3.2 Aesthetics

This section describes the existing aesthetic resources and visual characteristics of the Project site and its immediate vicinity along with existing plans and policies that are relevant to visual resource issues within the City of Menlo Park (City). This section also evaluates the effect on existing visual resources associated with implementation of the Commonwealth Corporate Center Project (Project). Potential impacts on aesthetic and visual resources due to implementation of the Project are evaluated based on a review of photographs, visual simulations, site reconnaissance, and Project data. The specific impacts examined in this section pertain to the Project's potential to change the visual quality and character of the Project area and to create new sources of light and glare.

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 building heights and landscaping.

Existing Conditions

Regulatory Setting

City of Menlo Park General Plan. The General Plan guides development and use of land within the City. Several goals and policies of the General Plan apply broadly to aesthetics across the City. The following policy from the Land Use Element of the General Plan pertain to the Project.

> *Policy I-G-10:* Extensive landscaping should be included in public and private development, including greater landscaping in large parking areas. Where appropriate, the City shall encourage placement of a portion of the required parking in landscape reserve until such time as the parking is needed. Plant material selection and landscape and irrigation design shall adhere to the City's Water Efficient Landscaping Ordinance.

The following policies from the Open Space and Conservation Element of the City's General Plan pertain to the Project.

> *OSC1.12:* Landscaping and Plazas. Include landscaping and plazas on public and private lands, and well-design pedestrian and bicycle facilities in areas of intensive non-vehicular activity. Require landscaping for shade, surface runoff, or to obscure parked cars in extensive parking areas.
>
> *OCS1.13*: Yard and Open Space Requirements in New Development. Ensure that required yard and open spaces are provided for as part of new multi-family residential, mixed-use, commercial, and industrial development.
>
> *OCS1.15*: Heritage Trees. Protect Heritage Trees, including during construction activities through enforcement of the Heritage Tree Ordinance (Chapter 13.24 of the Municipal Code).

Menlo Park Municipal Code, Chapter 13.24, Heritage Trees. Chapter 13.24 protects the health and maintenance of Heritage Trees, which are trees or groups of trees of historical significance, special character, or community benefit. Heritage Trees include oak trees native to California (Genus *Quercus*) that have trunks of 31.4 inches or greater circumference and all trees other than oaks that have a trunk with a circumference of 47.1 inches or more, measured 54 inches above natural grade.

Menlo Park Municipal Code, Chapter 16.64, Fences, Walls, Trees, and Hedges. The Zoning Ordinance, Chapter 16.64, includes standards for fences in nonresidential and residential areas. In

nonresidential areas, fences, walls, hedges, and similar structures located between the building and front lot line are required to obtain approval by the Community Development Director. The following features must be considered when obtaining approval: structural stability; aesthetics; general health, safety, and welfare of the community; and clear lines of sight for vehicular and pedestrian traffic or other safety factors.

Design Guidelines for Signs. The Design Guidelines for Signs[1] provides regulations for the design of signs in residential and nonresidential areas. The stated intent of the guidelines is to

> . . . encourage signage that helps maintain the positive image of the area enjoyed by the residents and businesses of the City. Every Menlo Park business is encouraged to post an attractive sign stating the name of the business. The sign should be at a scale appropriate to the pedestrian and vehicular streetscape and the nature of the business.

All new and modified signs require approval by the Director of Community Development or his/her designee. At this time, no plans for signage have been submitted to the City.

Architectural Control. Per Section 16.68.020 of the Municipal Code, any proposal for a new structure, addition to an existing structure, or change to the exterior of a structure that requires a building permit (with the exception of single-family dwellings, duplexes, and accessory buildings) also requires that the Planning Commission and, for this Project, the City Council, conduct architectural control review with regard to the following findings.

1. That the general appearance of the structures is in keeping with character of the neighborhood.
2. That the development will not be detrimental to the harmonious and orderly growth of the City.
3. That the development will not impair the desirability of investment or occupation in the neighborhood.
4. That the development provides adequate parking as required in all applicable City ordinances and has made adequate provisions for access to such parking.

Environmental Setting

Regional Context

The City of Menlo Park is a 19-square-mile municipality situated approximately 30 miles south of San Francisco and about 20 miles north of San Jose on the San Francisco Peninsula (Peninsula). Menlo Park is one of over a dozen cities located on the flatter portions of the western and southern margins of San Francisco Bay (Bay). The municipalities of Atherton and Redwood City border Menlo Park to the north, and Palo Alto and East Palo Alto border Menlo Park to the south.

Urban development within the region is largely concentrated between the Bay and the Interstate 280 (I-280) corridor. In general, the Peninsula is developed with low-density uses within distinct neighborhoods that include commercial, retail, and residential buildings. Larger-scale development, such as office parks and industrial buildings, tend to be located between the Bay and US 101. Some high-rise office, apartment, and hospital buildings are located between US 101 and I-280; however, these buildings are mainly concentrated along the US 101 and El Camino Real corridors.

[1] City of Menlo Park Community Development Department, Planning Division. 2008. "Design Guidelines for Signs." August. Available: <http://www.menlopark.org/departments/pln/signdesgnguide.pdf.> Accessed: May 7, 2013.

The Bay and its natural features are key visual components in the eastern and northern portions of the City. The principal topographic feature visible from the City is the Santa Cruz Mountain Range, which runs the length of the Peninsula and forms a barrier between the Pacific Ocean and the Bay. The mountain range is visible from adjacent cities and the majority of Menlo Park, especially to the north and east of US 101. The portion of the mountain range visible from Menlo Park and the adjacent cities is Skyline Ridge, rising over 2,400 feet in height and located approximately 7 miles southwest of the Project site.

Project Vicinity

The mix of developed uses, including industrial and office uses, in the immediate Project vicinity influences the visual and urban design character of the Project site. The Project site is part of an urbanized, largely built-out, portion of the City characterized by free-standing buildings. With recent construction of office buildings and the approval of the Menlo Gateway Project, this area is transitioning from low-scale manufacturing, industrial, and warehousing buildings to larger-scale corporate and office campuses. The Menlo Gateway Project, located a quarter-mile north along US 101, will include seven and eight story office buildings and a hotel. Construction is expected to begin on this project in late 2015.

The Project vicinity is currently characterized by one- to two-story, mostly tilt-up construction with several two-to three-story newer office buildings adjacent to the Project site along Commonwealth Drive and Jefferson Drive. These newer buildings are surrounded by manicured landscaped setbacks, tree-lined streets, and surface parking lots. The older industrial uses are often located on large parcels of land with low-rise, boxy buildings that have limited windows and no decorative façades. The buildings are surrounded by paved parking lots and sparse landscaping. Overhead utility lines are visible in most areas, and sidewalks are typical; however, there are no designated bicycle lanes or pedestrian trails. No scenic resources, such as rock outcroppings, cliffs, or knolls are present in the Project vicinity, although mature trees are present throughout the area.

The Project vicinity is relatively flat with limited long-range views, in part due to the prevalence of existing buildings that block views of the surroundings. In addition, mature trees and vegetation provide a visual separation and screening between existing buildings, the Belle Haven neighborhood to the east, and US 101 and the Suburban Park-Lorelei Manor-Flood Park Triangle neighborhood to the south. Visual resources to the north, such as the San Francisco Bay, the hilly open space of Bedwell-Bayfront Park, salt marshes, and the Dumbarton Bridge, are not visible from the majority of the Project vicinity; these resources are only visible from areas immediately adjacent to Bayfront Expressway.

The Belle Haven neighborhood, to the south of the decommissioned Dumbarton Rail Corridor and east of the Project site, generally consists of one- to two-story houses on medium-sized lots, with ample street setbacks, landscaped front yards, mature street trees, and well-maintained sidewalks. The neighborhood also features open space areas, parks, and a small commercial retail area adjacent to Willow Road/State Route (SR) 114.

Project Site

As described in Chapter 2, *Project Description*, the Commonwealth Site comprises approximately 13.27 acres. The Project site is immediately bordered by Jefferson Drive to the north; industrial uses and office parks to the north, east, and west; the Dumbarton Rail Corridor to the southeast; and US 101 to the south.

Commonwealth Site. The Commonwealth Site is currently accessible by a gated entrance on Commonwealth Drive. The 12.1-acre Commonwealth Site is bound by office parks to the north and west, the Jefferson Site to the north, and US 101 to the south. In addition, the site is directly adjacent to the southeast by the Dumbarton Rail Corridor, with Joseph P. Kelly Park (Kelly Park) further to the east. The site is enclosed by a chain-link fence topped with barbed wire and dense landscaping along its north, south, and west perimeter. Limited landscaping is located on the eastern perimeter, allowing for full views of the Dumbarton Rail Corridor.

Visual Character. The Commonwealth Site was formerly occupied by Diageo North America and was used as a spirits distilling, bottling, and distribution plant. The main manufacturing building was constructed in 1956, with an addition constructed in 1970.[2] As depicted in Figures 3.2-1a, 3.2-1b, and 3.2-1c, the Commonwealth Site includes three single-story buildings, a tank farm, processing equipment areas, a 500,000-gallon fire suppression water tank, storage areas, and associated parking and unkempt landscaped areas. Additional structures are located in the northern portion of the Commonwealth Site, including water storage, a garage, a boiler room, and outdoor storage. In total, the Commonwealth Site consists of approximately 217,396 square feet (sf) of building area.

The Commonwealth Site has remained unoccupied since the site's closure in 2011. Consequently, the site is generally not maintained and features rundown industrial buildings and cracked paved surfaces. An abandoned railroad spur from the Dumbarton Rail Corridor (Figure 3.2-1d) bisects the Commonwealth Site and connects to the main manufacturing building. Utility poles and wires run along the site's southern perimeter, adjacent to US 101.

Onsite Topography. The Commonwealth Site is relatively flat and lies at an elevation of approximately 6.7 to 11.9 feet above mean sea level (msl). The parking lots are generally graded towards the existing drainage facilities. There are several feet of fill within the building footprints, elevating the interior floor above the surrounding exterior grade.[3]

Vegetation. The existing Project site (including the Jefferson Site) is comprised of approximately 93.4 percent (540,577 sf) impervious surfaces with limited vegetation. Small ruderal weeds grow between the cracked pavement. In addition, as shown in Figure 3.2-1a, a lawn with some mature trees is located at the entrance of the office area of the manufacturing building. The north, south, and west perimeter is covered in moderate to dense trees and bushes, providing a visual barrier between the site and the exterior uses. In total, the arborist report prepared for the Commonwealth Site (included as Appendix 3.2) evaluated 27 trees, 13 of which qualify as heritage trees under the City's Tree Ordinance.[4]

Lighting and Glare. Light sources at the Commonwealth Site are extremely limited due to the unoccupied nature of the site. Although there are some light fixtures on the existing buildings and flood lights around the paved parking areas and the manufacturing areas, these are not currently in use. Light sources in the surrounding areas include lighting in the office building parking lots to the north and west, field lighting at Kelly Park to the east, cobra-style street lighting along Commonwealth Drive, and vehicular headlights on US 101. Limited glass or metallic surfaces, or other sources of glare, are present. Figure 3.2-1d depicts some of the lighting fixtures within and bordering the site.

[2] PES Environmental, Inc. 2011. "Phase I Environmental Site Assessment: Former Diageo North America Facility, 151 Commonwealth Drive, Menlo Park, California." November 29.

[3] Cornerstone Earth Group. 2012. "Preliminary Geotechnical Investigation: Commonwealth Office Complex." March 14.

[4] McClenahan Consulting, LLC. 2012. "Tree Survey." 151 Commonwealth and 164 Jefferson. March 27.

Jefferson Site. The Jefferson Site is currently accessible by two driveways in the northern portion of the site along Jefferson Drive. The 1.17-acre (51,183-sf) site is bound by Jefferson Drive to the north, office parks to the east, south, and west, and the Commonwealth Site to the south. The site is enclosed by a chain-link fence and dense landscaping along its eastern, southern, and western perimeters. The northern boundary along Jefferson Drive is open to the street.

Visual Character. The Jefferson Site currently is occupied by a one-story, 20,462-sf building that is used as warehouses and offices for storage and light industrial uses. The northern (front) façade of the building (Figure 3.2-2a), which is setback from Jefferson Drive, includes glass doors, concrete awnings, and decorative paint. The western and eastern façades (Figures 3.2-2b and 3.2-2c) include glass doors, solid doors, and roll-up service doors with decorative painting and no articulation. The southern façade (the back of the building) (Figure 3.2-2d) features one window. Surrounding the building is a surface parking lot for 47 vehicles and mature perimeter landscaping. Utility poles and wires traverse the northern portion of the site along Jefferson Drive.

Onsite Topography. The Jefferson Site is relatively flat and lies at an elevation of approximately 6.6 to 7.4 feet above msl. The onsite surface parking lot and the existing building are at equal grade. However, a gentle slope rises from Jefferson Drive to the front of the building.

Vegetation. The majority of the Jefferson Site consists of impervious surfaces and limited vegetation. As shown in Figure 3.2-2a, a sloping lawn is located between Jefferson Drive and the existing building with three mature trees and manicured hedges. The eastern, southern, and western perimeters are covered in moderate to dense trees and bushes, providing a visual barrier between the site and the exterior uses. In total, the Jefferson Site evaluated 18 trees, 11 of which qualify as heritage trees under the City's Tree Ordinance.[5]

Lighting and Glare. The Jefferson Site includes mounted light fixtures on the existing building, parking lot lighting, and accent lighting at the front of the building. Light sources in the surrounding areas include offsite parking lot lights and cobra-style street lighting along Jefferson Drive. Although the building includes some glass doors, reflective surfaces are minimal and blocked from exterior areas by vegetation and fencing.

Onsite Visibility

Commonwealth Site. Within the interior of the Commonwealth Site, views are limited due to distance, flat topography, existing onsite buildings, and perimeter fencing and vegetation. Foreground views include the decommissioned distillery buildings and vast expanses of impervious surfaces. Looking north (Figure 3.2-3a) and west, views consist of the neighboring two- to three-story office buildings largely screened by mature vegetation, fencing, and surface parking lots. Facing east (Figure 3.2-3b), views outside of the Commonwealth Site include the tracks of the Dumbarton Rail Corridor, vegetation surrounding Kelly Park, and lighting for the park's tennis courts and athletic fields. Views facing south (Figure 3.2-3c) encompass US 101 and the Dumbarton Rail Corridor overcrossing. However, because the site is above grade from US 101, the freeway is only visible from the southernmost portion of the site. Across US 101, some development on the border of the Suburban Park-Lorelei Manor-Flood Park Triangle neighborhood is visible through the mature vegetation. Background views from certain locations of the Commonwealth Site, looking south, include mainly obstructed and channelized views of the Santa Cruz Mountain Range (Figure 3.2-3d).

[5] McClenahan Consulting, LLC. 2012. "Tree Survey." 151 Commonwealth and 164 Jefferson. March 27.

Jefferson Site. Similar to the Commonwealth Site, there are no topographic features at the Jefferson Site; consequently, views from this site are limited to the immediate built environment. Facing north and west (Figure 3.2-4a), foreground views include the onsite vegetation and views of the neighboring warehouse buildings of similar architectural style as the existing onsite building. Properties to the east and southwest (Figures 3.2-4b and 3.2-4c) include newer two- to three-story office buildings and surface parking lots. Views to the southeast encompass the manufacturing buildings at the Commonwealth Site (Figure 3.2-4d). No background views are visible.

Public View Corridors

Although portions of the Project site are visible from public streets, the whole Project site is not visible in its entirety from a single, ground-level vantage point due to its large size, flat topography, and surrounding low-rise buildings. However, there are three public vantage points with views towards the Project site, as discussed below.

US 101. The Project site is visible from both northbound and southbound US 101,[6] which is a four-lane freeway in each direction. From the northbound direction, the Commonwealth Site becomes briefly visible after the Dumbarton Rail Corridor overcrossing. However, the site is located above grade from the freeway and is separated by a vegetated slope, dense trees and shrubs, and fencing. Consequently, the existing buildings are only visible through intermittent breaks in the vegetation and are not prominent features.

From the southbound direction, after the Marsh Road overcrossing, the Commonwealth Site appears to the northeast of the freeway within the context of the existing urban development pattern, including a three-story office building. Due to distance and thick vegetation, the existing buildings are mainly obscured from passing vehicles. The Jefferson Site and the onsite building are not visible from either direction of US 101. In addition, no background views can be seen from this segment of US 101.

Kelly Park and the Belle Haven Neighborhood. Kelly Park is located at 100 Terminal Avenue in the Belle Haven neighborhood and is owned and operated by the City of Menlo Park. The 8.3-acre park is well-maintained and was renovated in 2011 with a synthetic turf soccer field, a full-size track with various exercise apparatuses, tennis courts, basketball courts, and restroom facilities.[7] The park is adjacent to the Onetta Harris Community Center, the Menlo Park Senior Center, and the Beechwood School, which is a private, nonprofit school for students in kindergarten through eighth grade. The Belle Haven neighborhood contains mainly single-family residential units setback from the streets with mature and well-maintained landscaping. Background views of the areas surrounding the Belle Haven neighborhood are not visible at pedestrian level because of the flat topography, existing structures, and dense vegetation.

Although the Dumbarton Rail Corridor provides a physical barrier between the Project site and Kelly Park, the existing buildings are visible from the park looking west, behind the trees planted along the perimeter of the park. Due to the limited development directly abutting the Dumbarton Rail Corridor, there are limited channelized views of the Commonwealth Site from select locations in the Kelly Park area, particularly from the soccer field. However, the orientation of the streets in the Belle Haven

[6] This segment of US 101 runs in a northwest–southeast direction. However, US 101 is considered a north–south freeway and, therefore, is referred to as such in this document.

[7] City of Menlo Park. 2013. "Kelly Park." Available: <http://www.menlopark.org/departments/com/parks/kelly.htm.> Accessed May 23, 2013.

neighborhood do not allow for direct views of the built features at the Commonwealth Site from other locations.

Suburban Park–Lorelei Manor–Flood Park Triangle Neighborhood. US 101 separates the Project site from the residential areas to the south. However, the Project site is directly across US 101 from the Suburban Park–Lorelei Manor–Flood Park Triangle neighborhood. Currently, ground-level views are blocked by dense foreground and mid-ground vegetation and residential development. However, the utility poles and wires in the southeast corner of the Commonwealth Site are visible from Hedge Road. Due to the surrounding residential units and flat topography, no background views are visible.

Environmental Impacts

This section describes the impact analysis relating to aesthetics 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. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion.

Thresholds of Significance

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

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a scenic highway.
- Substantially degrade the existing visual character or quality of the site and its surroundings.
- Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Methods for Analysis

The visual quality of an area is based on the physical appearance and characteristics of the built environment; the proximity and balance of man-made structures with open space or landscaping; and views of public open space or of more distant landscape features such as hills, water bodies, or built landmarks. These elements help define a sense of place and a physical orientation in a larger visual setting. Visual conditions within the vicinity of the Project are defined by a mix of regional roadways and industrial, office, recreational, residential, and commercial development. The interplay of these elements of the visual setting varies, depending on viewer location. Implementation of the Project would change the appearance of the Project site and the surrounding community as a result of the construction of new and taller buildings at the Project site.

To illustrate the general appearance of the development proposed at the Project site, photomontages (massing studies) from three vantage points were prepared, as shown in Figure 3.2-5. A *photomontage* is a photograph of the existing conditions with an image of the proposed buildings superimposed over the photograph using computer imaging techniques. The photomontages have been constructed in a photo-realistic fashion to show how the proposed development would look and provide a reasonable representation of the buildings' general massing, scale, and height upon Project completion and include landscaping features. Since façade articulations and architectural designs have not yet been developed,

these features are not included in the photomontages. The photomontages, as included in Figures 3.2-6 through 3.2-8, depict views of the Project from the following locations.

- Viewpoint 1: Project site looking northeast from southbound US 101.
- Viewpoint 2: Project site looking west from Kelly Park.
- Viewpoint 3: Project site looking north from Suburban Park–Lorelei Manor–Flood Park Triangle Neighborhood.

Prior to preparing the photomontages, field investigations were conducted to determine those locations that would offer maximum visual exposure of the Project from public vantage points. The photomontage locations include both "existing" (without the Project) and "proposed" (with the Project) views.

Impacts Not Evaluated in Detail

Impacts on Scenic Vistas. For the purposes of this analysis, a *scenic vista* is defined as a vantage point with a broad and expansive view of a significant landscape feature (e.g., a mountain range, lake, or coastline) or of a significant historic or architectural feature (e.g., views of a historic tower). A scenic vista is a location that offers a high quality, harmonious, and visually interesting view. The City does not have any officially designated scenic views or vistas; however, scenic vistas could include views of scenic water areas (such as the Bay and creeks) and open space areas.

The Project would result in additional height, bulk, and massing from the proposed buildings and associated mechanical screening areas that would interrupt existing views of the Santa Cruz Mountain Range. However, there are no areas that are considered scenic vistas that would be affected by the proposed development. Due to distance and intervening structures and vegetation, the proposed buildings as seen from Bedwell–Bayfront Park would blend with their surroundings and would be not be visible. Additionally, the proposed buildings would not be visible from the Bay Trail due to the flat topography and distance. Therefore, the Project would result in ***no impact*** on a scenic vista. Therefore, this impact is not evaluated further.

Impacts on Scenic Resources along a State Scenic Highway. The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. The Project site is visible from US 101; however, this freeway is not designated as a State Scenic Highway by the California Department of Transportation. The closest designated State Scenic Highway is I-280, which is over 5 miles southwest from the Project site.[8] No views of the Project site can be seen from any portion of I-280. Therefore, although the Project would remove trees, ***no impacts*** related to scenic resources within a State Scenic Highway corridor would occur. Therefore, this impact is not evaluated further.

Impacts and Mitigation Measures

Impact AES-1: Degradation of Visual Character or Quality. The Project would not substantially degrade the existing visual character or quality of the site and its surroundings. (LTS)

For the purposes of this analysis, a substantial degradation of the existing visual character or quality would occur if the Project would introduce a new visible element that would be inconsistent with the

[8] California Department of Transportation (Caltrans). 2013. "California Scenic Highway Mapping System, San Mateo County." Available: <http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.> Accessed: April 9, 2013.

overall quality, scale, and character of the surrounding development. The analysis considers the degree of contrast between the proposed features and existing features that represent the area's valued aesthetic image, in addition to the degree to which the Project would contribute to the area's aesthetic value. This analysis examines the changes in visual character and quality of the site itself and also examines how the Project would change the existing visual character and quality, as seen from sensitive areas surrounding the Project site.

The Sobrato Organization (Project Sponsor) would redevelop the Project site with two separate four-story buildings located in the southwest corner, towards the main entrance from Commonwealth Drive. Building 1 would be arranged in an east–west orientation, and Building 2 would be arranged in a north–south orientation to the east of Building 1. Each building would have a footprint of approximately 34,535 sf. Together, the two buildings would have a total floor area of approximately 259,920 sf.

Landscaping would be provided throughout the Project site in a manner that provides shading of the parking lot, supports stormwater treatment, and encourages active use of the outdoors. The Project would include bamboo clusters, a variety of trees, wall water features, pedestrian paving, a sunken lawn with seat walls, lighting, tree grates, curved and raised seatwalls, lounging steps, and café tables and chairs. The portion of the Project site adjacent to Jefferson Drive would include a lawn, active recreation space, trellises, planting areas, picnic tables, fencing, and other vegetation. Up to eight stormwater treatment areas would be located throughout the Project site in order to limit stormwater runoff. These stormwater retention and treatment areas would serve as landscape elements to reduce drainage impacts and function as soil and plant-based filtration devices to remove pollutants through a variety of physical, biological, and chemical treatment processes.

Currently, a dense vegetative barrier, which is predominantly outside of the property line, is present along the perimeter of the Project site to the north, south, and west, providing a visual buffer between the site and the adjacent streets, US 101, and the nearby office and industrial developments. Mature vegetation is located to the east of the Dumbarton Rail Corridor, buffering Kelly Park and the Belle Haven neighborhood. All of the perimeter trees and shrubs that are not on the Project site property would remain with implementation of the Project, continuing to obstruct the majority views of the Project site from adjacent areas.

There are 45 existing trees at the Project site. Of these trees, 24 trees are considered to be Heritage Trees per Section 13.24 of the City's Municipal Code. Under the existing site plans, 23 Heritage Trees and 21 non-Heritage Trees would be removed. However, one existing Heritage Tree would remain, and approximately 474 trees would be planted to offset the Heritage Tree removal. These trees would be located throughout the Project site, including around the site perimeter, throughout the surface parking lot, along the two-lane boulevard in the western portion of the site, and surrounding the proposed buildings. When first planted, the proposed trees would not sufficiently screen the buildings from surrounding areas. However, at full maturity, it is expected that the proposed trees could screen a substantial portion of the buildings. In addition, all of the existing perimeter trees not located on the Project site would remain with implementation of the Project and continue to limit views to and from the site.

Impacts on Project Site and Surrounding Area. The vicinity of the Project site is not a visually significant area as it consists of an urbanized and industrial area with several manufacturing and warehousing buildings and expansive impervious surfaces. The existing vacant buildings, limited vegetation, and unkempt landscaping do not contribute positively to the character of the industrial/business parks to the north and west or the Belle Haven neighborhood to the east. The mix of

uses in this area, which include newer office complexes to the north and west, industrial and warehouse buildings further to the north and east, and residential uses to the east and south, generally results in an inconsistent visual pattern.

The Project would increase onsite building height and mass, and alter the existing visual character of the site while remaining consistent with the surrounding area. However, the existing visual character does not support the recent and future trend of developing the area into an updated office park setting. The proposed development would support the trend of this area's transition to office campuses and increase unity with its surroundings by creating contiguous landscape areas, bicycle and pedestrian connections, and buildings that reflect a similar architectural design. Although it is unknown at this time what types of façade articulation and architectural design would be used for the buildings, it is expected that they would incorporate features and materials common in modern steel-framed buildings and would be harmonious with each other and their surroundings. The building massing, materiality, transparency of façade, and interconnectivity of buildings would attempt to link the campus visually to its broader context. In addition, the Project Sponsor would be required to adhere to the City's architectural review, as outlined in Section 16.68.020 of the Municipal Code and described above.

While the Project would increase onsite building height, mass, and bulk, the Project would not degrade the visual character and quality of the Project site and its surroundings. The Project buildings would be consistent with the neighboring office buildings in architecture and scale and would be partially screened by the existing and proposed trees. However, it is important to note that potential impacts resulting from a change in visual character are partially subjective. To some, any development and change in the existing setting, regardless of design, is considered significantly adverse, while others may consider any change in development to be beneficial. For the purposes of CEQA, the impact on visual character and quality is considered to be ***less than significant***.

Impacts on Public View Corridors. Project impacts on the public view corridors identified under *Environmental Setting*—US 101, Kelly Park and the Belle Haven neighborhood, and the Suburban Park–Lorelei Manor–Flood Park Triangle neighborhood—are discussed below.

US 101 (Viewpoint 1). As discussed above, from northbound US 101, the Project site is briefly visible after the Dumbarton Rail Corridor overcrossing. However, the site is located above grade from the freeway and is separated by a vegetated slope, dense trees and shrubs, and fencing. All of the existing perimeter trees, vegetation, and fencing would remain with the implementation of the Project. Therefore, views of the proposed buildings would only be visible through intermittent breaks in the vegetation and would not significantly alter the view as seen from northbound US 101.

As shown in Figure 3.2-6a, the existing buildings at the Project site are predominantly screened from US 101 by dense clusters of perimeter vegetation. No background views are visible. With the proposed development (Figure 3.2-6b), the Project buildings would appear to be taller than the existing surrounding development as seen from southbound US 101. The two buildings would be visible to varying degrees from US 101; however, the existing perimeter landscaping, which would remain under the Project, would soften the Project's appearance and reduce its visual contrast with the immediate landscape.

US 101 is not a designated scenic route and motorists only have fleeting views of the Project site due to permitted speeds on US 101. In addition, motorists typically direct their attention to the freeway ahead rather than views from the freeway. Therefore, the views of the Project from US 101 do not constitute sensitive views, and the development of the Project site would not significantly alter the visual character of the area.

Kelly Park (Viewpoint 2). As shown in Figure 3.2-7a, views from Kelly Park facing west consist of the park's playing field and onsite lighting in the foreground and the existing structures at the Commonwealth Site in the middleground. Perimeter vegetation and fencing obstruct the majority of ground-level views; however, the roof of the main building is highly visible. With implementation of the Project, the proposed buildings would be set back from Kelly Park and the Belle Haven neighborhood in order to reduce the visual impacts on this area. However, since the buildings would be significantly taller than the existing structures (27 feet in height compared to 61.3 feet), the proposed buildings would still be visible from Kelly Park, as depicted in Figure 3.2-7b.

Building 2 would be positioned in a north–south orientation, and Building 1 would be located to the west of Building 2 in an east–west orientation. Consequently, Building 2 would block a portion of Building 1 from view, making the buildings appear as one. This would limit some of the perception of mass and bulk at the Project site from Kelly Park. The increase in building mass and height would not obstruct any existing visual features since no background views are currently visible. Nonetheless, the Project would alter the existing aesthetic character of the area by constructing a significantly taller building at the Project site. The existing 27-foot-tall industrial buildings would be demolished and replaced with two 61.3-foot-tall buildings. However, as shown in Figure 3.2-7b, the existing perimeter vegetation, which would remain with implementation of the Project, would screen portions of the proposed building. In addition, as discussed above, the Project Sponsor would plant approximately 474 new trees, many of which would be in the parking lot between the proposed buildings and Kelly Park. Although these trees, when first planted, may not provide a significant visual buffer, at maturity they would screen a substantial portion of the buildings. Figure 3.2-7b does not depict the proposed vegetation; therefore, this view represents a conservative scenario.

The proposed buildings would add building height, mass, and bulk to the Project site, as seen from Kelly Park, altering the existing built environment. However, the existing Project site includes industrial buildings that are inconsistent with the surroundings. In addition, the Project site does not comprise of a visually significant area and does not include views. Although the Project would change current visual conditions, the buildings would be consistent with surrounding development and would be partially screened by existing and proposed vegetation.

Suburban Park–Lorelei Manor–Flood Park Triangle Neighborhood (Viewpoint 3). US 101 separates the Project site from the residential areas of the City to the south. Therefore, views of the Project site are generally blocked by existing buildings and vegetation along US 101, as depicted in Figure 3.2-8a. The only existing feature at the Project site that is visible from this residential neighborhood is the approximately 60-foot-tall utility pole at the southwest corner of the Project site.

The buildings proposed under the Project would be partially visible over residential rooftops from Hedge Road and the backyards of the residential properties along this street. Although the buildings would be visible to residents, they would not substantially alter the existing visual character of the area. The buildings, as seen in Figure 3.2-8b, would be at a distance of approximately 400 feet to the north, across US 101, which is a distance slightly longer than a football field (including the end zones). While this distance is relatively close, views of the buildings would be limited and consist of mainly blocked background views; therefore, the buildings would not be a dominant feature in the area. Additionally, since there are no significant background views further to the north (such as the Bay or the East Bay Hills) visible from this area, the buildings would not obstruct any valued view corridors. The perception of privacy in the rear yards of the residential units is not expected to change since there would be screening due to distance, existing vegetation, and the soundwall between these residential properties and US 101.

Overall Degradation of Existing Visual Character or Quality. The proposed development at the Project site would provide increased unity with its surroundings by creating contiguous landscape areas and office buildings that reflect a similar architectural design. The existing site consists of outdated industrial buildings and warehouses. The Project would construct new buildings that would be a continuation of the existing pattern of multi-story office buildings in the area to the north and west of the Dumbarton Rail Corridor. Implementation of the Project would change the visual character of the Project site but would not significantly alter the quality of the surrounding areas due to the dense perimeter vegetation, proposed trees, flat topography, and the modern architectural detailing on the exterior of the building. The upper levels of the proposed buildings would be visible from surrounding areas, altering the visual character. However, this would not change the overall views to the extent that the visual quality of the area and public view corridors would be substantially degraded. Therefore, the impact would be ***less than significant***.

Impact AES-2: New Sources of Light and Glare. The Project could create a new source of substantial light or glare that could adversely affect daytime or nighttime views in the area. (PS)

Exterior Lighting. Exterior lighting would be added to an area where there currently is little to no lighting. The Project site is visible from US 101 and could be a nuisance or distraction to the motorists if substantial lighting sources were introduced to the area. Increased lighting at the site could also affect residents in the Belle Haven neighborhood and the Suburban Park–Lorelei Manor–Flood Park Triangle neighborhood.

Proposed development would result in nighttime lighting from vehicles, the onsite boulevard, the parking lots, security lighting, and the interior illumination of the building. The increase in building heights would make building lights visible to motorists along US 101 and surrounding neighborhoods, but some of the interior lights for the lower floors would be screened by the perimeter vegetation and potentially by window overhangs and awnings.

Due to the urbanized nature of the surrounding area, a significant amount of ambient nighttime lighting currently exists, affecting views of the nighttime sky. The lighting performance standards set by Leadership in Energy and Environmental Design (LEED) would be followed through lighting specifications, shielding techniques, automatic lighting controls, and light pollution considerations. Nonetheless, the new buildings and increased onsite activity would result in a ***potentially significant*** increase in lighting in the area.

Glare from Buildings. Glare is caused by light reflections from pavement, vehicles, and building materials, such as reflective glass and polished surfaces. During the daylight hours, the amount of glare depends on the intensity and direction of sunlight. Glare can create hazards to motorists and be a nuisance for bicyclists and pedestrians and other sensitive viewers.

With implementation of the Project, highly reflective surfaces at the Project site could pose the most significant impacts along major road corridors, such as US 101. At this time, the specific types of building materials and glass surfaces are unknown. However, the proposed building façade could incorporate silver composite aluminum panels, steel frames, low-e glazing with blue tint glass and clear glass, metal roof screens, and high-performance glass set in aluminum frames. This façade would provide energy saving benefits for the buildings. Other building features could include fin columns, cornices, metal roof screens, and guardrails. Since building material specifics are currently unknown, it is conservatively assumed that the Project would result in ***potentially significant*** glare impacts.

Vehicle Headlights. The proposed surface parking lot would be located adjacent to office uses to the north and west, Kelly Park to the east, and US 101 to the north. The light and glare from vehicle headlights and windshields could be a nuisance to the motorists and the adjacent uses. The existing chain-link fence and vegetation along the perimeter of the Project site would remain. In addition, new trees and hedges would be planted that would block vehicle headlight spillage. The uses to the north and west of the Project site currently include corporate office complexes and surrounding surface parking lots; therefore, these uses would not be affected by vehicle headlights. Lower-story shrubs would be planted adjacent to US 101, limiting light impacts on motorists, and proposed and existing landscaping on both sides of the Dumbarton Rail Corridor would block vehicle headlights from Kelly Park. Therefore, the Project would result in ***less-than-significant*** impacts from vehicle headlight spillage.

MITIGATION MEASURES. Implementation of Mitigation Measures AES-2.1 and AES-2.2 would reduce potential light and glare impacts of the Project to a ***less-than-significant*** level.

AES-2.1: Design Lighting to Meet Minimum Safety and Security Standards. Concurrent with the building permit submittal, the Project Sponsor shall incorporate lighting design specifications to meet minimum safety and security standards. The comprehensive site lighting plans shall be subject to review and approval by the City's Community Development Department Planning Division prior to building permit issuance of the first building on that site. The following measures shall be included in all lighting plans.

- Luminaries shall be designed with cutoff-type fixtures or features that cast low-angle illumination to minimize incidental spillover of light onto adjacent private properties. Fixtures that shine light upward or horizontally shall not spill any light onto adjacent private properties.
- Luminaries shall provide accurate color rendering and natural light qualities. Low-pressure sodium and high-pressure sodium fixtures that are not color-corrected shall not be used, except as part of an approved sign or landscape plan.
- Luminary mountings shall be downcast and pole heights minimized to reduce potential for back scatter into the nighttime sky and incidental spillover light onto adjacent properties and undeveloped open space. Light poles shall be no higher than 20 feet. Luminary mountings shall be treated with non-glare finishes.

AES-2.2: Treat Reflective Surfaces. The Project Sponsor shall ensure application of low-emissivity coating on exterior glass surfaces of the proposed structures. The low-emissivity coating shall reduce visible light reflection of the visible light that strikes the glass exterior and prevent interior light from being emitted brightly through the glass.

Cumulative Impacts

The geographic context for cumulative aesthetic impacts is generally confined to areas visible to and from the Project site that could combine to cause a cumulative impact. For the Project, the cumulative context includes the Project site plus adjacent development north of US 101 and west of the Dumbarton Rail Corridor. Proposed projects in the City on the other side of US 101 and the Dumbarton Rail Corridor are not included because the distance, flat topography, and intervening development serve as visual barriers between the areas.

Impact C-AES-1: Cumulative Degradation of Visual Character or Quality. The Project, in combination with other foreseeable development in the surrounding area, would not have a significant cumulative impact on visual character or quality. (LTS)

Tier 1

Cumulative Tier 1 projects consist of 2 residential developments, 10 non-residential projects, and 1 mixed-use project. Only cumulative projects that are in the immediate vicinity of the Project site could contribute to degradation of the visual character or quality of the existing neighborhood. The other cumulative projects are too far from the Project site to combine with the Project to degrade visual character or quality. The public view corridors identified under *Environmental Setting* include US 101, Kelly Park, and the Suburban Park–Lorelei Manor–Flood Park Triangle neighborhood. Within the geographic context described above, the only project visible from these view corridors is the Menlo Gateway Project, which is considered together with the Project to determine the Project's cumulative impact on visual character and quality.

The Menlo Gateway Project, the Project, and any other future development in the Project area, would constitute further intensification of an already urban and relatively built-out area and would generally occur through infill development. Most projects in the City are required to undergo architectural review pursuant to Section 16.68.020 of the Municipal Code. Any proposal for a new structure, addition to an existing structure, or change to the exterior of a structure that requires a building permit (with the exception of single-family dwellings, duplexes, and accessory buildings) requires that the Planning Commission conduct architectural control review to ensure that the general appearance of the structures is in keeping with character of the neighborhood. Thus, as with the Project, the Menlo Gateway Project will be expected to be consistent with architectural and design guidelines and would not substantially degrade the visual character or quality of its surroundings.

As described above, the Project area is part of the trend of this area's redevelopment of some existing industrial and warehousing uses to corporate office campuses. The existing Project site and the Menlo Gateway site include vacant manufacturing buildings, warehouses, and unkempt land adjacent to newer office developments. The Project would provide increased unity with its existing and planned surroundings by creating contiguous landscape areas and buildings that reflect a similar architectural design. Therefore, the Project, together with Menlo Gateway, would not result in a substantial degradation of visual character or quality of the surroundings, and the cumulative impact would be ***less than significant***.

Tier 2

The Dumbarton Rail Corridor Project is the only Tier 2 project that could cumulatively contribute to a change in visual character of the surrounding area of the Project. The Dumbarton Rail Corridor Project passes through several jurisdictions and abuts the Project site to the east. Although no stations are proposed in the vicinity of the Project site that could alter the existing visual setting, this project could result in the removal of the existing vegetation that lines the corridor and provides a visual buffer from Kelly Park. However, development along the Dumbarton Rail Corridor would be subject to the City's General Plan and Municipal Code, particularly with regard to tree removal. Adherence to these policies would ensure that development of this project would be aesthetically compatible with adjacent development. As noted, the proposed development at the Project site would provide increased unity with its surroundings by creating contiguous landscape areas and buildings that reflect a similar architectural design. Therefore, the Project, together with the Tier 2 project, would not result in a

substantial degradation of visual character or quality of the surroundings, and the cumulative impact would be ***less than significant***.

Impact C-AES-2: Cumulative Sources of Light and Glare. Implementation of the Project, in combination with foreseeable development, would not create new sources of light or glare that could adversely affect day or nighttime views. (LTS)

Tier 1

Cumulative development could include direct illumination of Project structures, features, and/or walkways, and could increase ambient nighttime lighting levels in the Project area. Menlo Gateway is large enough to contribute to a cumulative lighting impact and would include direct illumination of project structures, features, and/or walkways, as well as increased light and glare from vehicle headlights entering and exiting the site. Building surfaces could also increase glare if they are reflective or if the structures contain large expanses of windows. Since the final design and architecture of Menlo Gateway is unknown, the increase in ambient nighttime lighting levels and glare in the area could be significant, even though a substantial amount of ambient light and glare currently exists as a result of the urbanized nature of the area. This is a potentially significant impact. Similar to the Project, Menlo Gateway would be required to comply with all requirements of the Municipal Code with respect to lighting and architectural surfaces. However, Mitigation Measures AES-2.1 and AES-2.2 would reduce potential Project-level and cumulative light and glare impacts, and the Project's contribution to a cumulative light and glare impact would not be cumulatively considerable. Therefore, the Project's cumulative impact associated with ambient nighttime light and glare would be ***less than significant***.

Tier 2

Only the Tier 2 projects that are in the immediate vicinity of the Project site would contribute to a cumulative light and glare impact. Light and glare effects diminish with distance from the source and must be viewed directly in order to affect the viewer. Given the distance of the majority of Tier 2 projects from the Project site and due to the intervening structures and vegetation, any light and glare from these projects, in combination with the light and glare from the Project, would likely not result in substantial increases of light and glare that would affect daytime or nighttime views. Therefore, only lighting from the Dumbarton Rail Corridor Project could be cumulatively considerable in combination with the Project. Since the Dumbarton Rail Corridor is not currently operational, the Project would likely add lighting sources along some portions of the tracks. However, this lighting along the tracks would likely be minimal. In addition, the Project area is currently subject to a substantial level of light and glare due to its urban nature. All Project-related impacts with regard to light and glare are reduced to less than significant levels through Mitigation Measures AES-2.1 and AES-2.2. Therefore, the Project's cumulative impact would be ***less than significant***.