

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): City of Menlo Park
701 Laurel Street
Menlo Park, Ca 94025

County Clerk

County of: San Mateo

555 County Center

Redwood City, Ca 94063

(Address)

FILED ENDORSED
IN THE OFFICE OF THE
COUNTY CLERK RECORDER
SAN MATEO COUNTY CALIF

Project Title: 68 Willow Road Project

MAY 20 2026

Project Applicant: 68 Willow Owner, LLC

MARK CHURCH, County Clerk

By NILES LOPSHIRE

Project Location - Specific:

68 Willow Road, APN 062-423-020

Project Location - City: Menlo Park Project Location - County: San Mateo

Description of Nature, Purpose and Beneficiaries of Project:

Demolish an existing office building and construct eight new three-story residential townhome buildings with a total of 50 for-sale townhome dwelling units and associated site improvements. The proposal includes a major subdivision to subdivide the lot into 50 condominium parcels and one common area parcel. Eight units would be available for purchase at Below Market Rate (BMR) for households earning up to 120 percent area median income (moderate rate) or for rent for households earning up to 80 percent area median income (low income).

Name of Public Agency Approving Project: City of Menlo Park

Name of Person or Agency Carrying Out Project: Willow Owner, LLC

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
Declared Emergency (Sec. 21080(b)(3); 15269(a));
Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
[X] Categorical Exemption. State type and section number: Class 32 Infill (Sec. 15332)
Statutory Exemptions. State code number:

Reasons why project is exempt:

See Attached

Lead Agency Contact Person: Chris Turner Area Code/Telephone/Extension: 650-330-6724

If filed by applicant:

- 1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: [Signature] Date: 5/19/26 Title: Senior Planner

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR:



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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 PM2.5 emissions. Health risk impacts were addressed by predicting the increased cancer risk, the increase in annual PM2.5 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 PM2.5. 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 PM2.5. 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 PM2.5 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 PM2.5 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 PM2.5 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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>

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 (letter report)</i>
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 (letter report)</i>
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; SR82 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; SR82 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; SR82 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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