Chapter 4
Alternatives Analysis

4.1 Introduction

The California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) require that an Environmental Impact Report (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)). If mitigation measures or a feasible project alternative that would meet most of the basic project objectives would substantially lessen the significant environmental effects of a proposed project, then the lead agency should not approve the proposed project unless it determines that specific technological, economic, social, or other considerations make the mitigation measures and the project alternative infeasible (PRC Section 21002, State CEQA Guidelines Section 15091(a)(3)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency's determination (State CEQA Guidelines Section 15126.6(c)).

One of the alternatives that must be analyzed is the "No Project" Alternative. The No Project analysis must discuss the existing conditions at the time the Notice of Preparation (NOP) is published, as well as 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 (State CEQA Guidelines Section 15126.6(e)(2)). Therefore, pursuant with the State CEQA Guidelines, this section discusses and analyzes a No Project Alternative.

In addition to the No Project Alternative, this section provides an additional alternative (Reduced Intensity Alternative) to the Commonwealth Corporate Center Project (Project) and analyzes the impacts of each. This section later provides a description of the alternatives and compares the significant impacts of the alternatives to the significant environmental impacts of the Project as proposed.

4.2 Description of Alternatives Considered

As discussed in Chapter 2, *Project Description*, the Sobrato Organization (Project Sponsor) has identified the following Project objectives that are relevant to the physical impacts considered in this Draft EIR.

- Redevelop an underutilized property in the City of Menlo Park (City) that is visible from US 101 into an economically viable, flexible, and adaptable research and development (R&D)/office campus.
- Develop two equivalent-sized buildings within the allowable floor area ratio (FAR) for the M-2 zone.
- Maximize the amount of onsite landscaping.

- Achieve economies of scale and attract significant corporate tenants.
- Maintain convenient access to and from US 101.
- Create jobs and tax revenues for the City.

As stated above, the alternatives to a proposed project are meant to feasibly attain most of the basic project objectives while avoiding or substantially lessening its significant impacts. Significant and unavoidable Project-specific and cumulative impacts from the Project are listed below.

Project-Level Impacts

- **Impacts on Intersections in Near Term 2015 Plus Project Conditions**. Increases in traffic generated by the Project under Near Term 2015 Plus Project Conditions would result in increased delays during AM and PM Peak Hours at the following intersections: Marsh Road/Bayfront Expressway, Marsh Road/US 101 Northbound Off-Ramp, Independence Drive/Constitution Drive, Chrysler Drive/Bayfront Expressway, Chrysler Drive/Jefferson Drive, Chrysler Drive/Independence Drive, Willow Road/Bayfront Expressway, Willow Road/Newbridge Street, and University Avenue/Bayfront Expressway. (Impact TRA-1)
- **Impacts on Roadway Segments in the Near Term 2015 Plus Project Conditions**. Increases in traffic associated with the Project under the Near Term 2015 Plus Project Conditions would result in increased ADT volumes on the following Project area roadway segments: Marsh Road between Bohannon Drive and Bay Road; Chrysler Drive between Bayfront Expressway and Constitution Drive; Chrysler Drive between Constitution Drive and Jefferson Drive; Chilco Street between Bayfront Expressway and Constitution Drive; Chilco Street between Hamilton Avenue and Ivy Drive; Constitution Drive between Independence Drive and Chrysler Drive; Constitution Drive between Jefferson Drive and Chilco Street; Jefferson Drive between Chrysler Drive and the Project driveway; Jefferson Drive between the Project driveway and Constitution Drive; Independence Drive between Constitution Drive and Chrysler Drive. (Impact TRA-2)
- **Impacts on Routes of Regional Significance in the Near Term Plus Project Conditions**. Increases in traffic associated with the Project under the Near Term 2015 Plus Project Conditions would result in potentially significant impacts on the following Routes of Regional Significance: SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and the County Line; US 101 between Marsh Road and Willow Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (Impact TRA-3)
- **Violation of Any Air Quality Standard During Construction**. The Project would result in the violation of a BAAQMD air quality standard or substantial contribution to an existing or projected air quality violation during Project construction. (Impact AQ-2)
- **Substantial Temporary or Periodic Increase in Vibration Levels**. The Project would generate ground-borne vibration levels in excess of 65 VdB at nearby office buildings but would not exceed vibration levels in excess of 80 VdB and noise levels in excess of 43 dBA at nearby residences. (Impact NOI-4)

Cumulative Impacts

- **Impacts on Intersections in the Cumulative 2030 Plus Project Conditions**. Increases in traffic associated with the Project under the Cumulative 2030 Plus Project Conditions would result in increased delays at the following intersections during peak hours: Marsh Road/Bayfront Expressway, Marsh Road/US 101 Northbound Off-Ramp, Marsh Road/US 101 Southbound Off-Ramp, Marsh Road/Middlefield Road, Independence Drive/Constitution Drive, Chrysler Drive/Bayfront Expressway, Chrysler Drive/Jefferson Drive, Willow Road/Bayfront Expressway, Willow Road/Newbridge Street, and University Avenue/Bayfront Expressway. (Impact TRA-6)
- **Impacts on Roadway Segments in the Cumulative 2030 Plus Project Conditions**. Increases in traffic associated with the Project under the Cumulative 2030 Plus Project Conditions would result in increased average daily traffic at the following study roadway segments: Marsh Road between Bohannon Drive and Bay Road; Chrysler Drive between Bayfront Expressway and Constitution Drive; Chrysler Drive between Constitution Drive and Jefferson Drive; Chilco Street between Bayfront Expressway and Constitution Drive; Chilco Street between Hamilton Avenue and Ivy Drive; Constitution Drive between Independence Drive and Chrysler Drive; Constitution Drive between Jefferson Drive and Chilco Street; Jefferson Drive between Chrysler Drive and Project driveway; Jefferson Drive between Project driveway and Constitution Drive; and Independence Drive between Constitution Drive and Chrysler Drive. (Impact TRA-7)
- **Impacts on Routes of Regional Significance in the Cumulative 2030 Plus Project Conditions**. Increases in traffic associated with the Project under the Cumulative 2030 Plus Project Conditions would result in impacts on the following Routes of Regional Significance: SR 84 between Willow Road and University Avenue; SR 84 between US 101 and Bayfront Expressway; US 101 between Marsh Road and Willow Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (Impact TRA-8)
- **Violation of a BAAQMD Air Quality Standards or Substantial Contribution to an Existing or Projected Air Quality Violation during Project Construction.** Construction activities associated with the Project, in combination with other construction activities in the City, could generate substantial oxides of nitrogen (NO_X) emissions in excess of BAAQMD threshold. (Impact C-AQ-2)

Based on the goal of reducing these significant and unavoidable impacts, two Project alternatives have been developed for evaluation in this Draft EIR: the No Project Alternative and Reduced Intensity Alternative. Table 4-1 provides a summary of key features of the Project and each alternative. Further details regarding each alternative are provided below.

Table 4-1. Comparative Description of the Project Alternatives

	Project	No Project Alternative	Reduced Intensity Alternative
Total Square Feet	259,920	237,858[a]	194,940
Site Coverage	11.9%	41%	11.9%
Max Building Heights	61’4”	~27’	~46’
Total Employees	1,300	30	975

Source: City of Menlo Park, 2013; Arc Tech, 2013

Notes:

[a.] Includes 217,396 sf at the Commonwealth Site and 20,462 sf at the Jefferson Site.

It has been determined that, in order to minimize significant and unavoidable impacts relative to transportation, air quality, and noise, an approximately 25 percent reduction in daily trips would be necessary. The 25 percent reduction was chosen because it allows for an increase in occupancy and development over existing conditions at the Project site, while decreasing the overall number of trips associated with the Project. It also allows for the attainment of the majority of the Project objectives. For these reasons, the Reduced Intensity Alternative reducing daily trips by 25 percent was chosen as the most feasible alternative.

No Project Alternative

Under the No Project Alternative, the existing Project site would remain as-is. The three buildings at the Commonwealth Site that include 217,396 sf would remain. The one building at the Jefferson Site that includes 20,462 sf would also remain. Approximately 30 employees would occupy the Jefferson Site. No construction would occur under the No Project Alternative.

Reduced Intensity Alternative

The Reduced Intensity Alternative would include a 25 percent reduction in the amount of floor area and number of employees compared to the Project. This would equate to approximately 194,940 sf of building area, for a FAR of 0.34, and accommodate approximately 975 employees. As with the Project, the Reduced Intensity Alternative would include either office or R&D uses. The Reduced Intensity Alternative would result in an equivalent decrease in daily trips, which would equate to approximately 3,057 daily trips.

The site plan of the Reduced Intensity Alternative would be similar to the Project with the same building footprints. Since the building footprints would not change, all footprint-based impacts would be identical to the Project. However, the two buildings would be three stories tall, rather than four stories, with building heights at approximately 46 feet. As such, the Reduced Intensity Alternative would still require rezoning of the Project site to M-2(X) (Conditional Development Overlay) zoning district with a corresponding Conditional Development Permit (CDP) in order to increase the permitted building heights from 35 feet to 46 feet.

Similar landscaping and bicycle and pedestrian amenities would be installed. Walkways would traverse the Project site, and bicycle lockers and racks would be provided. As with the Project, the Reduced Intensity Alternative would be accessible from two driveways: the main access point at Commonwealth Drive in the southwest corner of the Project site and the secondary access point at Jefferson Drive in the northern portion of the Project site. A two-lane boulevard would be located along the western boundary of the Project site and would connect the Commonwealth Drive entrance, the Jefferson Drive entrance, and the surface parking lot. However, since the Reduced Intensity Alternative would result in less building area and fewer employees, the amount of parking would be reduced. The M-2 zoning requires one parking stall per 300 sf of building space. As such, this alternative would provide 650 parking stalls, compared to 867 stalls under the Project. It is assumed that the reduction in parking spaces would result in increased landscape areas.

4.3 Attainment of Project Objectives

An evaluation of how each alternative meets or does not meet the basic Project objectives is provided below. Pursuant to State CEQA Guidelines Section 15126.6(a), this analysis compares the alternatives to the objectives of the Project. As described in detail above, there are two alternatives for the Project: No Project Alternative and Reduced Intensity Alternative. The following analysis describes the extent to which these alternatives meet or do not meet the Project Sponsor's objectives as described in Chapter 2, *Project Description*, and discussed above.

No Project Alternative

The No Project Alternative would not meet the primary objectives of redeveloping an underutilized property in City into an economically viable, flexible, and adaptable office/R&D campus. Instead, the Commonwealth Site would remain unused and the Jefferson Site would continue to serve as warehouses and offices for storage and light industrial uses. The No Project Alternative would not demolish the existing unused buildings and would not construct office/R&D space within two equivalent-sized buildings. Given the specialized nature of the existing buildings, virtually any reuse of the Commonwealth Site would involve a discretionary City approval with CEQA review.

Since the proposed buildings would not be constructed, the No Project Alternative would not achieve economies of scale and would not be able to attract significant corporate tenants to the Project site. Although the Project site would maintain convenient access to and from US 101, no new employees would benefit from this access. The No Project Alternative would not create jobs; instead of approximately 1,300 jobs under the Project, the No Project Alternative would continue to provide jobs for approximately 30 employees. The tax revenues for the City would stay the same rather than increase with implementation of the Project. As such, the No Project Alternative would not meet the Project objectives.

Reduced Intensity Alternative

The Reduced Intensity Alternative would meet some of the Project Sponsor's objectives. This alternative would redevelop the underutilized parcels into a new office/R&D campus with two buildings of equivalent sizes, which would still be visible from US 101. A reduction in 25 percent of building space and employees would still allow the Project site to be occupied at a greater level than existing conditions, but at a lower level than under the Project. The Reduced Intensity Alternative would translate to approximately 975 new employees instead of the Project's approximate 1,300 employees. Although to a lesser extent than the Project, this alternative would still create jobs, achieve economies of scale, and attract corporate tenants. Since the Reduced Intensity Alternative would be in the same location, the Project would still be in a prominent location proximate to major transportation corridors such as US 101. In addition, the Reduced Intensity Alternative would create increased tax revenues for the City.

However, the Reduced Intensity Alternative would not maximize development at the Project site. The buildings would be approximately 194,940 sf, or a FAR of 0.34, which is significantly below the goal of a FAR of 0.45. While the Reduced Intensity Alternative would meet the majority of the Project objectives, this alternative would be smaller in size than what is preferred by the Project Sponsor.

4.4 Alternatives Considered but Rejected

State CEQA Guidelines Section 15126.6(f)(2) states that a Draft EIR must consider offsite alternatives if such alternatives are deemed to be feasible by the lead agency. As stated in State CEQA Guidelines, Section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility of an alternative include:

> site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

Alternative Locations

An offsite alternative was considered for this analysis but rejected from further review because it would be infeasible, would not attain most of the basic Project objectives, and would not sufficiently reduce the Project impacts. Alternative locations for the Project are not feasible because the Project Sponsor owns this site; an alternate location for the office/R&D uses would require additional land acquisition, which is not included in the Project Sponsor plans or objectives. The Project Sponsor currently owns and manages 75 office and R&D projects comprising over 7.5 million sf of space in the Silicon Valley. The Project Sponsor owns several buildings that average similar square footage as the Project that have space available for rent. However, none of the buildings that are currently available are within Menlo Park or neighboring cities.[1] Therefore, the proposed uses could not be accommodated within existing properties owned by the Project Sponsor.

Although the Project could be constructed on other similar-sized parcels near the San Francisco Bay (Bay) (for example, Redwood City, East Palo Alto, or Mountain View), there are currently not alternative sites in these areas that could accommodate the development intensity proposed given existing land use designations and zoning and scarcity of available land in the Project vicinity. In addition, the significant and unavoidable impacts of the Project would likely occur regardless of location, meaning that an offsite alternative would not further reduce these impacts. Therefore, this Draft EIR does not analyze an offsite location alternative.

Alternative Development Scenario

Alternatives that would consist of a permanent use other than office/R&D were not considered because they would not be consistent with applicable City zoning and General Plan land use designations and policies. For example, residential uses at the Project Site were considered, but rejected, since the site is not zoned for single-family residential or mixed uses with residential units. In addition, an alternative that would consist of hotel uses was considered but rejected for two reasons: first a hotel is not allowed in the M-2 zone, and second, a hotel that could efficiently occupy 13.27 acres at the Project site would be larger than what the Peninsula hotel market could economically absorb given the approved hotel development at Menlo Gateway near the Marsh Road interchange, approximately 0.3 mile west of the Project site.

[1] The Sobrato Organization. 2013. "List of Currently-Available Buildings." Available: <http://www.sobrato.com/real-estate-development/available-properties/buildings/>. Accessed December 13, 2013.

4.5 Impact Assessment

This section evaluates whether the alternatives would reduce the significant impacts of the Project to less-than-significant levels and/or would generate impacts other than those identified for the Project. Summarized lists of recommended mitigation measures for each alternative are provided in the analysis below; however, these mitigation measures are fully described in each resource section within Chapter 3, *Environmental Impact Analysis*, of this document. In addition, a summary comparative analysis of the Project and its alternatives is provided in Table 4-3, at the end of this section.

No Project Alternative

As described above, under the No Project Alternative, the redevelopment of the Project site would not occur and all existing buildings would remain. No new land uses or rezoning would occur under this alternative.

Land Use

In order to develop the Project to the desired height, the Project would require a rezoning to the M-2(X) zoning district with a corresponding CDP. The No Project Alternative would not require a change in zoning and a CDP since no new buildings would be constructed. Similar to the Project, the No Project Alternative would result in no impact on an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plans, nor would it conflict with the existing land use designation. In addition, since the No Project Alternative would not increase operational traffic or vibration impacts during construction, the No Project Alternative would not result in the policy conflicts with respect to the Noise Ordinance that could potentially occur with the Project. Consistency with land use plans and policies is inherently a project-specific issue, and each jurisdiction would decide on project consistency on the project level. As such, there would be a less-than-significant cumulative impact as a result of cumulative development in the Association of Bay Area Governments (ABAG) region and under the No Project Alternative, as with the Project.

The No Project Alternative would result in several other General Plan policy conflicts that would not occur with the Project. For example, the Project would enhance the Project site by adding extensive landscaping, outdoor seating, pedestrian paving, and bicycle facilities, which would support policies I-G-10, OSC1.12, and OSC1.13. However, the No Project Alternative would not provide these amenities and the unoccupied distillery facility would remain resulting in potential conflicts with other General Plan policies. Nonetheless, since this is an existing condition and no changes would be made under the No Project Alternative, this alternative would be generally consistent with the applicable goals, policies, and actions, resulting in a less-than-significant impact. (LTS)

Aesthetics

The No Project Alternative would not alter existing conditions and, therefore, would not change the existing visual character. The proposed development with implementation of the Project would increase massing, height, and bulk over existing conditions and views of the Project site. While the aesthetic impacts would be less than significant under the Project, no impact would occur under the No Project Alternative. The Project site would remain unoccupied and its landscaping unimproved. Over time, the non-use of the site could result in blight conditions with associated community problems.

The Project would replace the vacant Commonwealth Site with new buildings, enhanced landscaping, and bicycle and pedestrian amenities that would complement the surrounding existing office development and other nearby commercial uses. These improvements to the area's visual quality would not occur with the No Project Alternative. Since no new structures would be built under the No Project Alternative, no new source of light and glare would be created compared to the potentially significant, but mitigable, light and glare impacts that would result from the Project. No impact on visual quality would result with the No Project Alternative. (NI)

Transportation

The No Project Alternative would retain existing conditions at the Project site and would not generate additional traffic or parking demand. This alternative would result in the same daily vehicle trips and affected intersections as the baseline since no new uses would be added at the Project site. No transportation-related impacts would result with the No Project Alternative. (NI)

Air Quality

The No Project Alternative would not construct new uses at the Project site and would not generate air emissions above the baseline. Since no development would occur under the No Project Alternative existing uses would remain consistent with the Transportation Control Measures (TCMs) identified in the 2005 Ozone Strategy as critical to attaining the California Clean Air Act (CAA) ozone standard. In addition, no construction or operational emissions would exceed the Bay Area Air Quality District's (BAAQMD's) significance thresholds. No impacts on air quality would result with the No Project Alternative. (NI)

Greenhouse Gas Emissions

The No Project Alternative would result in no new direct greenhouse gas (GHG) emissions from area and mobile sources or indirect emissions from electricity generation and solid waste that would occur with intensification of use. Since this alternative would not construct new buildings, and no new uses would operate at the Project site, there would be no increase in GHG emissions over the baseline, resulting in no impact. (NI)

Noise

Since no construction would occur under the No Project Alternative, no construction noise would be generated. Unlike the Project, the No Project Alternative would not result in significant and unavoidable construction vibration impacts on vibration-sensitive equipment in adjacent buildings. In addition, the operational noise at the Project site would remain the same because vehicle trips and employment would not increase. No noise-related impacts would result with the No Project Alternative. (NI)

Cultural Resources

The No Project Alternative would not demolish the existing buildings at the Project site. Because these existing structures are not historically significant, neither the Project nor the No Project Alternative would result in impacts on historic buildings. Because no ground-disturbing construction would occur at the Project site, unlike the Project, the No Project Alternative would result in no impacts on archeological and paleontological resources or human remains. (NI)

Geology and Soils

There are no faults that cross the Project site, and the site is not within an Alquist-Priolo Earthquake Fault Zone. There would be no impact from the No Project Alternative related to fault rupture. The Project site is primarily flat and not adjacent to any hillsides where seismically induced landslides or other downslope movement of rock or soil material that could pose a hazard. The No Project Alternative would not include any septic tanks or leach field systems. Consequently, the existence of soils incapable of supporting septic systems is not considered an impact associated with the Project, and this impact is not evaluated. Thus, similar to the Project, the No Project Alternative would have no impact relative to fault rupture, landslide hazards, loss of topsoil, or septic systems.

Since no construction would occur at the Project site under the No Project Alternative, there would be no topographic changes that could alter the erosion potential. In addition, construction activities, such as excavation, would not introduce instability and cause slopes to collapse. Therefore, the No Project Alternative would result in no soil erosion or other soil hazards, whereas these impacts would be less than significant under the Project.

Development of the Project site would involve the occupancy of buildings in a location where strong seismic groundshaking and liquefaction, as well as expansive soils, can be expected to occur over the life of the Project. The No Project Alternative would not construct new buildings or increase the amount of employees at the Project site over existing conditions. Therefore, the No Project Alternative would not expose additional people to groundshaking, liquefaction, or expansive soils. Consequently, there would be no impact, unlike the less-than-significant impact of the Project. (NI)

Hydrology and Water Quality

The No Project Alternative would not develop the Project site and would not add employees over existing conditions. Since no additional employees would be included with the No Project Alternative, additional people would not be exposed to the 100-year floodplain or potential sea level rise; as a result, there would be no impact. Existing groundwater recharge potential within the Project area is minimal because portions of the site contain impervious surfaces. The No Project Alternative would result in a similar less-than-significant impact on groundwater recharge potential. The potential for tsunami or seiche inundation is low, and the Project site is not subject to dam failure inundation. The No Project Alternative would not modify the existing conditions at the Project site, which would remain primarily covered with impervious surfaces. The No Project Alternative would not include planned stormwater quality features, such as bioretention areas, to temporarily store stormwater runoff and settle out pollutants. Therefore, the No Project Alternative would have a greater impact on stormwater runoff and potential pollutants than the Project. Nonetheless, since the groundwater recharge potential and impervious surface area is an existing condition, the No Project Alternative would result in no impact. (NI)

Hazards and Hazardous Materials

As with the Project, the No Project Alternative would not expose employees or structures to wildland fires, airport hazards, or onsite hazardous materials that are pursuant to Government Code Section 65062.5. However, unlike the Project, the No Project Alternative would not demolish any structures or disturb the soil and, therefore, would result in no impact relative to the potential release of hazardous materials. Under the No Project Alternative, construction workers would not be exposed to potential risks from contaminated soil or groundwater, andecological receptors would not be exposed to residual

contaminants in soil and/or groundwater. Operation at the Project site would include routine hazardous materials use and maintenance activities standard for office uses or R&D uses; however, compliance with applicable federal, state, and local regulations would ensure that the impacts would not be significant. In addition, the No Project Alternative would not add traffic to the area and, therefore, would not impair emergency access and emergency plans. (NI)

Population and Housing

The No Project Alternative would result in no change in housing or employment levels over existing conditions. The existing 30 employees at the Jefferson Site would remain. As such, the No Project Alternative would not result in a demand for new housing units within the City or proximate local jurisdictions. The Project would result in population growth that is less than significant, though the No Project Alternative would avoid this population growth altogether. The No Project Alternative would have no potential to contribute to cumulative impacts on population, housing, or employment growth. (NI)

Public Services

There would be no increase in employees on the site over existing conditions that could result in increased demand for police, fire protection, emergency services, and recreational facilities. In addition, as discussed above, the No Project Alternative would not increase the population and housing demand within the City. As such, the No Project Alternative would not increase the demand for schools or library services. The No Project Alternative would have no potential to contribute to cumulative impacts related to public services. (NI)

Utilities and Service Systems

The No Project Alternative would not change the existing use at the Project site; the Jefferson Site would continue to serve approximately 30 employees, and the Commonwealth Site would remain vacant. Therefore, the No Project Alternative would have similar water, sewer, storm drainage, energy, and operational solid waste demands as under existing conditions. The No Project Alternative would have no potential to contribute to cumulative impacts related to utilities. (NI)

Biological Resources

The No Project Alternative would not include the demolition of existing buildings, the construction of new buildings, or the removal of vegetation. As such, pallid bats and other potential crevice-roosting bat species would not be affected. Migratory birds would not be affected under the No Project Alternative because no trees would be removed and there would be no disruption of nesting habitat. As with the Project, since there is no riparian habitat, salt marsh, state or federally protected wetlands, and/or other sensitive natural community present in any portion of the site, there would be no impact on these resources. Therefore, no project or cumulative impacts would occur under the No Project Alternative and there would be no conflicts with local policies adopted to protect biological resources. No impacts on biological resources would result from the No Project Alternative. (NI)

Reduced Intensity Alternative

As described above, the Reduced Intensity Alternative would include a 25 percent reduction in the amount of floor area and number of employees. This would equate to approximately 194,940 sf of building area and approximately 975 employees. As with the Project, the Reduced Intensity Alternative would include either office or R&D uses. The site plan of the Reduced Intensity Alternative would be similar to the Project, with the same building footprints. Since the building footprints would not change, all footprint-based impacts would be identical to the Project, as explained below.

Land Use

Conflicts with Adopted Land Use Plans and Policies. Similar to the Project, the Reduced Intensity Alternative would require a CDP and rezoning to establish a new height limit. While the proposed building heights under this alternative would be less than under the Project, the heights of approximately 46 feet would exceed the allowed maximum height in an M-2 zone of 35 feet. The proposed new CDP and rezoning to M-2(X) would allow the Reduced Intensity Alternative to be consistent with the Zoning Ordinance, resulting in less-than-significant impacts. In addition, the Reduced Intensity Alternative would be generally consistent with the General Plan. As with the Project, the Reduced Intensity Alternative would enhance the Project site by installing landscaping, outdoor seating, pedestrian paving, onsite parking, and bicycle and pedestrian amenities and would protect employees from potential hazards. In general, the Reduced Intensity Alternative would be consistent with the General Plan. (LTS)

Cumulative Impacts. Consistency with land use plans and policies is inherently a project-specific issue, and each jurisdiction would decide on project consistency on the project level. As such, there would be a less-than-significant cumulative impact as a result of cumulative development in the ABAG region under the Reduced Intensity Alternative, as with the Project. (LTS)

Aesthetics

Degradation of Visual Character or Quality. The Reduced Intensity Alternative would result in approximately 194,940 sf of building space compared to 237,858 sf under existing conditions. As such, there would be a net decrease in overall building area. However, the buildings would be taller under this Alternative with two buildings at approximately 46 feet instead of the existing 27-foot-tall buildings. Therefore, the buildings would be more visible to surrounding uses, similar to the Project but more consistent with the adjacent office buildings. The existing visual character and quality does not support the recent and future trend of developing the area into an updated office park setting. Similar to the Project, the Reduced Intensity Alternative would promote the transition of the area to office campuses and increase unity with it surroundings by creating contiguous landscape areas, bicycle and pedestrian connections, and buildings that reflect a similar architectural design. 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.

Compared to the Project, the Reduced Intensity Alternative would reduce building height (46 feet compared to 61 feet). Regardless, visual impacts would be relatively similar since the site would be altered from an existing vacant distillery to a medium-scale office campus. While the Reduced Intensity Alternative would increase onsite building height over existing conditions, this alternative would not alter or degrade the visual character or quality of the Project site and its surroundings or the public view corridors in the area to the same degree as the Project, resulting in a less-than-significant impact. (LTS)

New Sources of Light and Glare. The Reduced Intensity Alternative would add exterior lighting 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 light sources were introduced to the area. Similar to the Project, the Reduced Intensity Alternative would result in nighttime lighting from employee vehicles, the onsite boulevard, the parking lots, buildings, and security features. The increase of building heights from existing conditions would make the building lights more visible to surrounding areas, though less visible than the Project. 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. Regardless, Mitigation Measure AES-2.1 would require lighting design to meet minimum safety and security standards, reducing the potentially significant lighting impact to less than significant.

As with the Project, the No Project Alternative could also result in highly reflective surfaces at the Project site. Glare from these surfaces could create hazards to motorists along US 101. However, since the buildings would be slightly smaller in height than the Project (46 feet compared to the Project height of over 61 feet), there would be less building surface for glare to occur. Regardless, it is conservatively assumed that the Reduced Intensity Alternative would result in potentially significant impacts. Mitigation Measure AES-2.2, which is required for the Project, would treat reflective surfaces, resulting in less-than-significant impacts. (PS/LTS)

Cumulative Impacts. As described above, the Project area is transitioning from industrial and warehousing uses to corporate campuses. The Reduced Intensity Alternative and the Menlo Gateway Project would develop these respective sites into office developments. Combined, these two projects would provide increased unity with the existing and planned surroundings by creating contiguous landscape areas and buildings that reflect a similar architectural design. Therefore, the Reduced Intensity Alternative, together with Menlo Gateway, would not result in a substantial degradation of visual character or quality of the surroundings. In addition, implementation of Mitigation Measures AES-2.1 and AES-2.2 would reduce the Reduced Intensity Alternative's contribution to cumulative light and glare impacts to less than significant, similar to the Project. (LTS)

Transportation

Although the Reduced Intensity Alternative would reduce employees and building square footage by 25 percent, the resulting trip generation would be slightly less than 25 percent. The estimated trip generation for the office use is based on the trip generation rate using a fitted curve equation. This trip generation methodology that uses employee count rather than square footage is the most conservative estimate. Since the generation rate is a fitted curve and is not linear, a certain percent reduction in square feet would not necessarily correlate with the same reduction in trips. As shown in Table 4-2, the Reduced Intensity Alternative increment would result in 465 trips (414 inbound and 51 outbound trips) for the AM peak hour, 415 trips (69 inbound and 346 outbound trips) for the PM peak hour, and 3,057 daily trips. This would represent a 22 percent reduction in the AM peak hour, a 23 percent reduction in the PM peak hour, and an 18 percent reduction in daily trips, as compared to the Project.

Table 4-2. Reduced Intensity Alternative Trip Generation

	AM Peak Hour			PM Peak Hour			
Proposed Use	In	Out	Total	In	Out	Total	Daily
Existing Office Use	-2	-6	-8	-3	-3	-6	-126
Proposed Office Use (25% Reduction in employees)	416	57	473	72	349	421	3,183
Total Net New Increment Trips	**414**	**51**	**465**	**69**	**346**	**415**	**3,057**

Source: DKS Associates, 2013.

On a daily basis, 3,057 vehicle trips would be generated for the Reduced Intensity Alternative. With the trip generation detailed in Table 4-2, the same number of intersection, roadway segment, and Routes of Regional Significance impacts would occur when compared to the Cumulative 2030 Condition.

A 25 percent reduction in the Project increment would result in two fewer intersection potential impacts. At the intersection of Marsh Road and Bayfront Expressway, the reduction would decrease the delay for the southbound approach below the 0.8 second significance threshold, eliminating the impact. At the intersection of Chilco Street and Constitution Drive, the reduction would improve the operation to LOS C, eliminating the impact. There would, however, continue to be significant and unavoidable impacts on other intersections, roadway segments, Routes of Regional Significance, and cumulative impacts with the Reduced Intensity Alternative, as with the Project. (SU)

Air Quality

Conflict with or Obstruct Implementation of the Applicable Air Quality Plan. The proposed development under both the Project and the Reduced Intensity Alternative is consistent with and supportive of the Transportation Control Measures (TCMs) identified in the 2005 Ozone Strategy and the 2010 Clean Air Plan as critical to attaining the CCAA ozone standard. Therefore, impacts are considered less than significant. (LTS)

Violation of Any Air Quality Standard During Construction. This alternative would result in 25 percent of the Project building area, which would likely result in a shorter construction period. However, in order to maintain a shorter construction period, it is likely that the daily construction activities under the Reduced Intensity Alternative would be similar to the Project. Therefore, daily construction emissions generated by the alternative would likely be similar to the Project.

The daily construction emissions from operation of onsite construction equipment and onroad vehicles under the Project would be well below the BAAQMD's significance thresholds for reactive organic gas (ROG), carbon monoxide (CO), and particulate matter (PM10 or PM2.5). As such, the Reduced Intensity Alternative would also not exceed the thresholds. Regardless, as required by the BAAQMD, Mitigation Measure AQ-2.2, as proposed for the Project, would be implemented to reduced PM10 and PM2.5 fugitive dust emissions.

The construction of the Project would generate daily exhaust emissions of nitrogen oxides (NO_X) in exceedance of the BAAQMD's significance threshold during the demolition, excavation and grading, and building construction phases. The Reduced Intensity Alternative would also likely generate similar level of daily NO_X emissions in exceedance of the BAAQMD NO_X threshold. Similar to the Project, implementation of Mitigation Measure AQ-2.1 would reduce the impact and could potentially bring daily NO_X emissions below the BAAQMD threshold during demolition phase. However, daily NO_X emissions

during the excavation and grading and building construction phases would still exceed the threshold. Therefore, this impact would remain significant and unavoidable. (SU)

Violation of Any Air Quality Standard During Operation. Project operation has the potential to create air quality impacts primarily associated with mobile and area sources. Motor vehicle traffic would include daily employee trips, visitor trips, vender delivery trucks, and waste management trucks. Since the Reduced Intensity Alternative would result in fewer vehicle trips due to the reduction in building space and employees, the operational air quality impacts would be reduced. Operation of the Project is expected to result in an increase in all criteria pollutant emissions, relative to existing conditions. However, these increases would all be below applicable BAAQMD significance thresholds. Therefore, since the Reduced Intensity Alternative would result in a 25 percent reduction, this alternative would also be below the BAAQMD significance thresholds for criteria air pollutants. Impacts would be less than significant, similar to the Project. (LTS)

Exposure to Diesel Particulate Matter Concentrations. Diesel-fueled engines, which generate diesel particulate matter (DPM), would be used during construction and operation of the Reduced Intensity Alternative, similar to the Project. Multiple sensitive receptors are located within 1,000 feet of the Project site, including single-family residences to the south of US 101, and Kelly Park and the Beechwood School, both to the east of the Project site. Project construction and operation would not result in significant increases of the non-cancer hazard index levels, cancer risk, or annual PM 2.5 concentrations at sensitive receptors within 1,000 feet of the Project site. Since the Reduced Intensity Alternative would result in a reduction of building area compared to the Project, these impacts would be less than under the Project. Exposure to DPM concentrations with implementation of the Reduced Intensity Alternative would be less than significant. (LTS)

Exposure to CO Concentrations. Traffic generated by the Project would have the potential to create CO hotspots at nearby roadways and intersections. However, since the Reduced Intensity Alternative would generate less traffic than the Project, the CO emissions would not be as significant. Regardless, for both the Project and the Reduced Intensity Alternative, CO concentrations are not expected to contribute to any new localized violations of the 1-hour or 8-hour ambient air quality standards, resulting in less-than-significant impacts. (LTS)

Exposure to Objectionable Odors. Potential odor sources during construction include diesel exhaust from heavy-duty equipment. Construction-related operations near existing receptors would be temporary in nature, and construction activities would not be likely to result in nuisance odors that would violate BAAQMD Regulation 7 (Odorous Substances). Potential odor sources from operation of both the Project and the Reduced Intensity Alternative would include diesel exhaust from landscaping equipment and emergency generators during routine maintenance. The odor impacts during operation would be limited and infrequent. Since there would be no change in land use under the Reduced Intensity Alternative compared to the Project, the same less-than-significant impacts would occur. (LTS)

Cumulative Impacts. Implementation of the Project or the Reduced Intensity Alternative, in combination with other cumulative development in the City, would not conflict with or obstruct implementation of the applicable air quality plan, resulting in a cumulatively significant impact. Additionally, the Project and the Reduced Intensity Alternative, in combination with other development within the City, would be consistent with the Ozone Attainment Plan and the Clean Air Plan. This would be a less-than-significant cumulative impact.

However, similar to the Project, the Reduced Intensity Alternative, in combination with the Tier 1 and Tier 2 Projects within the City, would result in a cumulatively significant impact for NO_X. This is considered cumulatively significant according to BAAQMD's significance thresholds when a project exceeds the BAAQMD's project mass emission threshold for criteria air pollutants. Because no feasible mitigation has been identified for the Project or for the Reduced Intensity Alternative, the impact for NO_X emissions is therefore significant and unavoidable. (SU)

Greenhouse Gas Emissions

GHG Emissions during Project Construction. Construction of the Reduced Intensity Alternative would generate emissions of carbon dioxide (CO_2), methane (CH_4), and nitrogen oxides (NOx) from mobile and stationary construction equipment exhaust, and employee and haul truck vehicle exhaust. Although the construction period could be shorter for this alternative due to less building area, the intensity of construction activities at a given time would be similar to the Project. BAAQMD's CEQA Guidelines do not recommend a GHG emission threshold for construction-related emissions; therefore, construction of the Reduced Intensity Alternative would not exceed thresholds. However, the Guidelines recommend implementation of BMPs to help control and reduce GHG emissions. Therefore, as with the Project, the construction of the Reduced Intensity Alternative is considered less than significant with implementation of Mitigation Measure GHG-1.1. (PS/LTS)

GHG Emissions during Project Operation. Operation of the Reduced Intensity Alternative would generate fewer direct and indirect GHG emissions than the Project due to a decrease in building area and employees. As a result, this alternative would result in fewer vehicle trips, and less electricity generation and consumption, waste and wastewater generation, and water use. However, the Reduced Intensity Alternative would still generate an increase in direct and indirect GHG emissions over existing conditions. Sources of direct emissions include mobile vehicle trips, natural gas combustion, and landscaping activities. Regardless, since the Project would not generate GHG emissions above the BAAQMD threshold, the Reduced Intensity Alternative would also result in less-than-significant impacts. (LTS)

Conflicts with Applicable GHG Emission Plans, Policies, and Regulations. As with the Project, the Reduced Intensity Alternative would not pose any explicit conflict with the applicable list of Air Resources Board (ARB) GHG reduction strategies outlined in the Climate Change Scoping Plan designed to meet the objectives of AB 32 to reduce GHG emissions to 1990 levels by 2020. Since the Reduced Intensity Alternative would be developed to a lesser extent than the Project, this alternative would also be consistent with and would not conflict with a variety of General Plan policies or strategies in the City's Climate Action Plan. The Reduced Intensity Alternative, similar to the Project, would also implement several GHG reduction measures and comply to with 2013 Energy Codes. Therefore, the Reduced Intensity Alternative's impact relative to conflicts with applicable Plans and Policies would be less than significant. (LTS)

Exposure of Property and People to Climate Change. The northern portion of the Jefferson Site would be potentially subject to inundation by mid-century sea level rise. However, the buildings at the Commonwealth Site are outside the mid-century sea level rise inundation zone. Moreover, the Reduced Intensity Alternative, like the Project, would incorporate designs to reduce exposure of property or persons to the potential effects of climate change. Consequently, the impact of climate change on the Reduced Intensity Alternative and the Project is considered less than significant. (LTS)

Noise

Substantial Temporary or Periodic Increase in Noise Levels. Construction would require the use of heavy equipment that would temporarily increase noise levels at properties near the work sites. Although the Reduced Intensity Alternative would result in less building area and, therefore, potentially shorter construction periods, noise levels at a given time during construction would be similar to the levels expected under the Project. Due to distance, construction noise impacts on nearby sensitive receptors such as residences to the south of US 101 and the Beechwood School, would be less than significant. However, demolition of the existing buildings, which would occur with both the Project and the Reduced Intensity Alternative, would exceed the Noise Ordinance limit, resulting in potentially significant impacts on the adjacent commercial and office uses. Implementation of Mitigation Measure NOI-1.1, as required for the Project, would reduce construction noise impacts of the Reduced Intensity Alternative to less than significant. (PS/LTS)

Exposure of Onsite Users to Excessive Noise Levels. Vehicular traffic on US 101 is the primary source of noise at the Project site. Although the proposed buildings under the Reduced Intensity Alternative would be three stories compared to four stories under the Project, these buildings would still provide acoustical shielding of the proposed outdoor buildings. In addition to building and open space setbacks, the resulting noise conditions would be quieter than existing conditions. Therefore, traffic noise levels at the Project site under the Reduced Intensity Alternative would be less than significant, similar to under the Project. (LTS)

Exposure of Sensitive Receptors to Excessive Noise Levels. Operation of the Reduced Intensity Alternative would consist of typical office operations, such as stationary mechanical equipment, parking lot activities, truck loading activities, and traffic noise from building reflection. Since this alternative would result in less building space, employment, parking, and vehicle trips than the Project, it is expected that the operational noise would be slightly less than under the Project. Additionally, the buildings would not be as tall as the Project buildings (46 feet compared to 61 feet), resulting in less noise reflection from the proposed buildings. Since the Project would result in less-than-significant operational noise impacts, and the Reduced Intensity Alternative would result in a reduction of operational activities, this impact would also be less than significant. (LTS)

Substantial Temporary or Periodic Increase in Vibration Levels. The operation of heavy construction equipment can generate localized ground-borne vibration and noise at buildings adjacent to the construction site. Since the Reduced Intensity Alternative, like the Project, would not involve pile driving activities, no damage to surrounding buildings is expected. However, because of the nature of the businesses that are present in the vicinity, these uses may include vibration-sensitive equipment. As mentioned above, although the construction period could be shorter for this alternative due to less building area, the intensity of construction activities at a given time would be similar to the Project. Therefore, the ground-borne vibration levels from operation of heavy construction equipment could also exceed the threshold, resulting in a potentially significant impact. Implementation of Mitigation Measures NOI-4.1 and NOI-4.2, as required for the Project, would help reduce impacts on buildings with vibration-sensitive equipment. However, although implementation of these measures would reduce ground-borne vibration impacts during construction of the Reduced Intensity Alternative, vibration-sensitive equipment at adjacent office buildings could still be exposed to excessive construction-generated vibration levels. Therefore, as with the Project, this impact is considered to be significant and unavoidable. (SU)

Cumulative Impacts. Cumulative noise impacts would be similar under this alternative as compared to the Project. None of the cumulative projects, with the exception of the Dumbarton Rail Corridor Project, are located within 300 feet of the Project site. However, the Dumbarton Rail Corridor Project is in the preliminary stages of planning and would not be constructed at the same time as the Project. Therefore, operational and construction noise generated by the Reduced Intensity Alternative and the Project would not result in a cumulatively considerable impact. (LTS)

Cultural Resources

Impacts on Historic Resources. The Reduced Intensity Alternative would demolish the existing structures at the Project site. However, as with the Project, the Reduced Intensity Alternative would not cause a substantial adverse change in the significance of a historic resource because none of the existing buildings are considered historic. Therefore, like the Project, the Reduced Intensity Alternative would result in a less-than-significant impact on historic resources. (LTS)

Impacts on Archaeological Resources. Although no archaeological resources were identified in or adjacent to the Project site, three prehistoric sites have been recorded within 0.5 mile of the Project site. As such, due to ground-disturbing activities during construction, the Reduced Intensity Alternative has the potential to encounter previously undiscovered archaeological resources during construction. However, as with the Project, implementation of Mitigation measure CUL-2.1 would reduce the impact to less than significant. (PS/LTS)

Impacts on Paleontological Resources. The Reduced Intensity Alternative 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 may occur as a result of construction, as well as the paleontological sensitivity of the materials underlying the site. Construction activities under the Reduced Intensity Alternative would be similar to the Project. As such, this alternative could expose undisturbed deposits that may contain fossils, resulting in a potentially significant impact. However, Mitigation Measure CUL-3.1, as required for the Project, would reduce this impact to less than significant. (PS/LTS)

Impacts on Human Remains. Although the Northwest Information Center background records search did not identify any human remains in or adjacent to the Project site, at least one human burial has been identified within 0.5 mile of the Project site. Therefore, the potential may exist for previously undiscovered human remains to be encountered during construction of the Reduced Intensity Alternative. However, Mitigation Measure CUL-4.1 would reduce the impact to less than significant. (PS/LTS)

Cumulative Impacts. Because all historical resources are unique and nonrenewable members of finite classes, all adverse effects or negative impacts erode a dwindling resource base. For this reason, the cumulative effects of development in the region on historical resources are considered significant. However, since the existing buildings at the Project site are not considered historic, the Reduced Intensity Alternative would not contribute to any potential cumulative impact on historical resources. 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, paleontological resources, and human remains, could be encountered during construction. All significant archaeological resources, paleontological resources, and human remains are unique and nonrenewable resources. For this reason, the cumulative effects of all development on these resources are considered potentially significant. However, compliance with Mitigation Measures CUL-2.1, CUL-3.1, and CUL-4.1 would reduce the

Reduced Intensity Alternative's contribution to the cumulative impact to less than cumulatively considerable and would reduce the potentially significant cumulative impacts associated with the loss of archaeological and paleontological resources and the disturbance of human remains to a less-than-significant level, similar to the impacts Project. (PS/LTS)

Geology and Soils

Strong Seismic Groundshaking and Seismic-Related Ground Failure. The Reduced Intensity Alternative would construct two buildings totaling approximately 194,940 sf. This new development would expose approximately 975 new workers to groundshaking. The risks to public safety from seismic hazards can be mitigated to the extent required by law with implementation of the proper design and construction methods, which would be within the responsibility of the City and the Project Sponsor to monitor and enforce through its building permit process. In addition, the City, along with other Bay Area jurisdictions, participates in a coordinated planning and emergency response program, and has its own Emergency Operation Plan to respond to natural disasters. Consequently, the Reduced Intensity Alternative, as with the Project, would not have a significant adverse impact with regard to exposure of people or structures to damage resulting from seismic groundshaking or liquefaction-related hazards. Therefore, impacts are considered less than significant. (LTS)

Soil Erosion. The Project site is nearly level and would not involve development on hillsides that would involve cut-and-fill. Thus, there would be no topographic changes that could alter erosion potential. However, development of the Project site under the Reduced Intensity Alternative would involve grading to construct building foundations and trenching for utility installations. Some minor modifications to allow additional roadway access points would also be implemented. These construction activities could temporarily expose soils to erosive effects from stormwater runoff. Similar to the Project, compliance with City requirements and the CBC, which are within the authority of the City to enforce and monitor, would ensure that erosion impacts resulting from Project construction would be less than significant. (LTS)

Soil Hazards. The preliminary geotechnical investigation anticipates differential settlement at the Project site resulting from seismically induced liquefaction. If the two buildings proposed with the Reduced Intensity Alternative are improperly designed and constructed, differential settlement could undermine structural foundations, potentially exposing people onsite to increased safety risks. Adherence to the soil and foundation support parameters of the City Building Code, as required by City and State law, would ensure the maximum practicable protection available from soil failures under static or dynamic conditions for structures and their associated trenches and foundations. With implementation of the Reduced Intensity Alternative although fewer people would be exposed to soil related hazards than with the Project the Project Sponsor would be required to incorporate these recommendations into Project design. Therefore, as with the Project, hazards related to unstable geologic or soil units are considered less than significant. (LTS)

Expansive Soil. The preliminary geotechnical investigation for the Project site indicates that soils are expected to have a moderate to high shrink-swell potential. Structural damage, warping, and cracking of roads, driveways, parking areas, and sidewalks, and rupture of utility lines may occur if the potential for expansive soils and the nature of the imported fill are not considered during design and construction of the Reduced Intensity Alternative. As with the Project, adherence to the soil and foundation support parameters of the City Building Code, as required by City and state law, would ensure the maximum practicable protection available from soil failures under static or dynamic conditions for structures and

their associated trenches and foundations. Therefore, similar to the Project, the Reduced Intensity Alternative would result in less-than-significant impacts related to expansive soils. (LTS)

Cumulative Impacts. Soil and geologic conditions are site-specific and there is little, if any, cumulative relationship between the Project site and other areas in the City. As such, the potential for cumulative impacts to occur is geographically limited for many geology and soils impact analyses. The Reduced Intensity Alternative would have a less-than-significant potential to cause cumulatively substantial erosion or siltation. Construction and operational activities embodied in the Reduced Intensity Alternative would be subject to the same regulations as the Project. Consequently, cumulative impacts would be less than significant. (LTS)

Hydrology and Water Quality

Violation of Water Quality Standards or Waste Discharge Requirements. Implementation of the Reduced Intensity Alternative, like the Project, would include construction activities, which would disturb land and place stockpiles within proximity to storm drain inlets. This could result a temporary increase in sediment loads to the Lower San Francisco Bay. Sediment transport to local drainage facilities could also result in reduced storm flow capacity, resulting in localized ponding or flooding during storm events. All Project construction activities would be subject to existing regulatory requirements. All construction activities would comply with the General Construction Permit from the San Francisco Bay Regional Water Board, which contains standards to ensure that water quality is not degraded. Because the Reduced Intensity Alternative, similar to the Project would be in compliance with the General Construction Permit, local stormwater ordinances, and other related requirements, potential water quality impacts during construction would be less than significant.

As with the Project, up to eight stormwater treatment areas would be located throughout the Project site in order to limit stormwater runoff and provide for biotreatment of contaminants. In addition, the Reduced Intensity Alternative would result in increased pervious surfaces over existing conditions and the Project. Since less parking would be required with this alternative compared to the Project due to a decrease in building area, these paved surfaces under the Project would instead consist of pervious landscaped areas. As such, the Reduced Intensity Alternative would result in a net decrease in the amount of runoff leaving the Project site and thus, a reduced volume of potential contaminated runoff. The Reduced Intensity Alternative, as with the Project, would be in compliance with the San Francisco Bay Region MS4 Permit, San Mateo Countywide Stormwater Pollution Prevention Program, and local stormwater ordinances. Therefore, potential water quality impacts would be less than significant. (LTS)

Effects on Groundwater Supplies and Recharge. The majority of the water supplied to the Project site is from surface water sources and this would not change during or following implementation of the Reduced Intensity Alternative. Construction of this alternative, similar to the Project, would not require dewatering activities, resulting in no potential for reducing the volume of water in the local aquifer table. As with the Project, the Reduced Intensity Alternative would increase pervious service area; therefore, an increase in groundwater recharge would occur. However, the Reduced Intensity Alternative would include slightly more pervious surfaces than the Project since less parking would be required, furthering the groundwater recharge potential. Therefore, effects of the Reduced Intensity Alternative on groundwater supplies and recharge would result in a less-than-significant impact like the Project. (LTS)

Changes to the Existing Drainage Patterns. Construction activities under the Reduced Intensity Alternative would alter existing drainage patterns and could result in local (onsite) and temporary erosion and siltation. However, although drainage patterns on the Project site would be altered, drainage would ultimately be improved because implementation of the Reduced Intensity Alternative would result in increased pervious area over existing conditions and Project conditions that would further minimize runoff volumes and the potential for ponding and other drainage issues onsite. In addition to increased pervious area, surface runoff from the Project site would be collected into a combination of new and existing storm drain inlets and pipes and a portion required for stormwater treatment would be directed to pumps, which would ultimately be pumped to the biotreatment areas located throughout the site. Therefore, similar to the Project, the Reduced Intensity Alternative would not result in flooding onsite or offsite due to altered existing drainage patterns. Impacts would be less than significant. (LTS)

Changes to Stormwater Runoff. As with the Project, the Reduced Intensity Alternative would result in the reduction of the total stormwater runoff rate for a 10-year storm event compared to existing conditions. This alternative would have larger landscaped areas relative to existing conditions and the Project and biotreatment measures would be incorporated. Therefore, runoff water from the Project site would not exceed the capacity of existing or planned stormwater drainage systems. Further, the Reduced Intensity Alternative would adhere to all applicable federal, state, and local requirements associated with stormwater runoff. Impact would be less than significant, similar to the Project. (LTS)

Degradation of Water Quality. The groundwater table is relatively shallow at the Project site, and pollutants associated with construction activities (e.g., fuel, petroleum products) could migrate or percolate into the groundwater and contribute to degradation of the local groundwater aquifer. However, implementation of construction Best Management Practices (BMPs) such as spill prevention and good housekeeping (e.g., proper storage, handling and disposal of construction-related materials) would be included in the Stormwater Pollution Prevention Plan (SWPPP) and would prevent significant impacts on groundwater quality during construction. Reduced Intensity Alternative, as with the Project, would not violate any water quality standards or waste discharge requirements as a result of construction or operation and maintenance. Therefore, this alternative would not substantially degrade water quality, resulting in a less-significant impact. (LTS)

Impacts from Flooding. The Reduced Intensity Alternative would add approximately 975 employees to the Project site, which has the potential to expose additional people to flooding. However, the Project site is not within a Federal Emergency Management Agency (FEMA)-designated special flood hazard area for a 100-year flood. The majority of the Project site (the portion that is currently the Commonwealth Site) is in an area designated as one of minimal flood risk with a portion of the Jefferson Site in an area of moderate flood risk. The Reduced Intensity Alternative would result in a decrease in impervious surface area compared to existing conditions and Project conditions. As such, this would ultimately reduce the potential for moderate flood risks associated with low flood elevations and ponding throughout the Project site. Similar to the Project, impacts related to flooding would be less than significant. (LTS)

Cumulative Impacts. The Reduced Intensity Alternative would result in the same hydrology, or slightly fewer, impacts as the Project. Cumulative impacts under the Project, including storm drain impacts, flooding and sea level rise, water quality, and groundwater supplies and recharge would result in less than cumulatively considerable impacts. As such, the Reduced Intensity Alternative would result in the same less than cumulatively considerable impacts as the Project. (LTS)

Hazards and Hazardous Materials

Routine Hazardous Materials Use. As with the Project, the Reduced Intensity Alternative would be required to comply with mandatory hazardous materials regulations and SWPPP requirements. Project construction would involve routine transport, use, and disposal of hazardous materials such as solvents, paints, oils, grease, and caulking. Compliance with applicable regulations would ensure that potential releases from the transport and use or disposal of hazardous materials during Reduced Intensity Alternative construction activities would be reduced to a less-than-significant level, similar to the Project.

During operation, it is anticipated that the Reduced Intensity Alternative would involve use of hazardous materials typical of office uses (solvents, cleaning agents, paints, petroleum fuels, propane, batteries, etc.). Project operation may also involve use of hazardous materials typical of biotech and other research and development facilities. Use, storage, and disposal of these materials would be regulated according to federal and state regulations and guidelines, the intent of which is to minimize the risk of upset. Therefore, the risk of accidental explosion or release of hazardous materials that could create a health hazard with the implementation of the Reduced Intensity Alternative is low, and impacts would be less than significant, as with the Project. (LTS)

Accidental Release of Hazardous Materials. The Reduced Intensity Alternative would result in the same accidental release potential of hazardous materials as the Project. Implementation of the Reduced Intensity Alternative could expose people and the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. The Commonwealth Site is known to contain soil contaminated with petroleum hydrocarbons from a diesel release. Both the Commonwealth Site and the Jefferson Site are sited on fill materials that may contain naturally occurring asbestos. As with the Project, the Reduced Intensity Alternative would develop the Project site and would disturb soil during construction, which could generate dust containing residual soil contaminates. In addition, demolition of the buildings could disturb the existing hazardous building materials, such as asbestos and polychlorinated biphenyls (PCB) ballasts in fluorescent lights. This could cause adverse health or safety effects on construction workers, the public, and/or the environment if appropriate hazardous materials surveys and safety precautions are not taken.

Soil movement during construction of the Reduced Intensity Alternative could also expose ecological receptors to residual contaminants in soil and/or groundwater if measures are not implemented to control contaminants. Because residual hydrocarbon contaminants remain in soil, onsite soil movement during construction could provide a new potential pathway through which wildlife species could be exposed to contaminants in soil or fill material, resulting in a potentially significant impact. However, as with the Project, implementation of Mitigation Measures HAZ-2.1 and HAZ-2.2 would reduce the impacts on human populations and ecological systems to a less-than-significant level. (PS/LTS)

Exposure to Schools. The Reduced Intensity Alternative, like the Project, could emit hazardous emissions or involve the handling of hazardous materials within 0.25 mile of existing schools. The closest school is Beechwood School, located approximately 0.12 mile from the Project site. Construction of this alternative would disturb and release hazardous materials, resulting in a potentially significant impact on the sensitive receptors at the school. However, as with the Project, implementation of Mitigation Measures HAZ-2.1 and HAZ-2.2would reduce the impact to less than significant. (PS/LTS)

Impairment of Emergency Access or Emergency Plans. As discussed in Section 3.3, Transportation and Traffic, the Project would increase traffic in the vicinity of the Project site. The Reduced Intensity Alternative would also increase traffic, but to a lesser extent than the Project due to the associated 25

percent reduction in daily trips. Emergency access to the Project site would be provided from both access points at Commonwealth Drive and Jefferson Drive. Implementation of the Reduced Intensity Alternative would not impede emergency access routes and would continue to maintain the existing City grid system. As such, implementation of the Reduced Intensity Alternative would not physically interfere with the City's 2011 Emergency Operation Plan. Therefore, a less-than-significant impact would occur, similar to the Project. (LTS)

Cumulative Impacts. All cumulative impacts of the Project would be less than cumulatively considerable with implementation of the mitigation measures for the Project. Since the Reduced Intensity Alternative would develop the Project site similar to the Project and would disturb the same amount of soil, this alternative would have the same cumulative impacts. Development of the Project Site and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Reduced Intensity Alternative and other cumulative development could also expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures proposed for the Project, and compliance with current regulatory standards, would reduce the cumulative impacts to less than significant. (LTS)

Population and Housing

Population Increases. The Reduced Intensity Alternative would not include development of new housing units. However, as with the Project, there would be a population increase associated with new employment during operation this alternative. Approximately 975 new employees would be employed at the Project site as a result of the Reduced Intensity Alternative. This would be an increase compared to the 30 workers currently employed at the site but would be less than the anticipated 1,300 employees under the Project.

The increase in employment would result in a demand for new housing units and an indirect increase in the residential population. Assuming that 7.8 percent of employees would live in the City, the Reduced Intensity Alternative would result in approximately 76 new households within Menlo Park. With a persons per household (pph) ratio of 2.57, this alternative would result in the increase of approximately 195 new residents compared to the 262 new residents under the Project. Therefore, this alternative represents only a portion of the net population increase expected for the Project, which would have a less-than-significant impact. Similar to the Project, the percentage of regional housing demand resulting from the Reduced Intensity Alternative would be relatively small in comparison with projected housing growth in the region. As such, the impact of the Reduced Intensity Alternative would be less than the Project and would remain less than significant. (LTS)

Cumulative Impacts. This alternative, in combination with other projected growth in the City, would increase population, employment, and housing in the City. The contribution of the Reduced Intensity Alternative to any cumulative increase in employment would not result in direct adverse impact, resulting in a less than cumulatively considerable impact, as with the Project. (LTS)

Public Services

Police Impacts. Like the Project, the Reduced Intensity Alternative would require an increased level of police services due to increased employment and onsite activity. With more onsite activity, there could be more incidents requiring police response. However, the increased level of police services would not be large enough to trigger the need for construction of new or expanded facilities that could adversely affect the physical environment or affect human health and safety. This alternative's impacts regarding police services would be less than the Project, but would remain less than significant. (LTS)

Fire Impacts. Similar to the Project, the Reduced Intensity Alternative would require an increased level of fire services due to increased employment and onsite activities over existing conditions. With more onsite activity there could be more incidents requiring fire department response. As with the Project, this alternative would require additional staff to serve the increased activity at the Project Site. However, the increased level of fire services would not be large enough to trigger the need for construction of new or expanded facilities that could adversely affect the physical environment or affect health and safety. This alternative's impacts on fire services would be less than the Project, but would remain less than significant. (LTS)

School Impacts. This alternative would not involve the construction of new residential units in the City and, therefore, would not directly generate students. Nonetheless, this alternative would generate student demand from the induced housing demand caused by increased employment at the Project site. Approximately 76 new households could live in the City as a result of the Reduced Intensity Alternative. However, as with the Project, impacts from the indirectly generated students would be mitigated by the payment of the school impact fees established by SB 50 by the Project Sponsor and any subsequent residential projects as a result of this alternative. The Reduced Intensity Alternative's impacts regarding schools would be less than the Project, but would remain less than significant. (LTS)

Recreational Impacts. As with the Project, the Reduced Intensity Alternative would provide onsite amenities to the employees such as a lawn, active recreation space, and picnic tables. These proposed features would reduce the likelihood of employees utilizing or overburdening City facilities. This alternative would add approximately 975 new employees to the area. Although the number of employees would increase, it is likely that these employees would mainly use the onsite facilities during work hours rather than the neighboring City parks. Although the residential population in the City would increase as a result of the Reduced Intensity Alternative, there are no capacity issues and the existing facilities would be able to accommodate the increase in residents. In addition, the Project would be subject to the City's property taxes that finance the maintenance of City parks. The Project would not trigger the need for the construction or expansion of parks or other recreational facilities. This alternative's impacts regarding recreation would be less than the Project, but would remain less than significant. (LTS)

Library Impacts. The Reduced Intensity Alternative would add employees to the Project site who could use the City's libraries. However, it is expected that the existing libraries in the City would be able to accommodate an increase in employment at the Project site and the associated increase in residents. This alternative's impacts regarding libraries would be less than the Project, but would remain less than significant. (LTS)

Cumulative Impacts. As discussed in Section 3.12, *Public Services*, cumulative impacts with respect to police, fire protection, schools, recreational facilities, and libraries would be less than significant. Because this alternative would involve fewer employees compared to the Project, cumulative impacts would also be less than significant. (LTS)

Utilities and Service Systems

Water Supply. Implementation of the Reduced Intensity Alternative would result in approximately 325 fewer employees than the Project. As such, the water demand with implementation of the Reduced Intensity Alternative would be less than the approximately 21 acre-feet per year (AFY) of water demand at full buildout of the Project. Under the Project, the Menlo Park Municipal Water District (MPMWD) would have an adequate supply to meet its projected demands in normal and single dry years. As such, since the Reduced Intensity Alternative would demand less water than the Project, implementation of this alternative would have a less-than-significant impact on water supplies in MPMWD's service area and expansion of existing facilities or entitlements would not be necessary. (LTS)

Impacts on Water Treatment Facilities. As described above, implementation of the Reduced Intensity Alternative would not require expansion of the existing water treatment facilities serving MPMWD. Further, MPMWD has sufficient capacity under normal year conditions to accommodate the water demands of the Project within its Individual Supply Guarantee (ISG). As such, since the Reduced Intensity Alternative would include fewer employees at the Project site than the Project, this alternative would not require MPMWD to acquire additional water supplies. The San Francisco Public Utilities Commission (SFPUC) has sufficient capacity in its water treatment facilities to deliver treated water to its customers. Therefore, implementation of the Reduced Intensity Alternative would not require the expansion of existing water treatment facilities or the construction of new facilities, similar to the Project. This alternative would have a less-than-significant impact related to water treatment facilities. (LTS)

Wastewater Generation. It is estimated that 100 percent of indoor Project water demand would become wastewater conveyed to the South Bayside System Authority (SBSA) Regional Treatment Plant. Implementation of the Project would result in the generation of approximately 21 AFY of wastewater associated with indoor uses. Although the Reduced Intensity Alternative would include fewer employees at the Project site compared to the Project, wastewater generation would still increase over existing conditions, just to a lesser extent than the Project. Wastewater discharge from the Project site would constitute less than one percent of West Bay Sanitary District (WBSD) current capacity. Therefore, WBSD's available capacity entitlements from SBSA would be sufficient to accommodate the projected wastewater flow that would result from implementation of the Project. Because the SBSA Regional Treatment Plant would have adequate capacity to process the wastewater generated from the Project, implementation of the Project would not exceed the wastewater treatment requirements of the San Francisco Bay Regional Water Board. The Reduced Intensity Alternative would not require the expansion or construction of new wastewater facilities. As such, similar to the Project, the Reduced Intensity Alternative would result in less-than-significant impacts. (LTS)

Solid Waste Generation. At full buildout and occupancy, the Project would generate approximately 355.6 tons of solid waste per year, or approximately 0.97 tons per day. Since the Reduced Intensity Alternative would include approximately 325 fewer employees than the Project, solid waste generation would be less under this alternative. The solid waste facilities that would serve the Project have sufficient remaining capacity to accommodate the Project. Therefore, the solid waste facilities that would serve the Project site would be sufficient to accommodate the Reduced Intensity Alternative. This alternative would not contribute to the need to expand existing or construct new solid waste disposal facilities. Since the Reduced Intensity Alternative would involve less development than the Project, this alternative would also result in less-than-significant impacts related to solid waste generation. (LTS)

Stormwater Generation. With implementation of the Reduced Intensity Alternative, the increased employee density and Project site development, compared to existing conditions, would not result in adverse impacts on the City's storm drain system. Further, implementation of this alternative would adhere to provisions included in the Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit and the City's grading and drainage policies, which regulate the quantity of stormwater runoff from new development, specifically prohibiting a net increase in the rate of runoff from new development. No new facilities would be required. Therefore, as with the Project, implementation of the Reduced Intensity Alternative would have a less-than-significant impact on the City's storm drain system. (LTS)

Energy Demand. The Reduced Intensity Alternative would use slightly less energy than the Project due to the decrease in the number of employees at the Project site. Implementation of the Project would result in less-than-significant impacts on existing electricity and natural gas supply and associated infrastructure. Since the Reduced Intensity Alternative would demand fewer gas and electric services due to fewer employees and less building area, this alternative would result in an even greater reduction. Because the Reduced Intensity Alternative would be served by Pacific Gas and Electric (PG&E) and would result in substantial per capita energy reductions, impacts related to electricity and natural gas supply would be less than significant, similar to the Project. (LTS)

Cumulative Impacts. As discussed in Section 3.13, Utilities, the City's water, stormwater drainage, and solid waste facilities have sufficient capacity to serve the cumulative development of the City. The City and its service providers would have adequate supplies to meet customer demand until 2035, including the demand of the Project combined with existing and planned future uses. Since the Reduced Intensity Alternative would use less water and energy and generate less wastewater, stormwater, and solid waste than the Project, which would not be cumulatively considerable. (LTS)

Biological Resources

Impacts on Special-Status Species. Pallid bats, hoary bats, and other potential crevice-roosting bat species are the only mammal species that could occur in the vicinity of the Project site. Since the Reduced Intensity Alternative would have the same building footprint as the Project, the same amount of trees would be removed (approximately 44 of the 45 existing trees). In addition, the Reduced Intensity Alternative would demolish all existing buildings. Removal of trees and removal of or modification to buildings containing active bat roots, particularly during the nesting season (typically April through August), could result in the loss of individual bats, bat colonies, or their habitat. However, implementation of Mitigation Measure BIO-1.1 would identify and protect roosting and breeding bats on the Project Site, reducing the potentially significant impact to less than significant. The same impacts would occur with implementation of the Reduced Intensity Alternative as under the Project. (PS/LTS)

Impacts on Nursery Sites. Existing shrubs and trees on the Project site could provide nesting habitat for a variety of native migratory birds. With implementation of the Reduced Intensity Alternative, as with the Project, the existing buildings at the Project site would be demolished, existing landscaping removed, and the site would be developed with new buildings and landscaping. If nesting migratory birds are present (i.e., nests containing eggs or youths), tree and shrub removal associated with the redevelopment of the Project site could result in the loss of those birds caused by the direct mortality of adult or young birds, nest destruction, or disturbance of nesting native migratory bird species. However, implementation of Mitigation Measure BIO-2.1 would require pre-construction surveys for nesting migratory birds. As with the Project, the Reduced Intensity Alternative would result in less-than-significant impacts with implementation of this mitigation measure. (PS/LTS)

Indirect Impacts on Special-Status Species Inhabiting Nearby Salt Marshes. The buildings and trees added as a result of the Reduced Intensity Alternative could serve as new or additional perching or nesting opportunities that could increase predation by raptors or other predatory birds on special-status species in the nearby salt marshes. However, raptors or other predatory birds would have no direct line of sight from which to prey on special-status species in the nearby salt marshes. Therefore, like the Project, the Reduced Intensity Alternative would result in less-than-significant impacts on special-status species in nearby salt marshes. (LTS)

Loss of Riparian, Wetlands, and Other Habitats. Based a field survey and existing conditions, no riparian habitat or natural plant communities are present within the boundaries of the Project site. Although salt marshes occur within 0.25 miles to the north, the Project site is separated from these marshes by developed land. Since all construction and operational activities would occur with the Project site boundaries, the Reduced Intensity Alternative, as with the Project, would result in less-than-significant impacts. (LTS)

Conflicts with any Local Policies or Ordinances. The Reduced Intensity Alternative would remove 44 of the existing 45 trees, like the Project. Removal of these trees would be required to adhere to the City's Municipal Code and the Heritage Tree Ordinance. Therefore, the Reduced Intensity Alternative would not conflict with any local policies protecting biological resources and would result in the same less-than-significant impacts as the Project. (LTS)

Cumulative Impacts. As discussed in Section 3.14, *Biological Resources*, cumulative impacts with respect to biological resources would be less than significant with the implementation of Mitigation Measures BIO-1.1 and BIO-2.1. Because this alternative would involve the same amount of tree removal, building demolition, and building footprint impacts as the Project, the same less than cumulatively considerable impacts would occur. (LTS)

4.6 Comparison of Impacts

Table 4-3. Comparison of Impacts among Project Alternatives

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Land Use			
Conflicts with Adopted Land Use Plans and Policies	LTS	LTS	LTS
Cumulative Impacts	LTS	LTS	LTS
Aesthetics			
Degradation of Visual Character or Quality	LTS	NI	LTS
New Sources of Light and Glare	PS/LTS	NI	PS/LTS
Cumulative Impacts	LTS	NI	LTS
Transportation			
Impacts on Intersections	SU	NI	SU
Impacts on Roadway Segments	SU	NI	SU
Impacts on Routes of Regional Significance	SU	NI	SU
Impacts on Local Transit Systems	LTS	NI	LTS
Impacts on Local Bicycle and Pedestrian Facilities	LTS	NI	LTS

Table 4-3. Comparison of Impacts among Project Alternatives

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Cumulative Impacts	SU	NI	SU
Air Quality			
Conflict with or Obstruct Implementation of the Applicable Air Quality Plan	LTS	NI	LTS
Violation of Any Air Quality Standard During Construction	SU	NI	SU
Violation of Any Air Quality Standard During Operation	LTS	NI	LTS
Exposure to DPM Concentrations	LTS	NI	LTS
Exposure to CO Concentrations	LTS	NI	LTS
Exposure to Objectionable Odors	LTS	NI	LTS
Cumulative Impacts	SU	NI	SU
Greenhouse Gas Emissions			
GHG Emissions During Project Construction	PS/LTS	NI	PS/LTS
GHG Emissions During Project Operation	LTS	NI	LTS
Conflicts with Applicable GHG Emission Plans, Policies, and Regulations	LTS	NI	LTS
Exposure of Property and People to Climate Change	LTS	NI	LTS
Noise			
Substantial Temporary or Periodic Increase in Noise Levels	PS/LTS	NI	PS/LTS
Exposure of Onsite Users to Excessive Noise Levels	LTS	NI	LTS
Exposure of Sensitive Receptors to Excessive Noise Levels	LTS	NI	LTS
Substantial Temporary or Periodic Increase in Vibration Levels	SU	NI	SU
Cumulative Impacts	LTS	NI	LTS
Cultural Resources			
Impacts on Historic Resources	LTS	NI	LTS
Impacts on Archaeological Resources	PS/LTS	NI	PS/LTS
Impacts on Paleontological Resources	PS/LTS	NI	PS/LTS
Impacts on Human Remains	PS/LTS	NI	PS/LTS
Cumulative Impacts	PS/LTS	NI	PS/LTS
Geology and Soils			
Strong Seismic Groundshaking and Seismic-Related Ground Failure	LTS	NI	LTS
Soil Erosion	LTS	NI	LTS
Soil Hazards	LTS	NI	LTS
Expansive Soil	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Hydrology and Water Quality			
Violation of Water Quality Standards or Waste Discharge Requirements	LTS	NI	LTS
Effects on Groundwater Supplies and Recharge	LTS	NI	LTS

Table 4-3. Comparison of Impacts among Project Alternatives

Environmental Issue	Project	No Project Alternative	Reduced Intensity Alternative
Changes to the Existing Drainage Patterns	LTS	NI	LTS
Changes to Stormwater Runoff	LTS	NI	LTS
Degradation of Water Quality	LTS	NI	LTS
Impacts from Flooding	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Hazards and Hazardous Materials			
Routine Hazardous Materials Use	LTS	NI	LTS
Accidental Release of Hazardous Materials	PS/LTS	NI	PS/LTS
Exposure to Schools	PS/LTS	NI	PS/LTS
Impairment of Emergency Access or Emergency Plans	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Population and Housing			
Population Increase	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Public Services			
Police Impacts	LTS	NI	LTS
Fire Impacts	LTS	NI	LTS
School Impacts	LTS	NI	LTS
Recreational Impacts	LTS	NI	LTS
Library Impacts	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Utilities and Service Systems			
Water Supply	LTS	NI	LTS
Impacts on Water Treatment Facilities	LTS	NI	LTS
Wastewater Generation	LTS	NI	LTS
Solid Waste Generation	LTS	NI	LTS
Stormwater Generation	LTS	NI	LTS
Energy Demand	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS
Biological Resources			
Impacts on Special-Status Species	PS/LTS	NI	PS/LTS
Impacts on Nursery Sites	PS/LTS	NI	PS/LTS
Indirect Impacts on Special-Status Species Inhabiting Nearby Salt Marshes	LTS	NI	LTS
Loss of Riparian, Wetlands, and Other Habitats	LTS	NI	LTS
Conflicts with Local Policies or Ordinances	LTS	NI	LTS
Cumulative Impacts	LTS	NI	LTS

NI = No Impact LTS = Less-than-Significant PS = Potentially Significant SU = Significant Unavoidable

Source: ICF, 2013.

4.7 Environmentally Superior Alternative

Section 21002 of the State CEQA Guidelines requires lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the proposed project (CEQA Guidelines Section 15126.6).

On the basis of comparing the extent to which the alternatives reduce or avoid the significant impacts of the Project, the No Project Alternative would be the environmentally superior alternative. Since no development would occur at the Project site, there would be no construction or operational impacts. However, legally the No Project Alternative cannot be selected as the environmentally superior alternative.

As previously discussed, the Reduced Intensity Alternative involving a 25 percent reduction in building space and employees is the only other alternative that has been deemed feasible. This alternative would result in a reduction of building area and an associated reduction of employees, vehicle trips, and parking areas. However, since a similar site plan is proposed under the Reduced Intensity Alternative as with the Project, the same construction and building footprint impacts discussed for the Project would occur for the Reduced Intensity Alternative. Only the impacts related to the number of employees, traffic trips, building heights, and amount of impervious surfaces due to a change in parking area would be reduced with this alternative. However, these differences would not be enough to reduce any of the significant and unavoidable impacts identified in the Project analysis.

While the Reduced Intensity Alternative would not eliminate significant and unavoidable impacts, it would nonetheless reduce the severity of some identified impacts. Therefore, the Reduced Intensity Alternative is considered the Environmentally Superior Alternative.