

Process Following Release of the Draft EIR

A Draft Environmental Impact Report (EIR), pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Section 21000 et seq.), was prepared by the City of Menlo Park (City) to disclose the potential environmental effects of the Facebook Campus Expansion Project (Project). The Draft EIR, issued for public review on May 26, 2016, includes a description of the Project, an assessment of its potential effects, a description of mitigation measures to reduce significant effects that were identified, and consideration of alternatives that could address potential significant environmental impacts. The Draft EIR was released on May 26, 2016 for a 45-day review period, ending on July 11, 2016. During this review period, the document was reviewed by various state, regional, and local agencies, as well as by interested organizations and individuals. Comment letters on the Draft EIR were received from 10 agencies, eight organizations, and 43 individuals. The public review period also included a Planning Commission (Commission) hearing on June 20, 2016, at which the public could provide comments on the Draft EIR. Please see Chapter 2, *List of Commenters*, for a listing of all agencies, organizations, and individuals who commented on the Draft EIR.

This document responds to written and oral comments on the Draft EIR that were raised during the public review period, and it contains revisions intended to correct, clarify, and amplify the Draft EIR. The responses and revisions in this document substantiate and confirm or correct the analyses contained in the Draft EIR. No new significant environmental impacts, no new mitigation measures, and no substantial increase in the severity of an earlier identified impact have resulted from responding to comments. Together, the previously released Draft EIR and this responses-to-comments document constitute the Final Environmental Impact Report (Final EIR). As the lead agency, the City must certify the Final EIR before action can be taken on the Project. Certification requires that the lead agency make findings that the Final EIR complies with CEQA.

Project Description

Hibiscus Properties, LLC (Project Sponsor), an affiliate of Facebook, Inc., is proposing to redevelop an existing approximately 58-acre industrial site, known as the TE Connectivity (TE) Campus, by demolishing existing onsite buildings and landscaping and constructing two new office buildings and a hotel (Project). The Project would expand the existing Facebook Campus, which currently consists of Buildings 10–19 (formerly known as the East Campus), located north of Bayfront Expressway/State Route (SR) 84; Building 20, located east of the Project site; and Building 23, located at the western end of the Project site and currently undergoing tenant improvements.

The two proposed office buildings (Buildings 21 and 22) would encompass approximately 962,400 gross square feet (gsf). In addition, the Project includes a 200-room limited-service¹ hotel with approximately 174,800 gsf. Development of the office buildings and hotel would result in a net increase of approximately 121,300 gsf at the Project site. The Project Sponsor is also proposing a trip cap as part of the Project to limit the number of daily and peak-period trips (AM and PM) and reduce traffic impacts.

¹ A limited-service hotel generally offers fewer services (e.g., in-house drinking and dining options) than a full-service hotel.

Although Building 20 is currently subject to a trip cap under a prior entitlement process, the Project would implement a trip cap that would apply to both the Project site (including Building 23) and Building 20. In addition, the Project would include a Transportation Demand Management (TDM) program to promote alternatives to private automotive travel and reduce the number of single-occupancy vehicle trips as well as the resulting traffic and greenhouse gas (GHG) emissions.

Building 21 would be constructed during the first phase of development. Building 21 would be connected to the existing Building 20 through an enclosed bridge. Building 22 would be constructed during the second phase of development. It is anticipated that Building 22 would be connected to Building 21 through an open-air bridge. The hotel would be located near the corner of Chilco Street and SR 84 and also constructed in the second phase. The Project would provide approximately 3,533 parking spaces for the office buildings, hotel, and Building 23.^{2,3} The office buildings and the hotel would be approximately 75 feet in height.

The Project would be organized around a publicly accessible open space that would provide a connection to the San Francisco Bay Trail (Bay Trail) and a gathering space for the community. A multi-use bicycle/pedestrian bridge over SR 84 would allow access to the Bay Trail and Bedwell Bayfront Park (Bayfront Park) from the Project site and the Belle Haven neighborhood. The Project would also include bicycle/pedestrian pathways that would be separated from the internal vehicle access roads where feasible. The onsite paths would connect the proposed office buildings to the existing Building 20 east of the Project site and Facebook Buildings 10–19 north of SR 84. In addition, a new approximately 0.7-acre terraced garden space, primarily for employee use, would be provided between Buildings 20 and 21. The perimeter of the Project site would have a landscaped buffer. As a separate project, Facebook (in partnership with the City) is constructing bicycle and pedestrian improvements on Chilco Street, along the perimeter of the site, to improve bicycle and pedestrian safety in the area. The frontage improvements would also include landscaping along the frontage.

The Project site is zoned M-2 (General Industrial) and M-2(X) (General Industrial, Conditional Development). The current conditional development permit and “X” combining district apply only to specific buildings that exceed the 35-foot height limit of the M-2 zoning district, not the overall site. It is designated as Limited Industry under the City of Menlo Park (City) General Plan and can be built out to approximately 1.142 million gsf for office uses under the allowable 0.45 floor area ratio (FAR) and up to approximately 1.396 million gsf (0.55 FAR) for other general industrial uses, including, but not limited to, warehousing, manufacturing, printing, assembling, related office and laboratory uses, and shipping and receiving. The Project would require the entire site to be rezoned from M-2 and M-2(X) to M-2(X) to exceed the maximum 35-foot height limit. In addition, a Conditional Development Permit (CDP) would be incorporated as part of the Project to define development standards and create mechanisms for the City to process any revisions to the Project that might arise over the buildout period. The Project Sponsor also proposes to amend the zoning ordinance text to accommodate the proposed hotel and enter into a development agreement with the City to create vested rights in Project approvals and specify benefits to the City.

² If the hotel is constructed, then the parking spaces associated with the hotel could be in a surface parking lot under the podium of the hotel. If the hotel is not constructed, then a surface parking lot with the same number of spaces would be provided in the northwestern portion of the Project site.

³ Building 23 is not part of the Project but is on the Project site. The parking spaces developed as part of the Project would be available to Building 23.

Significant and Unavoidable Environmental Impacts

Section 21100(b)(2)(A) of the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) requires that an EIR identify any significant environmental effects that cannot be avoided if the Project is implemented. Most impacts identified for the Project would either be less than significant or could be mitigated to a less-than-significant level. Chapter 5, *Alternatives*, of the Draft EIR summarizes the significant and unavoidable impacts that would result from implementation of the Project as follows.

Project-Level Impacts

- **Peak Hour Motor Vehicle Traffic at Study Intersections.** Increases in traffic associated with the Project would result in increased delays during the a.m. and p.m. peak hours causing significant and unavoidable impacts at study intersections. (Impact TRA-1)
- **Peak Hour Motor Vehicle Traffic on Routes of Regional Significance.** Increases in peak hour traffic associated with the Project would result in significant and unavoidable impacts to regionally significant segments of State Route 84 / Bayfront Expressway and US 101. (Impact TRA-2)
- **Daily Motor Vehicle Traffic on Roadway Segments.** Increases in daily traffic associated with the Project increase daily traffic volumes on study segments, resulting in significant and unavoidable impacts on roadway segments. (Impact TRA-3)
- **Increased Delay to Transit Vehicles.** Increases in peak hour traffic associated with the Project would increase delay to AC Transit Dumbarton buses operating on Bayfront Expressway, resulting in a significant and unavoidable impact. (Impact TRA-8)
- **Conflicts with Applicable Plans and Policies.** The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, especially EO S-3-05. (Impact GHG-2)

Cumulative Impacts

- **Cumulative Peak Hour Traffic at Study Intersections.** Increases in traffic associated with the Project would contribute to increased delay during the a.m. and p.m. peak hours under Year 2040 conditions contributing to significant and unavoidable cumulative impacts at study intersections. (Impact TRA-10)
- **Cumulative Peak Hour Traffic on Routes of Regional Significance.** Increases in peak hour traffic associated with the Project under Year 2040 conditions would contribute to significant and unavoidable cumulative impacts to regionally significant segments of State Route 84/Bayfront Expressway, and US 101. (Impact TRA-11)
- **Cumulative Daily Traffic on Roadway Segments.** Increases in daily traffic associated with the Project would contribute to increased daily traffic volumes on study segments under Year 2040 conditions, contributing to significant and unavoidable cumulative impacts on roadway segments. (Impact TRA-12)

Project Alternatives

CEQA and the State CEQA Guidelines require that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (State CEQA Guidelines Section 15126.6(a)). The EIR discusses and analyzes the No Project Alternative and a reduced intensity alternative. The EIR analyzes the impacts of the alternatives and compares the significant impacts of the alternatives to the significant environmental impacts of the Project as proposed. These alternatives are described in more detail in Chapter 5, *Alternatives*, of the Draft EIR.

- **No Project Alternative.** The No Project Alternative is provided in this Draft EIR to compare the impacts of the Project with what would be reasonably expected to occur in the foreseeable future if the Project were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (CEQA Guidelines Section 15126.6(e)(2)).
- **Reduced Intensity Alternative.** The Reduced Intensity Alternative assumes a 30 percent reduction in building area and the number of employees. As discussed in Chapter 5, the Reduced Intensity Alternative is the Environmentally Superior Alternative.

Purpose of This Responses-to-Comments Document

Under CEQA, the City is required, after completion of a Draft EIR, to consult with and obtain comments from public agencies having jurisdiction by law with respect to the Project, and to provide the general public with an opportunity to comment on the Draft EIR. As the lead agency, the City is also required to respond to significant environmental issues raised in the review and consultation process.

This responses-to-comments document has been prepared to respond to public agency and general public comments received on the Draft EIR for the Project, which was circulated for a 45-day public review period from May 26, 2016 to July 11, 2016, and to respond to comments received at the Commission hearing on June 20, 2016. This document contains the public comments received on the Draft EIR, written responses to those comments, and changes made to the Draft EIR in response to the comments.

The responses-to-comments document provides clarification and further substantiation for the analysis and conclusions presented in the Draft EIR. Additionally, the responses correct and remedy minor technical mistakes or errors identified in the Draft EIR. The purpose of the responses-to-comments document is to address concerns raised about the environmental effects of the Project and the process by which the City conducted the CEQA process. Comments that express an opinion about the merits of the Project or Project alternatives, rather than raise questions about environmental impacts and mitigation measures and alternatives, the adequacy of the Draft EIR or the Project’s compliance with CEQA, are not examined in detail in this document. In addition, this document does not provide a response regarding financial concerns or Project design that would not have a physical environmental impact. Section 15088 of the CEQA Guidelines stipulates that responses should pertain to major or significant environmental issues raised by commenters. As explained earlier, the previously released Draft EIR and this responses-to-comments document together constitute the Final EIR.

How to Use This Report

This document addresses substantive comments received during the public review period and consists of five sections:

- *Chapter 1 – Introduction.* Reviews the purpose and contents of the responses-to-comments document.
- *Chapter 2 – List of Commenters.* Lists the public agencies, organizations, and individuals who submitted comments on the Draft EIR.
- *Chapter 3 – Master Responses.* Provides master responses to comments that were raised in multiple comment letters and warrant comprehensive responses.
- *Chapter 4 – Responses to Comments.* Contains each comment letter and written response to the individual comments. In Chapter 4, specific comments within each comment letter have been bracketed and enumerated in the margin of the letter. Each commenter has been assigned a discrete comment letter number, as listed in Chapter 2. Responses to each of these comments follow each comment letter reproduced in Chapter 4. For the most part, the responses provide explanatory information or additional discussion of text contained in the Draft EIR. In some instances, the response supersedes or supplements the text of the Draft EIR for accuracy or clarification. New text that has been added to the Draft EIR is indicated with underlining. Text that has been deleted is indicated with ~~striketrough~~.
- *Chapter 5 – Revisions to the Draft EIR.* Provides a comprehensive listing of the text changes to the Draft EIR that have resulted from responding to comments or staff-initiated changes.

