



STAFF REPORT

City Council

Meeting Date:

6/9/2026

Staff Report Number:

26-096-CC

Public Hearing:

Consider and adopt a resolution to approve a vesting tentative subdivision map to subdivide a property into 50 condominium parcels and one common area parcel in the C-1 (Administrative and Professional, Restrictive) zoning district, at 68 Willow Rd.

Recommendation

Staff and the Planning Commission recommend that the City Council adopt a resolution to approve a tentative subdivision map to subdivide the parcel located at 68 Willow Rd. into 50 condominium parcels and one common area parcel (Attachment A).

Policy Issues

The City Council should consider whether the required tentative findings can be made for the proposed project. The goals, policies, and programs of the General Plan, specifically the 6th Cycle Housing Element Update can be used to evaluate the project and guide a decision. A table detailing the project's compliance with the General Plan is included as Attachment B. Many of the policies listed are relevant to housing projects generally. However, the project would comply with Policy OSC 2.3, which requires dedication of park land or payment of in-lieu fees for all residential uses. The applicant would be required to pay a recreation in-lieu fee of approximately \$3.9 million as a condition of approval.

Background

Site location

The project site consists of one parcel in the C-1 zoning district with a total area of approximately 2.5 acres. For the purposes of this staff report, Willow Road is presented in an east-west orientation, and all compass directions referenced will use this orientation. The project site is located at the intersection of Willow Road and Willow Place approximately 1,000 feet west of the intersection of Willow Road and Middlefield Road. The property is bordered by other properties in the C-1 district to the east, west, and southwest, San Francisquito Creek and residential properties in Palo Alto to the southeast, and residential properties in the R-3 (Apartment) zoning district across Willow Road to the north. A location map is provided as Attachment C.

Previous review

Planning Commission

On May 4, the Planning Commission reviewed the proposed project and approved the use permit, architectural control permit, and below market rate (BMR) agreements to demolish the existing commercial building and construct eight three-story multi-family residential buildings consisting of 50 townhouse dwelling units and on-site improvements. Eight of the units would be offered at below market rates. The

Planning Commission approved two BMR agreements, one for the project if it is a for-sale project and one for if the project is not subdivided and becomes a rental project. If the project is for-sale, the units would be affordable to moderate income households (120% area median income) and if the project is a rental project, the units would be affordable to low-income households (80% area median income). Additionally, the project includes the removal of 23 heritage trees, which were reviewed and conditionally approved by the City Arborist. The Planning Commission's approval of the use permit, architectural control permit, and BMR agreement was not appealed and the entitlements are now active.

Additionally, the Planning Commission discussed the proposed vesting tentative map and recommended the City Council approve the proposed map. An excerpt of the draft minutes from the May 4 Planning Commission meeting is included as Attachment D

Housing Commission

On Nov. 5, 2025, the Housing Commission reviewed the originally-proposed BMR agreement, which consisted of eight for-sale BMR units, for consistency with the City's BMR ordinance and BMR guidelines, and voted unanimously to recommend approval of the BMR agreement. The meeting minutes from the Nov. 5, 2025, Housing Commission meeting are included as Attachment E.

After the project had been reviewed by the Housing Commission, the applicant indicated their desire for an alternate BMR agreement for a rental project instead of a for-sale project, citing shifts in the housing market and rising construction costs. On April 1, the Housing Commission reviewed an alternate agreement, which included eight rental units, and voted 6-0, with Commissioner Beeli absent, to recommend approval of the alternate BMR agreement. The meeting minutes from the April 1 Housing Commission meeting are included as Attachment F. As previously stated, the Planning Commission approved the BMR agreements. The applicant must record the appropriate BMR agreement prior to issuance of building permits.

Environmental Quality Commission

The project includes a Heritage Tree Removal (HTR) permit for the removal of 23 heritage trees. On Oct. 8, 2025, the city arborist conditionally approved the HTR permit subject to approval of the project. The HTR permit was appealed and subsequently reviewed by the Environmental Quality Commission (EQC) Jan. 21. The appellant only appealed the removal of 13 trees that were native to the area, and did not appeal the other, non-native heritage tree removals. Two competing motions were voted on and each failed. Since no action was passed by the EQC, staff's conditional approval of the HTR permit was upheld. No appeal of the HTR permit was received following Planning Commission action on the use permit, architectural control, and BMR Agreements.

Analysis

Project description

The applicant is proposing to subdivide the existing parcel located at 68 Willow Rd. into 50 condominium parcels and one common area parcel. The project would allow the units within the approved 50-unit townhouse project to be sold independently. A full analysis of the approved project, including the building design and layout, transportation demand management, parking, trees and landscaping, state density bonus law waivers and incentives, and BMR agreements is included in the staff report from the May 4, Planning Commission meeting (Attachment G).

Site layout

The proposed project would consist of eight three-story residential buildings with three- and four-bedroom units. Six of the buildings would line the perimeter of the project site and two buildings would be located in

the center of the site. An interior loop road would provide access to the buildings. The site would contain an amenity area for residents near the bank of the San Francisquito Creek, which would include trellises, benches, and play equipment. The approved site plan is included in Attachment H.

Vehicular access would be from Willow Place. Pedestrian access would be provided primarily from Willow Place, while individual units in Building 8 could be accessed directly from Willow Road. The project would include paved walkways along the perimeter of the site as well as along the north side of Street A and between Buildings 4 and 5.

Vesting tentative map

The applicant is requesting approval of a vesting tentative map for a major subdivision to subdivide the project into 50 condominium units on one common area parcel. The proposed condominium subdivision would allow the individual residential units to be bought and sold independently.

State law outlines factors that the City Council may consider in reviewing the request for subdivisions. Specifically, there are five factors for the City Council to consider.

The first consideration is whether the proposed subdivision is in conformance with the City's General Plan. The General Plan land use designation for the subject property is Professional and Administrative Offices, which is consistent with the C-1 (Administrative and Professional, Restrictive) zoning district, which was updated as part of the 2023-2031 Housing Element update to allow for residential uses. The proposed subdivision would not conflict with General Plan goals and policies and would comply with the Zoning Ordinance and Subdivision Ordinance.

The second factor to consider is whether the site of the subdivision is physically suitable for the proposed type or density of the development. The proposed subdivision would meet all applicable regulations of the Subdivision Ordinance as well as all development regulations pertaining to the C-1 district within the Zoning Ordinance, with the exception of approved waivers and one concession per State Density Bonus Law. The site contains an existing office building that would be demolished. The proposed subdivision would result in 50 residential units with associated site improvements, including a loop road, landscaping, amenity spaces, underground utilities, and emergency vehicle access to all units.

The third and fourth factors are concerned with whether the design of the subdivision or proposed improvements is likely to cause substantial environmental damage or serious public health problems. The proposed subdivision is located within a fully developed neighborhood, and all necessary utilities are readily available. In addition, the development of the property would need to adhere to specific conditions of the Engineering Division, all applicable building codes, and requirements of other agencies such as the West Bay Sanitary District, Menlo Park Fire Protection District, and other utility companies. Adherence to the recommended conditions of approval and all applicable codes would eliminate substantial or serious environmental or public health impacts.

The final factor to consider is whether the proposed subdivision would conflict with any public access easements. No public access easements currently exist on the site, so there is no conflict.

Staff and the Planning Commission have reviewed the tentative map and have found the map to be in compliance with State and City regulations subject to the conditions outlined in Attachment A, Exhibit E. All standard and project specific conditions of approval would need to be complied with prior to recordation of the final map. The applicant would need to apply for the final map within two years of the approval date of the tentative map. In order to deny the proposed subdivision, the City Council would need to make specific findings that would identify conditions or requirements of the State law or the City's ordinance that have not

been satisfied.

Correspondence

Staff has not received any written correspondence since the Planning Commission meeting.

Conclusion

Staff's analysis indicates the project would be consistent with the C-1 development standards, Subdivision Map Act, and State Density Bonus Law, and would help implement an approved 50-unit townhouse project. The project would further the goals and policies of the General Plan and Housing Element by providing 50 large, for-sale units targeted towards families, including eight deed-restricted affordable units for either moderate or low income households, depending on whether the project is a for-sale or rental project, and would help the City reach its Regional Housing Needs Allocation (RHNA) obligations. Staff and the Planning Commission recommend the City Council adopt a resolution approving the vesting tentative subdivision map.

Impact on City Resources

The project sponsor is required to pay Planning, Building and Public Works permit fees, based on the City's Master Fee Schedule, to fully cover the cost of staff time spent on the review of the project.

Environmental Review

The project is categorically exempt under Class 32 (Section 15332), "Infill Development" of the current California Environmental Quality Act (CEQA) Guidelines because it satisfies the following conditions:

- A. *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- B. *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*
- C. *The project site has no value as habitat for endangered, rare or threatened species.*
- D. *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- E. *The site can be adequately served by all required utilities and public services.*

The City analyzed the property's eligibility for the Class 32 infill exemption. An in-depth analysis on how the project complies with the exemption is included as Attachment A Exhibit B.

The project would be required to comply with applicable mitigation measures from the ConnectMenlo program-level Environmental Impact Report (EIR) Mitigation Monitoring and Reporting Program (MMRP) (Attachment A, Exhibit C) and with the applicable mitigation measures of the 2023-2031 Housing Element Update Subsequent EIR MMRP (Attachment A, Exhibit D). Implementation of applicable mitigation measures is included as Condition 2.a.

Public Notice

Public notification was achieved by posting the agenda, with the agenda items being listed, at least 72 hours prior to the meeting. Public notification also consisted of publishing a notice in the local newspaper and notification by mail of owners and occupants within a 300-foot radius of the subject property.

Attachments

A. Resolution

Exhibits to Attachment A

- A. Vesting tentative map
- B. California Environmental Quality Act Exemption Memo
- C. ConnectMenlo Mitigation Monitoring and Reporting Program
- D. 2023-2031 Cycle Housing Element Update Subsequent EIR Mitigation Monitoring and Reporting Program
- E. Conditions of approval
- B. General Plan consistency table
- C. Location map
- D. Excerpt of draft May 4 Planning Commission meeting minutes
- E. Hyperlink – Nov. 5 Housing Commission meeting minutes:
www.menlopark.gov/files/sharedassets/public/v/1/agendas-and-minutes/housing-commission/2024-meetings/minutes/20241106-housing-commission-meeting-minutes-approved.pdf
- F. Hyperlink – April 1 Housing Commission meeting minutes:
www.menlopark.gov/files/sharedassets/public/v/1/agendas-and-minutes/housing-commission/2026-meetings/minutes/20260401-housing-commission-regular-meeting-minutes.pdf
- G. Hyperlink – May 4 Planning Commission Staff Report #26-013-PC:
www.menlopark.gov/files/sharedassets/public/v/1/agendas-and-minutes/planning-commission/2026-meetings/agenda/20260504-planning-commission-agenda-packet.pdf#page=63
- H. Approved site plan

Report prepared by:

Chris Turner, Senior Planner

Report reviewed by:

Kyle Perata, Assistant Community Development Director

RESOLUTION NO. XXXX**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MENLO PARK
APPROVING A VESTING TENTATIVE MAP FOR A MAJOR SUBDIVISION
TO CREATE 50 FOR-SALE CONDOMINIUM UNITS IN THE C-1
(ADMINISTRATIVE AND PROFESSIONAL, RESTRICTIVE) ZONING
DISTRICT AT 68 WILLOW RD.**

WHEREAS, the City of Menlo Park ("City") received an application requesting a use permit, architectural control permit, below market rate (BMR) housing agreement, heritage tree removal permits and major subdivision to demolish an existing commercial building and construct eight new three-story multi-family residential buildings consisting of 50 units on a lot in the C-1 (Administrative and Professional, Restrictive) zoning district (collectively, the "Project") from 68 Willow Owners, LLC ("Applicant and Owner") located at 68 Willow Rd. (APN 062-423-020) ("Property"). The Project is depicted in and subject to the development plans and supporting materials attached to Planning Commission resolution No. 2026-009; and

WHEREAS, the property is located in the C-1 (Administrative and Professional, Restrictive); and

WHEREAS, the maximum allowed density in the C-1 zone is 30 dwelling units per acre and the maximum number of units allowed by the zoning ordinance is 75 units; and

WHEREAS, the project is subject to the below market rate housing ordinance ("BMR ordinance") and is required to comply with the Below Market Rate housing guidelines ("BMR Guidelines") to ensure proper implementation of the BMR Ordinance; and

WHEREAS, the Applicant has provided two proposals to provide eight units to be offered to lower-income households, which were reviewed and recommended by the Housing Commission at its meetings Nov. 5, 2025, and April 1, 2026; and

WHEREAS, the major subdivision would create 50 for-sale condominium parcels to be sold individually and a common area parcel; and

WHEREAS, the proposed Project would increase the number of housing units on-site by 50 multi-family units and the Applicant would be required to pay the recreation in-lieu fee to mitigate impact on recreation facilities; and

WHEREAS, the applicant submitted a tentative map, attached hereto as Exhibit A, which was reviewed by the Engineering Division and found to be technically correct; and

WHEREAS, the tentative map was reviewed by utility and public service providers, including West Bay Sanitary District, Cal Water, Comcast, AT&T, and PG&E and no objections were raised; and

WHEREAS, all required public notices and public hearings were duly given and held according to law; and

WHEREAS, after notice having been lawfully given, a public hearing was scheduled and held before the Planning Commission of the City of Menlo Park May 4, 2026, whereat all persons interested therein might appear and be heard; and

WHEREAS, the Planning Commission reviewed the project on May 4, 2024, and found the project to be categorically exempt from environmental review pursuant to Cal. Code of Regulations, Title 14, Section 15332 et seq. (Infill Development Projects) based on evidence provided in the CEQA exemption memo attached hereto as Exhibit B; and

WHEREAS, the City certified a program-level environmental impact report (EIR) for updates to the City's General Plan (collectively ConnectMenlo), which included a Mitigation Monitoring and Reporting Program (MMRP) to mitigate environmental impacts anticipated by the updated General Plan; and

WHEREAS, the City certified a Subsequent EIR for the 6th Cycle Housing Element update, which includes additional MMRP measures applicable to housing projects; and

WHEREAS, the Applicant would be required to comply with applicable mitigation measures included in the ConnectMenlo MMRP and the 6th Cycle Housing Element Subsequent EIR MMRP, attached hereto as Exhibits C and D, respectively, pursuant to Menlo Park Municipal Code Section 16.02.070; and

WHEREAS, the Planning Commission of the City of Menlo Park having fully reviewed, considered, and evaluated all the testimony and evidence submitted in this matter voted affirmatively to approve the findings and conditions for a use permit, architectural control, and Below Market Rate Housing Agreement for the project, and recommended approval of the major subdivision to the City Council; and

WHEREAS, after notice having been lawfully given, a public hearing was scheduled and held before the City Council of the City of Menlo Park on June 9, 2026, whereat all persons interested therein might appear and be heard; and

WHEREAS, the City Council reviewed the vesting tentative map on June 9, 2026, and found the project to be categorically exempt from environmental review pursuant to Cal. Code of Regulations, Title 14, Section 15332 et seq. (Infill Development Projects).

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Menlo Park finds that the above recitals together with the staff report and the application materials, including without limitation, related documents, reports, studies, maps, oral and written testimony, and materials in the City's file for the applications and the Project, and all adopted and applicable City planning documents related to the Project and the Project Site and all associated evidentiary basis for the recommendations set forth in this resolution

NOW, THEREFORE, BE IT FURTHER RESOLVED that the City Council makes the following findings:

Section 1. The City Council makes findings that the proposed vesting tentative map for a major subdivision is technically correct and in compliance with all applicable State regulations, City General Plan, Zoning and Subdivision Ordinances, and the State Subdivision Map Act for the following reasons:

1. The proposed vesting tentative map for the project site is technically correct and in compliance with all applicable State regulations, City General Plan, Zoning and Subdivision Ordinances, and the State Subdivision Map Act.
2. The proposed vesting tentative map for the project site, including the contemplated design and improvements, is consistent with the applicable General Plan goals and policies, in

particular the goals set forth in the Housing Element. The project is consistent with the land use designations described in the General Plan and would be consistent with the City General Plan policies as well as City Zoning Ordinance requirements at the proposed density and for the types of uses.

3. The project site is physically suitable for the proposed development, including the proposed density of development, and the design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially injure fish or wildlife or their habitat. The project is consistent with the density and uses for the site set forth in the General Plan. The project Site is in an urbanized area of the City currently occupied by an existing commercial building, landscaped, and hardscaped areas and does not include any aquatic habitat that would be disturbed by the project. The project would not cause substantial environmental damage to the already disturbed Project Site and would not substantially injure the limited wildlife that access the site or their habitat.
4. The design of the subdivision or types of improvements is not likely to cause serious public health or safety problems. The project would comply with the General Plan's goals and policies, City Zoning and Subdivision Ordinances, and other applicable regulations designed to prevent serious health and safety problems.

Section 2. Based on the findings above, the City Council approves the vesting tentative map for the Project, included in the project plans, (Exhibit A) and the associated conditions of approval attached hereto as Exhibit E and incorporated herein by this reference.

Section 3. If any term, provision, or portion of these findings or the application of these findings to a particular situation is held by a court to be invalid, void or unenforceable, the remaining provisions of these findings, or their application to other actions related to the Project, shall continue in full force and effect unless amended or modified by the City.

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I, Judi A. Herren, City Clerk of the City of Menlo Park, do hereby certify that the above and foregoing City Council Resolution was duly and regularly passed and adopted at a meeting by said City Council on the ninth day of June, 2026, by the following votes:

AYES:

NOES:

ABSENT:

ABSTAIN:

IN WITNESS THEREOF, I have hereunto set my hand and affixed the Official Seal of said City on this _____ day of June, 2026.

Judi A. Herren, City Clerk

Exhibits

- A. Vesting tentative map
- B. California Environmental Quality Act exemption memo
- C. ConnectMenlo Mitigation Monitoring and Reporting Program
- D. 2023-2031 Housing Element Update Subsequent EIR Mitigation Monitoring and Reporting Program
- E. Conditions of approval

GENERAL NOTES

1.

ASSESSOR'S PARCEL NO.:

062-423-020
2.

ADDRESS:

68 WILLOW ROAD
3.

SITE AREA:

TOTAL: 2.499 AC±
4.

CONTOUR INTERVAL:

1 FOOT (EXISTING)
5.

EXISTING PARCEL:

1
6.

PROPOSED PARCEL:

1
7.

DWELLING UNITS:

TOWNHOMES: 50 UNITS
8.

SITE DENSITY:

TOTAL: 20.0 DU/AC (GROSS SITE AREA)
9.

EXISTING LAND USE:

CO - COMMERCIAL OFFICE
10.

PROPOSED LAND USE:

R-MU - RESIDENTIAL MIXED USE
11.

ZONING:

C-1 ADMINISTRATIVE AND PROFESSIONAL DISTRICT
12.

BUILDING COVERAGE:

0.971 AC / 2.499 AC = 39%
13.

PROPOSED SETBACKS:

FRONT PORCH: 5' MIN
FRONT BUILDING: 10' MIN
SIDE: 7' MIN
REAR: 55.2' MIN
14.

EXISTING STRUCTURES:

ALL EXISTING BUILDINGS AND PAVEMENT WITHIN THE PROJECT BOUNDARY ARE TO BE REMOVED.
15.

EXISTING UTILITIES:

EXISTING UTILITIES WITHIN THE PROJECT BOUNDARY TO BE REMOVED AS NOTED.
16.

TREES:

STREET TREES WILL BE INSTALLED PER THE CITY OF MENLO PARK STANDARDS. SEE LANDSCAPE PLANS. ALL EXISTING TREES ON SITE ARE TO BE REMOVED UNLESS OTHERWISE NOTED ON SHEET TM-2.
17.

PRIVATE UTILITIES:

PROPOSED ONSITE STORM DRAIN, SEWER, AND WATER FACILITIES WILL BE PRIVATELY OWNED AND MAINTAINED.
18.

LANDSCAPING:

ALL LANDSCAPING WITHIN PROJECT BOUNDARY WILL BE PRIVATELY OWNED AND MAINTAINED.
19.

FLOOD ZONE:

ZONE X - AREA WITH REDUCED FLOOD RISK DUE TO LEVEE. PER FEMA MAP PANEL 0801C008E CREATED OCTOBER 16, 2012.
20.

WELLS ONSITE:

NONE
21.

UTILITIES:

WATER
SEWER
STORM DRAIN
GAS
ELECTRIC

CALWATER
WEST BAY SANITATION DISTRICT
CITY OF MENLO PARK
PSDE
PSDE
22.

GRADING:

PROPOSED GRADING AS SHOWN IS PRELIMINARY. FINISHED GRADING IS SUBJECT TO FINAL DESIGN.
23.

EROSION CONTROL:

EROSION CONTROL WILL BE PREPARED FOR CITY STANDARDS AND ABAG RECOMMENDATIONS.
24.

BENCHMARK:

CITY OF MENLO PARK BENCHMARK NO. 4 BRASS DISC SET IN TOP OF CURB AT REAR OF THE SOUTHEASTERLY CATCH BASIN AT THE INTERSECTION OF QUERRY AND LAUREL AVENUE. STAMPED "CITY BENCHMARK 4". ELEVATION: 34.76' (NAD 83).
25.

BASIS OF BEARINGS:

THE BASIS OF BEARINGS FOR THIS SURVEY IS BETWEEN FOUND MONUMENTS ON THE CENTERLINE OF WILLOW ROAD, THE BEARING BEING N81°50'00"E PER THAT RECORD OF SURVEY FILED IN 5 LLS 154.
26.

CONDOMINIUM MAP:

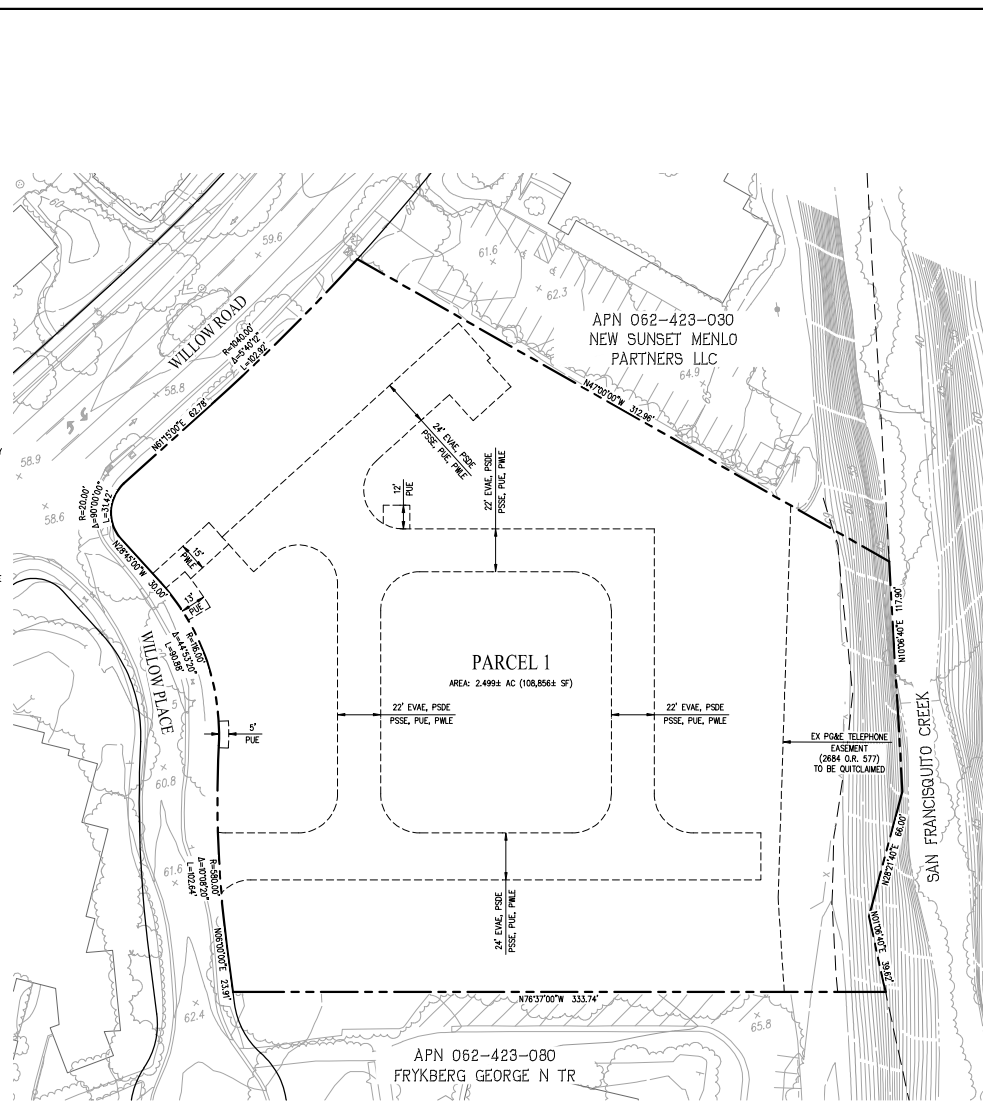
A CONDOMINIUM PLAN WILL BE RECORDED FOR PARCEL 1. THE SUBDIVISION IS A CONDOMINIUM PROJECT AS DEFINED IN SECTION 4285 ET. SEQ. OF THE CIVIL CODE OF THE STATE OF CALIFORNIA AND FILED PURSUANT TO THE SUBDIVISION MAP ACT. THE TOTAL NUMBER OF CONDOMINIUM DWELLING UNITS SHALL BE NO MORE THAN 50 RESIDENTIAL CONDOMINIUM UNITS FOR PARCEL 1.
27.

EASEMENTS:

PARCEL 1 IS TO INCLUDE THE FOLLOWING PUBLIC AND PRIVATE EASEMENTS TO SERVE ONSITE PRIVATE AND PUBLIC FACILITIES AND PROVIDE GRANT ACCESS AS NOTED: EVAE, PSDE, PUE, PWLE, & PSSE. EASEMENTS MAY CHANGE SUBJECT TO FINAL DESIGN.
28.

MAPPING:

A FINAL MAP FOR CONDOMINIUM PURPOSES WILL BE FILED AND RECORDED.



CONTACTS

- OWNER/DEVELOPER:

WILLOW PLACE INVESTMENTS
A CALIFORNIA LIMITED LIABILITY COMPANY
2442 DIAMOND STREET
SAN FRANCISCO, CA 94131
CHASE RAPP
- CIVIL ENGINEER:

CARLSON, BARBEE, & O'BSON
2633 CAMINO RAMON, SUITE 350
SAN RAMON, CA 94583
(925)-866-0322
RYAN HANSEN, P.E.
- ARCHITECTURE:

SDG ARCHITECTS
3361 WALNUT BOULEVARD SUITE 120
BRENTWOOD, CA 94513
(925) 634-7000
JEFFREY POTTS
- LANDSCAPE:

ENVIRONMENTAL FORESIGHT
2065 N. BROADWAY, SUITE 203
WALNUT CREEK, CA 94596
(925) 945-0300
KEVIN PROCTOR

LEGEND

- SUBDIVISION BOUNDARY
- RIGHT OF WAY
- TOP OF BANK
- EASEMENT LINE
- APN

ASSESSORS PARCEL NUMBER
- EVAE

EMERGENCY VEHICLE ACCESS EASEMENT
- EX

EXISTING
- PR

PROPOSED
- PUE

PUBLIC UTILITY EASEMENT
- PSDE

PRIVATE STORM DRAIN EASEMENT
- PSSE

PRIVATE SANITARY SEWER EASEMENT
- PUE

PUBLIC UTILITY EASEMENT
- PWLE

PRIVATE WATER LINE EASEMENT
- R/W

RIGHT-OF-WAY
- SDE

PUBLIC STORM DRAIN EASEMENT

SHEET SET

SHEET NO.	SHEET TITLE
TM-1	VESTING TENTATIVE MAP
TM-2	AREA PLAN
TM-3	EXISTING CONDITIONS & TOPOGRAPHIC SURVEY
TM-4	PRELIMINARY SITE PLAN
TM-5	PRELIMINARY GRADING & UTILITY PLAN
TM 5.1	GRADING SECTIONS
TM-6	PRELIMINARY STORMWATER PLAN
TM-7	PRELIMINARY EROSION CONTROL PLAN
TM-8	PRELIMINARY FIRE ACCESS PLAN
TM-9	PRELIMINARY TRASH MANAGEMENT PLAN
TM-10	BEST MANAGEMENT PRACTICES

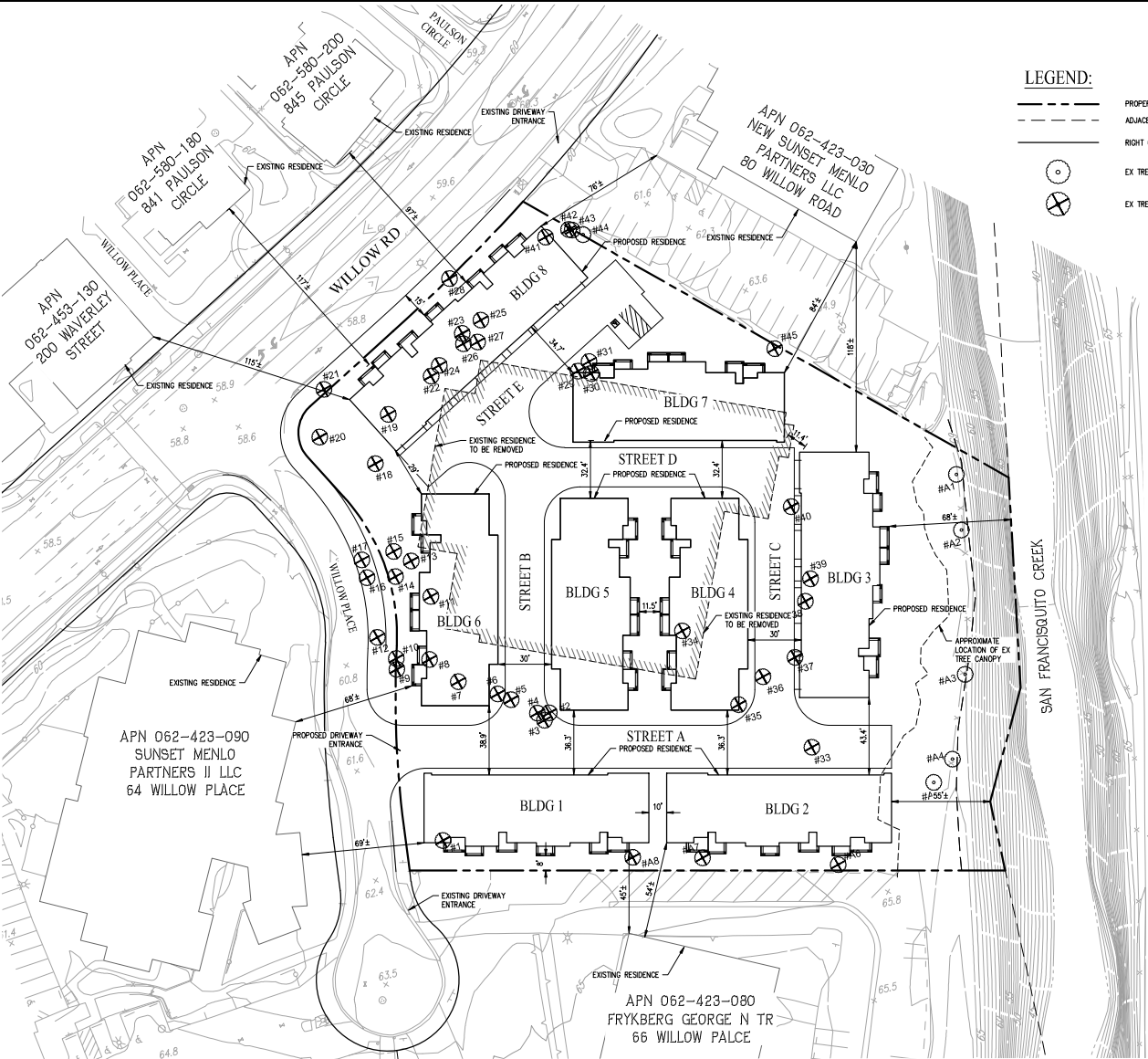
VESTING TENTATIVE MAP
FOR CONDOMINIUM PURPOSES
68 WILLOW ROAD

CITY OF MENLO PARK SAN MATEO COUNTY CALIFORNIA
SCALE: 1" = 30' DATE: JUNE 30, 2025

SAN RAMON • (925) 866-0322
ROSEVILLE • (916) 788-4456
WWW.CBGRAND.COM

CIVIL ENGINEERS • SURVEYORS • PLANNERS

TM-1



LEGEND:

--- PROPERTY LINE
--- ADJACENT PROPERTY LINE
--- RIGHT OF WAY LINE

○ EX TREE TO REMAIN
⊗ EX TREE TO BE REMOVED

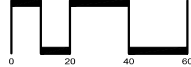
TREE TABLE				
TREE NO.	SPECIES	DIAMETER (IN)	PROTECTED	PROPOSED ACTION
1	DEODAR CEDAR	39	YES	REMOVE
2	WHITE BIRCH	10	NO	REMOVE
3	WHITE BIRCH	11	NO	REMOVE
4	WHITE BIRCH	9	NO	REMOVE
5	WHITE BIRCH	7	NO	REMOVE
6	WHITE BIRCH	11	NO	REMOVE
7	COASTAL LIVE OAK	35	YES	REMOVE
8	HAWTHORN	12	NO	REMOVE
9	MAGNOLIA	6	NO	REMOVE
10	MAGNOLIA	5	NO	REMOVE
11	JAPANESE MAPLE	30	NO	REMOVE
12	CAROB	16	YES	REMOVE
13	PLUM	12	NO	REMOVE
14	PLUM	8	NO	REMOVE
15	PLUM	9	NO	REMOVE
16	AMERICAN SWEET GUM	17	YES	REMOVE
17	CAROB	33	YES	REMOVE
18	AMERICAN SWEET GUM	23	YES	REMOVE
19	AMERICAN SWEET GUM	21	YES	REMOVE
20	CHERRY	10	NO	REMOVE
21	RED MAPLE	9	NO	REMOVE
22	PLUM	9	NO	REMOVE
23	PLUM	8	NO	REMOVE
24	PLUM	8	NO	REMOVE
25	CHERRY	15	YES	REMOVE
26	PLUM	8	NO	REMOVE
27	PLUM	9	NO	REMOVE
28	VALLEY OAK	15	YES	REMOVE
29	WHITE BIRCH	17	YES	REMOVE
30	WHITE BIRCH	10	NO	REMOVE
31	WHITE BIRCH	7	NO	REMOVE
32	COAST LIVE OAK	36	YES	REMOVE
33	COAST LIVE OAK	24	YES	REMOVE
34	COAST LIVE OAK	30	YES	REMOVE
35	COAST LIVE OAK	39	YES	REMOVE
36	COAST LIVE OAK	41	YES	REMOVE
37	COAST LIVE OAK	15	YES	REMOVE
38	COAST REDWOOD	48	YES	REMOVE
39	COAST REDWOOD	48	YES	REMOVE
40	CHINESE PISTACHE	11	NO	REMOVE
41	INCENSE CEDAR	14	YES	REMOVE
42	COAST LIVE OAK	12	YES	REMOVE
43	COAST LIVE OAK	19	YES	REMOVE
44	COAST LIVE OAK	22	YES	TO REMAIN
45	COAST REDWOOD	24	YES	REMOVE
A1	COAST LIVE OAK	24	YES	TO REMAIN
A2	COAST LIVE OAK	25	YES	TO REMAIN
A3	COAST LIVE OAK	29	YES	TO REMAIN
A4	COAST LIVE OAK	27	YES	TO REMAIN
A5	COAST LIVE OAK	21	YES	TO REMAIN
A6	COAST LIVE OAK	21	YES	REMOVE
A7	COAST LIVE OAK	14	YES	REMOVE
A8	COAST LIVE OAK	14	YES	REMOVE

NOTE:

1. ALL TREES NOTED ON THE PLANS PER ARBORIST URBAN TREE MANAGEMENT
"TREE SURVEY REPORT" DATED SEPTEMBER 22, 2024.

AREA PLAN
68 WILLOW ROAD

CITY OF MENLO PARK SAN MATEO COUNTY CALIFORNIA
SCALE: 1" = 20' DATE: JUNE 30, 2025

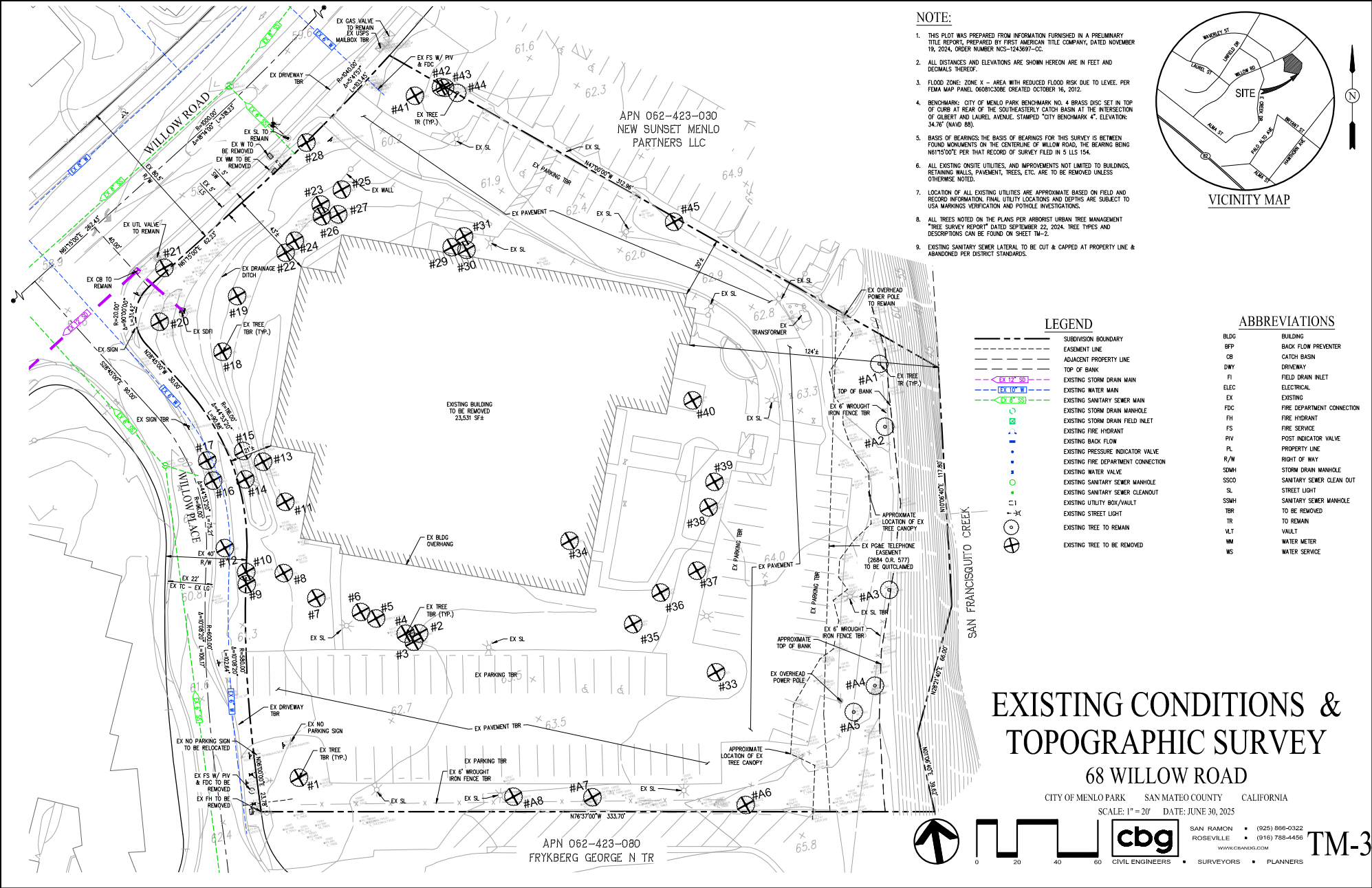


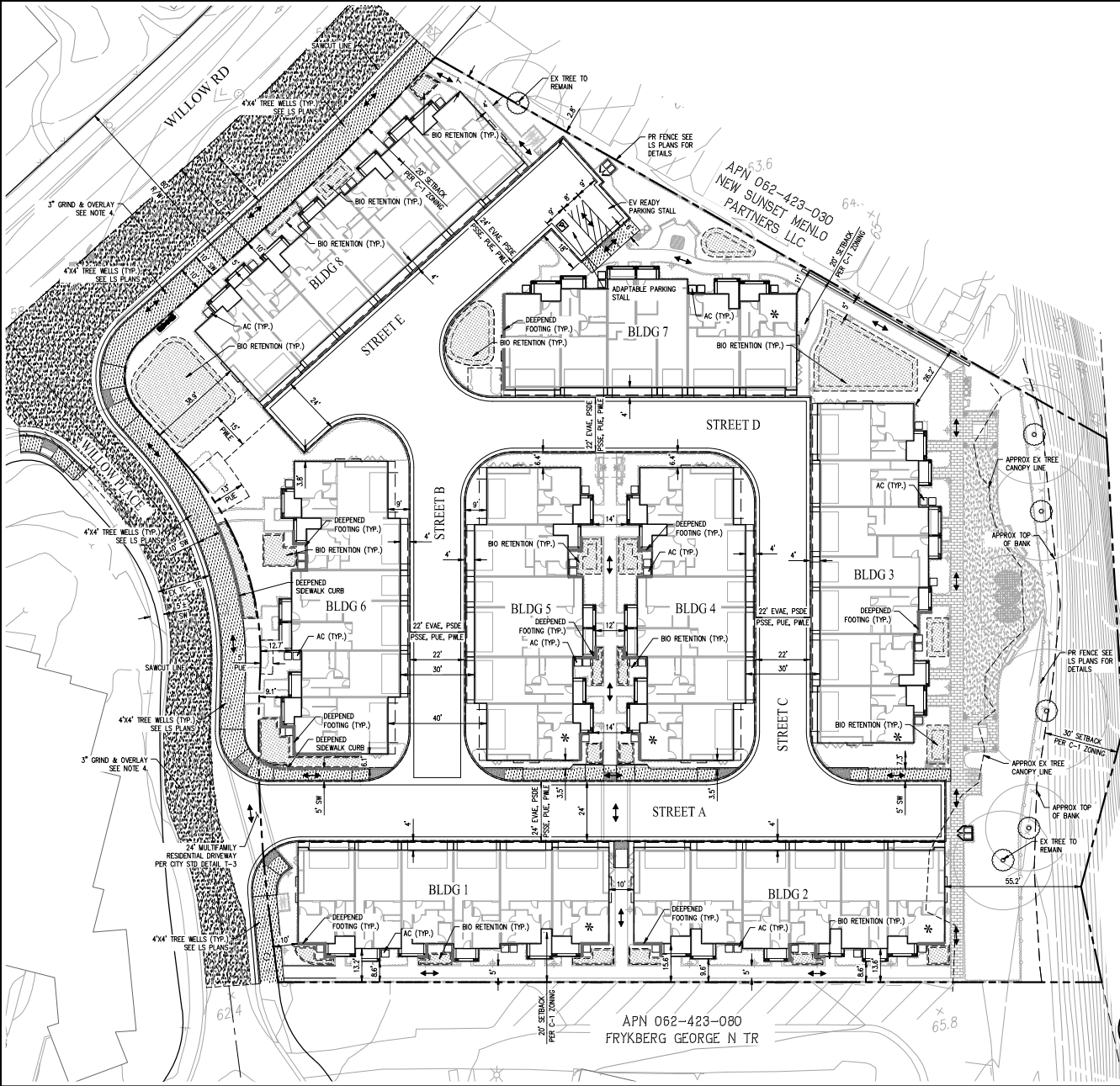


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TM-2





LEGEND:

- PROPERTY LINE
- ADJACENT PROPERTY LINE
- MONUMENT LINE
- CENTERLINE
- RIGHT OF WAY LINE
- PROPOSED EASEMENT LINE
- PROPOSED DEEPEMED FOOTING
- PROPOSED DEEPEMED SIDEWALK CURB
- PEDESTRIAN PATH OF TRAVEL
- ADAPTABLE PARKING STALL
- ADAPTABLE UNIT
- BIO-RETENTION AREA
- EX TREE TO REMAIN
- AC-AIR CONDITIONER
- 3" GRIND & OVERLAY

ABBREVIATIONS:

APPROX	APPROXIMATE
CL	CENTERLINE
EX	EXISTING
EVAE	EMERGENCY VEHICLE ACCESS EASEMENT
LS	LANDSCAPE
PL	PROPERTY LINE
PSDE	PRIVATE STORM DRAIN EASEMENT
PUE	PUBLIC UTILITY EASEMENT
PSSE	PRIVATE SANITARY/SEWER EASEMENT
PWLE	PRIVATE WATER LINE EASEMENT
SC	SANICUT
SW	SIDEWALK
TYP.	TYPICAL
TRC	TOP OF ROLLED CURB
TC	TOP OF CURB
VG	VALLEY GUTTER

NOTE:

- SEE LANDSCAPE PLANS BY OTHERS FOR ALL LANDSCAPE & IRRIGATION DETAILS.
- SEE LANDSCAPE PLANS FOR ALL WALKWAY SURFACE TYPE DETAILS.
- ALL PEDESTRIAN STREET CROSSINGS WILL BE PROVIDED WITH AN ACCESSIBLE CURB RAMP & TRUNCATED DOMES AND WILL BE DETAILED ON THE PROJECTS CONSTRUCTION DRAWINGS.
- CONTRACTOR TO PROVIDE ADDITIONAL GRIND & OVERLAY OR FULL PAVEMENT REPLACEMENT AS REQUIRED TO CONFORM TO THE EXISTING PAVEMENT CONDITIONS TO ENSURE A SMOOTH TRANSITION.

TYPICAL STREET A (PRIVATE)
NOT TO SCALE

TYPICAL STREET B & C (PRIVATE)
NOT TO SCALE

TYPICAL STREET D (PRIVATE)
NOT TO SCALE

TYPICAL STREET E (PRIVATE)
NOT TO SCALE

TYPICAL WILLOW PLACE (PUBLIC)
NOT TO SCALE

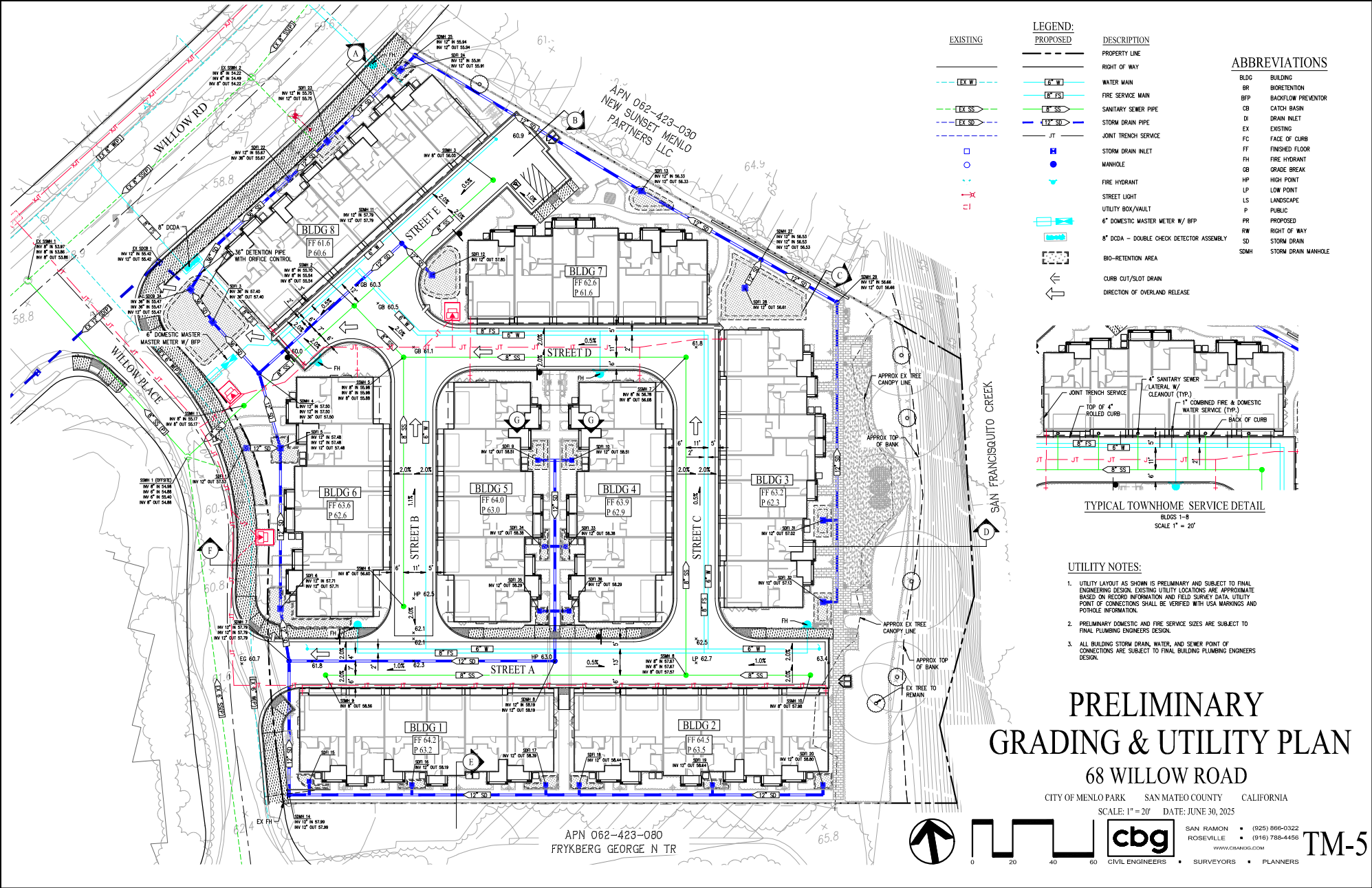
TYPICAL WILLOW ROAD (PUBLIC)
NOT TO SCALE

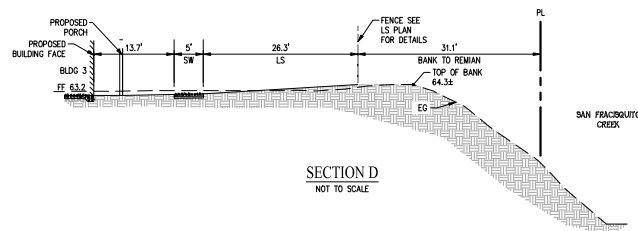
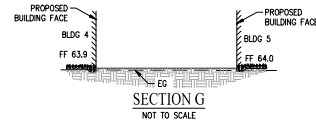
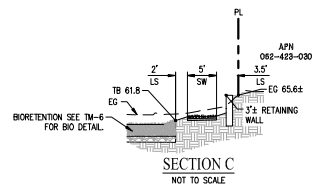
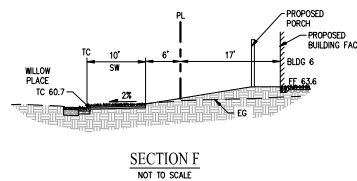
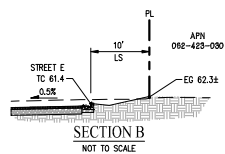
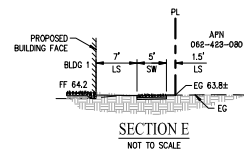
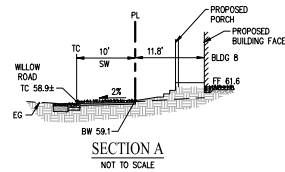
PRELIMINARY SITE PLAN
68 WILLOW ROAD

CITY OF MENLO PARK SAN MATEO COUNTY CALIFORNIA
SCALE: 1" = 20' DATE: JUNE 30, 2025

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PRELIMINARY GRADING SECTIONS 68 WILLOW ROAD

CITY OF MENLO PARK SAN MATEO COUNTY CALIFORNIA
SCALE: NTS DATE: JUNE 30, 2025



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TM-5.1



RISK LEVEL 2 SITES -
BEST MANAGEMENT PRACTICE NOTES:

- 1. RISK LEVEL 2 SITES ARE SUBJECT TO A pH NAL OF 6.5-8.5, AND A TURBIDITY NAL OF 250 NTU.
- 2. RISK LEVEL 2 SITES REQUIRE A RAIN EVENT ACTION PLAN.
- 3. RISK LEVEL 2 SITES REQUIRE LINEAR SEDIMENT CONTROLS ALONG THE TOE OF THE SLOPE, FACE OF THE SLOPE AND AT THE GRADE BREAKS OF EXPOSED SLOPES TO COMPLY WITH THE FOLLOWING SHEET FLOW LENGTHS:

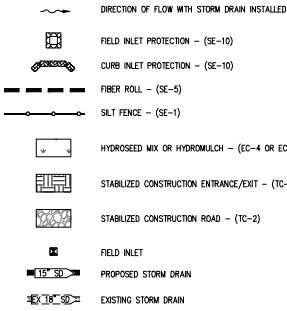
CRITICAL SLOPE / FLOW LENGTH COMBINATIONS	
0-25%	20 FEET
25-50%	15 FEET
OVER 50%	10 FEET

- 4. RISK LEVEL 2 SITE MONITORING AND REPORTING REQUIREMENTS:

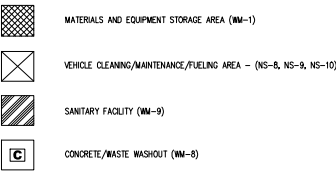
SUMMARY OF MONITORING AND REPORTING REQUIREMENTS							
RISK LEVEL	VISUAL INSPECTIONS					SAMPLE COLLECTION	
	QUARTERLY NON-STORMWATER DISCHARGE	PRE-STORM EVENT		DAILY STORM BMP	POST STORM	STORMWATER DISCHARGE	RECEIVING WATER
		BASELINE	REAP				
X	X	X	X	X	X	X	N/A

- 5. IT SHALL BE THE LEGALLY RESPONSIBLE PARTY'S (LIP/DISCHARGER) DUTY TO MAINTAIN CONTROL OF THE ENTIRE CONSTRUCTION OPERATION AND TO ENSURE THE ENTIRE SITE IS IN COMPLIANCE WITH THE STORM WATER POLLUTION PREVENTION PLAN (SWPPP) APPROVED FOR THE SITE, THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD (SWRCB) ORDER NO. 2009-0059 DWQ, NPDES NO. CAS000002 AND THE CASQA CONSTRUCTION BMP GUIDANCE HANDBOOK.
- 6. THIS PLAN IS INTENDED TO BE UTILIZED FOR INTERM EROSION AND SEDIMENT CONTROL ONLY AND IS NOT TO BE UTILIZED FOR FINAL ELEVATIONS OR PERMANENT IMPROVEMENTS.
- 7. THIS PLAN MAY NOT COVER ALL THE SITUATIONS THAT MAY ARISE DURING CONSTRUCTION DUE TO UNANTICIPATED FIELD CONDITIONS. VARIATIONS AND ADDITIONS MAY BE MADE TO THIS PLAN AS NECESSARY IN THE FIELD, DOCUMENT AND REPORT ANY FIELD CHANGES PER THE REQUIREMENTS OF THE SWPPP AND NOTIFY THE CITY OR COUNTY REPRESENTATIVE OF THE FIELD CHANGES.
- 8. ALL MAINTENANCE AND OPERATION REQUIREMENTS SHALL COMPLY WITH THE SWPPP AND THE CASQA CONSTRUCTION BMP GUIDANCE HANDBOOK.
- 9. DISCHARGERS SHALL EFFECT AND MAINTAIN PRECAUTIONARY MEASURES NECESSARY TO PROTECT ADJACENT WATERCOURSES AND PUBLIC OR PRIVATE PROPERTY FROM DAMAGE BY EROSION, FLOODING AND DEPOSITION OF MUD OR DEBRIS ORIGINATING FROM THE SITE.
- 10. THE CONTRACTOR IS RESPONSIBLE FOR ALL ASPECTS OF EROSION CONTROL FOR THE PROJECT AND SHALL INSTALL AND MAINTAIN ANY DEVICES AND MEASURES NECESSARY TO THE SATISFACTION OF THE CITY OR COUNTY ENGINEER AND THE REGIONAL WATER QUALITY CONTROL BOARD (RWQCB).
- 11. DISCHARGERS SHALL ESTABLISH AND MAINTAIN EFFECTIVE BMP, PERMITTER CONTROLS AND STABILIZED ALL CONSTRUCTION ENTRANCES AND EXITS TO SUFFICIENTLY CONTROL EROSION AND SEDIMENT DISCHARGES FROM THE SITE YEAR-ROUND.
- 12. EROSION CONTROL MEASURES WILL BE PROPERLY IN PLACE YEAR-ROUND. ALL REMOVABLE PROTECTIVE DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN THE FIVE DAY RAIN PROBABLY EXCEEDS 50 PERCENT.
- 13. INSPECTIONS AND OBSERVATIONS SHALL OCCUR WEEKLY, AND AT LEAST ONCE EACH 24-HOUR PERIOD DURING EXTENDED STORM EVENTS, TO IDENTIFY AND RECORD BMPs THAT NEED MAINTENANCE TO OPERATE EFFECTIVELY, THAT HAVE FAILED OR THAT COULD FAIL TO OPERATE AS INTENDED.
- 14. DISCHARGERS SHALL IMPLEMENT MEASURES TO CONTROL ALL NON-STORMWATER DISCHARGES DURING CONSTRUCTION.
- 15. DISCHARGERS SHALL IMPLEMENT EFFECTIVE WIND EROSION CONTROL.
- 16. CONSTRUCTION TRAFFIC SPEEDS WILL BE LIMITED TO 15 MPH, OR LESS, AS REQUIRED BY THE CONTRACTOR.
- 17. STABILIZED CONSTRUCTION ENTRANCES SHALL BE INSTALLED PRIOR TO COMMENCEMENT OF SITE WORK. ALL CONSTRUCTION TRAFFIC ENTERING THE PAVED ROAD MUST CROSS THE ENTRANCE. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT TRACKING OR FLOWING OF SEDIMENT ONTO PUBLIC RIGHTS-OF-WAY.
- 18. APPLY GRAVEL CONSTRUCTION ENTRANCE MATERIAL WITHIN MATERIAL STORAGE AREA.
- 19. APPLY GRAVEL CONSTRUCTION ENTRANCE MATERIAL WITHIN THE VEHICLE STORAGE AREA.
- 20. PLACE ALL EQUIPMENT OR VEHICLES, WHICH ARE TO BE FUELED, MAINTAINED AND STORED IN A DESIGNATED AREA FITTED WITH APPROPRIATE BMPs.
- 21. IMPLEMENT BMPs TO PREVENT THE OFF-SITE TRACKING OF LOOSE CONSTRUCTION AND LANDSCAPE MATERIALS.
- 22. PAVED STREETS WILL BE MONITORED DAILY AND FREQUENTLY CLEANED. STREETS WILL ALSO BE SWEEPED ON AT LEAST A WEEKLY BASIS OR MORE OFTEN, AS NEEDED, TO MAINTAIN CONTINUOUS LITTER AND TRACKING CONTROL. STREET WASHING WILL NOT BE DONE.
- 23. TRASH RECEPTACLES WILL BE PROVIDED THROUGHOUT THE SITE AND UTILIZED BY ALL WORKERS FOR MISCELLANEOUS TRASH. SITE REFUSE WILL BE PICKED UP ON A WEEKLY BASIS OR AS OFTEN AS NECESSARY IN ORDER TO KEEP THE SITE CLEAN.
- 24. COVER AND BERN LOOSE STOCKPILED CONSTRUCTION MATERIALS THAT ARE NOT ACTIVELY BEING USED (I.E. SOIL, SPOILS, AGGREGATE, FLY-ASH, STUCCO, HYDRATED LIME, ETC.).
- 25. CONTAIN AND SECURELY PROTECT STOCKPILED WASTE MATERIAL FROM WIND AND RAIN AT ALL TIMES UNLESS ACTIVELY BEING USED.
- 26. EXCAVATING, FILLING, BACKFILLING AND GRADING WORK SHALL NOT BE PERFORMED DURING UNFAVORABLE WEATHER CONDITIONS.
- 27. DISCHARGERS SHALL PROVIDE EFFECTIVE SOIL COVER FOR INACTIVE AREAS AND ALL FINISHED SLOPES, OPEN SPACE, UTILITY BACKFILL AND COMPLETED LOTS. INACTIVE AREAS OF CONSTRUCTION ARE AREAS OF CONSTRUCTION ACTIVITY THAT HAVE BEEN DISTURBED AND ARE NOT SCHEDULED TO BE RE-DISTURBED FOR AT LEAST 14 DAYS.
- 28. SLOPES WILL BE GRADED SO THAT WATER IS DIRECTED AWAY FROM THE SLOPE FACES AT THE END OF EACH WORKING DAY WHEN A CHANCE OF RAIN IS FORECAST.
- 29. ALL RILLS, GULLIES, ETC. WILL BE PROMPTLY REPAIRED AS PRACTICAL BY REGRADING OR INSTALLATION OF SOIL, GRAVEL OR SANDBAGS.
- 30. ALL DRAIN INLETS WILL BE PROTECTED AS THEY ARE COMPLETED, DURING THE ENTIRE COURSE OF CONSTRUCTION.
- 31. IF SEDIMENT BASINS ARE TO BE USED, DISCHARGERS SHALL, AT A MINIMUM DESIGN SEDIMENT BASINS ACCORDING TO THE METHOD PROVIDED IN CASQA'S CONSTRUCTION BMP GUIDANCE HANDBOOK.
- 32. AFTER EACH RAINSTORM, SILT AND DEBRIS SHALL BE REMOVED FROM CHECK DAMS, FIBER ROLLS, SILT FENCES AND SILT SACKS. SEDIMENT TRAPS/BASINS SHOULD ALSO BE OBSERVED AND PUMPED DRY AS NECESSARY TO ASSURE PROPER FUNCTION AND CAPACITY.
- 33. INTERIOR FIBER ROLLS MAY BE REMOVED AS THE AREA COMES UNDER CONSTRUCTION FOR FINISH GRADING AND LANDSCAPING. INSTALLATION. PERIMETER PROTECTION SHOULD BE LEFT IN PLACE YEAR-ROUND.
- 34. GRAVEL CHECK DAMS MAY BE REMOVED FROM UNPAVED ROADWAYS AS THEY COME UNDER CONSTRUCTION.

LEGEND



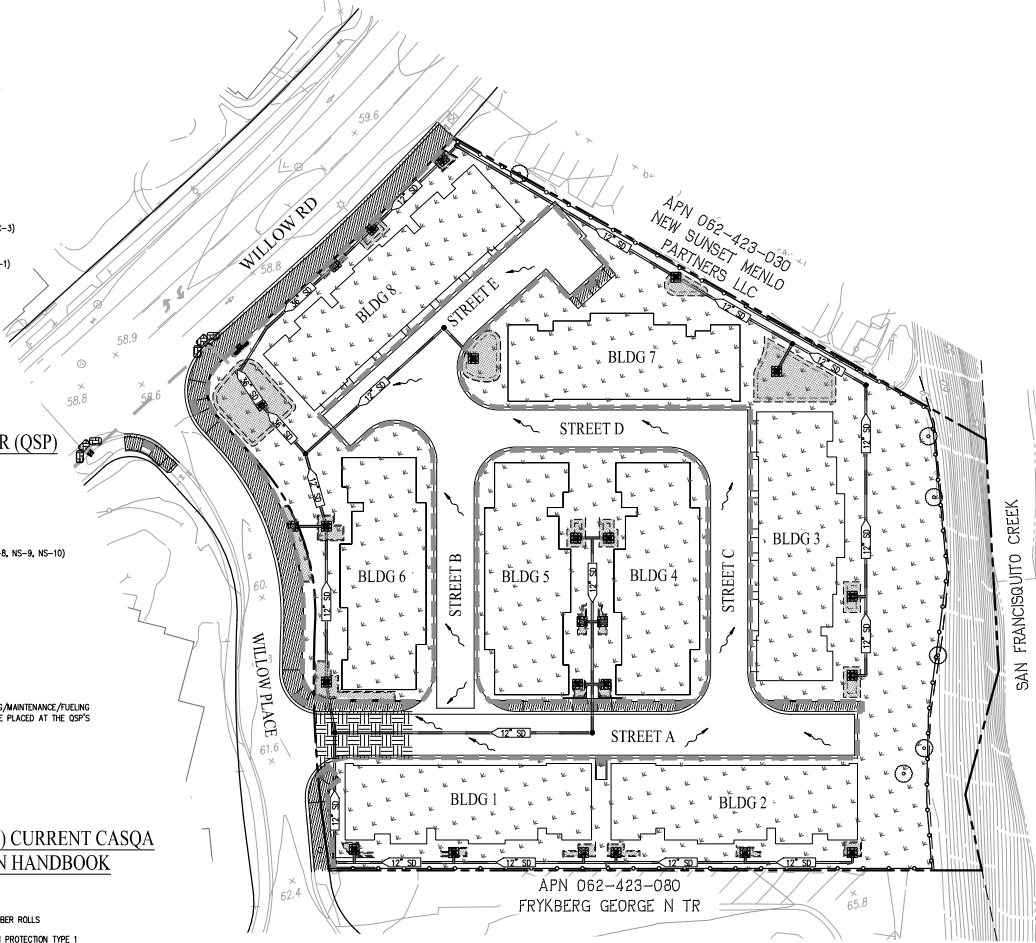
QUALIFIED SWPPP PRACTITIONER (QSP)
MARK KNOWN LOCATIONS*



- NOTE:
- * THE MATERIALS AND EQUIPMENT STORAGE AREA, VEHICLE CLEANING/MAINTENANCE/FUELING AREA, SANITARY FACILITY AND CONCRETE/WASTE WASHOUT WILL BE PLACED AT THE QSP'S DISCRETION AND ARE SUBJECT TO CHANGE.

APPLICABLE (BUT NOT LIMITED TO) CURRENT CASQA
STORMWATER BMP CONSTRUCTION HANDBOOK

EC-1	SCHEDULING	SE-5	FIBER ROLLS
EC-3	HYDROMULCH	SE-10	DI PROTECTION TYPE 1
EC-4	HYDROSEED	SE-10	DI PROTECTION TYPE 2
NS-1	WATER CONSERVATION PRACTICES	SE-10	DI PROTECTION TYPE 3
NS-2	DEWATERING OPERATIONS	TC-1	STABILIZED CONSTRUCTION ENTRANCE/EXIT
NS-3	PAVING & GRINDING OPERATIONS	TC-2	STABILIZED CONSTRUCTION ROADWAY
NS-8	VEHICLE & EQUIPMENT CLEANING	TC-3	ENTRANCE & OUTLET TIRE WASH
NS-9	VEHICLE & EQUIPMENT FUELING	WE-1	WIND EROSION CONTROL
NS-10	VEHICLE & EQUIPMENT MAINTENANCE	WM-1	MATERIAL DELIVERY & STORAGE
NS-12	CONCRETE CURING	WM-2	MATERIAL USE
NS-13	CONCRETE FINISHING	WM-3	STOCKPILE MANAGEMENT
SE-1	SILT FENCE	WM-8	CONCRETE WASTE MANAGEMENT
SE-4	CHECK DAMS	WM-9	SANITARY/SEPTIC WASTE MANAGEMENT



PRELIMINARY EROSION
CONTROL PLAN

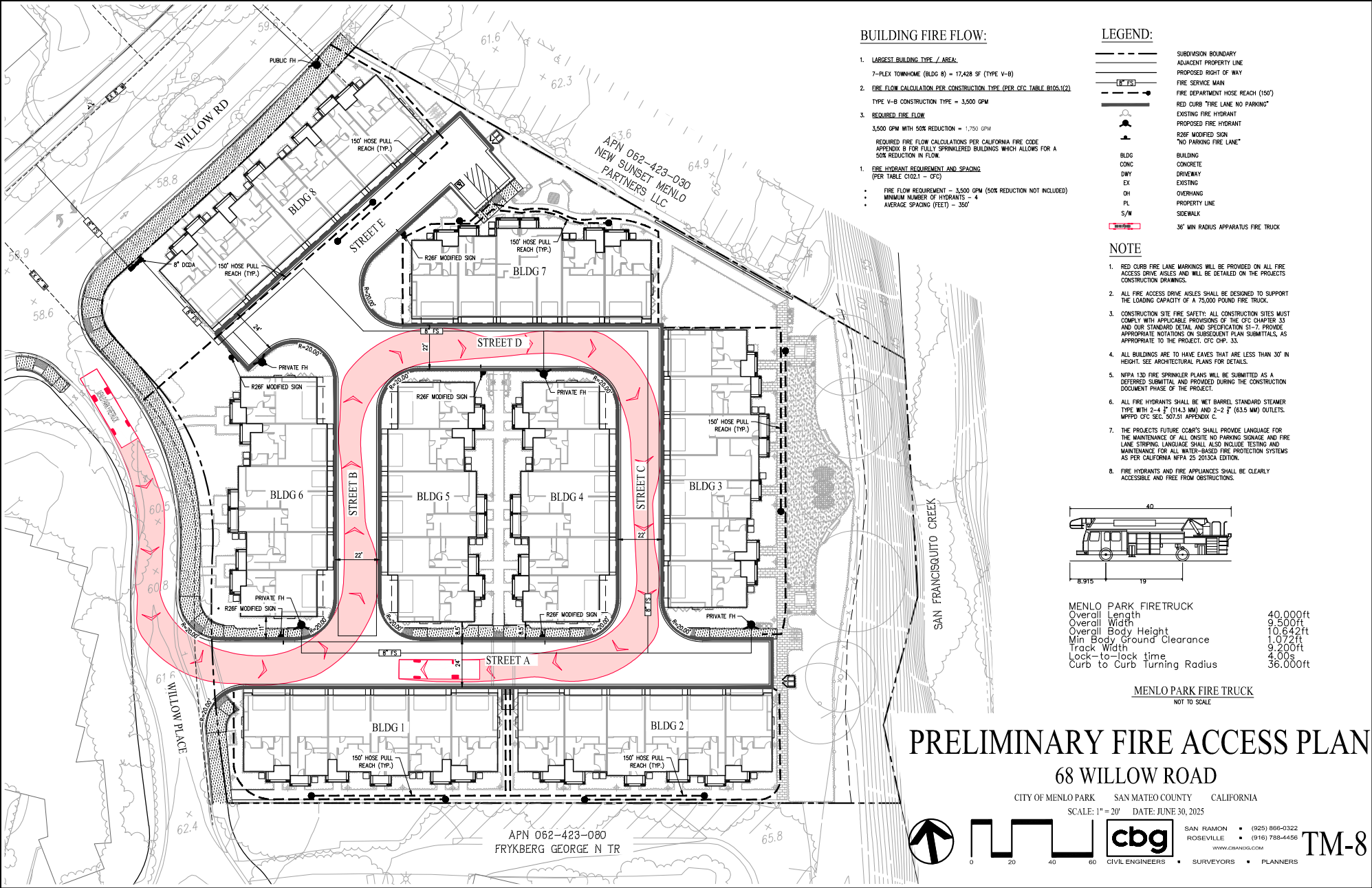
68 WILLOW ROAD

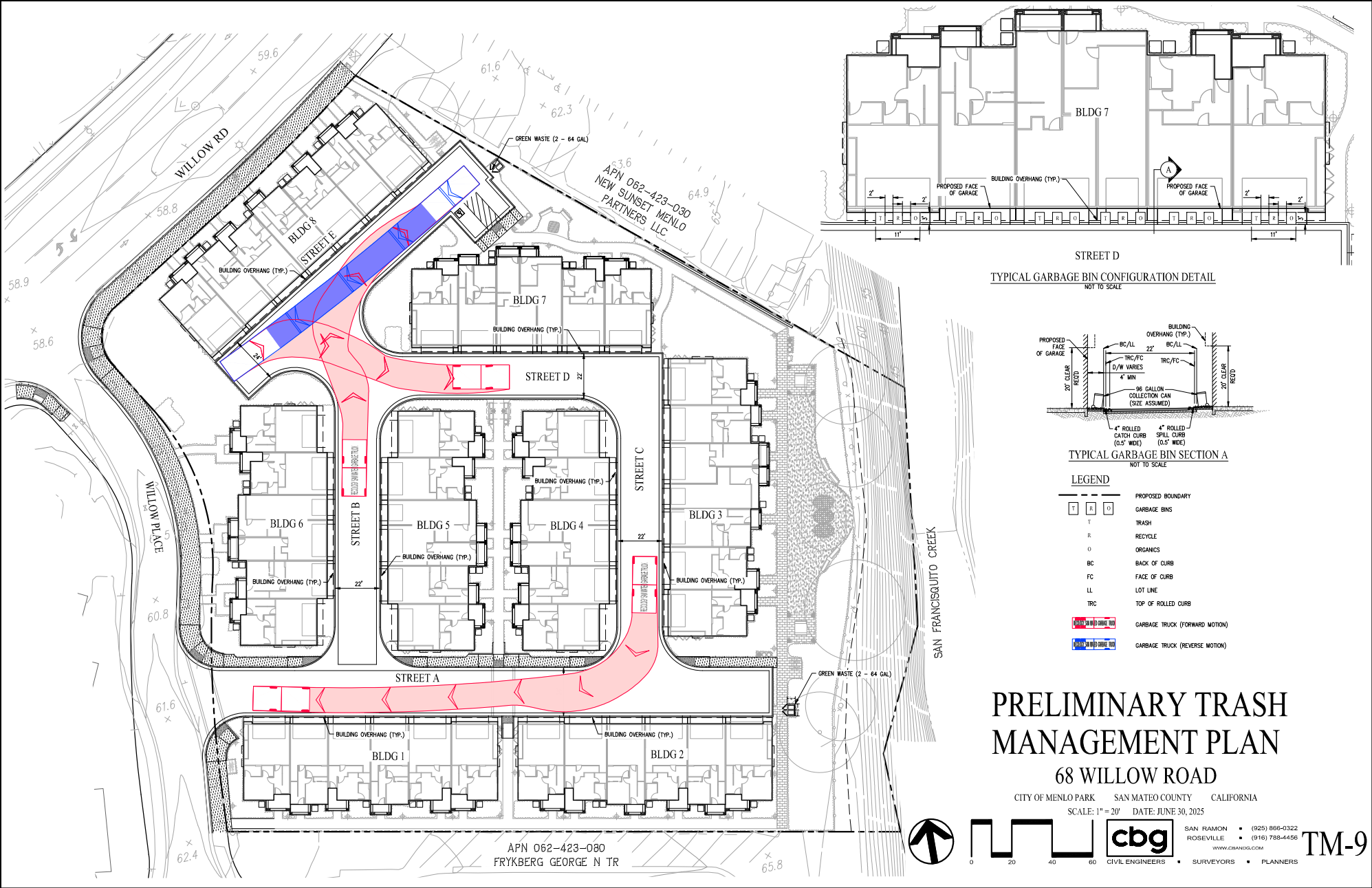
CITY OF MENLO PARK SAN MATEO COUNTY CALIFORNIA
SCALE: 1" = 30' DATE: JUNE 30, 2025

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TM-7







**San Mateo Countywide
Water Pollution
Prevention Program**
Clean Water. Healthy Community.

Construction Best Management Practices (BMPs)

Construction projects are required to implement the stormwater best management practices (BMP) on this page, as they apply to your project, all year long.

Painting & Paint Removal



Painting Cleanup and Removal

- Never clean brushes or rinse paint containers into a street, gutter, storm drain, or stream.
- For water-based paints, pour out residues to the extent possible, and rinse into a drain that goes to the sanitary sewer. Never pour paint down a storm drain.
- For oil-based paints, pour out residues to the extent possible and clean with thinner or solvent in a proper container. Filter and reuse thinner and solvent. Dispose of excess fluids as hazardous waste.
- Paint chips and dust from non-hazardous dry stripping and sand blasting may be swept up or collected in plastic drop cloths and disposed of as trash.
- Chemical paint stripping residues and chips and dust from marine paints or paints containing lead, mercury, or other toxic must be disposed of as hazardous waste. Lead based paint removal requires a state-certified contractor.

Materials & Waste Management



Non-Hazardous Materials

- Store and cover materials of sand, dirt or other construction material with tarps when rain is forecast or if not actively being used within 14 days.
- Use floor dirt (excavated) contained water for dust control.

Hazardous Materials

- Label all hazardous materials and hazardous wastes (such as pesticides, paints, thinners, solvents, fuel, oil, and antifreeze) in accordance with city, county, state and federal regulations.
- Store hazardous materials and wastes in water tight containers, store in appropriate secondary containment, and move them at the end of every work day or during wet weather or when rain is forecast.
- Follow manufacturer's application instructions for hazardous materials and be careful not to use more than necessary. Do not apply chemicals outdoors when rain is forecast within 24 hours.
- Arrange for appropriate disposal of all hazardous wastes.

Waste Management

- Clear waste disposal containers regularly with tarps at the end of every work day and during wet weather.
- Check waste disposal containers frequently for leaks and to make sure they are not overfilled. Never hose down a dumpster on the construction site.
- Close or replace portable toilets, and inspect them frequently for leaks and spills.
- Dispose of all wastes and debris properly. Recycle materials and wastes that can be recycled (such as asphalt, concrete, aggregate base materials, wood, dry board, pipe, etc.).
- Dispose of liquid contents from paints, thinners, solvents, glues, and cleaning fluids as hazardous waste.

Construction Entrances and Perimeter

- Establish and maintain effective perimeter controls and installing all construction entrances and exits to sufficiently control erosion and sediment discharges from site and tracking off site.
- Remove or vacuum any interior tracking immediately and install sediment control to prevent further tracking. Never hose down streets to clean up tracking.

Equipment Management & Spill Control



Maintenance and Parking

- Designate an area, lined with appropriate BMPs, for vehicle and equipment parking and storage.
- Perform major maintenance, repair jobs, and vehicle and equipment washing off site.
- If refueling or vehicle maintenance must be done onsite, work in a fenced area away from storm drains and over a drip pan or drop cloth big enough to collect fluids. Recycle or dispose of fluids as hazardous waste.
- If vehicle or equipment cleaning must be done onsite, clean with water only in a fenced area that will allow rinse water to run into gutters, storm drains, or surface water.
- Do not clean vehicle or equipment inside using soap, solvents, degreasers, or steam cleaning equipment.

Spill Prevention and Control

- Keep spill cleanup materials (e.g., mats, absorbents and oil absorbent) available at the construction site at all times.
- Inspect vehicles and equipment frequently for and repair leaks promptly. Use drip pans to catch leaks and report any leaks.
- Check up spills or leaks immediately and dispose of chemical materials properly.
- Do not hose down surfaces where fluids have spilled. Use dry cleanup methods (absorbent materials, oil filter, and/or rag).
- Sweep up spilled dry materials immediately. Do not try to wash them away with water, or bury them.
- Clean up spills on dirt areas by digging up and properly disposing of contaminated soil.
- Report significant spills immediately. You are required by law to report all significant releases of hazardous materials, including oil. To report a spill: 1) Dial 911 or your local emergency response number; 2) Call the Governor's Office of Emergency Services Warning Center, (800) 852-7310 (24 hours).

Earthmoving



- Inhibit grading and construction work during dry weather.
- Stabilize all disturbed areas, roads, and materials temporary erosion controls (such as erosion control blankets or seeded fiber mats) until vegetation is established.
- Remove existing vegetation only when absolutely necessary, and used as plant vegetation for erosion control on slopes or where construction is not immediately planned.
- Prevent sediment from entering ditches and protect storm drain inlets, gutters, ditches, and drainage courses by installing and maintaining appropriate BMPs, such as filter socks, silt fences, sediment basins, gravel bags, berms, etc.
- Keep equipment and materials and transfer to dump trucks on site, not in the streets.

Contaminated Soils

- If any of the following conditions are observed, test for contamination and contact the Regional Water Quality Control Board:
 - Unusual soil conditions, discoloration, or odor.
 - Abandoned underground tanks.
 - Abandoned wells.
 - Hazardous materials, debris, or trash.

Paving/Asphalt Work



- Avoid paving and seal coating in wet weather or whenever it forecast, to prevent materials that have not cured from contaminating stormwater runoff.
- Collect storm drain inlets and manholes when applying seal coat, tack coat, slurry seal, fog seal, etc.
- Collect and recycle or appropriately dispose of excess slurry about a foot or less. Do NOT sweep or wash it into gutters.
- Do not use water to wash down freshly applied seal coats or slurry.

Sealcoating & Asphalt/Concrete Removal

- Prevent nearby storm drain inlets when seal coating. Use filter socks, catch basins, catch basins, or gravel bags to keep slurry out of the storm drain system.
- Shovel, absorb, or vacuum up seal slurry and dispose of all waste as soon as you are finished in one location at the end of each work day (whichever is sooner).
- If sealant slurry enters a catch basin, clean it up immediately.

Concrete, Grout & Mortar Application



- Store concrete, grout, and mortar away from storm drains or waterways, and use plastic water covers to protect them from rain, runoff, and wind.
- Wash out concrete equipment (bucket, hose, etc.) in a designated washout area, where the water will flow into a temporary water pit, and is contained. This will prevent leaching into the underlying soil or into surrounding areas. Let concrete harden and dispose of no gutters.
- When washing equipment, protect washwater from entering storm drains. Block any holes and remove gutters, hose wash water into dirt area, or drain into a fenced surface to be pumped and disposed of properly.

Landscaping



- Prevent stockpiled landscaping materials from wind and rain by storing them under tarps all year-round.
- Track bagged material on pallets and under cover.
- Discontinue application of any seed肥 landscape material within 2 days before a forecast rain event or during wet weather.

Storm drain polluters may be liable for fines of up to \$10,000 per day!

BEST MANAGEMENT PRACTICES 68 WILLOW ROAD

CITY OF MENLO PARK | SAN MATEO COUNTY | CALIFORNIA

SCALE: NTS | DATE: JUNE 30, 2025



NOT TO SCALE



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TM-10



Memorandum

To:	Christopher Turner, Senior Planner, City of Menlo Park
From:	Heidi Mekkelson and Devan Atteberry, ICF
Date:	April 7, 2026
Re:	68 Willow Road Project CEQA Class 32 Categorical Exemption

The purpose of this memorandum is to provide evidence in support a determination by the City of Menlo Park (City) that the 68 Willow Road Project (Project) qualifies for a Class 32 categorical exemption from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15332.

Proposed Project

The Project would demolish a surface parking lot, landscaping, and an approximately 27,000-square-foot (sf) office building at 68 Willow Road. In its place, the Project would construct a new residential development that would provide 50 townhome-style units within eight buildings on the approximately 2.5-acre Project site. The Project would include approximately 99,015 sf of residential space and approximately 22,237 sf of above-grade garage space, for a total of approximately 121,252 sf of new development. In addition, the Project would provide approximately 4,242 sf of private open space in the form of porches and decks and approximately 31,109 sf of common open space in the form of landscaped areas and amenity areas that would be located throughout the site and along the eastern boundary of the site adjacent to San Francisquito Creek. The eight residential buildings would be three stories tall and reach heights of up to approximately 40 feet. Eight of the proposed 50 residential units would be designated as below-market-rate (BMR) units to comply with the City's BMR requirements. The housing unit mix would be a combination of three-bedroom and four-bedroom units, which would range from approximately 1,569 sf to 2,225 sf. The approximately 22,237 sf of garage space would be provided in the form of one- or two-car garages for each of the residential units. A total of 84 parking spaces, including two guest parking spaces, would be provided on the Project site. Vehicular access to the Project site would

be provided from a full-access driveway on Willow Place. On-site circulation would be provided through a network of two-way internal streets (A to E) within the Project site. The garage at each residential unit would connect to these new internal streets. In addition, a total of 12 short-term bicycle parking spaces would be provided on the Project site.

Construction of the Project would involve demolition of existing structures, grading, excavation, paving, and vertical construction. Project construction would occur over an approximately 20-month period.

Table 1, below, provides a summary of the Project characteristics.

Table 1. Project Characteristics

Land Use	Project
Site acreage	2.5
Residential	99,015 gsf 50 du (8 BMR)
Open space	35,351 sf
Parking	22,237 gsf (individual parking garages) 82 residential vehicle park spaces 2 guest vehicle parking spaces 12 bicycle parking spaces
Building design	39.35% lot coverage
BMR = below market rate; du = dwelling unit; gsf = gross square feet; sf = square feet	

Per Menlo Park Municipal Code (Municipal Code) Section 16.02.070, all development, including the Project, shall comply with the Mitigation Monitoring and Report Program (MMRP) established through Resolution No. 6356, associated with the environmental impact report (EIR) prepared for the General Plan and M-2 Area Zoning Update (ConnectMenlo), adopted in November 2016, and the MMRP established through Resolution No. 6808, associated with the subsequent environmental impact report (SEIR) prepared for the Housing Element Update (HEU), adopted in January 2023, as applicable. Specific mitigation measures applicable to the Project from the ConnectMenlo EIR and HEU SEIR are noted in the analysis below.

CEQA Exemption

Article 19 of State CEQA Guidelines Sections 15300 to 15333 identifies classes of projects that do not have a significant effect on the environment and, therefore, are exempt from review under CEQA.

Class 32 (Infill Development)

Among the classes of projects that are exempt from CEQA review are those that are specifically identified as urban infill development. State CEQA Guidelines Section 15332 states that the term *infill development* (or the Class 32 exemption) is applicable to projects that meet the following conditions:

- The project is consistent with the applicable general plan designation and all applicable general plan policies as well as applicable zoning designations and regulations.
- The proposed development occurs within the city limits on a project site of no more than 5 acres and surrounded by urban uses.

- The project site has no value as habitat for endangered, rare, or threatened species.
- Approval of the project would not result in any significant effects related to traffic, noise, air quality, or water quality.
- The site can be adequately served by all required utilities and public services.

The analysis presented in the section that follows provides substantial evidence that the Project qualifies for an exemption under State CEQA Guidelines Section 15332 as a Class 32 urban infill development and would not have a significant effect on the environment.

Exceptions

Even if a project is ordinarily exempt under the potential categorical exemptions, State CEQA Guidelines Section 15300.2 provides specific instances where exceptions to otherwise applicable exemptions apply. Exceptions to a categorical exemption apply in the following circumstances, effectively nullifying a CEQA categorical exemption:

- **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located. A project that is ordinarily insignificant in its impact on the environment may, in a particularly sensitive environment, be significant. Therefore, these classes are considered to apply in all instances, except when the project may affect an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type and in the same place over time is significant.
- **Significant Effect.** A categorical exemption will not be used for an activity when there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- **Scenic Highways.** A categorical exemption will not be used for a project that may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway that has been officially designated as a State Scenic Highway. This does not apply to improvements that are required as mitigation by an adopted negative declaration or certified EIR.
- **Hazardous Waste Sites.** A categorical exemption will not be used for a project located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- **Historical Resources.** A categorical exemption will not be used for a project that may cause a substantial adverse change in the significance of a historical resource.

The analysis that follows presents substantial evidence to demonstrate that no exceptions apply to the Project or its site, the Project would not have a significant effect on the environment, and, therefore, the Class 32 exemption remains applicable.

CEQA Exemption Checklist

The analysis that follows provides substantial evidence to support the conclusion that the Project qualifies for an exemption under State CEQA Guidelines 15332 as a Class 32 urban infill development and, therefore, would not have a significant effect on the environment.

1. Criterion Section 15332(a): General Plan and Zoning Consistency

	Yes	No
The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.	☒	☐

The Project site’s general plan land use designation is Commercial Office (CO); the zoning designation is Administrative and Professional District, Restrictive (C-1). The Project site’s C-1 zoning designation was modified as part of the zoning amendments to Chapters 16.30 (C-1, Administrative and Professional District, Restrictive), 16.32 (C-1-A, Administrative and Professional District), 16.36 (C-1-C, Administrative, Professional and Research District, Restrictive), 16.38 (C-2, Neighborhood Shopping District), 16.43 (O, Office District), and 16.52 (Parking District) to allow up to 30 dwelling units per acre (du/ac) under the HEU SEIR, as approved by City Council in November 2023. The HEU SEIR is adequate environmental documentation for the Project site’s increased residential density, as allowed under the zoning amendment.

The CO and C-1 land use and zoning designations allow a range of uses, including professional, executive, and administrative offices; research facilities; multiple dwellings; and public utilities. In addition, under the C-1 zoning designation, the maximum density for residential developments is 30 du/ac. Because the Project would provide a new residential development with multiple dwellings (i.e., 50 townhome-style units) at a density of 20 du/ac, it would be consistent with the land use and zoning designations for the Project site. In addition, as stated above under *Proposed Project*, eight of the proposed 50 residential units would be designated as BMR units to comply with the City’s BMR requirements (Municipal Code Section 16.96). As such, the Project qualifies for a housing density bonus, incentive, and/or waiver, consistent with California’s Density Bonus Law and the City’s Density Bonus Ordinance (Municipal Code Section 16.97). Specifically, Municipal Code Section 16.97.010 states the following: “The purpose of this chapter [Chapter 16.97, State Density Bonus Law] is to adopt an ordinance that specifies how compliance with Government Code Section 65915 (“State Density Bonus Law”) will be implemented...” In addition, Municipal Code Section 16.97.20 further clarifies that definitions and terms identified in the State Density Bonus Law shall apply to the terms in the City’s adopted ordinance, unless otherwise specified. California’s Density Bonus Law (Section 65915[d]) states that an applicant for a density bonus may submit to a city a proposal for specific incentives or concessions. The C-1 zoning designation includes development standards for floor area ratio (FAR [90 percent]), height (40 feet), open space (100 sf of common open space/unit or 80 square feet of private open space/unit), lot coverage (50 percent), building setbacks, parking spaces (maximum 1.5 spaces per unit), building projections and profile, exterior materials, and garage parking stall size (10 feet by 20 feet per car). The Project would comply with the open space and lot coverage requirements. The Project Sponsor would obtain a waiver/modification for building setbacks, FAR, projections, profile, exterior materials, garage parking stall size, and height consistent with California’s Density Bonus Law. Given the above, the Project meets the criteria of State CEQA Guidelines Section 15332(a) and is consistent with the general plan and applicable zoning regulations for the site.

2. Criterion Section 15332(b): Project Location, Size, and Context

	Yes	No
The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.	☒	☐

The Project site is within the incorporated limits of Menlo Park. The site comprises one parcel (68 Willow Road) that covers approximately 2.5 acres and is surrounded by urban uses (offices to the south, east, and west; residential neighborhoods to the north and east; and a park [Timothy Hopkins Creekside Park] to the south, with additional residences farther south beyond the park). In accordance with Public Resources Code (PRC) Section 21072, CEQA defines a qualified urban use as “...any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.” Given these facts, the Project adheres to the criteria of State CEQA Guidelines Section 15332(b) as a site of no more than 5 acres that is substantially surrounded by urban uses.

3. Criterion Section 15332(c): Endangered, Rare, or Threatened Species

	Yes	No
The project site has no value as habitat for endangered, rare, or threatened species.	☒	☐

The Project Sponsor submitted a biological resources technical report prepared by WRA Environmental Consultants in August 2024 and peer reviewed by ICF in September 2025. WRA Environmental Consultants updated the report in October 2025, based on recommendations. ICF confirmed that the technical report provided substantial evidence for a determination that approval of the Project would not result in any significant effects related to endangered, rare, or threatened species or habitat. A summary of the findings is provided below.

The Project site has one existing office building but is otherwise covered with a paved surface parking lot, except for limited landscape vegetation. The Project site is within Menlo Park and surrounded by fully developed residential and office uses. One aquatic resource, San Francisquito Creek, is adjacent to the Project site, providing a riparian corridor. According to the October 2025 biological resources technical report prepared by WRA Environmental Consultants, no special-status plant species have the potential to occur within the Project site; however, seven special-status wildlife species have the potential to occur within the Project site or in the immediate vicinity (WRA Environmental Consultants 2025). These species are hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), white-tailed kite (*Elanus leucurus*), San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), western pond turtle (*Actinemys marmorata*), California red-legged frog (*Rana draytonii*), and central California coast steelhead (*Oncorhynchus mykiss irideus*) (WRA Environmental Consultants 2025). In addition, native non-special-status birds and bats also have the potential to occur in the immediate vicinity of the Project site.

Construction activities, including building demolition and tree removal associated with the Project, could result in the direct removal of active bat roosts protected under the California Fish and Game Code and CEQA. In addition, grading and vegetation removal associated with the Project could result in the destruction or abandonment of nests for special-status or non-special-status bird species protected under the Migratory Bird Treaty Act and the California Department of Fish and Wildlife. Furthermore, although the Project would be designed to avoid impacts on aquatic resources, and no direct impacts on wetlands or jurisdictional waters would occur as a result of the Project, construction activities adjacent to aquatic resources (i.e., San Francisquito Creek) could result in an incidental sediment discharge or erosion. San Francisquito Creek provides suitable habitat for western pond turtle, California red-legged frog, and steelhead.

The Project would incorporate the recommendations below from the biological resources technical report as Project features, in accordance with adopted general plan policies and ConnectMenlo as well as HEU SEIR Mitigation Measure BIO-1, *Project-Specific Baseline Biological Resources Assessment (BRA)*, which requires a project applicant to prepare a BRA as well as a site-specific BRA to identify measures such as preconstruction surveys, no-disturbance zones, and bird-safe building designs for sensitive species on-site to avoid significant impacts on biological resources.

Sensitive Natural Communities and Aquatic Resources

No Project-related disturbance would occur below the top of bank (TOB), and no riparian trees would be removed. Although some Project elements would be located beneath the riparian canopy, any impervious surfaces below the riparian canopy would be restricted to the prior development envelope. Permeable surfaces below the riparian canopy (e.g., open-cell pavers, walking trails with decomposed granite) would be placed so as to avoid significant impacts on the root zone of riparian trees. In addition, prior to ground-disturbing activities, aquatic resources adjacent to construction areas would be flagged and appropriate erosion control measures (e.g., silt fencing, straw wattles) would be installed in areas adjacent to jurisdictional waters. The erosion control measures would be installed with oversight from a qualified biologist.

Roosting Bats

Building demolition and tree removal should occur outside the bat maternity season (defined as April 1 through August 31). If tree removal and building demolition must occur between April 1 and August 31, prior to the removal of trees or buildings, a bat habitat assessment would be performed by a qualified biologist to identify potential maternity roost sites prior to March 15 and no more than 60 days prior to the anticipated start of construction/demolition. If a tree or building has no potential to support roosting bats (e.g., insufficient interstitial spaces), tree removal and building demolition may proceed with no further measures required to protect roosting bats. If potential roosting sites are identified, the qualified biologist shall determine if the roosts are active, either through direct observation (e.g., using a bore scope to investigate the spaces in a building or tree) or through an emergence survey. If a potential roost is confirmed inactive, the tree or building may be removed with no further avoidance. If a roost is active and work is occurring outside of the maternity season, the qualified biologist shall make recommendations for bat exclusion or other actions to make the site unsuitable for roosting. Methods may include, but are not limited to, the following:

- For buildings, passive exclusion of bats could involve building modification (e.g., cutting holes in the roof or walls to circulate air) or the installation one-way doors at egress points to allow bats to vacate the building but prevent them from re-entering.
- For trees, a two-phased cutting method may be implemented, with oversight from a qualified biologist.

Regardless of time of year, any trees felled should be allowed to remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats to escape.

Nesting Birds

To the extent feasible, Project-related activities should be avoided during the nesting bird season, generally defined as February 1 through August 31. If Project work must occur during the nesting bird season, a pre-construction nesting bird survey shall be conducted by a qualified biologist within 7 days of ground disturbance or vegetation removal to avoid disturbance of active nests, eggs, and/or young of nesting birds. Surveys shall be conducted in all potential nesting habitat within and adjacent to Project work sites as well as staging and storage areas.

If an active nest is located, a no-disturbance buffer shall be established around the nest. Active nest sites and protective buffer zones shall be designated as “environmentally sensitive areas” where no Project-related activities or personnel may enter until a qualified biologist determines that the young have fully fledged or the nest has otherwise become inactive (e.g., due to predation) and will no longer be adversely affected by the Project. Suggested distances for buffer zones differ, depending on species, existing conditions, and nest placement, shall be determined and implemented in the field by a qualified biologist.

Bird-Friendly Building Design

The Project design incorporates bird-safe measures developed in accordance with the requirements outlined in Municipal Code Chapter 16.30 (05), Bird-Friendly Design. According to the plan by SDG Architects (August 2025), the total amount of glazing (i.e., glass) proposed is relatively small. In addition, bird-safe measures (e.g., insect screens) would be applied at all operable windows and doors with glazing. Overall, less than 10 percent of the façade of each building would be non-bird-friendly glazing, which would be used only sparsely at front and rear building elevations (approximately 1 to 4 percent of the façade area). No transparent building corners, glass guardrails, free-standing glass walls, or glass walkways are proposed at any building elevation. Furthermore, building exteriors would use a combination of colors, textures, and patterns (e.g., stone veneer, multi-colored board-and-batten siding, stucco), which would break up the exterior of the buildings visually (creating “visual noise”) and increase the likelihood that flying birds would perceive buildings as a solid surface.

All exterior lighting would be kept to a minimum and include down-facing fixtures to prevent light trespass into adjacent habitats. All lighting would use shields so that bulbs would not be visible, ensuring that the light would be directed to the ground surface. No floodlights would be used unless required for safety or security purposes. Furthermore, no rodenticides would be allowed.

There are 52 trees on the Project site, 31 of which are identified as protected heritage-size trees (Urban Tree Management 2024). The Project would require the removal of 23 heritage trees and 24 additional non-heritage trees, for a total of 47 trees. The Project would plant approximately 16 trees throughout the site and nearby streetscapes as well as pay an in-lieu fee to compensate for the removal of the 23 heritage trees, in accordance with Municipal Code Section 13.24.090.

Given the above, the Project adheres to the criteria of State CEQA Guidelines Section 15332(c). The site does not have value as habitat for endangered, rare, or threatened species. Compliance with Municipal Code requirements and incorporation of the above recommendations from the biological resources technical report as Project features would ensure that the Project would result in less-than-significant impacts on trees, aquatic resources, and special-status wildlife species.

4. Criterion 15332 (d): Traffic, Noise, Air Quality, and Water Quality

	Yes	No
Approval of the project would not result in any significant effects related to traffic, noise, air quality, and water quality.	☒	☐

Traffic

A transportation impact analysis (TIA) was prepared for the proposed Project by the City's transportation consultant, Hexagon Transportation Consultants, in October 2025. The TIA incorporated information from the trip generation memorandum prepared by Fehr and Peers and the transportation demand management (TDM) plan by TDM Specialists (2025), which were peer reviewed by Hexagon Transportation Consultants. The TIA describes existing and future conditions related to transportation with and without the Project. In addition, the TIA includes information regarding access to and from the Project site as well as pedestrian and bicyclist facilities associated with the Project.

Trip Generation

For Project analysis, the trip generation estimates prepared by Fehr and Peers assumed trip generation for both the Project and the existing 27,000 sf office building at 68 Willow Road (Fehr and Peers 2026). The net change in the number of vehicle trips was estimated by subtracting the estimated number of trips for the existing office building from the estimated number of trips for the proposed residential uses. The Project would generate up to approximately 332 daily trips, with 20 trips (six inbound and 14 outbound) during the AM peak hour and 26 trips (15 inbound and 11 outbound) during the PM peak hour. This is a conservative estimate because it does not include the reduction in the number of trips due to incorporation of the Project's TDM plan. After accounting for the existing office building's trips (371 daily trips, with 54 trips during the AM peak hour and 56 trips during the PM peak hour), the Project would generate 39 fewer daily vehicle trips than the existing office uses.

Vehicle Miles Traveled

The TIA analyzed the Project's vehicle miles traveled (VMT) in accordance with the City's guidelines, adopted in 2020 and subsequently updated in 2022. According to the guidelines, the evaluation of a residential project is based on a metric that considers daily VMT per capita. A residential project is considered to have a significant VMT impact if its projected VMT per capita exceeds a level of 15 percent below the regional average of 13.1. Therefore, the VMT threshold for the Project is 11.2 VMT per capita.

As analyzed in the TIA, the Project's VMT would be 12.3 per resident (Hexagon Transportation Consultants 2025). Therefore, the Project would be required to reduce VMT by 9 percent to avoid a potentially significant VMT impact. However, with incorporation of the TDM plan, the Project would achieve a trip reduction target of 25 percent, thereby exceeding the 9 percent reduction required for VMT. Therefore, the Project would result in a less-than-significant impact on VMT.

Access and Circulation

The Project would provide 82 parking spaces in the garages of the residential units as well as two guest parking spaces, for a total of 84 parking spaces on the Project site. Access to the Project would be provided from a full-access driveway on Willow Place. In accordance with the California Department of

Transportation (Caltrans) sight-distance standards for stopping, access points for parking facilities are required to be free and clear of obstructions to provide adequate sight distance, ensuring that drivers see pedestrians on sidewalks as well as bicycles and other vehicles. The Willow Place driveway would be 24 feet wide and meet the City's standard for parking stalls and driveway designs. In addition, the Project would result in approximately one car entering or exiting the driveway every 2 minutes during the peak hour. As explained in the TIA, this small number of vehicle trips would not result in any issues regarding access at the Willow Place driveway, nor would the small number of trips disrupt traffic operations on Willow Place and Willow Road (Hexagon Transportation Consultants 2025).

Access throughout the Project site would be provided by new internal streets (A to E) that would be at least 22 feet wide; each of the garages for the townhome units would connect to these streets. The width of the proposed streets would accommodate two-way circulation and provide adequate room for vehicles when backing out of the garages, along with access for emergency vehicles and garbage trucks. The proposed Street "A" would dead end at both ends; the proposed Street "E" would dead end at the east end. However, the dead-ends on these streets would not result in any access issues for residents. In addition, the dead-end at the east end of Street "A" would provide access to resident garages as well as the two visitor parking spaces.

Proposed Streets "A" to "D" would form an internal circle throughout the Project site. Emergency response vehicles and garbage trucks would be able to access the Project site from the proposed Willow Place driveway and circle around the Project site through Streets "A" to "D." No turnaround space would be provided along Street "E" for garbage trucks or emergency vehicles. Such vehicles would be required to back out of Street "E." However, fire trucks or other emergency vehicles would be able to access and service the Project from Willow Road; there is an existing fire hydrant on Willow Road.

As discussed above, the Project would not include geometric design features or incompatible uses that could substantially increase hazards and would not result in inadequate emergency access. Therefore, the Project's impacts related to access, circulation, and hazards would be less than significant.

Bicycle, Pedestrian, and Transit Facilities

Bicycle lanes and routes within the Project vicinity include north-south bicycle connections along Willow Road, Ravenswood Avenue, and Ringwood Avenue and east-west bicycle connections along Middlefield Road and Alma Street, with connectivity to both the Menlo Park Caltrain station and Palo Alto Caltrain station. Residents would be able to store their bicycles within the townhome garages. In addition, the Project would provide six short-term bicycle racks with up to 12 bicycle parking spaces. The Project would incorporate a bicycle fix-it station, which would allow cyclists to conduct minor maintenance or repairs on their bicycles.

Pedestrian facilities in the vicinity of the Project site consist of sidewalks, crosswalks, and signals at intersections. In addition, existing access to San Francisquito Creek and Timothy Hopkins Creekside Park, which are adjacent to the Project site, is provided via a trail off of Willow Place. The Project would also incorporate pedestrian-realm expansions and improvements, including sidewalks throughout the perimeter of the Project site as well as between buildings. These proposed pedestrian improvements would connect to existing pedestrian facilities in the area.

There are several transit facilities within proximity of the Project site that future residents could access. Existing San Mateo County Transit District (SamTrans) bus stops are within 0.5 mile of the Project site at Willow Road and Waverly Street as well as Willow Road and Middlefield Road, providing access to Menlo Park, Palo Alto, San Francisco, and Redwood City. In addition, there are City shuttle bus stops at Linfield Drive

and Waverly Street as well as Willow Road and Middlefield Road, providing access to the Menlo Park Caltrain station, Palo Alto Caltrain station, Stanford Shopping Center, and the Veterans Affairs Medical Center. Furthermore, the bus stop at Willow Road and Middlefield Road is also served by the Dumbarton Express, which offers regional connections to the East Bay via the Dumbarton Bridge.

The Project would not remove bicyclist, pedestrian, or transit facilities, nor would it conflict with any adopted plans or policies associated with new transportation facilities, resulting in less-than-significant impacts.

Noise

Noise studies for the Project were prepared by Salter, Inc., and peer reviewed by ICF in October 2025. Two technical studies were completed and peer reviewed: an environmental noise study memo to evaluate the noise compatibility of the proposed residences and a noise impact study to evaluate potential noise impacts from construction and operation of the Project (Salter, Inc. 2025a and 2025b). ICF confirmed that the technical studies provide substantial evidence for a determination that approval of the Project would not result in any significant effects related to noise. A summary of the findings is provided below.

Construction

Construction of the Project would involve demolition, grading, excavation, paving, and vertical construction over approximately 20 months. Noise levels from the use of heavy equipment would be between 77 and 85 decibels (dB) at 50 feet. The Project would not include the use of pile drivers.

As described in the noise impact study, compliance with the Municipal Code would be achieved through adherence to allowable construction hours and noise limits. Construction activities would occur between the allowed hours of 8:00 a.m. and 6:00 p.m. Monday through Friday, as permitted by Section 8.06.040 of the Municipal Code. Noise levels from individual pieces of heavy equipment would not exceed 85 dB at 50 feet, and signs detailing permitted hours would be posted at all site entrances. These measures are consistent with general plan Policy N-1.10 and Policy N-1.D and would minimize the exposure of nearby properties to excessive construction noise.

To minimize construction noise, the Project would implement the noise control measures required by Mitigation Measure NOI-1, *Construction Noise Control*, from the HEU SEIR. The mitigation measure states that:

Project applicants shall minimize the exposure of nearby properties to excessive noise levels from construction-related activity through CEQA review, conditions of approval, and/or enforcement of the City's Noise Ordinance. Prior to issuance of demolition, grading, and/or building permits for development projects, a note shall be provided on development plans, indicating that, during ongoing grading, demolition, and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise:

- Demonstrate that any construction activities taking place outside daytime construction hours of 8:00 a.m. to 6:00 p.m. Monday through Friday shall comply with the 60 dBA L_{eq} [A-weighted decibels, equivalent continuous sound level] limit during the hours of 7:00 a.m. to 8:00 a.m. and the 50 dBA L_{eq} limit during the hours of 6:00 a.m. to 7:00 a.m. In addition, the property owner/developer shall demonstrate that individual pieces of equipment proposed for use will not exceed the limit (85 dBA L_{eq} at 50 feet) for powered equipment noise and that combined construction noise will not result in a 10 dBA increase over the ambient noise level at nearby sensitive receptors. Activities that would produce noise above applicable daytime

or nighttime limits shall be scheduled only during normal construction hours. If it is concluded that a particular piece of equipment will not meet the requirements of this mitigation measure, that equipment shall not be used outside the daytime construction hours.

- Verify construction activities are conducted at adequate distances or otherwise shielded with sound barriers, as determined through analysis, from noise-sensitive receptors when working outside the daytime construction hours of 8:00 a.m. to 6:00 p.m. Monday through Friday and verify compliance with the Menlo Park Municipal Code through measurement.
- Ensure that all internal-combustion engines on construction equipment and trucks are fitted with properly maintained mufflers, air intake silencers, and/or engine shrouds that are no less effective than as originally equipped by the manufacturer.
- Locate stationary equipment such as generators and air compressors as far as feasible from nearby noise-sensitive uses.
- Locate stockpiling as far as feasible from nearby noise-sensitive receptors.
- Limit unnecessary engine idling to the extent feasible.
- Limit the use of public address systems.
- Limit construction traffic to the haul routes established by the City of Menlo Park.

Additional controls, as warranted, may include, but are not limited to:

- Upgraded construction equipment mufflers (e.g., improved mufflers, intake silencers, ducts, engine enclosures, acoustically attenuating shields, shrouds) on equipment and trucks used for project construction.
- Equipment staging plans (e.g., locating stationary equipment at adequate distances).
- Limitations on equipment and truck idling.
- Shielding sensitive receptors with sound barriers to comply with the Menlo Park Municipal Code.

Vibration from construction equipment would be perceptible only in areas directly adjacent to equipment. No high-impact equipment types, such as pile drivers, would be used. The nearest residences are approximately 100 feet east of the Project site; at that distance, vibration from heavy equipment would not be perceptible, nor would it result in building damage. Vibration impacts would therefore be less than significant.

Operation

Once operational, the Project would generate noise from daily vehicle trips and the use of building mechanical equipment. A traffic analysis in the noise impact report indicates the Project would add up to 25 net new daily trips; however, this figure was subsequently revised by Fehr & Peers in a later analysis (Fehr & Peers 2026). The revised analysis indicated that Project trip generation would result in a net decrease amounting to 39 vehicle trips per day. Consequently, traffic noise levels would be reduced slightly under the Project; however, the magnitude of the decrease would be less than 1 dB, which would not be perceptible. Traffic noise levels under the Project would be similar to existing noise levels near the site, which range from 54 to 60 dB, day-night average sound level (DNL). The minor decrease in traffic noise would not affect compatibility with residential land uses. As such, the Project would be in compliance with general plan Policy N1.4, which discourages noise-sensitive uses in areas exceeding 65 dB DNL without mitigation.

Operational stationary noise sources include outdoor heat pumps and air-conditioning units. Preliminary calculations, which account for shielding from a 6-foot solid wood fence, show that noise levels at property lines would remain below 50 dB, thereby meeting the Municipal Code Section 8.06.030 limit for nighttime hours and the standard for roof-mounted equipment of 50 dB at 50 feet. This would minimize noise from mechanical equipment, consistent with general plan Policy N1.8.

The Project site is more than 2 miles from the nearest airports: Moffett Field, San Francisco International Airport, San Carlos Airport, and Oakland International Airport. As such, the Project would not expose people residing or working in the Project area to excessive noise levels.

Given this analysis, operational and traffic-related noise impacts are considered to be less than significant.

Air Quality

The Project Sponsor submitted a construction emissions and health risk assessment prepared by Illingworth and Rodkin in March 2025 and peer reviewed by ICF in October 2025 (Illingworth & Rodkin 2025). Illingworth & Rodkin updated the report on November 7, 2025, based on recommendations. ICF confirmed that the technical report provided substantial evidence for a determination that approval of the Project would not result in any significant effects related to air quality. A summary of the findings is provided below.

Regulatory Setting

The Project site is in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air District (Air District). The Air District adopted thresholds of significance to assist lead agencies in the evaluation and mitigation of air quality impacts under CEQA. The Air District thresholds, which are incorporated in the district's 2022 CEQA Air Quality Guidelines, establish the levels at which emissions of ozone precursors (i.e., reactive organic gases [ROGs] and nitrogen oxides), particulate matter (PM), local carbon monoxide (CO), and toxic air contaminants (TACs) would cause significant air quality impacts. The regulation of two fractions of PM emissions is based on aerodynamic resistance diameters equal to or less than 10 microns (PM₁₀) and 2.5 microns (PM_{2.5}). The air quality analysis below uses thresholds from the 2022 CEQA Air District Guidelines to evaluate the potential impacts of the Project.

Construction Criteria Pollutant Emissions

The construction schedule assumes that the Project would be built over a period of approximately 20 months, or 427 construction workdays. Average daily emissions were annualized for each year of construction by dividing annual construction emissions by the number of active workdays during that year. As indicated in Table 3 of the Illingworth & Rodkin report, estimated unmitigated emissions for each year of construction would not exceed the applicable Air District significance thresholds.

Menlo Park General Plan Policy OSC-5.1 and HEU SEIR Mitigation Measure AQ-2, *Emissions Reductions Measures*, requires projects to apply Air District best management practices (BMPs) to reduce fugitive PM emissions.¹ HEU SEIR Mitigation Measure AQ-2 (AQ-2b1 from ConnectMenlo, with clarifying amendments) states the following:

¹ Per Menlo Park Municipal Code Section 16.02.070, all development, including the Project, shall comply with the MMRP established through Resolution No. 6356, associated with the EIR prepared for ConnectMenlo, adopted in November 2016, and the MMRP established through Resolution No. 6808, associated with the SEIR prepared for the HEU project, adopted in January 2023, as applicable.

As part of the City's development approval process, the City shall require applicants for future development projects to comply with the current Bay Area Air Quality Management District's basic control measures for reducing construction emissions of PM₁₀ (Table 8-18-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).

Implementation of the Air District fugitive dust BMPs would be required by the City as a standard condition of approval, consistent with the City General Plan.

Operational Criteria Pollutant Emissions

The Project would result in emissions from vehicle travel, evaporative ROG's associated with consumer products, and minor miscellaneous sources. The Air District's 2022 CEQA Air Quality Guidelines consider land use projects to have significant criteria pollutant emissions if they exceed the screening levels in Chapter 4, Table 4-1, of the guidelines. The Project proposes 50 townhomes/condos, which is well below the screening level of 637 townhomes/condos for significant operational emissions. Therefore, the criteria pollutant emissions generated by the Project would not be significant.

Construction Toxic Air Contaminant Emissions

Project impacts related to increased health risks can occur from the generation of TAC and PM_{2.5} emissions. Health risk impacts were addressed by predicting the increased cancer risk, the increase in annual PM_{2.5} concentrations, and the Hazard Index (HI) for non-cancer health risks. Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust emissions pose health risks for sensitive receptors such as surrounding residents, school students, and day-care infants/children. Off-site worker receptors were included in the analysis, per Air District guidance in Appendix E of the 2022 CEQA Air District Guidelines. The primary health risk issues associated with construction emissions are cancer risk and exposure to PM_{2.5}. A health risk assessment of Project construction activities was conducted to evaluate potential health effects on nearby sensitive receptors from construction-related emissions of diesel PM and PM_{2.5}. This assessment included dispersion modeling to predict the off-site concentrations resulting from Project construction so that lifetime cancer risks and non-cancer health effects could be evaluated. The Project's maximally exposed individual (MEI) is identified as the sensitive receptor that is most affected by the Project's construction.

The methodology for computing health risks impacts is contained in Appendix E of the Air District's 2022 CEQA Air Quality Guidelines.

As indicated in Table 4 of the Illingworth & Rodkin report, estimated unmitigated cancer risks and annual PM_{2.5} concentrations would exceed the applicable Air District significance thresholds. However, with incorporation of HEU SEIR Mitigation Measure AQ-2, the Project would not exceed the Air District significance thresholds for both cancer risk and annual PM_{2.5} concentrations. HEU SEIR Mitigation Measure AQ-2 states the following:

- C) In the event that a project-specific analysis finds that the project could result in significant construction criteria air pollutant emissions that exceed significance thresholds, the project sponsor shall implement the following emission reduction measures to the degree necessary to reduce the impact to less-than-significance thresholds and shall implement other feasible measures as needed to reduce the impact to less than the significance thresholds.
 - 1. Diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, as required to reduce the emissions to less than the thresholds of significance shown in Table 2-1 of the BAAQMD CEQA Guidelines. This requirement shall

be verified through submittal of an equipment inventory that includes the following information: (1) type of equipment, (2) engine year and age, (3) number of years since rebuild of engine (if applicable), (4) type of fuel used, (5) engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable, and other related equipment data. A Certification Statement is also required to be made by the Contractor for documentation of compliance and for future review by the BAAQMD as necessary. The Certification Statement must state that the Contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract. The City may waive the equipment requirement above only under the following unusual circumstances: if use of a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible, or the equipment is not commercially available; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. If the City grants the waiver, the contractor shall use the next cleanest piece of off-road equipment available.

2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.

The HI value associated with construction activities would be below the Air District significance threshold with and without mitigation.

Cumulative Toxic Air Contaminant Emissions

Cumulative health risk assessments analyze all substantial sources of TACs within 1,000 feet of a project site (i.e., influence area) that can affect sensitive receptors. These sources include rail lines, roadways, and stationary sources identified by the Air District. No rail lines or stationary sources have been identified by the Air District within 1,000 feet of the Project site.

As indicated in Table 5 of the Illingworth & Rodkin report, the cumulative cancer risk, annual PM_{2.5} concentrations, and HI values would not exceed the applicable Air District significance thresholds.

Water Quality

The Project site contains a single-story office building, surface parking, and landscaping. The site is composed of approximately 56 percent impervious surfaces and 44 percent pervious surfaces (CBG 2025a). A 12-inch storm drain is located at the northwest corner of the Project site, next to Willow Road and Willow Place, with a catch basin inlet on the north side of Willow Road. San Francisquito Creek is adjacent to the Project site.

The Project would demolish the existing office building, surface parking, and landscaping and construct 50 townhome-style units within eight buildings on the approximately 2.5-acre Project site. Upon Project completion, approximately 73 percent of the Project site would be covered with impervious surfaces; approximately 27 percent would be covered with pervious surfaces, comprising landscaped areas with lawns, shrubs, and trees.

Construction would include the BMPs set forth in a stormwater pollution prevention plan (SWPPP), in accordance with the State Stormwater National Pollutant Discharge Elimination System (NPDES) Construction General Permit administered by the State Water Resources Control Board (SWRCB). BMPs would reduce both stormwater and non-stormwater discharges during construction and minimize the mobilization of sediment to storm drains. The Project would also be subject to, and would comply with, the applicable provisions of Municipal Code Chapter 7.42, *Stormwater Management Program*, which prohibits illicit discharges into municipal storm drain systems. In addition, BMPs would be required during general operation of the Project to ensure that stormwater runoff would meet the established applicable water quality standards and waste discharge requirements. The BMPs are provided in the Project’s stormwater control plan, which adheres to the San Mateo Countywide Water Pollution Prevention Program C.3 Regulated Projects Guide (CBG 2025b). As outlined in the stormwater control plan, the Project would incorporate stormwater treatment measures, such as bioretention areas, which would ensure that operation of the Project would not violate any water quality standards or result in impacts on water quality.

Through compliance with regulatory requirements, the Project would not result in the degradation of stormwater runoff and would not result in significant impacts related to water quality.

5. Criterion Section 15332(e): Utilities and Public Services

	Yes	No
The site can be adequately served by all required utilities and public services.	☒	☐
The Project site, an approximately 2.5-acre parcel in an urbanized area of Menlo Park, is currently developed with an office building, surface parking, and associated landscaping. The Project site is served by all required utilities and public services.		

Utilities

The California Water Service, Bear Gulch District, provides water to the Project site. The existing water supply system serving the Project site includes an 8-inch water main in Willow Road and a 6-inch water main in Willow Place. The Project would be served by an 8-inch line for domestic water that would loop throughout the Project site and connect to the existing 6-inch main in Willow Place. In addition, a separate, dedicated 8-inch fire main would also loop through the Project site to provide water to on-site fire hydrants; it would ultimately connect to the 8-inch water main in Willow Road. The California Water Service, Bear Gulch District, confirmed that it has adequate capacity to serve the Project through a will-serve letter dated May 9, 2025 (California Water Service 2025). Therefore, the Project would be adequately served by the water system.

Wastewater service for the Project site is provided by the West Bay Sanitary District (WBSD), which conveys wastewater to the Silicon Valley Clean Wastewater Treatment Plant. Currently, the site is connected to an existing 8-inch wastewater main in Willow Road. The Project’s 8-inch wastewater line would loop through the Project site and connect to the existing 8-inch wastewater main in Willow Road. The Project would generate, on average, approximately 10,000 gallons per day of wastewater (CBG 2025c). The WBSD confirmed that it has adequate capacity to serve the Project through a will-serve letter dated June 25, 2025 (WBSD 2025). Therefore, the Project would be adequately served by the wastewater system.

Recology provides solid waste collection and conveyance service for Menlo Park. Collected waste is conveyed to the Shoreway Environmental Center, which is owned by RethinkWaste, for processing and shipment. Shoreway is permitted to receive 3,000 tons per day of solid waste and recyclables (RethinkWaste 2026). Materials that are not composted or recycled at Shoreway are sent to several different landfills, with most going to the Ox Mountain Landfill near the city of Half Moon Bay. The Ox Mountain Landfill is expected to remain operational until 2034 and has a permitted capacity of 3,598 tons per day (California Department of Resources Recycling and Recovery [CalRecycle] 2026a). In 2024, Menlo Park's per capita solid waste disposal rate for residents was 2.4 pounds per day (ppd) (CalRecycle 2026b). The Project would generate approximately 225 new residents who would generate approximately 540 ppd, or 0.27 ton per day, of solid waste. Solid waste generated by the Project would represent less than approximately 1 percent of the permitted capacity of both the Shoreway Environmental Center and Ox Mountain Landfill. Therefore, the Project can be adequately served by solid waste facilities.

Pacific Gas and Electric (PG&E) provides both electric and natural gas services to Menlo Park. As a California Public Utilities Commission-regulated public utility in California, PG&E owns, operates, and maintains above- and belowground electric and natural gas facilities in Menlo Park, including substations. In addition, Peninsula Clean Energy (PCE), a community choice energy program, also provides electricity to the city. PCE uses PG&E's distribution system to distribute electricity to customers. The city is also served by both wired and wireless telecommunications from numerous providers, including Atherton Fiber, Sonic, Xfinity, AT&T, Earthlink, Wave Broadband, Viasat Internet, Zayo, Lumen, Verizon, and HughesNet (City of Menlo Park 2022). The Project's electric, natural gas, and telecommunication utilities would be connected to existing electric, natural gas, and telecommunication utilities. Therefore, the Project would be adequately served by dry utilities.

Public Services

The Menlo Park Fire Protection District (MPFPD) provides fire protection services for the Project site, and the Menlo Park Police Department provides police protection services. In addition, the Menlo Park City School District and Sequoia Union High School District serve the Project site, and the Menlo Park Library and Community Services Department provides library and recreational services. The Project would be required to comply with Municipal Code fire safety requirements, including those established in the building code (Chapter 12), as well as fire-flow requirements and California Fire Code requirements. Compliance with the requirements, along with general plan policies, would be demonstrated in the site plans, which would be submitted to MPFPD for review and approval prior to issuance of a building permit. In addition, the Project would provide approximately 4,242 sf of private open space in the form of porches and decks and approximately 31,109 sf of common open space in the form of landscaped areas and amenity areas that would be located throughout the site and along the eastern boundary of the site adjacent to San Francisquito Creek. Furthermore, the City's ConnectMenlo EIR and HEU SEIR determined that impacts on public services and recreational resources as a result of increased residential development would not be significant with payment of impact fees, compliance with state and local policies, and subsequent environmental review of public services or recreational facility improvements, if and when the need for such improvements is identified. Therefore, the Project would be adequately served by public services.

Exceptions to Categorical Exemptions Checklist

In addition to investigating the applicability of State CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exceptions to qualifying for a categorical exemption under CEQA are present. The analysis below compares the criteria of State CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

Criterion 15300.2(a): Location

	Yes	No
Is there an exception to the Class 32 exemption for the project due to its location in a particularly sensitive environment such that the project may affect an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies?	☐	☒

This possible exception applies only to CEQA exemptions under Classes 3, 4, 5, 6, or 11. Because the Project would be anticipated to qualify as a Class 32 urban infill exemption, this criterion is not applicable. The Project is within a developed and urban area and not within a sensitive environment. However, designated environmental resources of hazardous or critical concern in the vicinity of the Project site are evaluated under Criterion 15300.2(e), below.

Criterion 15300.2(b): Cumulative Impact

	Yes	No
Is there an exception to the Class 32 exemption for the project due to significant cumulative impacts of successive projects of the same type and in the same place over time?	☐	☒

The effects of the Project would generally be beneficial because it would help Menlo Park increase its housing supply, including BMR units, in accordance with the goals of the HEU. The Project would place new residents in an area that is well served by existing transit, thereby reducing VMT. Furthermore, the Project would repurpose an underutilized parcel in an already-developed area of Menlo Park with utilities and public services as well as multimodal transportation access. Any construction effects as a result of the Project would be temporary, would cease upon completion of construction, and would be confined to the Project vicinity. In addition, the Project would be required to follow Municipal Code ordinances and other applicable regulatory requirements, resulting in less-than-significant impacts.

The immediate vicinity of the Project site is undergoing intensification. There are several similar development projects within a 0.5-mile radius of the Project site, including at 333 Ravenswood Avenue (800 residential units and 1.1 million sf of office/commercial space), 115 El Camino Real (four residential units and 1,500 sf of retail space), and 300 Middlefield Road (53,000 sf public facility). The development project closest to the Project site is at 80 Willow Road (665 residential units, 130 hotel rooms, 336,00 sf of office space, 29,200 sf of commercial space, and 2,700 sf for a school), approximately 0.15 mile northeast of the Project site. These projects would be subject to their own environmental review process under CEQA and required to identify and implement mitigation measures to reduce any potentially significant impacts, as applicable. In addition, in accordance with Municipal Code Section 16.02.070, all development, including the previously identified projects, would be required to comply with applicable mitigation measures established in the MMRP associated with the ConnectMenlo EIR and HEU SEIR and adopted through Resolution No. 6356 and No. 6808.

Therefore, based on a review of the types and the locations of the related projects; implementation of applicable mitigation measures, as identified in subsequent project-level CEQA review and the MMRP adopted through Resolution No. 6356 and No. 6808; and the less-than-significant impacts that would result from the Project, the Project would not result in a cumulatively considerable contribution to any significant cumulative impacts when considering it along with other related present, past, and reasonably foreseeable future projects. Therefore, the exception under State CEQA Guidelines 15300.2(b) does not apply to the Project.

Criterion 15300.2(c): Significant Effect

	Yes	No
Is there an exception to the Class 32 exemption for the project because there is a reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances?	☐	☒

There are no known unusual circumstances that would be applicable to the Project or its site that would result in a significant effect on the environment. Therefore, the exception under State CEQA Guidelines Section 15300.2(c) does not apply to the Project.

Criterion Section 15300.2(d): Scenic Highway

	Yes	No
Is there an exception to the Class 32 exemption for the project because it may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway?	☐	☒

The nearest scenic highway, Interstate 280, is approximately 3.70 miles southwest of the Project site; the Project site is not visible from the interstate (Caltrans 2018). Therefore, the Project would have no adverse effect on scenic resources within a highway that has been officially designated as a State Scenic Highway. The exception under State CEQA Guidelines Section 15300.2(d) does not apply to the Project.

Criterion 15300.2(e): Hazardous Waste Sites

	Yes	No
Is there an exception to the Class 32 exemption for the project because the project is located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code?	☐	☒

The Project Sponsor submitted the *Phase I Environmental Site Assessment, 68 Willow Road, Menlo Park, California 94025* (Phase I ESA) prepared by AEI Consultants in November 2019 and peer reviewed by ICF in September 2025. Subsequent to peer review of the 2019 Phase I ESA, AEI Consultants provided a new Phase I ESA for the Project site dated October 24, 2025. ICF confirmed that the technical report provided substantial evidence for a determination that approval of the Project would not result in any significant effects related to hazardous waste sites. A summary of the findings is provided below.

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List.² The provisions require the Department of Toxic Substance Control, the SWRCB, the California Department of Public Health, and CalRecycle to submit information to the Secretary of the California Environmental Protection Agency (CalEPA) pertaining to sites associated with solid waste disposal, hazardous waste disposal, leaking underground tanks, and/or hazardous materials releases.

A Phase I ESA was prepared by AEI Consultants for the Project site on October 25, 2025, in accordance with ASTM Practice E1527-21 (AEI Consultants 2025). The Phase I ESA found the Project site within several databases, including the Hazardous Waste Tracking System (HWTS), Facility Index System (FINDS), Enforcement and Compliance History Online (ECHO), Hazardous Waste Electronic Manifest (E MANIFEST), Resource Conservation and Recovery Act Non-Generators (RCRA NonGen/NLR), and Hazardous Waste Information System (HAZNET), and included the following summary:

The subject property is listed as a FINDS and ECHO site. No violations or enforcement actions were identified on the EPA websites Envirofacts and ECHO. Details provided for the RCRA Non-Generator (NONGEN)/No Longer Regulated (NLR) listing identified the site as "not a generator, verified" in 2020. No violations were identified in connection with the RCRA listing.

According to the regulatory database, the subject property is identified in the Hazardous Waste Tracking System (HWTS) and HAZNET databases in association with generating 0.05 ton of asbestos-containing waste in 2020. Information on the EPA website indicates that the facility is currently in compliance, with no outstanding violations.

Based on the nature of these listings and lack of violations, they are not considered evidence of a REC.

As noted in the Phase I ESA, the Project site has not been identified on any lists compiled pursuant to Government Code Section 65962.5; the Phase I ESA did, however, identify several other environmental considerations (OECs). These OECs can have an environmental impact on the Project site and are not limited to those environmental issues required to be evaluated under the ASTM standard. The OECs were listed as potential exposure to agricultural chemicals (during soil disturbance) due to historical agricultural uses on the site and the potential exposure to hazardous building materials—specifically, asbestos-containing materials (ACM) and lead-based paint (LBP)—during demolition activities. Recommendations included in the Phase I ESA to address OECs included potential sampling for agricultural chemicals, an asbestos survey, and consultation with a certified lead risk assessor to determine options for the control of possible LBP hazards. The Project Sponsor would implement the recommendations found in the Phase I ESA prior to Project construction. Additional details can be found in the *Executive Summary* section of the site-specific Phase I ESA. Incorporation of the above recommendations would ensure that the Project would result in less-than-significant impacts.

² The following data resources provide information regarding the facilities or sites identified as meeting "Cortese List" requirements:

- List of hazardous waste and substances sites from Department of Toxic Substances Control *EnviroStor* database.
- List of leaking underground storage tank sites from the SWRCB's *GeoTracker* database.
- List of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit.
- List of "active" Cease and Desist Order (CDO) and Cleanup and Abatement Order (CAO) sites from SWRCB.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control.

A supplemental environmental database search conducted by ICF in November 2025, using the SWRCB’s *GeoTracker*, Department of Toxic Substances Control’s *EnviroStor*, and CalEPA *Cortese List of Data Resources* online databases, confirmed that the Project site is not listed within a site or immediately adjacent to a site that meets the criteria for a Cortese List site (SWRCB 2026; Department of Toxic Substances Control 2026; CalEPA 2026).

Because the Project site is not on any list compiled pursuant to Section 65962.5 of the Government Code, the exception under State CEQA Guidelines Section 15300.2(e) does not apply to the Project.

Criterion 15300.2(f): Historical Resources

	Yes	No
Is there an exception to the Class 32 exemption for the project because the project may cause a substantial adverse change in the significance of a historical resource?	☐	☒

The Project Sponsor submitted a historic resource evaluation prepared by Page & Turnbull in October 2024 and peer reviewed by ICF in September 2025. ICF confirmed that the technical report provided substantial evidence for a conclusion that approval of the Project would not result in any significant impacts related to historical resources. A summary of the findings is provided below.

Built-Environment Resources

The Project site at 68 Willow Road is an irregularly shaped, 2.5-acre parcel on the east side of Willow Road, between Middlefield Road and Willow Place. The property at 68 Willow Road contains a one-story commercial office building. The building has a rectangular footprint that combines the footprint of an original 1955 building with additions constructed in 1957 and 1979. The building reflects at least four periods of construction. Architect John Carl Warnecke designed the initial building in 1955 and an expansion on the southwest side in 1957, both in the Mid-Century Modern style. Architect James Foug designed a second expansion in 1979, adding a wing across the front of the primary (west) façade and minor additions at the building’s southwest and northeast corners. Additional changes since 1979 have further altered the appearance (Page & Turnbull 2024).

Because the building is of historic age (more than 50 years old), it may be eligible for listing in the California Register of Historical Resources (CRHR). Buildings that are listed in or are eligible for listing in the CRHR would meet CEQA’s definition of a historical resource. The term *built-environment resource* refers to buildings, structures, objects, and districts (National Park Service 1995).

In 2024, Page & Turnbull prepared a historic resource evaluation to evaluate the property for eligibility for listing in the National Register of Historic Places (NRHP) and the CRHR. The City does not currently have a local historic preservation ordinance or local historic register. However, the Project would be subject to the MMRP for the Menlo Park HEU SEIR. The historic resource evaluation was complied with the applicable measure, MMRP CR-1a, to provide an evaluation of eligibility for listing in the NRHP and CRHR.

Page & Turnbull found the building had not been previously listed in the NRHP or CRHR individually or as part of a registered historic district. Furthermore, the building was not listed in the Built-Environment Resource Directory (BERD) database for San Mateo County, meaning the building has not been formally evaluated using California Historical Resource Status Codes in a report submitted to an information center of the California Historical Resources Information System (CHRIS) of the California Office of Historic Preservation. The Project site does not have Menlo Park Historic Site District (H) zoning and does not appear to have been designated in a local historical resource inventory or identified as significant in a qualifying local historical resource survey (Page & Turnbull 2024).

Page & Turnbull's evaluation found that the property is not eligible under any criteria for listing in the NRHP or CRHR. Therefore, the property does not qualify as a historical resource under CEQA, as defined in CEQA Section 21084.1 and State CEQA Guidelines Section 15064.5(a)(3). The Project would not constitute a substantial adverse change in the significance of a historic resource, as defined by CEQA. For these reasons, the exception under State CEQA Guidelines Section 15300.2(f) does not apply to the Project.

Archaeological Resources

An ICF archaeologist conducted a cultural resource records search at the CHRIS Northwest Information Center (NWIC) in Sonoma, California, on October 2, 2025 (NWIC File #25-0554). The NWIC, an affiliate of the Office of Historic Preservation, is the official state repository of cultural resources records and reports for San Mateo County. The purpose was to identify any previously recorded cultural resources that may meet the CEQA definition of a historical resource (PRC Section 21084.1) or unique archaeological resource (PRC Section 21083.2) and intersect the Project site or an area within a 0.25-mile radius of the Project site and may be affected by development within the Project site.

The NWIC record search identified 19 previously conducted cultural studies within a 0.25-mile radius of the Project site (Table 2). Of the 19 previous studies, no cultural studies overlap the Project site.

Table 2. Previously Conducted Cultural Resource Studies within 0.25 mile of the Project Site

Study Number	Author (s)	Year	Title
S-005212	David Chavez	1982	<i>Lane Publishing Company Office Project, Menlo Park, California</i> (letter report)
S-008887	Miley Paul Holman	1985	<i>St. Patrick's Seminary Archaeological Research</i> (letter report)
S-008887a	Miley Paul Holman	1985	<i>Update on Archaeological Research at the St. Patrick's Seminary Site</i>
S-008887b	Miley Paul Holman	1985	<i>Addendum to the Update on Archaeological/Historical Research at the St. Patrick's Seminary Development Site</i> (letter report)
S-008887c	Mary E. Gallagher	1985	<i>Architectural Report: St. Patrick's Gymnasium, Menlo Park, California</i>
S-017839	Suzanne Baker	1995	<i>Archaeological Reconnaissance of the Middlefield Road Bike Lane Project, Menlo Park, California</i>
S-029573	Jonathan Goodrich and John Holson	2000	<i>Final Report, Archaeological Survey and Record Search for the Six Fluor Global Fiber Optic Segments, Mountain View, Palo Alto, and San Mateo County, California</i>
S-033061	Nancy Sikes, Cindy Arrington, Bryon Bass, Chris Corey, Kevin Hunt, Steve O'Neil, Catherine Pruett, Tony Sawyer, Michael Tuma, Leslie Wagner, and Alex Wesson	2006	<i>Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California</i>

68 Willow Road Project CEQA Class 32 Categorical Exemption

April 7, 2026

Page 22 of 25

Study Number	Author (s)	Year	Title
S-033061a		2006	<i>Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project, State of California</i>
S-033061b	Nancy E. Sikes	2007	<i>Final Report of Monitoring and Findings for the Qwest Network Construction Project</i> (letter report)
S-038684	Stacy Kozakavich and Alexandra Merritt-Smith	2008	<i>A Cultural Resources Study for the San Mateo County SMART Corridors Project, San Mateo County, California</i>
S-038684a	Neal Kaptain	2009	<i>Smart Corridors Geoarchaeological Sensitivity Research</i> (letter report)
S-039469	Neal Kaptain	2012	<i>Historical Resources Compliance Report for the San Mateo County SMART Corridors Project, Segment III, Redwood City, Atherton, Menlo Park, East Palo Alto, and Palo Alto, San Mateo County and Santa Clara County, California; EA #4A9201; EFIS #0400001169, Caltrans District 4; SR 82 PM SM 0/4.8; SCL 24.1/26.4; SR 84 PM 24.6/28.7; US 101 PM 0.7/5.5; SR 109 PM 1.10/1.87; SR 114 PM 5.0/5.93</i>
S-039469a	Neal Kaptain	2012	<i>Archaeological Survey Report for the San Mateo County SMART Corridors Project, Segment III, Redwood City, Atherton, Menlo Park, East Palo Alto, and Palo Alto, San Mateo County and Santa Clara County, California; EA #4A9201; EFIS #0400001169; Caltrans District 4; SR 82 PM SM 0/4.8; SCL 24.1/26.4; SR 84 PM 24.6/28.7; US 101 PM 0.7/5.5; SR 109 PM 1.10/1.87; SR 114 PM 5.0/5.93</i>
S-039469b	Neal Kaptain	2012	<i>Post-Review Discovery and Monitoring Plan for the San Mateo County SMART Corridors Project, Segment III, Redwood City, Atherton, Menlo Park, East Palo Alto, and Palo Alto, San Mateo County and Santa Clara County, California; EA #4A9201; EFIS #0400001169, Caltrans District 4; SR 82 PM SM 0/4.8; SCL 24.1/26.4; SR 84 PM 24.6/28.7; US 101 PM 0.7/5.5; SR 109 PM 1.10/1.87; SR 114 PM 5.0/5.93</i>
S-041536	Michael Corbett and Denise Bradley	2001	<i>Final Survey Report, Palo Alto Historical Survey Update, August 1997–August 2000</i>
S-048738	Denise Jurich and Amber Grady	2011	<i>California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, San Francisco to San José Section, Archaeological Survey Report, Technical Report [Draft]</i>
S-048738a	Amber Grady and Richard Brandi	2011	<i>California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, San Francisco to San José Section, Historic Architectural Survey Report, Technical Report [Draft]</i>
S-048738b	Julianne Polanco	2019	<i>RE: High-Speed Rail Program, San Francisco to San José Project Section, Request for Review and Concurrence on Historic Architectural Survey Report</i>

The NWIC records search did not identify any previously recorded precontact or historic-era archaeological resources on the Project site. The record search identified one undefined cultural resource within the 0.25-mile radius of the Project site (Table 3). It is unknown whether the undefined cultural resource is a precontact or historic-era archaeological resource or a built-environment resource.

Table 3. Cultural Resources within 0.25 mile of the Project Site

Resource ID	Archaeological/ Built Environment	Age	Description	NRHP Eligibility
C-432	Unknown	Unknown	Unknown	Unknown

ICF did not identify any archaeological resources within the Project site or within 0.25 mile of the Project site that qualify as historical or unique archaeological resources under CEQA. Despite no previously recorded archaeological resources being identified within the Project site, there is always the possibility that archaeological resources could be encountered during Project construction activities.

In accordance with HEU SEIR Mitigation Measure CR-2b, *Inadvertent Discovery of Cultural Resources*, if unanticipated archaeological resources are encountered during Project construction, all construction activities should be immediately halted within a 100-foot radius until a qualified archaeologist can evaluate the resource and make the proper recommendations. If determined to be a historical or unique archaeological resource pursuant to PRC Section 21083.2, mitigation, such as preservation in place, shall be implemented as feasible. In addition, in accordance with HEU SEIR Mitigation Measure CF-3, *Inadvertent Discovery of Human Remains*, in the event that human remains are identified during Project construction, treatment will conform to the requirements of state law under California Health and Safety Code Section 7050.5 and PRC Section 5097.98. State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner or medical examiner has determined origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be Native American and not under the medical examiner's jurisdiction, within 24 hours, the medical examiner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for the treatment or disposition of the remains and associated artifacts. The MLD shall complete the inspection within 48 hours of notification by the NAHC. Work should be suspended within the immediate vicinity of the human remains until the MLD's recommendations are implemented.

In consideration of the analysis outlined above, the exception under State CEQA Guidelines Section 15300.2(f) does not apply to the Project.

Conclusions

On the basis of the evidence provided in this document, the Project is eligible for a Class 32 categorical exemption, in accordance with Section 15332, Infill Development Projects, of the State CEQA Guidelines. Based on the City of Menlo Park threshold criteria, no additional substantial adverse impacts, beyond those discussed above, are anticipated to occur as a result of the Project. Because the Project meets the criteria for categorically exempt infill development projects, and because it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption under State CEQA Guidelines Section 15332 may be prepared for the Project. No further review is required.

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Mitigation Monitoring or Reporting Program

This Mitigation Monitoring or Reporting Program (MMRP) has been prepared for the proposed Menlo Park General Plan (Land Use & Circulation Elements) and M-2 Area Zoning Update (proposed project). The purpose of the MMRP is to ensure the implementation of mitigation measures identified as part of the environmental review for the proposed project. The MMRP includes the following information:

- The full text of the mitigation measures;
- The party responsible for implementing the mitigation measures;
- The timing for implementation of the mitigation measure;
- The agency responsible for monitoring the implementation; and
- The monitoring action and frequency.

The mitigation measures in this MMRP shall be applied to all future development anywhere in the city unless otherwise specified in the specific mitigation measure. The City of Menlo Park must adopt this MMRP, or an equally effective program, if it approves the proposed project with the mitigation measures that were adopted or made conditions of project approval.

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
Air Quality						
AQ-2a: Prior to issuance of a building permits, all development projects in the city that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines shall prepare and submit to the City's Planning Division a technical assessment evaluating potential project-related operational air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology for assessing air quality impacts. If operational-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the project applicant is required to incorporate mitigation measures into the development project to reduce air pollutant emissions during operation. The identified measures shall be incorporated into all appropriate construction documents, subject to the review and approval of the Planning Division prior to building permit issuance.	Project applicant	During the building permit and site development review process and prior to permit issuance	City of Menlo Park Planning Division	Plan review and approval	Once for the preparation of the technical assessment	Initials: _____ Date: _____
AQ-2b1: Prior to building permit issuance, the City shall require applicants for all development projects in the city to comply with the current Bay Area Air Quality Management District's (BAAQMD) basic control measures for reducing construction emissions of PM10 (Table 8-1, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).	Project applicant	During the building permit and site development review process and prior to permit issuance	City of Menlo Park Planning Division	Plan review and approval	Prior to approval and during scheduled site visits	Initials: _____ Date: _____
AQ-2b2: Prior to issuance of a building permit, development projects in the City that are subject to CEQA and exceed the screening sizes in the BAAQMD's CEQA Guidelines shall prepare and submit to the City of Menlo Park a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as	Project applicant	During the building permit and site development review process and prior to permit issuance	City of Menlo Park Planning Division	Plan review and approval	Once for the preparation of the technical assessment	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
identified in the BAAQMD CEQA Guidelines, the project applicant is required to incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds (e.g., Table 8-2, Additional Construction Mitigation Measures Recommended for projects with Construction Emissions Above the Threshold of the BAAQMD CEQA Guidelines, or applicable construction mitigation measures subsequently approved by BAAQMD). These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans), subject to the review and approval of the Planning Division prior to building permit issuance.						
AQ-3a: As part of the discretionary review process for development applications, applicants for all non-residential projects within the City that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City's Planning Division. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), PM2.5 concentrations exceed 0.3 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. Mitigation measures may include but are not limited to: - Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. - Electrifying warehousing docks.	Project applicant	During the building permit and site development review process and prior to permit issuance	City of Menlo Park Planning Division	Plan review and approval	Once for the preparation of the HRA	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
- Requiring use of newer equipment and/or vehicles. - Restricting off-site truck travel through the creation of truck routes. Mitigation measures identified in the project-specific HRA shall be incorporated into the site development plan as a component of a proposed project, subject to the review and approval of the Community Development Department.						
AQ-3b: As part of the discretionary review process, applicants for all residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) anywhere in the City within 1,000 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City's Planning Division. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM2.5 concentrations exceed 0.3 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to: - Air intakes located away from high volume roadways and/or truck loading zones. - Heating, ventilation, and air conditioning systems of the	Project applicant	During the building permit and site development review process and prior to permit issuance	City of Menlo Park Planning Division	Plan review and approval	Once for the preparation of the HRA	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
buildings provided with appropriately sized maximum efficiency rating value (MERV) filters. Measures identified in the HRA shall be incorporated into the site development plan as a component of the proposed project subject to the review and approval of the Community Development Department. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City, subject to the review and approval of the Community Development Department.						
AQ-5: Implementation of Mitigation Measures AQ-2a through AQ-3b.						Initials: _____ Date: _____
Biological Resources						
BIO-1: As part of the discretionary review process for development projects, new construction and building additions regardless of size, in addition to appropriate CEQA review, the City shall require all project applicants to prepare and submit project-specific baseline biological resources assessments (BRA) if the project would occur on or adjacent to a parcel containing natural habitat with features such as mature and native trees, unused structures that could support special-status bat species, other sensitive biological resources, and/or active nests of common birds protected under the Migratory Bird Treaty Act (MBTA). Sensitive biological resources triggering the need for the baseline BRA shall include: wetlands, occurrences or suitable habitat for special-status species, sensitive natural communities, and important movement corridors for wildlife such as creek corridors and shorelines. The baseline BRA shall be prepared by a qualified biologist. The baseline BRA shall provide a determination on whether any sensitive biological resources are present on the site, including jurisdictional wetlands and waters, essential habitat for special-	Project applicant	During the building permit and site development review process and prior to permit issuance	A qualified biologist approved by the City of Menlo Park Planning Division	Plan review and approval	Once for the preparation of a biological assessment and again, if determined further assessment is required as specified in this mitigation measure	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
status species, and sensitive natural communities. If jurisdictional wetlands and/or waters are suspected to be present on the site, a jurisdictional delineation confirmed by the U.S. Army Corps of Engineers (USACE) will be provided as part of the baseline BRA. The baseline BRA shall also include consideration of possible sensitive biological resources on any adjacent undeveloped lands that could be affected by the project, and lands of the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge). The baseline BRA shall incorporate guidance from relevant regional conservation plans, including, but not limited to, the then current Don Edwards San Francisco Bay National Wildlife Refuge Comprehensive Conservation Plan, South Bay Salt Pond Restoration Project, Tidal Marsh Recovery Plan and the United States Fish and Wildlife Service (USFWS) Recovery Plan for the Pacific Coast Population of the Western Snowy Plover, for determining the potential presence or absence of sensitive biological resources; however, the presence or absence of sensitive biological resources will be determined by on-site surveys. If the adjacent property is the Refuge, Refuge staff shall be contacted regarding the presence or absence of sensitive biological resources. If sensitive biological resources are determined to be present on the site or may be present on any adjacent parcel containing natural habitat, coordination with the appropriate regulatory and resource agencies must occur. Appropriate measures, such as preconstruction surveys, establishing no-disturbance zones and restrictive time periods during construction, protective development setbacks and restrictions, and applying bird-safe building design practices and materials, shall be developed by the qualified biologist in consultation with the regulatory and resource agencies to provide adequate avoidance, or provide						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
compensatory mitigation if avoidance is infeasible. With respect to fully protected species, if the BRA for any development project determines that any of the following Fully Protected Species are present, then neither take of such species will be permitted nor will mitigation measures including species collection or relocation. The Fully Protected Species include American Peregrine Falcon (<i>Falco peregrinus anatum</i>), California Black Rail (<i>Laterallus jamaicensis coturniculus</i>), California Clapper Rail - Ridgway's Rail (<i>Rallus longirostris obsoletus</i>) , California Least Tern (<i>Sterna albifrons browni</i>), White-tailed Kite (<i>Elanus leucurus</i>), Salt-marsh harvest mouse (<i>Reithrodontomys raviventris</i>), and San Francisco garter snake (<i>Thamnophis sirtalis tetrataenia</i>). The qualified biologist shall consult with the Refuge management and where appropriate, the Endangered Species Office of the USFWS, the National Marine Fisheries Service (NMFS), and California Department of Fish and Wildlife (CDFW) for determining the potential presence or absence of sensitive biological resources and appropriate avoidance or compensatory mitigation measures, if required. Where jurisdictional waters or federally and/or State-listed special-status species would be affected, appropriate authorizations (i.e., the USACE, San Francisco Bay Regional Water Quality Control Board (RWQCB), San Francisco Bay Conservation and Development Commission (BCDC), USFWS, NMFS, Refuge and CDFW), shall be obtained by the project applicant, and evidence of such authorization provided to the City prior to issuance of grading or other construction permits. For sites that are adjacent to undeveloped lands with federally and/or State-listed special status species, or sensitive habitats, or lands of the Refuge, the BRA shall include evaluation of the potential effects of:						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
▪ additional light, ▪ glare, ▪ shading (i.e., shadow analysis), ▪ noise, ▪ urban runoff, ▪ water flow disruption, ▪ water quality degradation/sedimentation, ▪ attraction of nuisance species/predators (e.g., attraction to refuse) and their abatement (e.g., adverse impacts of rodenticides), ▪ and pesticides, generated by the project, as well as the possibility for increased activity from humans and/or domesticated pets and their effects on the nearby natural habitats. The BRA shall include proposed avoidance, minimization, and mitigation of these adverse impacts. The City of Menlo Park Planning Division may require an independent peer review of the adequacy of the baseline BRA as part of the review of the project to confirm its adequacy. Mitigation measures identified in the project-specific BRA shall be incorporated as a component of a proposed project and subsequent building permit, subject to the review and approval of the Community Development Department and the appropriate regulatory and resource agencies. The following zoning regulations enacted by ordinances (including but not limited to 16.43 O-Office District, 16.43.080 Corporate housing, 16.43.140 Green and sustainable building; 16.44 LS-Life Science District, 16.44.130 Green and sustainable building) to minimize impacts to biological resources are incorporated by reference into this mitigation measure and shall be a component of the project building permits:						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
1. Setbacks (A) Minimum of two hundred (200) feet from the waterfront; waterfront is defined as the top of the levee. 2. Waterfront and Environmental Considerations. The following provisions are applicable when the property is adjacent to the waterfront or other sensitive habitat. a. Non-emergency lighting shall be limited to the minimum necessary to meet safety requirements and shall provide shielding and reflectors to minimize light spill and glare and shall not directly illuminate sensitive habitat areas. Incorporate timing devices and sensors to ensure night lighting is used only when necessary. b. Landscaping and its maintenance shall not negatively impact the water quality, native habitats, or natural resources. c. Pets shall not be allowed within the corporate housing due to their impacts on water quality, native habitats, and natural resources. 3. Bird-friendly design. a. No more than ten percent (10%) of façade surface area shall have non-bird- friendly glazing. b. Bird- friendly glazing includes, but is not limited to opaque glass, covering the outside surface of clear glass with patterns, paned glass with fenestration, frit or etching patterns, and external screens over nonreflective glass. Highly reflective glass is not permitted. c. Occupancy sensors or other switch control devices shall be installed on non-emergency lights and shall be programmed to shut off during non-work hours and between 10 PM and sunrise.						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
d. Placement of buildings shall avoid the potential funneling of flight paths towards a building façade. e. Glass skyways or walkways, freestanding (see-through) glass walls and handrails, and transparent building corners shall not be allowed. f. Transparent glass shall not be allowed at the rooflines of buildings, including in conjunction with roof decks, patios and green roofs. g. Use of rodenticides shall not be allowed. If it is determined through the BRA or CEQA review that further assessment/monitoring/reporting is required by appropriate regulatory or resource agencies, it shall be the responsibility of the City to ensure all project requirements are implemented.						
Cultural Resources						
CULT-1: At the time that individual projects are proposed on any site citywide with a building more than 50 years old or any site adjoining a property with a building more than 50 years old, the City shall require the project applicant to prepare a site-specific evaluation to determine if the project is subject to completion of a site-specific historic resources study. If it is determined that a site-specific historic resources study is required, the study shall be prepared by a qualified architectural historian meeting the Secretary of the Interior's Standards for Architecture or Architectural History. At a minimum, the study shall consist of a records search of the California Historical Resources Information System, an intensive-level pedestrian field survey, an evaluation of significance using standard National Register Historic Preservation and California Register Historic Preservation evaluation criteria, and recordation of all identified historic buildings and structures on California Department of Parks and Recreation 523 Site Record forms. The study shall describe the historic context and setting, methods used in the investigation, results of the evaluation, and	Project applicant	During the building permit and site development review process and prior to permit issuance	Qualified archeologist approved by the City of Menlo Park Planning Division	Plan review and approval	Once at time of preliminary assessment and again, if determined further assessment is required as specified in this mitigation measure	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
recommendations for management of identified resources. If applicable, the specific requirements for inventory areas and documentation format required by certain agencies, such as the Federal Highway Administration and California Department of Transportation (Caltrans), shall be adhered to. If the project site or adjacent properties are found to be eligible for listing on the California Register, the project shall be required to conform to the current <i>Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Restoring Historic Buildings</i>, which require the preservation of character defining features which convey a building's historical significance, and offers guidance about appropriate and compatible alterations to such structures.						
CULT-2a: If a potentially significant subsurface cultural resource is encountered during ground disturbing activities on any parcel in the city, all construction activities within a 100-foot radius of the find shall cease until a qualified archeologist determines whether the resource requires further study. All developers in the study area shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of the California Environmental Quality Act (CEQA) criteria by a qualified archeologist. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to the City of Menlo Park, Northwest Information Center (NWIC), and State Historic	Project applicant	During construction	Qualified archaeologist approved by the City of Menlo Park Planning Division	Initiated after a find is made during construction	During regularly scheduled site inspections that would be initiated after a find is made during construction	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
Preservation Office (SHPO), if required.						
CULT-2b: As part of the City's application approval process and prior to project approval, the City shall consult with those Native American Tribes with ancestral ties to the Menlo Park city limits regarding General Plan Amendments in the city and land use policy changes. Upon receipt of an application for proposed project that requires a General Plan Amendment or a land use policy change, the City shall submit a request for a list of Native American Tribes to be contacted about the proposed project to the Native American Heritage Commission (NAHC). Upon receipt of the list of Native American Tribes from the NAHC, the City shall submit a letter to each Tribe on the provided list requesting consultation with the Native American Tribe about the proposed project via the City's preferred confirmation of receipt correspondence tracking method (e.g., Federal Express, United States Postal Service Certified Mail, etc.).	The City of Menlo Park	During the project approval process	The City of Menlo Park Planning Division in conjunction with Native American Tribes with ancestral ties to the Menlo Park city limits	Initiated once Native American Tribes request consultation	To be determined by consulting parties	Initials: _____ Date: _____
CULT-3: In the event that fossils or fossil bearing deposits are discovered during ground disturbing activities anywhere in the city, excavations within a 50-foot radius of the find shall be temporarily halted or diverted. Ground disturbance work shall cease until a City-approved qualified paleontologist determines whether the resource requires further study. The paleontologist shall document the discovery as needed (in accordance with Society of Vertebrate Paleontology standards [Society of Vertebrate Paleontology 1995]), evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The excavation plan shall be submitted to the City of Menlo Park for review and	Project applicant	During construction	Qualified paleontologist approved by the City of Menlo Park Planning Division	Initiated after a find is made during construction	During regularly scheduled site inspections initiated after a find is made during construction	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
approval prior to implementation, and all construction activity shall adhere to the recommendations in the excavation plan.						
CULT-4: Procedures of conduct following the discovery of human remains citywide have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The San Mateo County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.	Project applicant	During construction	The San Mateo County Coroner	Initiated after a find is made during construction	During regularly scheduled site inspections initiated after a find is made during construction	Initials: _____ Date: _____
Greenhouse Gas Emissions						
GHG-1: Prior to January 1, 2020, the City of Menlo Park shall update the Climate Action Plan (CAP) to address the GHG reduction goals of Executive Order B-30-15 and Executive Order S-03-05 for GHG sectors that the City has direct or indirect jurisdictional control over. The City shall identify a GHG emissions reduction target for year 2030 and 2040 that is consistent with the GHG reduction goals identified in Executive Order B-30-15 and	City of Menlo Park	Prior to January 1, 2020	City of Menlo Park Planning Division	Update the Climate Action Plan (CAP)	Once for update to the CAP	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
Executive Order S-03-05. The CAP shall be updated to include measures to ensure that the City is on a trajectory that aligns with the state's 2030 GHG emissions reduction target.						
GHG-2: Implement of Mitigation Measure GHG-1.						
Hazards and Hazardous Materials						
HAZ-4a: Construction at the sites of any site in the City with known contamination, shall be conducted under a project-specific Environmental Site Management Plan (ESMP) that is prepared in consultation with the Regional Water Quality Control Board (RWQCB) or the Department of Toxic Substances Control (DTSC), as appropriate. The purpose of the ESMP is to protect construction workers, the general public, the environment, and future site occupants from subsurface hazardous materials previously identified at the site and to address the possibility of encountering unknown contamination or hazards in the subsurface. The ESMP shall summarize soil and groundwater analytical data collected on the project site during past investigations; identify management options for excavated soil and groundwater, if contaminated media are encountered during deep excavations; and identify monitoring, irrigation, or other wells requiring proper abandonment in compliance with local, State, and federal laws, policies, and regulations. The ESMP shall include measures for identifying, testing, and managing soil and groundwater suspected of or known to contain hazardous materials. The ESMP shall: 1) provide procedures for evaluating, handling, storing, testing, and disposing of soil and groundwater during project excavation and dewatering activities, respectively; 2) describe required worker health and safety provisions for all workers potentially exposed to hazardous materials in accordance with State and federal worker safety regulations; and 3) designate personnel responsible for implementation of the ESMP.	Project applicant	During the building permit and site development review process and prior to permit issuance	The appropriate "Oversight Agency" designated by the City of Menlo Park Planning Division	Plan review and approval	Prior to construction and during regularly scheduled site inspections	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
HAZ-4b: For those sites throughout the city with potential residual contamination in soil, gas, or groundwater that are planned for redevelopment with an overlying occupied building, a vapor intrusion assessment shall be performed by a licensed environmental professional. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into an occupied building, project design shall include vapor controls or source removal, as appropriate, in accordance with regulatory agency requirements. Soil vapor mitigations or controls could include vapor barriers, passive venting, and/or active venting. The vapor intrusion assessment and associated vapor controls or source removal can be incorporated into the ESMP (Mitigation Measure HAZ-4a).	Project applicant	During the building permit and site development review process and prior to permit issuance	Licensed environmental professional in accordance with RWQCB, DTSC, and SMCEHD approved by the City of Menlo Park Planning Division	Plan review and approval	Prior to construction and during regularly scheduled site inspections	Initials: _____ Date: _____
Land Use Planning						
LU-2: As part of the discretionary review process for development projects, all proposed development anywhere in Menlo Park is required to demonstrate consistency with the applicable goals, policies, and programs in the General Plan and the supporting Zoning standards to the satisfaction of the City of Menlo Park's Community Development Department. A future project is consistent with the General Plan and Zoning standards if, considering all its aspects, it will further the goals, policies and programs of the General Plan and supporting Zoning standards and not obstruct their attainment.	Project applicant	During the building permit and site development review process and prior to permit issuance	City of Menlo Park Planning Division	Plan review and approval	Once prior to plan review and approval	Initials: _____ Date: _____
Noise						
NOISE-1a: To meet the requirements of Title 24 and General Plan Program N1.A, project applicants shall perform acoustical studies prior to issuance of building permits for citywide development of new noise-sensitive uses. New residential dwellings, hotels, motels, dormitories, and school classrooms must meet an interior noise limit of 45 dBA CNEL or L_{dn} . Developments in areas exposed to more than 60 dBA CNEL must demonstrate that the structure	Project applicant	Prior to the issuance of construction permits	City of Menlo Park Planning Division	Plan review and approval	Once for preparation of acoustical studies as outlined in the mitigation measure	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
has been designed to limit interior noise in habitable rooms to acceptable noise levels. Where exterior noise levels are projected to exceed 60 dBA CNEL or L_{dn} at the façade of a building, a report must be submitted with the building plans describing the noise control measures that have been incorporated into the design of the project to meet the 45 dBA noise limit. Project applicants for all new multi-family residential projects subject to the review and approval of the Community Development Department, prior to building permit issuance, must perform acoustical studies within the projected L_{dn} 60 dB noise contours, so that noise mitigation measures can be incorporated into project design and site planning, subject to the review and approval of the Community Development Department.						
NOISE-1b: Stationary noise sources and landscaping and maintenance activities citywide shall comply with Chapter 8.06, Noise, of the Menlo Park Municipal Code.	Project applicant	Prior to the issuance of construction permits	City of Menlo Park Planning Division	Plan review and approval	During construction	Initials: _____ Date: _____
NOISE-1c: Project applicants for all development projects in the city shall minimize the exposure of nearby properties to excessive noise levels from construction-related activity through CEQA review, conditions of approval and/or enforcement of the City's Noise Ordinance. Prior to issuance of demolition, grading, and/or building permits for development projects, a note shall be provided on development plans indicating that during on-going grading, demolition, and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise: - Construction activity is limited to the daytime hours between 8:00 a.m. to 6:00 p.m. on Monday through Friday, as prescribed in the City's municipal code. - All internal combustion engines on construction equipment and trucks are fitted with properly maintained mufflers, air intake silencers, and/or engine shrouds that are no less	Project applicant	Prior to the issuance of construction permits	City of Menlo Park Planning Division	Plan review and approval	During construction	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
effective than as originally equipped by the manufacturer. - Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. - Stockpiling is located as far as feasible from nearby noise-sensitive receptors. - Limit unnecessary engine idling to the extent feasible. - Limit the use of public address systems. - Construction traffic shall be limited to the haul routes established by the City of Menlo Park.						
NOISE-2a: To prevent architectural damage citywide as a result of construction-generated vibration: - Prior to issuance of a building permit for any development project requiring pile driving or blasting, the project applicant/developer shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. The maximum levels shall not exceed 0.2 inch/second, which is the level that can cause architectural damage for typical residential construction. If maximum levels would exceed these thresholds, alternative methods such static rollers, non-explosive blasting, and drilling piles as opposed to pile driving shall be used To prevent vibration-induced annoyance as a result of construction-generated vibration: - Individual projects that involve vibration-intensive construction activities, such as blasting, pile drivers, jack hammers, and vibratory rollers, within 200 feet of sensitive receptors shall be evaluated for potential vibration impacts. A vibration study shall be conducted for individual projects where vibration-intensive impacts may occur. The study shall be prepared by an acoustical or vibration engineer holding a degree in engineering, physics, or allied discipline and who is able to demonstrate a minimum of two years of experience in	Project applicant	Prior to the issuance of construction permits	City of Menlo Park Planning Division	Plan review and approval	During construction	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
preparing technical assessments in acoustics and/or groundborne vibrations. The study is subject to review and approval of the Community Development Department. Vibration impacts to nearby receptors shall not exceed the vibration annoyance levels (in RMS inches/second) as follows: - Workshop = 0.126 - Office = 0.063 - Residential Daytime (7AM–10PM)= 0.032 - Residential Nighttime (10PM to 7 AM) = 0.016 If construction-related vibration is determined to be perceptible at vibration-sensitive uses, additional requirements, such as use of less-vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., nonexplosive blasting methods, drilled piles as opposed to pile driving, preclusion for using vibratory rollers, use of small- or medium-sized bulldozers, etc.). Vibration reduction measures shall be incorporated into the site development plan as a component of the project and applicable building plans, subject to the review and approval of the Community Development Department.						
NOISE-2b: To reduce long-term vibration impacts of future development citywide on existing or potential future sensitive uses: - Locate sensitive uses away from vibration sources. - Design industrial development to minimize vibration impacts on nearby uses. Where vibration impacts may occur, reduce impacts on residences and businesses through the use of setbacks and/or structural design features that reduce vibration to levels at or below the guidelines of the Federal Transit Administration near rail lines and industrial uses. - Work with the railroad operators (e.g., Caltrain, Union Pacific, etc.) to reduce, to the extent possible, the contribution of railroad train noise and vibration to Menlo Park's noise environment.	Project applicant	Prior to the issuance of construction permits	City of Menlo Park Planning Division	Plan review and approval	Once prior to plan review and approval	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
Transportation and Circulation						
TRANS-1a: Widen impacted roadway segments at appropriate locations throughout the city to add travel lanes and capacity to accommodate the increase in net daily trips.	City of Menlo Park	Ongoing	City of Menlo Park Transportation Division	Ongoing	Ongoing	Initials: _____ Date: _____
TRANS-1b: The City of Menlo Park shall update the existing Transportation Impact Fee (TIF) program to guarantee funding for citywide roadway and infrastructure improvements that are necessary to mitigate impacts from future projects based on the then current City standards. The fees shall be assessed when there is new construction, an increase in square footage in an existing building, or the conversion of existing square footage to a more intensive use. The fees collected shall be applied toward circulation improvements. The fees shall be calculated by multiplying the proposed square footage, dwelling unit, or hotel room by the appropriate rate. Transportation Impact fees shall be included with any other applicable fees payable at the time the building permit is issued. The City shall use the Transportation Impact Fees to fund construction (or to recoup fees advanced to fund construction) of the transportation improvements identified below, among other things that at the time of potential future development may be warranted to mitigate traffic impacts. It should be noted that any project proposed prior to the adoption of an updated TIF will be required to conduct a project-specific Transportation Impact Assessment to determine the impacts and necessary transportation mitigations that are to be funded by that project.	City of Menlo Park	Ongoing	City of Menlo Park Transportation Division	Ongoing	Ongoing	Initials: _____ Date: _____
As part of the update to the TIF program, the City shall also prepare a "nexus" study that will serve as the basis for requiring development impact fees under Assembly Bill (AB) 1600 legislation, as codified by California Code Government Section 66000 et seq., to support implementation of the proposed						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
project. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the improvements and facilities required to mitigate the impacts of new development pursuant to the proposed project. The following examples of improvements and facilities would reduce impacts to acceptable level of service standards and these, among other improvements, could be included in the TIF program impact fees nexus study: ▪ Sand Hill Road (westbound) and I-280 Northbound On-ramp (#1): Modify the signal-timing plan during the PM peak hour to increase the maximum allocation of green time to the westbound approach during the PM peak hour. ▪ Sand Hill Road (eastbound) and I-280 Northbound Off-ramp (#2): Add an additional northbound right-turn lane on the off-ramp to improve operations to acceptable LOS D during the AM peak hour. ▪ El Camino Real and Ravenswood Avenue (#28): One eastbound right-turn lane on Menlo Avenue to improve conditions. ▪ Willow Road and Newbridge Street (#33): Implement measures on Chilco Street south of Constitution Drive to reduce or prevent cut-through traffic through the Belle Haven neighborhood, such as peak-hour turn restrictions from Constitution Drive to southbound Chilco Street, and measures to enhance east/west circulation from Willow Road via O'Brien Drive and the proposed mixed-use collector street opposite Ivy Drive, extending east to University Avenue, to discourage use of Newbridge Street. ▪ Willow Road and Hamilton Avenue (#36): Provide primary access to potential future development sites east of Willow Road via O'Brien Drive and/or the proposed Mixed-Use Collector that would intersect Willow Road between Hamilton Avenue and O'Brien Drive. Implement measures on Chilco Street south of Constitution Drive to prevent cut-through						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
traffic through the Belle Haven neighborhood, such as peak-hour turn restrictions from Constitution Drive to southbound Chilco Street. Although the provision of an eastbound left-turn lane on Hamilton Avenue where it approaches Willow Road would reduce the delay, this potential mitigation is not recommend because it would encourage cut-through traffic via Chilco Street and Hamilton Avenue, potentially affecting the Belle Haven neighborhood. Therefore, to avoid facilitating the use of Chilco Street and Hamilton Avenue as cut-through routes in the adjacent residential neighborhood, mitigating this traffic impact is not recommended at this time, consistent with City policies that discourage cut-through traffic in residential neighborhoods. The improvements should be incorporated into the updated fee program for ongoing consideration. ▪ Bayfront Expressway and Willow Road (#37): Evaluate the potential for grade separation to allow conflicting movements to occur simultaneously. The evaluation must consider traffic improvements, along with potential secondary impacts caused by potential right-of-way acquisition, impacts to adjacent wetlands and the Dumbarton Rail corridor, as well as potential impacts or benefits for multi-modal accommodation. If found feasible, the updated fee program should incorporate fair-share contributions from future development towards grade separation. ▪ Bayfront Expressway and University Avenue (#38): Evaluate the potential for grade separation to allow conflicting movements to occur simultaneously. The evaluation must consider traffic improvements, along with potential secondary impacts caused by potential right-of-way acquisition, impacts to adjacent wetlands and the Dumbarton Rail corridor, as well as potential impacts or benefits for multi-modal accommodation. If found feasible, the updated fee program should incorporate fair-share contributions from future development towards grade separation.						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
▪ Chilco Street and Constitution Drive (#45): Install a traffic signal and signalized crosswalks at the intersection. Construct three southbound lanes on the one-block segment of Chilco Street, between Bayfront Expressway and Chilco Street, to include two southbound left-turn lanes to accommodate the volume of left-turning vehicles entering the project site. In addition, during the AM peak hour, provide a “split-phase” signal operation on Chilco Street. Construct a northbound left-turn lane on Chilco Street approaching Constitution Drive. Construct two outbound lanes on Chilco Street between Constitution Drive and Bayfront Expressway. If the Facebook Campus Expansion Project is approved, this mitigation measure would be required to be constructed as a requirement of that project. ▪ Chrysler Drive and Constitution Drive (#46): Construct a southbound left-turn on Chrysler Drive, approaching Constitution Drive. ▪ University Avenue and Adams Drive (#47): Install a traffic signal at this intersection. ▪ University Avenue and Bay Road (#51): Realign the eastbound and westbound approaches to allow replacement of the east/west “split-phase” signal on Bay Street with standard protected signal phases in order to allow eastbound and westbound pedestrian crossings to occur simultaneously, which would allow for an increase in green time allocated to northbound/southbound movements on University Avenue and reduce peak-hour delay at this intersection. This intersection is located in the City of East Palo Alto and under the control of Caltrans. If this measure is found feasible by the City of East Palo Alto, the improvements should be incorporated into the City of Menlo Park’s updated fee program to collect fair-share contributions from future development towards such improvements. ▪ University Avenue and Donohoe Street (#54): Mitigating this						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
impact would require providing additional westbound lane capacity on Donohoe Street, including an extended dual left-turn pocket, dedicated through lane, and dual right-turn lanes; providing a southbound right-turn lane on University Avenue and lengthening the northbound turn pockets. However, this mitigation is likely to be infeasible given right-of-way limitations, proximity to existing US 101 on- and off-ramps, and adjacent properties. In addition, this intersection is located in the City of East Palo Alto and under the control of Caltrans. If this measure is found feasible by the City of East Palo Alto, the improvements should be incorporated into the City of Menlo Park's updated fee program to collect fair-share contributions from future development towards such improvements. ▪ University Avenue and US 101 Southbound Ramps (#56): Mitigating this impact would require modifications to the US 101 Southbound On/Off Ramps and at this location. This intersection is located in the City of East Palo Alto and under the control of Caltrans. If this measure is found feasible by the City of East Palo Alto, the improvements should be incorporated into the City of Menlo Park's updated fee program to collect fair-share contributions from future development towards such improvements. ▪ Chilco Street and Hamilton Avenue (#60): Installation of a traffic signal would mitigate this impact to less than significant levels, but would have the undesirable secondary effect of encouraging the use of Chilco Street as a cut-through route, which conflicts with City goals that aim to reduce cut-through traffic in residential neighborhoods. Therefore, to avoid facilitating cut-through traffic, mitigating this traffic impact by increasing capacity is not recommended at this time, but should be incorporated into the updated fee program for ongoing consideration.						
TRANS-6a: The City of Menlo Park shall update the Transportation Impact Fee (TIF) program to provide funding for citywide bicycle	City of Menlo Park	Ongoing	City of Menlo Park	Ongoing	Ongoing	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
and pedestrian facilities that are necessary to mitigate impacts from future projects based on the then current City standards. The fees shall be assessed when there is new construction, an increase in square footage in an existing building, or the conversion of existing square footage to a more intensive use. The fees collected shall be applied toward improvements that will connect development sites within the area circulation system, including the elimination of gaps in the citywide pedestrian and bicycle network. The fees shall be calculated by multiplying the proposed square footage, dwelling unit, or hotel room by the appropriate rate. Transportation Impact fees shall be included with any other applicable fees payable at the time the building permit is issued. The City shall use the transportation Impact fees to fund construction (or to recoup fees advanced to fund construction) of the transportation improvements identified in this mitigation measure, among other things that at the time of potential future development may be warranted to mitigate traffic impacts. It should be noted that any project proposed prior to the adoption of an updated TIF will be required to conduct a project-specific Transportation Impact Assessment to determine the impacts and necessary pedestrian or bicycle facilities mitigations that are to be funded by that project. As part of the update to the TIF program, the City shall also prepare a "nexus" study that will serve as the basis for requiring development impact fees under Assembly Bill (AB) 1600 legislation, as codified by California Code Government Section 66000 et seq., to support implementation of the proposed project. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the bicycle and pedestrian improvements and facilities required to mitigate the traffic impacts of new development pursuant to the proposed project. The following examples of pedestrian and bicycle improvements would reduce impacts to acceptable standards,			Transportation Division			

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
and these, among others improvements, could be included in the updated TIF program, also described under TRANS-1: US 101 Pedestrian & Bicycle Overcrossing at Marsh Road, and Marsh Road Corridor Pedestrian & Bicycle Improvements (Haven Avenue to Marsh Road/Bay Road): Provide pedestrian and bicycle circulation between the Bayfront Area east of US 101 with the area circulation system west of US 101 along Marsh Road, including access to schools and commercial sites west of Marsh Road that are accessed via Bay Road and Florence Street. Improvements should facilitate pedestrian and bicycle circulation between Haven Avenue and across US 101 near Marsh Road. The recommended improvement would include a dedicated pedestrian and bicycle crossing adjacent to Marsh Road. Alternatively, the provision of continuous sidewalks with controlled pedestrian crossings and Class IV protected bicycle lanes on the Marsh Road overpass, if feasible, could mitigate this impact. Ringwood Avenue Corridor Pedestrian & Bicycle Improvements (Belle Haven to Middlefield Road): Eliminate pedestrian and bicycle facility gaps on primary access routes to the Ringwood Avenue bicycle/pedestrian overcrossing of US 101 (located near the terminus of Ringwood Avenue and Market Place). Improvements should include complete sidewalks on the north side of Pierce Road and bicycle facility improvements on the proposed Ringwood Avenue-Market Place-Hamilton Avenue bicycle boulevard (see Street Classification Map in Chapter 3, Project Description). These improvements would also enhance pedestrian and bicycle access to Menlo-Atherton High School. University Avenue Pedestrian Improvements: Eliminate gaps in the sidewalk network on those portions of University Avenue that are within the Menlo Park City limits. The TIF Program should also include a contribution towards elimination of sidewalk gaps outside the City limits (within the City of East Palo Alto) to ensure that continuous sidewalks are provided on						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
the west University Avenue between Adams Drive and the Bay Trail, located north of Purdue Avenue. Willow Road Bikeway Corridor (Bayfront Expressway to Alma Street): Provide a continuous bikeway facility that eliminates bicycle lane gaps, provides Class IV bicycle lanes on the US 101 overpass and where Willow Road intersects US 101 northbound and southbound ramps, and upgrades existing Class II bicycle lanes to Class IV protected bicycle lanes where feasible, particularly where the speed limit exceeds 35 miles per hour (mph). Willow Road Pedestrian Crossings (Bayfront Expressway to Newbridge Street): Provide enhanced pedestrian crossings of Willow Road at Hamilton Avenue, Ivy Drive (including proposed new street connection opposite Ivy Drive), O'Brien Drive and Newbridge Street. Enhanced crossings should include straightened crosswalks provided on each leg, high visibility crosswalk striping, accessible pedestrian signals, and pedestrian head-start signal timing (leading pedestrian intervals) where feasible. These enhanced crossings would provide improved access between the Belle Haven neighborhood and potential future development between Willow Road and University Avenue. Dumbarton Corridor Connections: Through separate projects, Samtrans is currently considering the potential for a bicycle/pedestrian shared-use trail along the Dumbarton Corridor right-of-way between Redwood City and East Palo Alto, through Menlo Park. If found feasible, the City's TIF Program should incorporate walking and bicycling access and connections to the proposed trail, including a potential rail crossing between Kelly Park and Onetta Harris Community Center and Chilco Street and pedestrian and bicycle improvements on streets that connect to the Dumbarton Corridor: Marsh Road, Chilco Street, Willow Road, and University Avenue.						

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
TRANS-6b: The City of Menlo Park shall update the existing Shuttle Fee program to guarantee funding for citywide operations of City-sponsored shuttle service that is necessary to mitigate impacts from future projects based on the then current City standards. The fees shall be assessed when there is new construction, an increase in square footage in an existing building, or the conversion of existing square footage to a more intensive use. The fees collected shall be applied toward circulation improvements and right-of-way acquisition. The fees shall be calculated by multiplying the proposed square footage, dwelling unit, or hotel room by the appropriate rate. Shuttle fees shall be included with any other applicable fees payable at the time the building permit is issued. The City shall use the Shuttle fees to fund operations of City-sponsored shuttle service to meet the increased demand. As part of the update to the Shuttle Fee program, the City shall also prepare a "nexus" study that will serve as the basis for requiring development impact fees under Assembly Bill (AB) 1600 legislation, as codified by California Code Government Section 66000 et seq., to support implementation of the proposed project. The established procedures under AB 1600 require that a "reasonable relationship" or nexus exist between the transit improvements and facilities required to mitigate the transit impacts of new development pursuant to the proposed project. The types of transit-related improvements and facilities that would reduce impacts to acceptable standards including increasing the fleet of City-sponsored Shuttles and adding additional transit stop facilities within one-quarter mile from residential and employment centers These, among other improvements, could be included in the Shuttle Fee program impact fees nexus study.	City of Menlo Park	Ongoing	City of Menlo Park Transportation Division	Ongoing	Ongoing	Initials: _____ Date: _____
TRANS-6c: The City should continue to support the Dumbarton Corridor Study, evaluating the feasibility of providing transit service to the existing rail corridor and/or operational	City of Menlo Park	Ongoing	City of Menlo Park Transportation	Ongoing	Ongoing	Initials: _____ Date: _____

MITIGATION MONITORING OR REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
improvements to Bayfront Expressway, Marsh Road and Willow Road, such as a dedicated high-occupancy vehicle (HOV) lane, bus queue-jump lanes, or transit-signal priority that could reduce travel time for current bus operations.			Division			
Utilities and Service Systems						
UTIL-10: The City shall continue its reduction programs and diversion requirements in an effort to further reduce solid waste that is diverted to the landfill and lower its per capita disposal rate citywide. In addition, the City shall monitor solid waste generation volumes in relation to capacities at receiving landfill sites to ensure that sufficient capacity exists to accommodate future growth. The City shall ensure any waste management firm it contracts with has access to a new landfill site(s) to replace the Ox Mountain landfills, at such time that this landfill is closed.	City of Menlo Park	Ongoing	City of Menlo Park Planning Division	Ongoing	Ongoing	Initials: _____ Date: _____

CHAPTER 4

Mitigation Monitoring and Reporting Program

4.1 Purpose of this Document

This chapter contains the Mitigation Monitoring and Reporting Program (MMRP) prepared in compliance with Public Resources Code Section 21081.6(a). The MMRP will be considered for adoption by the Planning Commission and/or the City Council and will aid the City in its implementation and monitoring of measures included in the Draft SEIR and adopted by the Commission and/or City Council.

**CITY OF MENLO PARK HOUSING ELEMENT UPDATE
MITIGATION MONITORING AND REPORTING PROGRAM**

	Implemented By	When Implemented	Monitored By	Verified By
Air Quality				
Mitigation Measure AQ-2: Emission Reduction Measures. The following mitigation measures are recommended to reduce criteria air pollutant emissions from multifamily housing developments under the HEU. a) [AQ-2b1 from <i>ConnectMenlo</i> with clarifying amendments]: As part of the City's development approval process, the City shall require applicants for future development projects to comply with the current Bay Area Air Quality Management District's basic control measures for reducing construction emissions of PM₁₀ (Table 8-18-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines). b) [AQ-2b2 from <i>ConnectMenlo</i> EIR with clarifying amendments]: Prior to issuance of building permits, development project applicants that are subject to CEQA and exceed the screening sizes in the BAAQMD's CEQA Guidelines shall prepare and submit to the City of Menlo Park a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the City of Menlo Park shall require that applicants for new development projects incorporate <u>emission reduction</u> mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds <u>of significance</u> (see for example e.g., Table 8-28-3, Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold of the BAAQMD CEQA Guidelines, or applicable construction mitigation measures subsequently approved by BAAQMD).¹ These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Building Division and/or Planning Division c) In the event that a project-specific analysis finds that the project could result in significant construction criteria air pollutant emissions that exceed significance thresholds, the project sponsor shall implement the following emission reduction measures to the degree necessary to reduce the impact to less than significance thresholds, and shall implement other feasible measures as needed to reduce the impact to less than the significance thresholds. 1. Diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, as required to reduce the emissions to less than the thresholds of significance shown in Table 2-1 of the BAAQMD CEQA Guidelines (BAAQMD, 2017b). This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the Contractor for documentation of compliance and for future review by the BAAQMD as necessary. The Certification Statement must state that the Contractor	Project sponsor	Prior to issuance of grading and/or building permits	Building Division and/or Planning Division	Building Division and/or Planning Division

¹ Table 8-3 was previously numbered at Table 8-2 in BAAQMD's 2011 guidance document, as recorded in the *ConnectMenlo* EIR.

	Implemented By	When Implemented	Monitored By	Verified By
agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract. The City may waive the equipment requirement above only under the following unusual circumstances: if a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. If the City grants the waiver, the contractor shall use the next cleanest piece of off-road equipment available. 2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit. d) [AQ-2a from <i>ConnectMenlo</i> EIR with clarifying amendments]: Prior to issuance of building permits, development project applicants that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines shall prepare and submit to the City of Menlo Park a technical assessment evaluating potential project operation-phase-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If operational-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the City of Menlo Park Community Development Department shall require that applicants for new development projects incorporate <u>emission reduction</u> mitigation measures to reduce air pollutant emissions during operational activities <u>to below the thresholds of significance</u>.				
Mitigation Measure AQ-3: Health Risk Reduction Measures. a) [AQ-3b from <i>ConnectMenlo</i> with amendments]: Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in Menlo Park within 1,000 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Menlo Park prior to future discretionary Project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million ($10E^{-06}$), $PM_{2.5}$ concentrations exceed $0.3 \mu g/m^3$, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to: • Air intakes located away from high volume roadways and/or truck loading zones.	Project sponsor	Prior to issuance of building permits	Building Division and/or Planning Division	Building Division and/or Planning Division

**CITY OF MENLO PARK HOUSING ELEMENT UPDATE
MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)**

	Implemented By	When Implemented	Monitored By	Verified By
Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters. Measures identified in the HRA shall be included in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Building Division and/or Planning Division. Project sponsors proposing multifamily development projects within 1,000 feet of sensitive receptors, including residences, schools, day care centers, and hospitals, shall prepare a project-level health risk assessment at the time the project is proposed. In lieu of a project-level health risk assessment, a comparison of the project with other similar-sized projects located a similar distance from receptors where a quantitative analysis has been conducted and were found to not exceed the BAAQMD health risk thresholds can be used to demonstrate less than significant health risk impacts. In the event that a project-level health risk assessment finds that the project could result in health risks that exceed significance thresholds, the project sponsor shall implement the clean construction equipment requirement of Mitigation Measure AQ-2(c) to the degree necessary to reduce the impact to less than significance thresholds, and shall implement other feasible measures as needed to reduce the impact to less than the significant thresholds.				
Biological Resources				
Mitigation Measure BIO-1: Project-Specific Baseline Biological Resources Assessments. Prior to individual project approval, the City shall require project applicants to prepare and submit project-specific baseline biological resources assessments on sites containing natural habitat with features such as mature and native trees or unused structures that could support special-status species and other sensitive biological resources, and common birds protected under Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF). The baseline biological resources assessment shall be prepared by a qualified biologist. The biological resource assessment shall provide a determination on whether any sensitive biological resources are present on the property, including jurisdictional wetlands and waters, essential habitat for special-status species, and sensitive natural communities. If sensitive biological resources are determined to be present, appropriate measures, such as preconstruction surveys, establishing no-disturbance zones during construction, and applying bird-safe building design practices and materials, shall be developed by the qualified biologist to provide adequate avoidance or compensatory mitigation if avoidance is infeasible. Where jurisdictional waters or federally and/or State-listed special-status species would be affected, appropriate authorizations shall be obtained by the project applicant, and evidence of such authorization provided to the City prior to issuance of grading or other construction permits. An independent peer review of the adequacy of the biological resource assessment may be required by the City, if necessary, to confirm its adequacy.	Project applicant	Prior to issuance of building permits	Building Division and/or Planning Division	Building Division and/or Planning Division
Cultural Resources				

	Implemented By	When Implemented	Monitored By	Verified By
Mitigation Measure CR-1a: Identify Architectural Historic Resources. Prior to any demolition work or significant alterations to any building or structure that is 45 years old or older, the City shall ensure that a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards evaluate the building or structure for eligibility for listing on the National Register, California Register, and for local eligibility.	Project applicant	Prior to issuance of building permits	Building Division and/or Planning Division	Building Division and/or Planning Division
Mitigation Measure CR-1b: Identify Character-Defining Features. Prior to any demolition work or significant alterations initiated at a known historical resource or a resource identified via implementation of Mitigation Measure CR-1a, the City shall ensure that a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards identifies character-defining features of each historical resource. Despite being presumed or having been previously determined eligible for listing in the National Register and/or California Register, character-defining features of the historical resources that would be demolished or may be significantly altered may not have been explicitly or adequately identified. According to guidance from the National Park Service, a historical resource "must retain... the essential physical features [i.e., character-defining features] that enable it to convey its historic identity. The essential physical features are those features that define both <i>why</i> a property is significant...and <i>when</i> it was significant" (National Park Service, 1997). The identification of character-defining features is necessary for complete documentation of each historical resource as well as appropriate public interpretation and salvage plans.	Project applicant	During initial project review and environmental analysis	Building Division and/or Planning Division	Building Division and/or Planning Division
Mitigation Measure CR-1c: Document Architectural Historic Resources Prior to Demolition or Alteration. Prior to any demolition work or significant alterations initiated of a known historical resource or a resource identified via implementation of Mitigation Measures CR-1a, the City shall ensure that a qualified architectural historian who meets the Secretary of the Interior's Professional Qualification Standards thoroughly documents each building and associated landscaping and setting. Documentation shall include still photography and a written documentary record of the building to the National Park Service's standards of the Historic American Buildings Survey (HABS) or the Historic American Engineering Record (HAER), including accurate scaled mapping and architectural descriptions. If available, scaled architectural plans will also be included. Photos include large-format (4"x5") black-and-white negatives and 8"x10" enlargements. Digital photography may be substituted for large-format negative photography if archived locally. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research and oral history collection as appropriate. Copies of the records shall be submitted to the Northwest Information Center at Sonoma State University.	Project applicant	Prior to issuance of demolition permits	Building Division and/or Planning Division	Building Division and/or Planning Division
Mitigation Measure CR-2a: Cultural Resources Study Requirements. The City shall ensure that a cultural resources records search is performed at the Northwest Information Center (NWIC) of the California Historical Resources Information System for the project area for multi-family development projects arising from the HEU that require ground disturbance (i.e., excavation, trenching, grading, etc.). To receive project approval, an archaeologist meeting the U.S. Secretary of the Interior's Standards (SOIS) for Archeology must review the results and identify if the project would potentially impact cultural resources. If the archaeologist determines that known cultural resources or potential archaeologically sensitive areas may be impacted by the project, a pedestrian survey must be conducted under the supervision of a SOIS-qualified archaeologist of all accessible portions of the project area, if one	Project applicant	Prior to issuance of building permits	Building Division and/or Planning Division	Building Division and/or Planning Division

**CITY OF MENLO PARK HOUSING ELEMENT UPDATE
MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)**

	Implemented By	When Implemented	Monitored By	Verified By
has not been completed within the previous five years. Additional research, including subsurface testing, monitoring during construction, and/or a cultural resources awareness training may be required to identify, evaluate, and mitigate impacts to cultural resources, as recommended by the SOIS-qualified archaeologist. If avoidance is not feasible, the City shall consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) to be affiliated with Menlo Park for the purposes of tribal consultation under Chapter 905, California Statutes of 2004 (if the resource is pre-contact or indigenous) to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2 and CEQA Guidelines Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3). A cultural report detailing the results of the research shall be prepared and submitted for review by the City and a final draft shall be submitted to the NWIC. Once the report has been approved by the City, the City may issue appropriate permits.				
Mitigation Measure CR-2b: Inadvertent Discovery of Cultural Resources. If pre-contact or historic-era archaeological resources are encountered during project construction and implementation, the project applicant shall halt all construction activities within 100 feet and notify the City. Pre-contact archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. An archaeologist meeting the U.S. Secretary of the Interior's Standards (SOIS) for Archeology shall inspect the findings and work shall be stopped within 100 feet of the potential archaeological resource until the material is either determined by the archaeologist to not be an archaeological resource or appropriate treatment has been enacted, with appropriate consultation, as needed. If the City determines that the resource qualifies as a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines) and that the project has potential to damage or destroy the resource, mitigation shall be implemented in accordance with PRC Section 21083.2 and CEQA Guidelines Section 15126.4, with a preference for preservation in place. If preservation in place is feasible, this may be accomplished through one of the following means: (1) siting improvements to completely avoid the archaeological resource; (2) incorporating the resource into a park or dedicated open space, by deeding the resource into a permanent conservation easement; (3) capping and covering the resource before building the project on the resource site after the resource has been thoroughly studied by a SOIS qualified archaeologist and a report written on the findings. If preservation in place is not feasible, the City shall consult with California Native American tribes identified by the Native American Heritage Commissions (NAHC) to be affiliated with Menlo Park for the purposes of tribal consultation under Chapter 905, California Statutes of 2004 (if the resource is pre-contact or indigenous) to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate by the	Project applicant	During construction	Building Division and/or Planning Division	Building Division and/or Planning Division

	Implemented By	When Implemented	Monitored By	Verified By
archaeologist, in consultation with the City, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3).				
Mitigation Measure CR-3. Inadvertent Discovery of Human Remains. Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5 (CEQA). According to the provisions in CEQA, if human remains are encountered, the project applicant shall ensure that all work in the immediate vicinity of the discovery shall cease and necessary steps are taken to ensure the integrity of the immediate area. The San Mateo County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the landowner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance.	Project applicant	During construction	Building Division and/or Planning Division	Building Division and/or Planning Division
Geology, Soils, and Paleontological Resources				
Mitigation Measure GEO-5: Discovery of Paleontological Resources In the event that fossils or fossil bearing deposits are discovered during ground disturbing activities, excavations within a 50-foot radius of the find shall be temporarily halted or diverted. Ground disturbance work shall cease until a City-approved qualified paleontologist determines whether the resource requires further study. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 2010), evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The excavation plan shall be submitted to the City of Menlo Park for review and approval prior to implementation, and all construction activity shall adhere to the recommendations in the excavation plan.	Project applicant	During construction	Building Division and/or Planning Division	Building Division and/or Planning Division
Greenhouse Gas Emissions				
Mitigation Measure GHG-1a: Enforce No Natural Gas Requirement. Subsequent housing development projects proposed under the HEU shall not be eligible for exceptions from the "all electric" requirement in the City's Reach Codes.	Project applicant	When building permit application is filed	Building Division and/or Planning Division	Building Division and/or Planning Division
Mitigation Measure GHG-1b: Enforce EV Charging Requirements in CALGreen Tier 2. Subsequent housing development projects proposed under the HEU shall comply with EV charging requirements in the most recently adopted version of CALGreen Tier 2 at the time that a building permit application is filed.	Project applicant	When building permit application is filed	Building Division and/or Planning Division	Building Division and/or Planning Division
Hazards and Hazardous Materials				

**CITY OF MENLO PARK HOUSING ELEMENT UPDATE
MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)**

	Implemented By	When Implemented	Monitored By	Verified By
Mitigation Measure HAZ-3a: Environmental Site Management Plan. Project applicants shall ensure that construction at the sites with known contamination are conducted under a project-specific Environmental Site Management Plan (ESMP) that is prepared by qualified personnel in consultation with the RWQCB or the DTSC, as appropriate. The purpose of the ESMP is to protect construction workers, the general public, the environment, and future site occupants from subsurface hazardous materials previously identified at the site and to address the possibility of encountering unknown contamination or hazards in the subsurface. The ESMP shall summarize soil and groundwater analytical data collected on the project site during past investigations; identify management options for excavated soil and groundwater, if contaminated media are encountered during deep excavations; and identify monitoring, irrigation, or other wells requiring proper abandonment in compliance with local, State, and federal laws, policies, and regulations. The ESMP shall include measures for identifying, testing, and managing soil and groundwater suspected of or known to contain hazardous materials. The ESMP shall: 1) Provide procedures for evaluating, handling, storing, testing, and disposing of soil and groundwater during project excavation and dewatering activities, respectively; 2) Describe required worker health and safety provisions for all workers potentially exposed to hazardous materials in accordance with State and federal worker safety regulations; and; 3) Designate personnel responsible for implementation of the ESMP.	Project applicant	Prior to issuance of building permits	Building Division and/or Planning Division	Building Division and/or Planning Division
Mitigation Measure HAZ-3b: Vapor Intrusion Assessment. Project applicants shall ensure that a vapor intrusion assessment is performed by a licensed environmental professional for sites with potential residual contamination in soil, soil gas, or groundwater that are planned for redevelopment with an overlying occupied building. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into an occupied building, project design shall include vapor controls or source removal, as appropriate, in accordance with regulatory agency requirements. Soil vapor controls could include vapor barriers, passive venting, and/or active venting. The vapor intrusion assessment and associated vapor controls or source removal can be incorporated into the ESMP (Mitigation Measure HAZ-3a).	Project applicant	Prior to issuance of building permits	Building Division and/or Planning Division	Building Division and/or Planning Division
Land Use and Planning				
Mitigation Measure LU-2: Demonstrate consistency with the applicable goals, policies, and programs in the General Plan and the supporting Zoning standards. Prior to individual project approval, as part of the project application process, future development in Menlo Park shall be required to demonstrate consistency with the applicable goals, policies, and programs in the General Plan and the supporting Zoning standards to the satisfaction of the City of Menlo Park's Community Development Department. A future project is consistent with the General Plan and Zoning standards if, considering all its aspects, it will further the goals, policies, and programs of the General Plan and supporting Zoning standards and not obstruct their attainment.	Project applicant	Prior to approval	Planning Division	Planning Division
Noise and Vibration				
Mitigation Measure NOI-1: Construction Noise Control.	Project applicant	Prior to issuance of construction permits	Building Division and/or Planning Division	Building Division and/or Planning Division

	Implemented By	When Implemented	Monitored By	Verified By
Project applicants shall minimize the exposure of nearby properties to excessive noise levels from construction-related activity through CEQA review, conditions of approval, and/or enforcement of the City's Noise Ordinance. Prior to issuance of demolition, grading, and/or building permits for development projects, a note shall be provided on development plans indicating that during on-going grading, demolition, and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise: • Demonstrate that any construction activities taking place outside daytime construction hours of 8:00 a.m. to 6:00 p.m. Monday through Friday shall comply with the 60 dBA Leq limit during the hours of 7:00 a.m. to 8:00 a.m. and the 50 dBA Leq limit during the hours of 6:00 a.m. to 7:00 a.m. In addition, the property owner/developer shall demonstrate that individual pieces of equipment proposed for use will not exceed the limit (85 dBA Leq at 50 feet) for powered equipment noise and that combined construction noise will not result in a 10 dBA increase over the ambient noise level at nearby sensitive receptors. Activities that would produce noise above applicable daytime or nighttime limits shall be scheduled only during normal construction hours. If it is concluded that a particular piece of equipment will not meet the requirements of this mitigation measure, that equipment shall not be used outside the daytime construction hours. • Verify construction activities are conducted at adequate distances or otherwise shielded with sound barriers, as determined through analysis, from noise-sensitive receptors when working outside the daytime construction hours of 8:00 a.m. to 6:00 p.m. Monday through Friday, and verify compliance with the Menlo Park Municipal Code through measurement. • All internal combustion engines on construction equipment and trucks are fitted with properly maintained mufflers, air intake silencers, and/or engine shrouds that are no less effective than as originally equipped by the manufacturer. • Stationary equipment such as generators and air compressors shall be located as far as feasible from nearby noise-sensitive uses. • Stockpiling is located as far as feasible from nearby noise-sensitive receptors. • Limit unnecessary engine idling to the extent feasible. • Limit the use of public address systems. • Construction traffic shall be limited to the haul routes established by the City of Menlo Park. • Additional controls, as warranted, may include but are not limited to: – Upgraded construction equipment mufflers (e.g., improved mufflers, intake silencers, ducts, engine enclosures, acoustically attenuating shields, shrouds) on equipment and trucks used for project construction. – Equipment staging plans (e.g., locating stationary equipment at adequate distances). – Limitations on equipment and truck idling. – Shielding sensitive receptors with sound barriers to comply with the Menlo Park Municipal Code.				
Transportation				
Mitigation Measure TRANS-2: Implement VMT Reduction Measures. Individual multifamily housing development proposals that do not screen out from VMT impact analysis shall provide a quantitative VMT analysis using the methods outlined by the City's most recent VMT guidelines. Projects that result in a significant impact shall include travel demand	Project applicant	Prior to discretionary project approvals	Transportation Division and/or Planning Division	Transportation Division and/or Planning Division

**CITY OF MENLO PARK HOUSING ELEMENT UPDATE
MITIGATION MONITORING AND REPORTING PROGRAM (CONTINUED)**

	Implemented By	When Implemented	Monitored By	Verified By
management measures and/or physical measures (i.e. improving multimodal transportation network, improving street connectivity) to reduce VMT, including but not limited to the measures below, which have been identified as potentially VMT reducing in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021). Potential VMT reduction estimates are included below, but detailed requirements, calculation steps, and limitations are described in the CAPCOA Handbook. Additional measures may be proposed by individual projects and/or required by City staff to achieve the necessary VMT reductions or to meet applicable TDM reduction requirements. - Unbundle parking costs (i.e. sell or lease parking separately from the housing unit). Effectiveness: up to 15.7 percent reduction in GHG from VMT per the CAPCOA Handbook. - Provide car-sharing, bike sharing, or scooter sharing programs. Effectiveness: 0.15 – 0.18 percent reduction in GHG from VMT for car share, 0.02 – 0.06 percent for bike share, and 0.07 percent for scooter share, per the CAPCOA Handbook. The higher car share and bike share values are for electric car and bike share programs. - Subsidize transit passes for residents of affordable housing. Effectiveness: up to 5.5 percent reduction in GHG from VMT per the CAPCOA Handbook.				

68 Willow Rd.

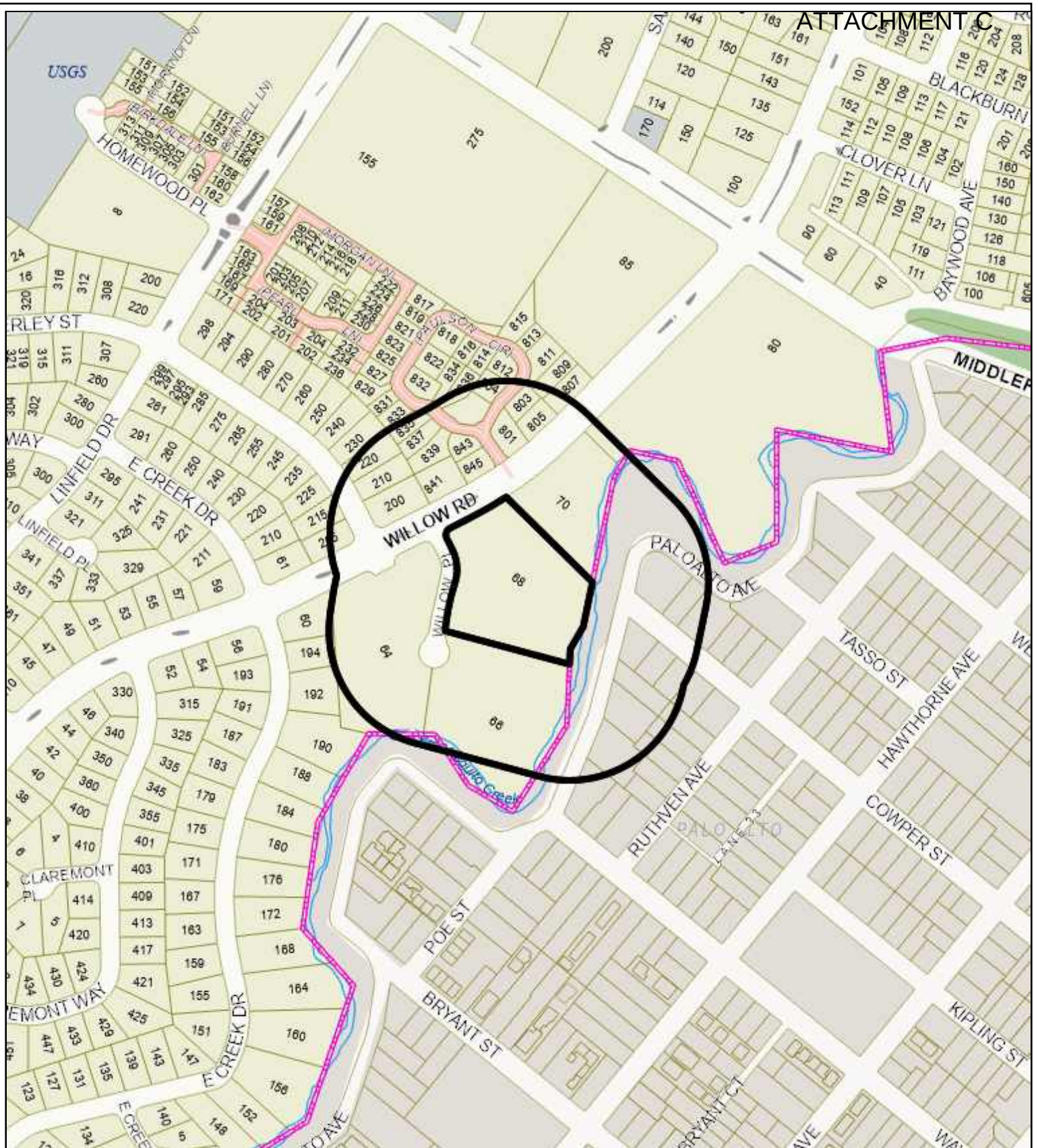
LOCATION: 68 Willow Rd	PROJECT NUMBER: SUB2024-00006	APPLICANT: 68 Willow Owner, LLC	OWNER: 68 Willow Owner, LLC
PROJECT CONDITIONS:			
1. The Tentative Map shall be subject to the following <i>standard conditions</i>: a. Development of the project shall be substantially in conformance with the Tentative Map prepared by cbg. Civil Engineers, consisting of 11 plan sheets, dated June 30, 2025 and approved by the City Council on _____, except as modified by the conditions contained herein, subject to review and approval of the Planning Division and Engineering Division. b. The Owner shall submit a Final Map for City Council approval within two years from the date of approval (_____, 2028) of the tentative map for the project to remain in effect. c. Owner shall adhere to the Subdivision Map Act and Chapter 15 of the City's Municipal Code. d. Prior to Final Map approval, the Owner shall comply with all Sanitary District, Menlo Park Fire Protection District, and utility companies' regulations that are directly applicable to the project. e. Prior to Final Map approval, the Owner shall comply with all requirements of the Building Division, Engineering Division, and Transportation Division that are directly applicable to the project. f. Prior to Final Map approval, if applicable, the Owner shall submit plans indicating that the Owner shall remove and replace any damaged and significantly worn sections of frontage improvements. The plans shall be submitted for review and approval of the Engineering Division. g. Prior to Final Map approval, if applicable, the Owner shall submit a Grading and Drainage Plan for review and approval of the Engineering Division. The Grading and Drainage Plan shall be approved prior to the issuance of grading, demolition or building permits. h. Prior to Final Map approval, the Owner shall pay all fees incurred through staff time spent reviewing the application. i. The Owner or permittee shall defend, indemnify, and hold harmless the City of Menlo Park or its agents, officers, and employees from any claim, action, or proceeding against the City of Menlo Park or its agents, officers, or employees to attack, set aside, void, or annul an approval of the Planning Commission, City Council, Community Development Director, or any other department, committee, or agency of the City concerning a development, variance, permit, or land use approval which action is brought within the time period provided for in any applicable statute; provided, however, that the Owner's or permittee's duty to so defend, indemnify, and hold harmless shall be subject to the City's promptly notifying the Owner or permittee of any said claim, action, or proceeding and the City's full cooperation in the Owner's or permittee's defense of said claims, actions, or proceedings. j. Notice of Fees Protest – The Owner may protest any fees, dedications, reservations, or other exactions imposed by the City as part of the approval or as a condition of approval of this development. Per California Government Code 66020, this 90-day protest period has begun as of the date of the approval of this application.			
2. The Vesting Tentative Map shall be subject to the following <i>project-specific</i> conditions: a. Simultaneous with submittal of the Final Map, the Owner shall demonstrate compliance with mitigation measures included in the ConnectMenlo MMRP and 2023-2031 Housing Element Update Subsequent EIR MMRP that are applicable to the project, subject to review			

68 Willow Rd.

LOCATION: 68 Willow Rd	PROJECT NUMBER: SUB2024-00006	APPLICANT: 68 Willow Owner, LLC	OWNER: 68 Willow Owner, LLC
PROJECT CONDITIONS: and approval by the Community Development and Public Works Departments and the applicable divisions within the City. b. Required frontage improvements include but not limited to: a. 3" of grind and overlay (curb to curb) along entire frontages (Willow Rd and Willow Place) b. Existing striping, markings and legends shall be replaced in kind, or as modified by the City Engineer on both Willow Rd and Willow Place. c. Lateral connections to overhead electric, fiber optic, and communication lines shall be placed in a joint trench. d. Existing sidewalk and curb and gutter shall be removed and replaced along the entire project frontages per approved project plans. i. New 10' sidewalk along Willow Rd and Willow Place ii. New Curb and gutter along Willow Rd and Willow Place iii. New 4'x4' tree wells along Willow Rd and Willow Place iv. New ADA ramps as per the approved Tentative Map v. New streetlights along Willow Rd and Willow Place c. Prior to Final Map approval, Owner shall pay all Public Works fees including Building Construction Impact Fee, unless deferred pursuant to Gov. Code § 66007. Refer to current City of Menlo Park Master Fee Schedule. d. Prior to approval of the Final Map, the Owner shall pay for fifty (50) new multiple family units at the current rate of \$78,400 per unit (in lieu of dedication), for a total recreation in lieu fee of \$3,920,000, in compliance with Section 15.16.020 of the Subdivision Ordinance, unless deferred pursuant to Gov. Code § 66007. e. Prior to Final Map approval, the Owner shall enter into a Subdivision Improvement Agreement and provide a performance bond for the completion of the off-site improvements as shown on the approved project improvement plans. f. All agreements shall run with the land and shall be recorded with the San Mateo County Recorder's Office prior to building permit final inspection.			

Table 1: General Plan goals and policies consistency analysis			
Goal/ Policy	Title	Summary	Consistency Analysis
Goal H4	Affordable Housing	Support the development of a diversity of housing types for people at all income levels	The project is a 50-unit, multi-family housing project which includes 42 market-rate units and eight BMR units, therefore it directly supports Goal H4. The BMR units would vary in size and include three- and four-bedroom units to fit a variety of needs.
Policy H4.2	Housing to Address Local Housing Needs	Strive to provide opportunities for new housing development to meet the City's share of its Regional Housing Needs Allocation (RHNA)	The project site is within the C-1 zoning district which was rezoned to allow for housing as part of the 6 th Cycle Housing Element update to provide additional opportunities to meet the City's RHNA obligations.
Policy H4.3	Variety of Housing Choices	Strive to achieve a mix of housing types, densities, affordability levels and designs distributed throughout the city	The project provides a townhouse-style housing option for sale and would include larger, family-friendly affordable units.
Policy H4.9	Long-Term Housing Affordability Controls	Apply rent and income restrictions to ensure that affordable housing provided through incentives remains affordable over time to the income group for which it is intended	Eight of the 50 units will be restricted to affordable sale prices, in line with this policy, for a minimum period of 55 years.
Policy H4.10	Preferences for Affordable and Moderate-Income Housing	Implement BMR and moderate-income housing preferences for people living or working in Menlo Park to the extent consistent with Fair Housing laws	To the extent consistent with State Law, the City is applying its BMR preferences to the project, consistent with this policy.
Policy H4.16	Neighborhood Responsibilities within Menlo Park	Seek ways specific to each neighborhood to provide additional housing as part of each neighborhood's fair share responsibility and commitment to help achieve community-wide housing goals	This project will bring 50 residential units to the Linfield Oaks neighborhood of Council District 3, in line with the City's housing goals.
Goal LU-1	Orderly Development	Promote the orderly development of Menlo Park and its surrounding area	This project is proposed on a site zoned C-1 and can be built at the proposed density within the current zoning pursuant to State Density Bonus Law, consistent with this Goal.
Policy LU-1.1	Land Use Patterns	Cooperate with the appropriate agencies to help assure a coordinated land use pattern in Menlo Park and the surrounding area	The City has coordinated the project application with the Menlo Park Fire Protection District and has confirmed the project meets applicable requirements for fire safety.
Goal LU-2	Neighborhood Preservation	Maintain and enhance the character, variety and stability of Menlo Park's residential neighborhoods	The architectural features and design of the project will contribute to the character and stability of Menlo Park's

			residential neighborhoods, consistent with the policy.
Policy LU-2.1	Neighborhood Compatibility	Ensure that new residential development possesses high-quality design that is compatible with the scale, look, and feel of the surrounding neighborhood and that respects the city's residential character	The proposed design of the project has been reviewed and is compatible with the scale, look and feel of the Willows neighborhood, consistent with this policy.
Policy LU-2.5	Below Market Rate Housing	Require residential developments of five or more units to comply with the provisions of the City's Below-Market Rate (BMR) Housing Program, including eligibility for increased density above the number of market rate dwellings otherwise permitted by the applicable zoning and other exceptions and incentives	This project is proposed pursuant to State Density Bonus law and is consistent, where applicable, with the City's BMR program, consistent with this policy.
Policy OSC 2.3	Recreation Requirements for New Development	Require dedication of improved land, or payment of fee in lieu of, for park and recreation land for all residential uses.	The owner would be required to pay approximately \$3.9M in recreation in-lieu fees.



City of Menlo Park
Location Map
68 WILLOW ROAD



Scale: 1:4,000

Drawn By: CRT

Checked By: KTP

Date: 6/9/2026

Sheet: 1

Planning Commission



REGULAR MEETING DRAFT EXCERPT MINUTES

Date: 5/4/2026
Time: 7:00 p.m.
Location: Zoom.us/join – ID# 846 9472 6242 and
 City Council Chambers
 751 Laurel St., Menlo Park, CA 94025

A. Call To Order

Chair Andrew Ehrich called the meeting to order at 7:00 p.m.

B. Roll Call

Present: Andrew Ehrich (Chair), Ross Silverstein (Vice Chair), Katie Behroozi, Katie Ferrick, Nancy Larocca Hedley, Jennifer Schindler, Misha Silin

Staff: Kyle Perata, Assistant Community Development Director; Matt Pruter, Associate Planner; Monica Roy, Planning Technician; Chris Turner, Senior Planner

F. Public Hearing

- F2.** Use Permit, Architectural Control, Major Subdivision, BMR Agreement, Environmental Review/68 Willow Owners, LLC/68 Willow Road:
 Consider and adopt a resolution to approve a use permit, architectural control permit, and environmental review to demolish an existing office building and construct eight new three-story residential townhome buildings with a total of 50 townhome dwelling units and associated site improvements, on a standard lot in the C-1 (Administrative and Professional District, Restrictive) zoning district. Eight units would be available at Below Market Rate (BMR) for households earning up to 120 percent area median income (moderate income) if the project is a for-sale project or 80% area median income (low income) if the project is a rental project; determine this action is categorically exempt under CEQA Guidelines Section 15332's Class 32 exemption for infill development. The application is being reviewed subject to the State Density Bonus Law, Government Code Section 65915 and relevant amendments, which permits exceptions to the City's Zoning Ordinance requirements. The applicant is requesting waivers from development standards to decrease the minimum front and side setbacks, increase the maximum floor area ratio (FAR), modify the building profile requirement, modify building projection requirements, increase the allowed percentage of stucco siding, decrease the minimum parking stall dimensions, increase maximum height, modify balcony setback requirements, and modify building modulation and height modulation requirements. In addition to requested waivers, the applicant is requesting one concession to increase the maximum parking ratio for residential uses in the C-1 district. Consider and adopt a resolution recommending approval of a vesting tentative subdivision map to subdivide the lot into 50 condominium parcels and one common area parcel. ([Staff report #26-013-PC](#))

Planner Turner presented the staff report on the project. He said after publication of the staff report comments were received on the project that generally expressed concern with bicycle and

pedestrian safety along Willow Place particularly relating to the bicycle bridge into Palo Alto, and general traffic related concerns.

Jeff Potts, SDG Architects, spoke on behalf of the project.

Chair Ehrich opened the public hearing.

Public Comment:

- Mike Federle, a HOA (Homeowners Association) board member, expressed concerns about potential impact along Willow Road including parking elimination and the narrowing down of bike lanes.
- David Wolter, a neighbor, emphasized the importance of carefully evaluating the project's requested waivers and concessions. He also expressed concerns about the three-story height of the development.
- Kim Johnson, a neighbor, conveyed her concern about safety during construction and the potential removal of bike lanes.
- Naomi Goodman, a Menlo Park resident, communicated her concerns about preserving the heritage tree canopy and urged denial of the project.
- Richard Crumb, a Menlo Park resident, noted that community outreach had been limited and his concerns about preserving native trees.

Chair Ehrich closed the public hearing and recessed the meeting for a short break.

Chair Ehrich reconvened the meeting at 9:00 p.m.

Commission comments included that the project was the first application after rezoning done as part of the Housing Element update implementation, expressions of appreciation for the ability to have housing, questions of feasibility of additional density, impacts on bicycle and pedestrian safety, and encouragement to the applicant to do community outreach.

ACTION: Motion and second (Schindler/Behroozi) to adopt a resolution approving the use permit, architectural control permit, and below market rate housing agreements as recommended, and adopt a resolution to recommend approval of the vesting tentative subdivision map to City Council; passes 7-0.

J. Adjournment

Chair Ehrich adjourned the meeting at 11:36 a.m.

Staff Liaison: Kyle Perata, Assistant Community Development Director

Recording Secretary: Brenda Bennett

