3.7 Cultural Resources

This section describes the affected environment and regulatory setting for cultural resources, including brief descriptions of the prehistoric and historic setting of the Facebook Campus Expansion Project (Project) area and the results of the archaeological resources investigation conducted for the Project. Applicable federal, state, and local regulations are identified, followed by impact analysis and mitigation measures, as applicable, to reduce potentially adverse impacts on cultural resources. This section is based on a records search at the Northwest Information Center (NWIC) of the California Historical Resources Information System, a search of the Native American Heritage Commission (NAHC) sacred lands database, archival research at the City of Menlo Park (City) Planning Department's Permit Center, and geological information.

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1) were considered in preparing this analysis. Applicable issues that were identified pertain to the documentation of an archaeological records search and Native American consultation.

Existing Conditions

Regulatory Setting

Federal

National Historic Preservation Act. Federal regulations for cultural resources are governed primarily by Section 106 of the National Historic Preservation Act (NHPA) of 1966, which applies to actions taken by federal agencies. The goal of the Section 106 review process is to offer a measure of protection to sites that are determined eligible for listing in the National Register of Historic Places (NRHP). The criteria for determining NRHP eligibility are found in 36 Code of Federal Regulations (CFR) Part 60. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and affords the federal Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. The council's implementing regulations, Protection of Historic Properties, are found in 36 Code of Federal Regulations (CFR) Part 800. The NRHP criteria (contained in 36 CFR 60.4) are used to evaluate resources with respect to complying with NHPA Section 106. The criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

a. Are associated with events that have made a significant contribution to the broad patterns of our history;

b. Are associated with the lives of persons significant in our past;

c. Embody the distinctive characteristics of a type, period, or method of construction or that possess high artistic values or that represent a significant distinguishable entity whose components may lack individual distinction; or

d. Have yielded, or may be likely to yield, information important to history or prehistory.

Archaeological site evaluation assesses the potential of each site to meet one or more of the criteria for NRHP eligibility, based upon visual surface and subsurface evidence (if available) at each site location, information gathered during the literature and records searches, and the researcher's knowledge of and familiarity with the historic or prehistoric context associated with each site.

Paleontological Resources Preservation Act. The federal Paleontological Resources Preservation Act of 2002 was enacted to codify the generally accepted practice of limiting the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers. These researchers must obtain a permit from the appropriate state or federal agency and agree to donate any materials recovered to recognized public institutions where they will remain accessible to the public and other researchers.

State

California Public Resources Code. Under the California Environmental Quality Act (CEQA), public agencies must consider the effects of their actions on both historical resources and unique archaeological resources. Pursuant to Public Resources Code Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."

Historical resource is a term with a defined statutory meaning (see Public Resources Code Section 21084.1 and State CEQA Guidelines Section 15064.5(a) and (b)). The term embraces any resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR). The CRHR includes resources listed in or formally determined eligible for listing in the NRHP as well as some California State Landmarks and Points of Historical Interest.

Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be historical resources for the purposes of CEQA, unless a preponderance of evidence indicates otherwise (Public Resources Code Section 5024.1; California Code of Regulations, Title 14, Section 4850). Unless a resource that has been listed in a survey is demolished or it loses substantial integrity or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for the CRHR.

In addition to assessing whether historical resources that may be affected by a proposed project have been listed or identified in a survey process, lead agencies have a responsibility to evaluate the resources against the CRHR criteria prior to making a finding as to a project's impacts on the resources (Public Resources Code Section 21084.1; State CEQA Guidelines Section 15064.5 (a)(3)). In general, a historical resource, under this approach, is defined as any object, building, structure, site, area, place, record, or manuscript that:

a. Is historically or archeologically significant or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California; and

b. Meets any of the following criteria:

    1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    2. Is associated with the lives of persons important in our past;

    3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values; or

    4. Has yielded, or may be likely to yield, information important in prehistory or history.

As noted above, CEQA also requires lead agencies to consider whether projects will affect unique archaeological resources. Although CEQA does not define a unique paleontological resource or site, Public Resources Code Section 21083.2 (g) states that *unique archaeological resource* means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person (Public Resources Code Section 21083.2 (g)).

With only slight modification, this definition is equally applicable to recognizing a unique *paleontological* resource or site. Additional guidance is provided in CEQA Section 15064.5 (a)(3)(D), which indicates "generally, a resource shall be considered historically significant if it has yielded, or may be likely to yield, information important in prehistory or history."

Under Section 21083.2 of the Public Resources Code, options on how to treat such resources include activities that preserve the resources in place in an undisturbed state. Other acceptable methods of mitigation under Public Resources Code Section 21083.2 include excavation and curation or study in place without excavation and curation (if the study finds that the artifacts would not meet one or more of the criteria for defining a unique archaeological resource).

Section 7050.5 (b) of the California Health and Safety Code specifies a protocol for when human remains are discovered. The code states:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.

State CEQA Guidelines Section 15064.5(e) requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the NAHC must be contacted within 24 hours. At that time, the lead agency is required to consult with the appropriate Native Americans, as identified by the NAHC, and direct the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

Local

City of Menlo Park General Plan. The following goal and policies from the Open Space Element of the City of Menlo Park General Plan are relevant to the Project.

> **Goal OSC3:** Protect and Enhance Historic Resources. Protect and enhance cultural and historical resources for their aesthetic, scientific, educational, and cultural values.
>
> *Policy OSC3.1:* Prehistoric or Historic Cultural Resources Investigation and Preservation. Preserve historical and cultural resources to the maximum extent practical.
>
> *Policy OSC32:* Prehistoric or Historic Resources Protection. Require significant historic or prehistoric artifacts to be examined by a qualified consulting archaeologist or historian for appropriate protection and preservation and ensure compliance with local, state, and federal regulations.
>
> *Policy OSC3.3*: Archaeological or Paleontological Resources Protection. Protect prehistoric or historic cultural resources either onsite or through appropriate documentation as a condition of removal. Require that when a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies superior mitigation. If resources are documented, undertake coordination with descendants and/or stakeholder groups, as warranted.
>
> *Policy OSC3.4*: Prehistoric or Historic Cultural Resources Found During Construction. Requires that if cultural resources, including archaeological or paleontological resources, are uncovered during grading or other onsite excavation activities, construction shall stop until appropriate mitigation is implemented.
>
> *Policy OCS3.5*: Consultation with Native American Tribes. Consult with those Native American tribes with ancestral ties to the Menlo Park city limits regarding General Plan Amendments and land use policy changes.

ConnectMenlo General Plan Update. The City's General Plan (Land Use and Circulation Elements) and M-2 Area Zoning Update, also known as ConnectMenlo, is under way. Although not yet adopted, the following draft policy in ConnectMenlo pertains to the Project and is identified for informational purposes.

> *Policy LU-7.8* Cultural Resource Preservation. Promote preservation of buildings, objects, and sites with historic and/or cultural significance.

Environmental Setting

Prehistoric Setting

The Project site is located along the southwest edge of the San Francisco Bay (Bay). The San Francisco Bay–Delta Cultural Sequence, often referred to as the Central California Taxonomic System, was defined largely on the basis of stylistic variation in artifacts from burials found in the lower Sacramento Valley.[1]

[1] Lillard, J., R. Heizer, and F. Fenenga. 1939. *An Introduction to the Archaeology of Central California*. Department of Anthropology Bulletin 2. Sacramento Junior College, Sacramento.

Over time, this sequence has been refined as research yielded new clues to the early development of the Bay Area. The following summary is extracted from Byrd and Meyer (2011),[2] which used several studies, including Milliken et al. (2007),[3] Rosenthal and Meyer (2004),[4] and Moratto (1984).[5]

Terminal Pleistocene (13,500–11,600 BP). The Terminal Pleistocene is largely contemporaneous with the Clovis and Folsom periods of the Great Plains and the southwest and generally considered to be represented by wide-ranging mobile hunters and gatherers who regularly exploited large game.[6] Throughout California, the Terminal Pleistocene is most often represented by isolated fluted points.[7,8]

Early Holocene (11,600–7700 BP). Early Holocene prehistoric material in the Bay Area is sparse; only four sites date to this period: two sites at Los Vaqueros Reservoir (Contra Costa County [CCO]-696 and -637) in the East Bay, the Blood Alley site (Santa Clara County [SCL]-178) in the Coyote Narrows of the Santa Clara Valley, and SCR-177 at Scott's Valley in the Santa Cruz Mountains.[9,10] Their deposits, which indicate diverse resource exploitation, demonstrate that the general region was occupied throughout this time segment, but strong insight into the nature of this early occupation is still lacking.

Middle Holocene (7700–4000 BP). In the Bay Area, Middle Holocene assemblages can include various types of groundstone; points; chopping, scraping, and pounding implements; and shell beads and ornaments.[11,12] Exploitation of the Bay's estuary, mud flats, and freshwater tidal marshes was common, and the presence of a diverse range of habitation sites, including the basal layers of some Bay-margin

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[2] Byrd, B. F., and J. Meyer. 2011. *Initial Cultural Resources Investigation, San Francisquito Creek Flood Damage Reduction and Ecosystem Restoration Project, Santa Clara and San Mateo Counties, California.* Redacted version. Prepared for Kristin O'Kane, Santa Clara Water District, San José.

[3] Milliken, R., R. T. Fitzgerald, M. G. Hylkema, R. Groza, T. Origer, D. G. Bieling, A. Leventhal, R. S. Wiberg, A. Gottsfield, D. Gillette, V. Bellifemine, E. Strother, R. Cartier, and D. A. Fredrickson. 2007. Punctuated Change in the San Francisco Bay Area, Chapter 8, pages 99–123. In Terry L. Jones and Kathryn A. Klar, (eds.), *California Prehistory: Colonization, Culture, and Complexity.* Altamira Press, New York.

[4] Rosenthal, J. S., and J. Meyer. 2004. *Landscape Evolution and the Archaeological Record: A Geoarchaeological Study of the Southern Santa Clara Valley and Surrounding Region.* Center for Archaeological Research at Davis. Publication 14. University of California, Davis.

[5] Moratto, M. 1984. *California Archaeology*. Academic Press, New York.

[6] Haynes, G. M. 2002. *The Early Settlement of North America: The Clovis Era*. Cambridge University Press, Cambridge.

[7] Erlandson, J., T. C. Rick, T. L. Jones, and J. F. Porcasi. 2007. One If by Land, Two If by Sea: Who Were the First Californians? In *California Prehistory: Colonization, Culture, and Complexity*, edited by T. L. Jones and K. Klar, pp. 53–62. Altamira Press, Walnut Creek.

[8] Rondeau, M. F., J. Cassidy, and T. L. Jones. 2007. Colonization Technologies: Fluted Projectile Points and the San Clemente Island Woodworking/Microblade Complex. In *California Prehistory: Colonization, Culture, and Complexity,* edited by T. L. Jones and K. Klar, pp. 63–70. Altamira Press, New York.

[9] Hildebrandt, W. R. 1983. *Archaeological Research of the Southern Santa Clara Valley Project: Based on a Data Recovery Program from Sites CA-SCl-54, CA-SCl-163, CA-SCl-178, CA-SCl-237, and CA-SCl-241 Located in the Route 101 Corridor, Santa Clara County, California.* Daniel, Mann, Johnson, and Mendenhall and San José State University. Los Angeles and San José. Submitted to California Department of Transportation, District 4, San Francisco. Report S-6369. On file at the Northwest Information Center, Sonoma State University, Rohnert Park, CA.

[10] Meyer, J., and J. S. Rosenthal. 1997. Archaeological and Geoarchaeological Investigations at Eight Prehistoric Sites in the Los Vaqueros Reservoir Area, Contra Costa County. In *Los Vaqueros Project Final Report*. Anthropological Studies Center, Sonoma State University, Rohnert Park, California. Submitted to the Contra Costa Water District, Concord. Report on file, Northwest Information Center, Sonoma State University, Rohnert Park, CA.

[11] Fitzgerald, R. T., Jr. 1993. *Archaic Milling Cultures of the Southern San Francisco Bay Region*. Edited by G. S. Breschini and T. Haversat. Coyote Press Archives of California Prehistory Number 35. Coyote Press.

[12] Meyer, J., and J. S. Rosenthal. 1998. *An Archaeological Investigation of Artifacts and Human Remains from CA-CCO-637, Los Vaqueros Project Area, Contra Costa County, California.* Anthropological Studies Center, Sonoma State Academic Foundation, Inc., Rohnert Park, California. Submitted to Contra Costa Water District, Concord, CA.

shell mounds, suggests higher population levels, more complex adaptive strategies, and longer seasonal occupation than during the early Holocene. Notable sites in the vicinity of the Project site include SCL-484, -674, and -832; SMA-269 and -273; and SFR-28, all of which contained several isolated human burials.

Late Holocene (4000–170 BP). The Late Holocene is generally divided into five "slices," based on specific types of shell beads. It is well documented in the Bay Area; more than 200 sites reflect widespread occupation by complex hunter-gatherers.[13] Important mounds along the Peninsula margins include the University Village site (SMA-77), the San Bruno Mountain mound (SMA-40), and the Ynigo Mound (SCL-12/H).[14,15] The artifact assemblages include various types of beads and pendants, bone tools, "flower pot" mortars, and the bow and arrow. Funerary rituals were strongly patterned and included flexed interments and "killed" grave offerings, along with occasional cremations. Extensive trade relations also appear to have flourished with neighboring groups.

Ethnographic Setting

Menlo Park is situated within territory once occupied by Costanoan (also commonly referred to as Ohlone) language groups. Eight Ohlone languages were spoken in the area from the southern edge of the Carquinez Strait to portions of the Big Sur and Salinas Rivers south of Monterey Bay and approximately 50 miles inland from the coast. Menlo Park lies on the approximate ethnolinguistic boundary between the Tamyen and Ramaytush languages. Tamyen, or Santa Clara Costanoan, was spoken around the south end of San Francisco Bay and in the lower Santa Clara Valley and seems to have had about 1,200 speakers. Ramaytush, or San Francisco Costanoan, was spoken by about 1,400 people in San Mateo and San Francisco Counties.[16]

Ohlone territories were composed of one or more land-holding groups that anthropologists refer to as *tribelets*. The tribelet consisted of a principal village that was occupied year-round, with a series of smaller hamlets and resource gathering and processing locations occupied intermittently or seasonally.[17] The Puichon tribelet lived on the west shore of San Francisco Bay between lower San Francisquito Creek and lower Stevens Creek, now the areas of Menlo Park, Palo Alto, and Mountain View.[18]

Seven Spanish missions were founded in Ohlone territory between 1776 and 1797. Although living within the mission system, the Ohlone commingled with other groups, including the Yokuts, Miwok, and Patwin. Members of the Puichon tribelet went to Mission San Francisco between 1781 and 1794 and to Mission Santa Clara from 1781 to as late as 1805. Mission life was devastating to the Ohlone

[13] Milliken, R., R. T. Fitzgerald, M. G. Hylkema, R. Groza, T. Origer, D. G. Bieling, A. Leventhal, R. S. Wiberg, A. Gottsfield, D. Gillette, V. Bellifemine, E. Strother, R. Cartier, and D. A. Fredrickson. 2007. Punctuated Change in the San Francisco Bay Area, Chapter 8, pages 99–123. In Terry L. Jones and Kathryn A. Klar, (eds.), *California Prehistory: Colonization, Culture, and Complexity.* Altamira Press, New York.

[14] Byrd, B. F., and J. Berg. 2009. *Phase II Excavations in the Caltrans Right-of-Way at CA-SCL-12/H, Santa Clara County, California.* 04-SCL-101/237 PM 46.10-46.3/Prepared for Caltrans District 4.

[15] Clark, M. R. 1989. *Evaluative Archaeological Investigations at the San Bruno Mountain Mound Site, CA-SMA-40, South San Francisco, California*. Report on file, Northwest Information Center, Sonoma State University, Rohnert Park, CA.

[16] Levy, R. 1978. Costanoan. Pages 398–413 in W. C. Sturtevant (ed.), *Handbook of North American Indians*, 8, California. Washington, DC: Smithsonian Institution.

[17] Kroeber, A. L. 1955. Nature of the Land-Holding Group. *Ethnohistory* 2:303–314.

[18] Milliken, R. 1995. *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area 1769–1810.* Ballena Press Anthropological Papers No. 43. Novato, CA: Ballena Press.

population.[19] When the first mission was established in Ohlone territory in 1776, the Ohlone population was estimated to be 10,000. By 1832, the Ohlones numbered less than 2,000 as a result of introduced disease, harsh living conditions, and reduced birth rates.[20,21,22]

Ohlone recognition and assertion began to move to the forefront during the early twentieth century, enforced by legal suits brought against the United States government by Indians of California (1928–1964) for reparation due them for the loss of traditional lands. The Ohlone participated in the formation of political advocacy groups, which brought focus upon the community and reevaluation of rights due its members.[23] In recent years, the Ohlone have become increasingly organized as a political unit and have developed an active interest in preserving their ancestral heritage. Many Ohlones are active in maintaining their traditions and advocating for Native American issues.

Historic Setting

Regional History

Spanish rule came to the Menlo Park area in 1769 when the exploration party led by Don Gaspar de Portola camped near "El Palo Alto" after their discovery of the Bay. The colonization of the San Francisco Peninsula began after the expedition of Juan Bautista de Anza passed through Menlo Park on its way to establishing Mission Dolores and the Presidio of San Francisco in 1776.[24]

The mission padres, explorers, military personnel, travelers, and settlers occupied areas of what is today Menlo Park, developing and populating the land. As a reward for their contribution to the settling movement, some pioneers were granted huge portions of land by the Spanish and, after 1822, by the Mexican government. The largest land grant on the San Francisco Peninsula was the Rancho de las Pulgas, an area of more than 35,000 acres, which was awarded to presidio comandante Don José Dario Arguello in 1795 by Governor Diego de Borica and endorsed on behalf of his son Luis Arguello in 1820 by Pablo Sola, the last Spanish governor of California. This land extended north and south from San Mateo Creek to San Francisquito Creek and east and west from the Bay to today's Cañada Road in Woodside. The present boundaries of Menlo Park would have been within this rancho, which became part of the new state of California. The Arguello family obtained legal title to their lands in 1853. Later, the land was subdivided.

In August 1854, Menlo Park received its official name when two Irishmen, Dennis J. Oliver and D. C. McGlynn, whose wives were sisters, purchased 1,700 acres (some sources say it was 640 acres) bordering present-day El Camino Real and built two houses with a common entrance. Across the drive they erected a huge wooden gate with tall arches on which the name of their estate "Menlo Park" was printed in foot-high letters. When the railroad came through in 1863, the Menlo Park station was

[19] Ibid.

[20] Cook, S. F. 1943a. The Conflict between the California Indians and White Civilization, I: The Indian Versus the Spanish Mission. *Ibero-Americana 21*. Berkeley, California.

[21] Cook, S. F. 1943b. The Conflict between the California Indians and White Civilization, II: The Physical and Demographic Reaction of the Non-Mission Indians in Colonial and Provincial California. *Ibero-Americana* 22. Berkeley, California.

[22] Levy, R. 1978. Costanoan. Page 486 in W. C. Sturtevant (ed.), *Handbook of North American Indians*, 8, California. Washington, DC: Smithsonian Institution.

[23] Bean, L. J. 1994. *The Ohlone Past and Present: Native Americans of the San Francisco Bay Region*. Ballena Press, Menlo Park, page xxiv.

[24] PaloAltoHistory.com. *Palo Alto: Rooted in History*. Available: <http://www.paloaltohistory.com>. Accessed: September 9, 2015.

unnamed, so a railroad official looked over at the gates and decided that "Menlo Park" would be officially adopted. This station is now California State Landmark No. 955, the oldest California station in continuous operation.[25]

San Mateo County became independent of San Francisco County in 1856. A county road had been laid from San Francisco to Belmont and soon extended to San José. This opened the San Francisco Peninsula to the residents of San Francisco who wished to establish summer residences in the country. Among the first to buy large tracts of land and build mansions were the Atherton, Hopkins, Flood, Mills, Donohoe, and Felton families. These estates were largely self-sufficient, working farms, and some had their own services, such as barber shops, general stores, blacksmith shops, livery stables, saloons, and hotels.[26]

On March 23, 1874, Menlo Park became the second incorporated city in San Mateo County, although only for a short time. The purpose was to provide a quick way to raise money for road repairs. This incorporation, which included Fair Oaks (later Atherton) and Ravenswood (later East Palo Alto), lasted only until 1876.[27]

Twentieth-Century History

Menlo Park remained relatively rural until World War I, when it was suddenly populated in 1917 by 27,000 soldiers who were in training at Camp Fremont for the 8th Division of the U.S. Army and for the 41st Division of the California National Guard before their planned deployment to France. Camp Fremont was located on land that extended from Valparaiso Avenue to San Francisquito Creek and El Camino Real to the Alameda de las Pulgas. Camp Fremont was in operation from 1917 to 1919 and covered 25,000 acres in Menlo Park. The transitory military population spurred the commercial growth of Menlo Park; its first gas station, water services, paved streets, and small businesses were a direct result. At the end of World War I, there was no longer a need for Camp Fremont, and the U.S. Army ordered the post closed. The buildings were sold off at auction, and the camp closed in January of 1920. At the camp's closure, the town reverted to being a small town with a population of 2,300.[28]

Menlo Park reincorporated in 1923, with much the same boundaries as the earlier town. Incorporation planning involving Menlo Park and Atherton culminated in a dramatic race to the county courthouse to file differing plans. Atherton representatives arrived only minutes before those from Menlo Park, who had wished to include Atherton in their plans. Final incorporation of Menlo Park took place in November 1927. However, growth continued at a slow rate. By 1940, 20 years after the closing of Camp Fremont, Menlo Park's population rose by less than 1,000, giving the City 3,258 residents.[29]

Near the Bay, Menlo Park developed light industrial plants after World War II. By the 1950s, as bayside land along the San Francisco Peninsula grew through silt accumulation and the infill of wetlands, land that was less desirable for residential and retail commercial space and more affordable and level for

[25] Durham, David L. 1998. *California's Geographic Names: A Gazetteer of Historic and Modern Names of the State*.

[26] ESA. 2011. *Menlo Park El Camino Real Downtown Specific Plan DEIR.* Prepared for City of Menlo Park, San Francisco, CA; City of Menlo Park. 2013. *General Plan Housing Element.* City of Menlo Park, Menlo Park, CA.

[27] Ibid.

[28] City of Menlo Park. 2013. 4.4-7; Menlo Park Historical Association. 2002. *Early Days in Menlo Park.* Available: <http://www.menlopark.org/homepage/history.html>. Accessed: September 9, 2015; California State Military Museum. 2010. *Historic California Posts: Camp Fremont*. Available: <http://www/militarymuseum.org/cpfremont.html>. Accessed: September 9, 2015; U.S. Bureau of the Census. 1952. U.S. Government Printing Office, Washington, DC.

[29] City of Menlo Park. 2013. *Menlo Park Association*. 2002.

industrial development became available. The further development of railroads for freight, the waterfront for some industries, and US 101 provided transportation networks that were essential for the economical trade of raw materials and manufactured products. This area, which includes the Project site, forms a district that has been in transition from industrial/light industrial to high-tech and other business offices from the late twentieth century to the present.

Raychem Corporation

Raychem Corporation, the first company based on radiation chemistry for developing industrial products, was founded in 1957 by Paul M. Cook, a chemical engineer. Cook leased the 4,800-gross-square-foot (gsf) rectangular building with a barrel roof at 2821 Fair Oaks Avenue in Redwood City, California, on January 1, 1957, to develop this idea. He named his venture Irradiated Products, Inc., and began mortgaging his house and pulling together $50,000 in equity capital to rent the first high-energy electron accelerator, which arrived in March 1957. Richard Muchmore, a manufacturing executive, and James Meikle, an engineer, joined Cook in January 1957 as co-founders. The partners changed the name of the company to Raytherm in March 1957 and finally to Raychem Corporation in 1960 to avoid confusion with the already established Raytheon Corporation.

Cook and his associates at Raychem Corporation were successful in using the high-energy electron accelerator in a production setting for the first time at their site in Redwood City, proving that beams produced by high-energy electron accelerators could be reliable for constant industrial use and that high-energy radiation was safe for industrial environments. Raychem's success was in developing *radiation crosslinking*, a process by which certain polymers are exposed to radiation and cross linked to produce characteristics such as toughness, abrasion resistance, cut-through resistance, solvent and chemical resistance, improved high-temperature performance, and elastic memory. Radiation crosslinking would become a cornerstone technology, supporting a worldwide industry based on improved performance of electronics components, electrical insulation, and industrial and telecommunication infrastructures. Radiation crosslinking made possible the commercialization of another important technology, elastic memory for polymer materials, which allows cross-linked expanded materials to revert to their original proportions when exposed to heat. Radiation crosslinking was first performed at Raychem's facility in Redwood City with the rented General Electric (GE) high-energy electron accelerator, which produced a beam of high-energy electrons. By 1960, other companies that were developing followed Raychem's pioneering work with radiation chemistry. The lightweight and high-performance aspects of Raychem's irradiated products made them ideal for military applications and military contractors were Raychem's initial customers.[30]

To accommodate the growth from their success in applied radiation chemistry, Raychem moved out of the small Redwood City building and purchased an approximately 80-acre industrial property in Menlo Park in 1965. The initial property included the Project site and the parcel immediately to the east. In 1977, the property expanded farther to the east to Willow Road. In 1992, the property acquired an additional site, bound by Hacker Way/Network Circle north of Bayfront Expressway/State Route (SR) 84 (Bayfront Expressway).[31]

The Raychem buildings on the Project site, constructed during the first phase of the company's development of the site in the mid- to late 1960s, were designed and constructed by Michael R. Cabak, a little-known civil and structural engineer. According to U.S. Census marriage and divorce records,

[30] Ahrendt. 1997. *A National Historic Chemical Landmark.*

[31] Ibid; City of Menlo Park, Department of Planning, Permits-Plans; historicaerials.com. Accessed: September 8, 2015.

Michael Cabak was born in approximately 1928 and married three times in San Mateo and Santa Clara Counties. He started his career in the early 1960s and began Cabak Associates in Menlo Park in 1969, which later dissolved in 1991.[32]

The buildings on the Project site are designed in the Corporate Modern style. They feature primarily two-story steel and concrete construction, with full-height concrete block column surrounds supporting the thick and wide eaves, in the manner of Frank Lloyd Wright, and façades of glass separated by spandrel panels of blue glass. Appendix 3.7 contains the detailed description and photographs of the existing buildings on the Project site at the time of the NOP release.

Table 3.7-1 lists all of the buildings constructed on the Project site in or prior to 1971.[33] Figure 2-2 shows the existing sites and locations of the buildings on the Project site.

Table 3.7-1. Raychem Corporation Buildings at 300–309 Constitution Drive, Menlo Park

Building #	Name: Raychem Use	Construction Date
23 (300)	Distribution Center/Warehouse	1969 (north)/circa 1975 (south)
301	Sales	1967
302	Administration	1967
303	Research and Development	1967
304	Library	1990
305 A, B, C	Manufacturing, Buildings A, B and C	1966
305 C Addition	Beam Room	1969
306	Research and Development	1968
307[a]	Building E	1969
308[a]	Building H	1970
309[a]	Data Center	1990
CTF	Chemical Transfer Facility	1989
ACB	Air Compressor Building (west of 305 A)	1986

Source: ICF International, 2016.

Note:

a. Prior to the City's consideration of the Project, two buildings (307–309) were slated to be demolished. This will occur as a separate project. Therefore, for purposes of this analysis, the buildings that were on the Project site at the time of the NOP release (the baseline) are included. It is assumed that Buildings 307–309 are existing at the Project site.

In April 1997, the American Chemical Society designated the original Raychem building in Redwood City as a National Chemical Landmark for being the site of the application of the new science of radiation chemistry. At that time, Raychem had grown into a company that employed 8,500 people in more than 45 countries. Raychem was purchased by Tyco International in 1999, which split into Tyco Connectivity and Tyco Electronics. According to available permits, the Raychem site in Menlo Park switched ownership in 2000. A review of historic aerials noted no major exterior changes to the buildings on the Project site since 2000.

[32] U.S. Census Record, Marriage and Divorce Records, 1958, 1969, 1980. Accessed through Ancestry.com in September 2015; Wysk Company. *Profile: Cabak Associates*. Available: <www.wysk.com>. Accessed: September 10, 2015.

[33] The construction dates of the buildings in the Project site were provided by permits and plans filed by the company with the City of Menlo Park Planning Department and accessible at the Permits counter and by historic aerials at historicaerials.com.

Founder: Paul M. Cook

Paul M. Cook was born on April 25, 1924, in Ridgewood, New Jersey. Cook's father founded the Cornish Wire Company and was that company's president and chief mechanical engineer. Cook took an early interest in chemistry and technology. He attended the Massachusetts Institute of Technology (MIT) after high school in 1941 and studied with Warren K. Lewis. Cook enlisted in the Army in 1943 and attended Stanford University for two semesters while studying chemical engineering through the Army Specialized Training Program. Cook left the Army in 1946 to work but returned to MIT to complete his degree in 1947.

Cook started a wire company with his older brother after graduating from MIT but left in 1949 to join the Stanford Research Institute (SRI) as a chemical engineer and spearhead a new study sponsored by the U.S. government's Atomic Energy Commission, researching the potential industrial uses of waste fission products. The study was not successful. However, through the conclusions reached in his experiments for the study, Cook became convinced of the potential of radiation chemistry for developing industrial products. In the early 1950s, engineers at GE pioneered significant work in irradiated plastics and used radiation to cross link polyethylene in a tape form. This, along with his own experiments at SRI, called the Stanford Research Institute at the time, further convinced Cook that radiation could be used to develop new materials for industrial applications. SRI is now an internationally recognized research-and-development non-profit organization created by Stanford University and located at 333 Ravenswood Avenue, Menlo Park. Cook established the Radiation Engineering Laboratory at SRI in 1952 and became its president. By the next year, Cook began an SRI-funded off-hours business, the Sequoia Process Corporation, to make electronic hook-up wire for connecting electronic components. Cook left SRI in late 1953 to become Sequoia's full-time CEO. He left in 1956 because of disagreements with the vision for the company. Cook wanted to explore developing new, unique products using high-energy radiation, but parties at the company did not agree. Cook took to his own venture again and began Raychem with two other engineers in 1957 and successfully commercialized radiation chemistry.[34]

Historical Significance and Resource Evaluation

California Register of Historic Resources Criteria (CRHR)

The former Raychem Corporation property on the Project site is evaluated below under CRHR Criteria 1 through 4. The current study concludes that the buildings on the Project site do not appear to be eligible for the CRHR under Criteria 1, 2 3, and 4, nor as contributors to a CRHR-eligible historic district.

CRHR Criterion 1

Under CRHR Criterion 1 (event), the Project site is not significantly associated with the events surrounding the historical contributions of Raychem Corporation to the development of applied radiation chemistry. Raychem's significance is tied specifically to developing radiation crosslinking and making the application of radiation chemistry to industrial production possible. However, this event of historical significance did not take place on the Project site, occupied by Raychem from 1966 to 2000, but at the site in Redwood City, California, which Raychem leased in 1957. Therefore, the Project site does not appear to be eligible for listing in the CRHR under Criterion 1 for association with a significant event.

[34] Ahrendt. 1997. *A National Historic Chemical Landmark*; James J. Bohning, 1992. *Transcript of an Interview: Paul M. Cook.* Interview by James J. Bohning at San Carlos, California. Chemical Heritage Foundation, Oral History Program: Philadelphia, PA.

CRHR Criterion 2

Under CRHR Criterion 2 (person), the Project site is not significantly associated with Paul M. Cook, the founder of Raychem Corporation. Cook is significant for his contribution to the development of radiation chemistry in applied science. However, his experiments with fellow co-founders that led to the successful marketing and manufacture of radiation crosslinking do not appear to be sufficiently historically significant to merit CRHR eligibility and were initiated at a site in Redwood City 9 years prior to development of the Project site. Therefore, the Project site does not appear to be eligible for listing in the CRHR under Criterion 2 for association with a person of historical significance.

CRHR Criterion 3

Under CRHR Criterion 3 (architectural significance), the Project site is not associated with the works of a master Modern architect, nor does it possess high artistic value. The majority of the buildings at the Project site were designed and constructed in the Corporate Modern style of architecture by engineer and architect Michael Cabak. The buildings feature primarily two-story steel and concrete construction with full-height concrete block column surrounds that support the thick, wide eaves and façades of glass, which are separated by spandrel panels of blue glass. These features, however, lack architectural merit. The Project site, therefore, does not appear eligible for listing in the CRHR under Criterion 3 as the design of a master architect or as having architectural significance.

CRHR Criterion 4

CRHR Criterion 4 (information source), commonly applies to properties that contain or are likely to contain information bearing on an important archaeological research question about human history that can only be answered by the actual physical materials of cultural resources. Under Criterion 4, the Project site does not appear to be significant as a source, or likely source, of important historical or prehistorical information, nor does it appear likely to yield important information about historic construction methods, materials, or technologies.

Paleontological Setting

The fossil-yielding potential of a particular area is highly dependent on the geologic age and origin of the underlying rocks as well as on the processes that the rocks have undergone, both geologically and anthropogenically.[35] As discussed in Section 3.9, *Geology and Soils*, the overlying materials at the Project site are Novato clay, a silty clay that is interbedded with sand, and urban land, also known as artificial fill.

Table 3.7-2 lists the paleontological sensitivity of the map units in the vicinity of the Project site, which is within the Palo Alto quadrangle. For those geologic units with paleontological sensitivity, the types of fossils that may be present are also provided. For an explanation of how paleontological sensitivity is determined, see *Methods for Analysis*, below. Geologic units of Pleistocene age and older have potential to contain paleontological resources. Because California's Pleistocene nonmarine strata have yielded many important vertebrate fossils, continental deposits of Pleistocene age are generally treated as paleontologically sensitive in California.

[35] *Anthropogenic* means caused by human activity.

Table 3.7-2. Surficial Geologic Units in the Project Area

Age[a]	Geologic Unit[a]	Map Symbol[a]	Location with Respect to Project Site	Potential Fossil Type	Paleontological Sensitivity[b]
Historic	Artificial fill	af	Project site	N/A	Low
Historic	Artificial levee fill	alf	Project site	N/A	Low
Holocene	Bay mud	Qhbm	Project site	N/A	Undetermined
Holocene	Basin deposits	Qhb	Project site	N/A	Undetermined
Holocene	Floodplain deposits	Qhfp	Adjacent to Project site	N/A	Undetermined
Holocene	Natural levee deposits	Qhl	Near Project site	N/A	Undetermined
Holocene	Alluvial fan and fluvial deposits	Qhaf	Near Project site	N/A	Undetermined
Pleistocene	Alluvial fan and fluvial deposits	Qpaf	Near Project site	Contains freshwater mollusks and extinct late Pleistocene vertebrate fossils.[a]	High
Holocene	Older alluvial fan deposits	Qpoaf	Near Project site	Contains freshwater mollusks and extinct Pleistocene vertebrate fossils.[a]	High
Lower Pleistocene and upper Pliocene	Santa Clara Formation	Qtsc	Near Project site	"Rare" fossils appear in the Santa Clara Formation, including a land mammal from the late Pliocene and plant fossils from the late Pliocene(?) and early Pleistocene.	Undetermined
Upper(?) and middle Miocene	Ladera Sandstone	Tlad	Near Project site	At and near the base of Ladera Sandstone are medium to thick lenticular beds of well-cemented, fossiliferous chert-granule sandstone, which interfingers with fine-grained sandstone.[b]	High
Middle Miocene	Monterey Formation	Tm	Near Project site	Covering a large area of California and an extended period of time, this formation of marine deposits contains fossils of whales, dolphins, crabs, and kelps and other soft-bodied seaweeds.[c]	High

Age[a]	Geologic Unit[a]	Map Symbol[a]	Location with Respect to Project Site	Potential Fossil Type	Paleontological Sensitivity[b]
Middle Miocene	Page Mill Basalt	Tpm	Near Project site	N/A	Low
Middle and lower Eocene	Whiskey Hill Formation	Tw	Near Project site	N/A	Undetermined
Unspecified	Sandstone	fs	Near Project site	N/A	Undetermined
Unspecified	Greenstone	fg	Near Project site	N/A	Undetermined
Cretaceous and/or Jurassic	Serpentine	sp	Near Project site	N/A	Undetermined

Notes:

a. Brabb, E.E., R.W. Graymer, and D.L. Jones. 2000. *Geologic Map and Map Database of the Palo Alto 30' x 60' Quadrangle, California*. U.S. Geological Survey, Miscellaneous Field Studies Map MF-2332. Version 1. Available: <http://pubs.usgs.gov/mf/2000/mf-2332/>. Accessed: September 21, 2015.

b. *Paleontological sensitivity* is based on the type of geologic unit or formation and to what extent the unit has been affected by human activities. See *Methods for Analysis,* below, for a more detailed explanation.

c. Vanderhurst, W. Lee, Jon C. Cummings, and David W. Andersen. 1982. The Santa Clara Formation as a Record of Late Cenozoic Uplift of the Santa Cruz Mountains, Santa Clara County, California. In R.V. Ingersoll and M.D. Woodburne (eds.), *Cenozoic Nonmarine Deposits of California and Arizona*. Society of Economic Paleontologists and Mineralogists, Pacific Section. University of California. 122 p.

d. University of California Museum of Paleontology. n.d. *Localities of the Miocene: The Monterey Foundation of California*. Available: <http://www.ucmp.berkeley.edu/tertiary/mio/monterey.html>. Accessed: September 21, 2015.

Northern Menlo Park is situated on Holocene alluvial fan deposits and Bay mud, which overlie older deposits, and on Pleistocene basin, alluvial fan, and stream terrace deposits.[36] These deposits all have potential to contain paleontological resources. Remains of land mammals, such as extinct mammoth, bison, and camel, have been reported from localities of similar age and origin in nearby areas, such as San Francisquito Creek, Middlefield Road in San Mateo County, and at the Stanford Linear Accelerator.[37] As discussed above, vertebrate fossils are considered sensitive paleontological resources. Much of northern Menlo Park is also situated on artificial fill of historic age. These Holocene and historic deposits overlie the Monterey Formation, which underlies the Bay Area as well as much of the rest of the California coast and parts of the southern Central Valley.

As shown in Table 3.7-2, the Miocene-age Monterey Formation has high paleontological sensitivity and has yielded fossils of marine mammals and other vertebrates.[38]

Project Site

Project Site Geology

The Project site is situated on Holocene alluvial fan deposits and Bay mud as well as artificial fill of historic age that overlies older deposits. The native deposits, including underlying older deposits, have the potential to contain paleontological resources. The geologic units that underlie the Project site are shown in Table 3.7-2.

Paleontological Potential at the Project Site

Artificial fill could include sediment from older rocks that originated elsewhere. Therefore, it is possible that there could be fossils in the artificial fill at the Project site, but because the fossils would have been transported from their original locations, they would lack stratigraphic context and be of limited scientific value. Pollen, plants, and shells have been recovered from Bay mud, but vertebrate fossils have not been reported. Remains of land mammals (extinct mammoth, bison, and horse) have been reported from localities in younger alluvium along the Bay margin in the Bay Area.[39] The Monterey Formation is known to produce marine fossils, including vertebrate fossils.[40] As discussed under *Methods for Analysis*, vertebrate fossils are considered sensitive paleontological resources.

[36] Brabb, E.E., Graymer, R.W., and Jones. D.L. 2000. *Geologic Map and Map Database of the Palo Alto 30' x 60' Quadrangle, California*. U.S. Geological Survey Miscellaneous Field Studies Map MF-2332. Version 1. Available: <http://pubs.usgs.gov/mf/2000/mf-2332/>. Accessed: September 21, 2015.

[37] University of California Museum of Paleontology. n.d. UCMP specimen search. Available: <http://ucmpdb.berkeley.edu/>. Accessed: September 21, 2015.

[38] University of California Museum of Paleontology. n.d. *Localities of the Miocene: The Monterey Foundation of California.* Available: <http://www.ucmp.berkeley.edu/tertiary/mio/monterey.html>. Accessed: September 21, 2015.

[39] University of California Museum of Paleontology. n.d. UCMP specimen search. Available: <http://ucmpdb.berkeley.edu/>. Accessed: September 21, 2015.

[40] University of California Museum of Paleontology. n.d. *Localities of the Miocene: The Monterey Foundation of California.* Available: <http://www.ucmp.berkeley.edu/tertiary/mio/monterey.html>. Accessed: September 21, 2015.

Environmental Impacts

This section describes the impact analysis related to cultural resources for the Project. It describes the methods used to determine the impacts of the Project and lists the thresholds used to conclude whether an impact would be significant. Impacts are determined to be no impact (NI), less than significant (LTS), less than significant with mitigation (LTS/M), or significant and unavoidable (SU). Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion, as needed.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would be considered to have a potentially significant effect if it would result in any of the conditions listed below.

- Cause a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource, pursuant to Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

Methods for Analysis

Records Search

Background research was conducted to identify any known cultural resources within 0.5 mile of the Project site. The research included a records search at the NWIC, Sonoma State University, Rohnert Park, in August 2015. Sources consulted during the records search included cultural resources studies and resource records, the Historic Properties Data File (August 24, 2015), the NRHP, the CRHR, California Historic Resources Inventory, California Historical Landmarks, and California Points of Historical Interest (May 1992 and updates).

No previously recorded cultural resources were identified by the NWIC in or adjacent to the Project site. However, four resources have been recorded within 0.5 mile of the Project site.

- **P-41-000282/CA-SMA-242:** This resource consists of a medium-density shell midden, which is highly disturbed by plowing/grading, about 0.5 mile west of the Project site. Fire-cracked rock, carbon, baked clay, lithics, a bowl mortar, and a possible human bone fragment have also been recorded at this site. A 2008 site record update, however, stated that there was no evidence of the previously recorded site despite a thorough inspection of the ground surface. Surface deposits within the recorded site were most likely destroyed within the railroad right-of-way.[41] This resource has not been evaluated for NRHP/CRHR eligibility.

[41] Whittaker, A. 2008. Continuation Sheet for P-41-00282/CA-SMA-242. Record on file at the Northwest Information Center, Sonoma State University, Rohnert Park, CA.

- **P-41-002292:** This resource consists of a shell scatter along the west side of Willow Road, about 0.5 mile southeast of the Project site. This resource has not been evaluated for NRHP/CRHR eligibility.
- **P-41-002351:** This historic-era resource consists of the Ravenswood Salt Works District, also known as the Alviso or Schilling Arden Salt Company. The district is located about 0.1 mile north of the Project site, encompassing the former salt ponds that now are a part of the Refuge. This historic-era resource is considered not eligible for the NRHP.
- **P-41-002415/CA-SMA-425:** This resource consists of shell, mammal bone, charcoal, and stone tool debris within dark midden soil in an apparent pit feature. This resource is located about 0.3 mile west of the Project site. This resource has not been evaluated for NRHP/CRHR eligibility.

Five cultural resources studies have covered portions of the Project site.

- S-3021, Dietz, S. 1976. *Archaeological Reconnaissance of the 100.6-acre Raychem Corporation Properties in Menlo Park, California.* No resources were identified during this study.
- S-7346, Offermann, J. 1985. *Archaeological Survey Report, Landscaping Project along Routes 84 and 101 in San Mateo and Alameda Counties* (04-SM/Ala-101, 84, 04253-033231). No resources were identified during this study.
- S-36481, Whitaker, A., P. Kaijankowski, J. Meyer, and B. Byrd. 2009. *Archaeological Survey Report for the Dumbarton Rail Corridor Project, San Mateo and Alameda Counties, California.* P-41-000282/CA-SMA-242 was re-investigated, and the site record was updated (see above description) during this study.
- S-38063, Kaptain, N. 2009. *Smart Corridors Geoarchaeological Sensitivity Research*. No resources were identified during this study.
- S-39604, Whitaker, A., P. Kaijankowski, J. Meyer, B. Byrd, and S. Waechter. 2012. *Archaeological Survey Report for the Dumbarton Rail Corridor Project, San Mateo and Alameda Counties, California.* P-41-000282/CA-SMA-242 was included in the study area, but because the site had been re-investigated in 2008, it was not updated at this time.

An additional 15 studies have been conducted within 0.5 mile of the Project site. These 15 studies consisted of studies for residential and commercial development. No resources within or adjacent to the Project site were identified in any of these studies.

Native American Consultation

ICF International (ICF) contacted the NAHC on August 20, 2015, and requested a search of its sacred land files. The NAHC responded on August 31, 2015, stating that a records search of the files failed to indicate the presence of Native American cultural resources in the immediate Project area.

The NAHC provided a list of 10 Native American contacts who might have information pertinent to the Project or have concerns regarding the Project. A letter explaining the Project, along with a map depicting the Project area, was sent to the contacts listed by the NAHC on September 3, 2015. The letters solicited responses from each of the contacts, should they have any questions, comments, or concerns regarding the Project.

Letters were sent to the following contacts:

- Katherine Erolinda Perez
- Jakki Kehl
- Linda G. Yamane
- Irene Zwierlein, chairperson, Amah Mutsun Tribal Band of Mission San Juan Bautista
- Michelle Zimmer, Amah Mutsun Tribal Band of Mission San Juan Bautista
- Valentin Lopez, chairperson, Amah Mutsun Tribal Band
- Ann Marie Sayers, chairperson, Indian Canyon Mutsun Band of Costanoan
- Rosemary Cambra, chairperson, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- Edward Ketchum, Amah Mutsun Tribal Band
- Andrew Galvan, Ohlone Indian Tribe

To date, no responses have been received from any of the Native American contacts regarding the Project. However, Native American correspondence is ongoing and will be updated if and when responses are received. Appendix 3.7 contains copies of the Native American correspondence.

Architectural and Historical Survey and Research

An ICF senior architectural historian conducted a survey of the Project site on August 17, 2015, and took photographs to note current conditions and visible alterations to the buildings. ICF conducted background research to gain a general understanding of the history of the City of Menlo Park, with a focus on settlement, development, and architecture. Available permits and plans filed with the City of Menlo Park were viewed in person by ICF architectural historian Aisha Fike on September 8, 2015, at the Planning Department permit counter in Menlo Park, California. An email was submitted to the Silicon Valley Historical Association on September 2, 2015, requesting available historical information pertaining to the Project site. John McLaughlin, who is with the association, responded on September 7, 2015, to inform ICF that the association does not have any specific information available for the subject property. Additional sources of information consulted include the California Historic Resources Inventory and the Menlo Park Historic Resources list; *San Francisco Chronicle* articles, through the San Francisco Library online database; Social Security Administration marriage and divorce records and Birth Index through Ancestry.com; and historic aerial photographs (historicaerials.com).

Paleontological Resources

As discussed above under *Paleontological Setting*, the fossil-yielding potential of a particular area depends on the geologic age and origin of the underlying rocks. It also depends on the processes that the rocks have undergone, both geologic and anthropogenic.

The Impact Mitigation Guidelines Revisions Committee of the Society of Vertebrate Paleontology (SVP) has published its *Standard Guidelines* in response to a recognized need to establish procedures for the investigation, collection, preservation, and cataloging of fossil-bearing sites. The *Standard Guidelines*, which are widely accepted among paleontologists and followed by most investigators, identify the two key phases of paleontological resource protection as (1) assessment and (2) implementation. Assessment involves identifying the potential for a project site or area to contain significant nonrenewable paleontological resources that could be damaged or destroyed by project excavation or construction. Implementation involves formulating and applying measures to reduce such adverse effects.

The SVP defines level of potential as one of four sensitivity categories for sedimentary rocks: High, Undetermined, Low, and No Potential.[42]

- **High Potential.** Assigned to geologic units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered as well as sedimentary rock units suitable for the preservation of fossils (e.g., Middle Holocene[43] and older, fine-grained fluvial sandstones…fine-grained marine sandstones, etc.). Paleontological potential consists of the potential for yielding abundant fossils, a few significant fossils, or "recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data."
- **Undetermined Potential.** Assigned to geologic units "for which little information is available concerning their paleontological content, geologic age, and depositional environment." In cases where no subsurface data already exist, paleontological potential can sometimes be assessed by subsurface site investigations.
- **Low Potential.** Field surveys or paleontological research may allow determination that a geologic unit has low potential for yielding significant fossils (e.g., basalt flows). Mitigation is generally not required to protect fossils.
- **No Potential.** Some geologic units have no potential to contain significant paleontological resources, such as high-grade metamorphic rocks (e.g., gneisses and schists) and plutonic igneous rocks (e.g., granites and diorites). Mitigation is not required.

Geologic maps were consulted to determine the geologic units present at and near the Project site. Once these were determined, a records search was conducted using the University of California Museum of Paleontology database of San Mateo County fossil records in the Project vicinity and the geologic units present. This was to confirm the presence of fossils in nearby areas with similar geologic settings and demonstrate the likelihood of fossil presence at the Project site. Based on information from the records search, paleontological sensitivity, based on SVP Guidelines, was assigned to each geologic unit present at the Project site (Table 3.7-2).

Impacts and Mitigation Measures

Impact CUL-1: Impacts on Historic Resources. The Project would not cause a substantial adverse change in the significance of a historical resource. (LTS)

The site survey and research conducted for the Project concluded that the former Raychem Corporation buildings at the Project site do not appear to be eligible for the CRHR under Criterion 1, 2, 3, or 4. The buildings also are not contributors to a CRHR-eligible historic district. As discussed above, technical inventions were successfully marketed by Raychem Corporation but not invented at the Project site (CRHR Criterion 1 [event]). Paul M. Cook, Raychem Corporation founder and engineer, did not market or initiate the manufacture of radiation crosslinking at the Project site (CRHR Criterion 2 [person]). Most of the buildings at the Project site were designed and constructed in the ubiquitous Corporate Modern

[42] Society of Vertebrate Paleontology. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Impact Mitigation Guidelines Revision Committee. Available: <http://vertpaleo.org/PDFS/8f/8fe02e8f-11a9-43b7-9953-cdcfaf4d69e3.pdf>. Accessed: September 21, 2015.

[43] The Holocene is the time period in the last approximately 11,700 years of Earth's geologic history. The exact extent of the "Middle Holocene" is not generally agreed upon and defined. One generally accepted definition is the period from 7,000 years before present to 5,000 years before present (NOAA National Climate Data Center. 2008. The Mid-Holocene "Warm Period." Available: <http://www.ncdc.noaa.gov/paleo/globalwarming/holocene.html>. Accessed: September 21, 2015. Last updated: August 20, 2008.)

style of architecture by engineer and architect Michael Cabak and lack architectural merit (Criterion 3 [architectural significance]). The buildings have no potential to be a source of important historical information (Criterion 4 [information source]). In addition, no listed or eligible historic district encompasses or is located adjacent to the Project site. Therefore, demolition of Buildings 301–306, as proposed during construction of the Project, would not affect the historic resources at the Project site.

No previously recorded historic resources were identified on or adjacent to the Project site. However, one historic site has been recorded within 0.5 mile of the Project site. As discussed in *Methods for Analysis*, this site is P-41-002351 (Ravenswood Salt Works District). This resource is considered not eligible for the NRHP. Project implementation would not affect any of the listed historic resources because distance from the Project site prevents any potential for indirect impact on the setting of the historic resources. As such, Project implementation would not affect a historic resource at the Project site because it does not include any historic resources. In addition, because of distance, construction of the proposed buildings would not affect historic sites. Therefore, the impact would be ***less than significant.***

Impact CUL-2: Impacts on Archaeological Resources. The Project has the potential to encounter and damage or destroy previously unknown subsurface archaeological resources during construction. (LTS/M)

The Project site lies within an area once that was occupied by the Costanoan, or Ohlone, group of Native Americans. Native American archaeological sites in this area of San Mateo County tend to be situated near the historic margin of the Bay's tidal marshland and along creeks that drain upland terrain that borders the Bayshore plain. However, the majority of the Project site is located on former marshland. Therefore, prehistorically, there was a lack of stable, dry ground. The portion of the Project site not located within the former marshland is located on artificial fill.

No archaeological resources were identified in or adjacent to the Project site. However, three prehistoric sites have been recorded within 0.5 mile of the Project site. As discussed in *Methods for Analysis*, these sites are P-41-000282/CA-SMA-242 (a medium-density shell midden, highly disturbed by plowing/grading), P-41-002292 (a shell scatter), and P-41-002415/CA-SMA-425 (shell, mammal bone, charcoal, and stone tool debris within dark midden soil in an apparent pit feature). Therefore, there is a low probability for previously undiscovered archaeological resources to be encountered during construction of various elements of the Project. However, if encountered during Project construction, such resources could be damaged or destroyed, resulting in a ***potentially significant*** impact.

MITIGATION MEASURE. Impacts on archaeological resources would be reduced to a ***less-than-significant*** level by implementing Mitigation Measure CUL-2.1.

CUL-2.1: Perform Construction Monitoring, Evaluate Uncovered Archaeological Features, and Mitigate Potential Disturbance of Identified Significant Resources at the Project Site. Prior to demolition, excavation, grading, or other construction-related activities on the Project site, the Project Sponsor shall hire a qualified professional archaeologist (i.e., one who meets the Secretary of the Interior's professional qualifications for archaeology or one under the supervision of such a professional) to monitor, to the extent determined necessary by the archaeologist, Project-related earth-disturbing activities (e.g., grading, excavation, trenching). In the event that any prehistoric or historic-period subsurface archaeological features or deposits, including locally darkened soil (midden), that could conceal cultural deposits, animal bone, obsidian, and/or mortar are discovered during demolition/construction-related earthmoving activities, all

ground-disturbing activity within 100 feet of the discovery shall be halted immediately, and the Planning and Building Divisions shall be notified within 24 hours. The City shall consult with the Project archaeologist to assess the significance of the find. Impacts on any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by the City that are consistent with the Secretary of the Interior's Standards for Archaeological Documentation. If Native American archaeological, ethnographic, or spiritual resources are discovered, all identification and treatment of the resources shall be conducted by a qualified archaeologist and Native American representatives who are approved by the local Native American community as scholars of the cultural traditions. In the event that no such Native American is available, persons who represent tribal governments and/or organizations in the locale in which resources could be affected shall be consulted. When historic archaeological sites or historic architectural features are involved, all identification and treatment is to be carried out by historical archaeologists or architectural historians who meet the Secretary of the Interior's professional qualifications for archaeology and/or architectural history.

Impact CUL-3: Impacts on Paleontological Resources. The Project could destroy a unique paleontological resource or site or unique geologic feature. (LTS/M)

The Project has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts on paleontological resources would depend on the depth, extent, and type of soil-disturbing activities that occur as a result of construction as well as the paleontological sensitivity of the materials underlying the site.

Site preparation would involve earthwork, such as excavation, grading, trenching, and the installation of foundation piles, all of which would encounter artificial fill and could encounter native deposits. Activities that disturb artificial fill would not result in a significant impact on paleontological resources because, as discussed above, fill has low paleontological sensitivity. Activities that intercept clay soils or the underlying older deposits could expose undisturbed deposits that contain fossils. These activities could damage or destroy fossils. Because the surficial soils and older underlying deposits have undetermined as well as high paleontological sensitivity, this is considered a ***potentially significant*** impact.

MITIGATION MEASURE. Mitigation Measure CUL-3.1 would ensure that construction personnel would recognize fossil materials and follow proper notification procedures in the event that such materials are uncovered during construction. Implementation of Mitigation Measure CUL-3.1 would reduce potentially significant impacts on paleontological resources to a ***less-than-significant*** level.

CUL-3.1: Conduct Protocol and Procedures for Encountering Paleontological Resources. Prior to the start of any subsurface excavations that would extend beyond previously disturbed soils, all construction forepersons and field supervisors shall receive training by a qualified professional paleontologist, as defined by the SVP, who is experienced in teaching non-specialists to ensure they recognize fossil materials and follow proper notification procedures in the event any such materials are uncovered during construction. Procedures to be conveyed to workers include halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who shall evaluate its significance.

If a fossil is determined to be significant and avoidance is not feasible, the paleontologist shall develop and implement an excavation and salvage plan in accordance with SVP standards. Construction work in these areas shall be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and cataloged. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall then be deposited in a scientific institution with paleontological collections. A final Paleontological Mitigation Plan Report shall be prepared that outlines the results of the mitigation program. The City shall be responsible for ensuring that the monitor's recommendations regarding treatment and reporting are implemented.

Impact CUL-4: Impacts on Human Remains. The Project has the potential to encounter or discover human remains during excavation or construction. (LTS/M)

As noted earlier, the NWIC background records search did not identify any human remains in or within 0.5 mile of the Project site. The Project site is located either within former marshland or on artificial fill. However, because three prehistoric sites have been recorded within 0.5 mile of the Project site, there is a potential for of encountering human remains during construction. Such resources may be eligible for listing in the CRHR. If encountered during construction, such resources could be damaged or destroyed, resulting in a ***potentially significant*** impact.

MITIGATION MEASURE. Mitigation Measure CUL-4.1 would reduce impacts to a ***less-than-significant*** level.

CUL-4.1: Comply with State Regulations Regarding the Discovery of Human Remains at the Project Site. If human remains are discovered during any construction activities, all ground-disturbing activity within 50 feet of the remains shall be halted immediately, and the county coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. Additionally, the Planning and Building Divisions shall be notified. If the remains are determined by the county coroner to be Native American, the NAHC shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The Project Sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Menlo Park Community Development Department, Planning Division, shall be responsible for approval of recommended mitigation, consistent with the provisions and standards of state law, as set forth in State CEQA Guidelines Section 15064.5(e) and Public Resources Code Section 5097.98. The applicant shall implement approved mitigation, to be verified by the Planning Division, before the resumption of ground-disturbing activities within 50 feet of where the remains were discovered.

Cumulative Impacts

The geographic context for the analysis of cumulative impacts associated with cultural resources considers a broad regional system. The cumulative context for this cultural resources analysis is the Bay Area, an area where common patterns of prehistoric and historic development have occurred. This analysis accounts for anticipated cumulative growth within the nine counties that make up the Bay Area.

The projects considered in this analysis are shown in Table 3.0-3 of Chapter 3, *Environmental Impact Analysis.* In addition, buildout of the general plans of the nine Bay Area counties and associated cities is considered in the cumulative context.

Impact C-CUL-1: Cumulative Impacts on Historical Resources. Development in the Bay Area could have significant impacts on historical resources. However, construction of the Project would not contribute to a cumulative impact. (LTS)

Urban development that has occurred over the past several decades in the Bay Area has resulted in the demolition and alteration of historical resources. It is reasonable to assume that present and future development will continue to result in impacts on historical resources. Because all historical resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. Federal, state, and local laws protect historical resources in most instances. Even so, it is not always feasible to protect historical resources, particularly when preservation in place would prevent implementation of projects. For this reason, the cumulative effects of development in the region on historical resources are considered significant.

The Project includes the demolition of Buildings 301–306 and the construction of two new office buildings (Buildings 21 and 22) and a 200-room hotel. Other separate projects on the Project site considered in the cumulative analysis include the renovation of Building 23 and the demolition of Buildings 307–309. These buildings are older than 50 years; however, none of the onsite buildings that would be demolished as part the Project, or other separate projects, are eligible for listing in the CRHR individually and are not considered part of a historic district. Therefore, the cumulative impact on historical resources would be ***less than significant.***

Impact C-CUL-2: Cumulative Impacts on Archaeological, Paleontological Resources, and Human Remains. Construction activities on the Project site and other development could result in impacts on archaeological resources, paleontological resources, and human remains. (LTS)

Given that known prehistoric resources have been identified within 0.5 mile of the Project site, there is the possibility that previously undiscovered archaeological resources, including human remains, could be encountered during construction. The Project, in combination with other foreseeable development in the identified geographic context, including other separate projects on the Project site, also has the potential to encounter and damage or destroy previously unknown paleontological resources during construction. All significant archaeological resources, paleontological resources, and human remains are unique and nonrenewable resources.

As analyzed above, the Project could contribute to the cumulative loss of archaeological, paleontological resources, and human remains. Therefore, the Project's contribution could be considerable. Mitigation Measures CUL-2.1, CUL-3.1, and CUL-4.1 prescribe discovery procedures for any previously unknown archaeological, paleontological resources, or human remains encountered during Project construction. The discovery procedures are consistent with professional standards and, because they pertain to discovered human remains, are compliant with state law. Compliance with these mitigation measures would reduce the Project's contribution to a cumulative impact to a ***less-than-significant*** level.