a less than significant level could not be determined until the specific characteristics of the project are known. As such, the SEIR concluded that the impact for projects that would not screen out from VMT impact analysis would conservatively remain significant and unavoidable with mitigation. This same finding would also apply to the revised HEU.

The SEIR also investigated the HEU's impacts on circulation design standards and emergency access to development sites. For both impacts, the SEIR determined that subsequent projects under the HEU, including any new roadway, bicycle, pedestrian, and transit infrastructure improvements would be designed according to *ConnectMenlo* and other City standards and subject to existing regulations that are aimed at reducing hazardous conditions with respect to circulation. Additionally, future development would be concentrated on sites that are already developed where impacts related to incompatible traffic related land uses would not be likely to occur. Therefore, the SEIR determined that the HEU would result in a less than significant impact related to transportation hazards. A similar finding was found for emergency access. The SEIR determined that *ConnectMenlo* and other City standards and regulations include policies that would ensure efficient circulation and adequate access are provided in the City, which would help facilitate emergency response. Additionally, future development would be concentrated on sites that are already developed where impacts related to inadequate emergency access would not likely occur.

Additional vehicles associated with new development sites could increase delays for emergency response vehicles during peak commute hours. However, emergency responders maintain

response plans that include use of alternate routes, sirens, and other methods to bypass congestion and minimize response times. In addition, California law requires drivers to yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes to ensure the safe and timely passage of emergency vehicles. Based on the above considerations, the SEIR determined that adequate emergency access would be provided to new development sites, and the impact would be less than significant. This same finding would also apply to the revised HEU.

In summary, each of the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The transportation impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to transportation impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to transportation impacts from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Tribal Cultural Resources

The 2026 *ConnectMenlo* EIR did not identify any archaeological resources within the City but did identify Native American remains in the study area. The *ConnectMenlo* EIR found that it was ‘highly improbable’ that archaeological deposits dating to the pre-contact or historic era exist on the locations that were identified for future development, which was focused on the Bayfront portion of the City. The *ConnectMenlo* EIR stated that General Plan goals and policies and compliance with federal, State, and local laws and regulations would protect recorded and unrecorded archaeological deposits in the study area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. However, the *ConnectMenlo* EIR did note that there was the potential for unrecorded archaeological resources to be significantly impacted.

For the SEIR’s analysis, a records search of the housing opportunity sites and land use strategy sites and the wider Menlo Park City boundary identified previously recorded archaeological resources within both of these areas. Given the long history of pre-contact and historic-age human occupation, the City is considered sensitive for the presence of subsurface pre-contact Native American cultural resources and human remains. Additionally, there may be previously unknown buried archaeological resources and/or tribal cultural resources that have not been recorded. No tribal cultural resources have been identified during tribal consultation. However, the Native American Heritage Commission (NAHC) Sacred Lands File search had a positive result for sacred lands within the HEU housing opportunity sites and land use strategy sites.

The SEIR noted that recent revisions to the Public Resources Code and the Government Code by AB 52 and AB 168 (SB 35) require local governments to consult with tribes during the review process for CEQA and for housing development projects that would otherwise be exempt from CEQA under changes made to the Government Code by SB 35.

The *ConnectMenlo* EIR found that there was a potential for the project to significantly impact tribal cultural resources and determined that implementation of Mitigation Measures CULT-2a, CULT-2b, and CULT-4 would mitigate potential impacts to a less than significant level. As stated previously in this Addendum under the discussion for cultural resources, *ConnectMenlo* EIR Mitigation Measures CULT-2a and CULT-2b do not conform to current best practices with respect to inadvertent discovery. Therefore, the SEIR prescribed that the *ConnectMenlo* Mitigation Measures CULT-2a and CULT-2b be replaced with Mitigation Measures CR-2a and CR-2b to address potential impacts to archaeological resources. Mitigation Measure CULT-4 from the *ConnectMenlo* EIR was determined to be sufficient to address potential impacts to human remains and was therefore adopted as part of the SEIR as Mitigation Measure CR-3.

While no tribal cultural resources were identified within the housing opportunity sites and land use strategy sites as a result of tribal consultation, the SEIR noted that there is the potential for previously unknown archaeological resources or human remains that are also tribal cultural resources to be impacted by the residential development and this impact would be potentially significant. Implementation of the above mitigation measures would reduce these potential impacts to less than significant levels. These same mitigations and findings would apply to the revised HEU, and the impact of the revised HEU would therefore be the same as that found in the SEIR.

In summary, the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The tribal cultural resources impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to tribal cultural resources impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to tribal cultural resources impacts from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Utilities and Service Systems

The 2016 *ConnectMenlo* EIR found that impacts related to the construction or relocation of utilities were less than significant as it was expected that the City would implement General Plan programs that require expansion of conservation programs and future development to employ green building best practices. The SEIR determined that these same findings would apply to implementation of the HEU, and the same findings would also apply to the revised HEU.

A Water Supply Assessment was prepared for the two water purveyors that would serve the HEU housing opportunity and land use strategy sites. The analysis determined that while water supply shortfalls are projected in single dry and multiple dry years with implementation of the Bay-Delta Plan Amendment, these projected shortfalls could be overcome through the San Francisco Public Utility Commission's various projects, programs, and plans and further addressed through implementation of the water shortage contingency plans (WSCPs) by Menlo Park Municipal Water (MPMW) and Cal Water's Bear Gulch District. In addition, development under the HEU would be required to adhere to all applicable regulations that promote water conservation and water use efficiencies. While results of the water supply projects, programs, and plans and demand reductions could not be quantified, the SEIR determined that it was reasonable to expect that many of the projects, programs, and plans would be successful and additional water supplies and demand reductions could be obtained. For these reasons, the SEIR determined that implementation of the HEU would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal years. In single dry and multiple dry years, demand management measures (DMMs) and implementation of the WSCPs by MPMW and Cal Water's Bear Gulch District would further reduce demand to meet the water supply shortage. While the increase in potential new units could result in additional water demand, the incremental increase in demand would not materially change the impact conclusions or mitigations in the SEIR, and the impact would remain less than significant.

Wastewater impacts associated with the HEU were also evaluated in the SEIR. The analysis determined that more than adequate wastewater treatment capacity was available to service the HEU, and that wastewater flows associated with the HEU would represent a very small percentage of the total daily wastewater capacities of the local treatment facilities. A similar determination was made in relation to solid waste disposal, as it was found that adequate landfill capacity was available to serve the additional solid waste produced by the HEU's new residential units. These same findings would also apply to the revised HEU; wastewater treatment and landfill disposal capacity is adequate to handle incremental increases from additional units.

In summary, the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The utilities and service systems impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to utilities and service systems impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to utilities and service systems impacts from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Wildfire

The 2016 *ConnectMenlo* EIR found that the project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The EIR found that the project would not include potential land use changes that would impair or physically interfere with the ability to implement the City's Emergency Operations Plan. The EIR further found that the Land Use and Circulation Elements, which were adopted as part of the *ConnectMenlo* project, and the existing Open Space/Conservation, Noise and Safety Elements contained general goals, policies, and programs that would require local planning and development decisions to consider impacts to the environment related to an adopted emergency response plan. The 2023 SEIR determined that these same findings would apply to implementation of the HEU. The same findings would also apply to the revised HEU.

Though utilizing criteria that have since been replaced by updates to the CEQA Guidelines Appendix G Checklist, the *ConnectMenlo* EIR found that the project would have a less-than-significant impact with respect to exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The SEIR determined that these same findings would apply to implementation of the HEU.

The City is located in a highly urbanized area and is not surrounded by woodlands or vegetation that would provide fuel loads for wildfires. Menlo Park does not contain designated areas of moderate, high, or very high Fire Hazard Severity.

The SEIR found that future development under the HEU, as part of the City's project approval process, would be required to comply with existing regulations as described in Section 4.17.3, *Regulatory Framework*. Specifically, all developments would be constructed pursuant to applicable building codes and the California Building Code and the Menlo Park Fire Protection District (MPFPD) Fire Prevention Code. Per standard procedure, project applications for development in Menlo Park are plan-checked by the MPFPD for compliance with the code, and those requirements would apply to any future development. In addition, MPFPD conducts a weed-abatement program throughout its jurisdiction to minimize fire risk on empty or unmaintained parcels.

Also, the SEIR noted that General Plan policies have been adopted to minimize impacts from wildfire. Specifically, Policy S1.1 permits development only in those areas where potential danger to the health, safety and welfare of the residents of the community can be adequately mitigated. Policy S1.5 requires that all new habitable structures incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards. Policy S1.13 requires new residential structures to incorporate fire resistant design and strategies such as the use of fire-resistant materials and landscaping, and to create defensible space.

Based upon these considerations, the SEIR determined that implementation of the HEU would have a less than significant impact with respect to enhanced wildfire risk. The same findings would also apply to the revised HEU.

The SEIR also evaluated the effects of the installation or maintenance of infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities that could exacerbate fire risk or that could result in temporary or ongoing impacts to the environment. The SEIR determined that impacts in this regard would be less than significant since the installation of such facilities would not be required to implement the HEU. The same findings would also apply to the revised HEU.

In summary, the findings described above would also apply to the revised HEU. The same compliance with established policies and regulatory requirements would still apply. The wildfire related impacts associated with the revised HEU would not differ substantially from those that have already been disclosed in the *ConnectMenlo* EIR and the SEIR. Consequently, the proposed HEU revisions would not result in a new significant impact or substantially more severe impacts related to wildfire than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the proposed HEU revisions would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than the significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the proposed HEU revisions. For these reasons, impacts related to wildfire from the revised HEU would not require the preparation of a subsequent EIR or negative declaration.

Conclusion

The proposed revisions to the 2023 HEU would not result in any additional or more severe impacts than those evaluated in the SEIR. Consequently, the proposed revisions would not result in a new significant impact or substantially more severe impacts than previously disclosed in the SEIR. In addition, there is no new information of substantial importance showing that the revised HEU would have one or more significant effects not previously discussed or that any previously examined significant effects would be substantially more severe than significant effects shown in the SEIR. Nor is there new information of substantial importance showing that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the revised HEU. For these reasons, the proposed project would not require the preparation of a subsequent negative declaration or EIR.

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