

## CITY OF MENLO PARK ADDENDUM TO THE STANFORD SAND HILL ROAD CORRIDOR PROJECTS ENVIRONMENTAL IMPACT REPORT

### 1.0 INTRODUCTION

This document is the City of Menlo Park's Addendum to the Stanford Sand Hill Road Corridor Projects Environmental Impact Report ("EIR"). The EIR was certified by the City of Palo Alto, the lead agency, on June 30, 1997. Most of the projects described in the EIR that are within Palo Alto have been constructed and no further discretionary approvals from Palo Alto are required. Portions of the Sand Hill Road Extension and Related Roadway Improvements Project described in the EIR would, however, be constructed in Menlo Park. These portions are now referred to as the Menlo Park Roadway Project. Menlo Park is considering whether to carry out the Menlo Park Roadway Project.

When it considers the Menlo Park Roadway Project, the City of Menlo Park acts as a "responsible agency" under the California Environmental Quality Act (CEQA) and is required to use Palo Alto's EIR. However, where, as here, changes are proposed in the project being considered by the responsible agency, the responsible agency may prepare an addendum to the EIR.

Accordingly, Menlo Park has prepared this Addendum to analyze changes to the Menlo Park Roadway Project that have occurred since the EIR was certified. The Addendum evaluates whether these changes would result in any new significant environmental impacts or substantially more severe impacts than were analyzed in the EIR; if that were the case, Menlo Park would be required to prepare a supplemental or subsequent EIR.

The Menlo Park Roadway Project consists primarily of widening Sand Hill Road in Menlo Park from two to four lanes between the city limits and Santa Cruz Avenue, widening Santa Cruz Avenue between Sand Hill Road and the Alpine Road/Junipero Serra Boulevard intersections, providing a new frontage road north of Sand Hill Road, adding or replacing bicycle and pedestrian lanes and paths, and making intersection improvements. As described in the EIR, the widening of Sand Hill Road would also result in a reconfiguration of three holes of the adjoining Stanford University Golf Course.

The changes in the Menlo Park Roadway Project are described in Section 3. They are:

- Roadway design refinements at and near the Sand Hill Road/Santa Cruz Avenue intersection (section 3.1);
- Inclusion of an off-road multi-user trail south of Sand Hill Road (section 3.2); and
- Modification of the Stanford University Golf Course reconfiguration (section 3.3).

The environmental analysis of the changes is found in Section 4 and the conclusions are presented in Section 5.

## 2.0 CEQA CONTEXT

### 2.1 The City of Palo Alto's Role As Lead Agency

The City of Palo Alto, the lead agency under CEQA, prepared the EIR for the Stanford Sand Hill Road Corridor Projects and certified the EIR on June 30, 1997. Stanford has constructed most of the projects described in the EIR that are within Palo Alto's jurisdiction and no further discretionary approvals from Palo Alto are required. Therefore, under CEQA, Palo Alto's rights and responsibilities as lead agency have come to an end:

Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in [CEQA Guidelines section 15162(a), discussed below] occurs, a subsequent EIR or negative declaration *shall only be prepared by the public agency which grants the next discretionary approval for the project, if any.*

14 Cal. Code Regs. 15162(c) (emphasis added). Thus it is now up to responsible agencies, such as the City of Menlo Park, to determine whether further CEQA review is required and if so, to conduct such review.

### 2.2 The City of Menlo Park's Role As Responsible Agency

Because the City of Menlo Park may approve and carry out a portion of the Stanford Sand Hill Road Corridor Projects, it is a responsible agency. As a responsible agency, Menlo Park must consider the EIR prepared by Palo Alto when Menlo Park decides whether to approve the project before it. 14 Cal. Code Regs. § 15096(a). The City of Menlo Park is prohibited from preparing a subsequent or supplemental EIR unless the standards of CEQA Guidelines section 15162 are met. 14 Cal. Code Regs. § 15096(f). *Therefore, because in-depth environmental review has already occurred and the question is whether circumstances have changed enough to justify repeating a substantial portion of the process.*

Section 15162(a) of the CEQA Guidelines explains the circumstances under which a lead agency or a responsible agency may prepare a subsequent EIR:

(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency [or here, the responsible agency] determines, on the basis of substantial evidence<sup>1</sup> in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new

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<sup>1</sup> The CEQA Guidelines define "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. . . ." 14 Cal. Code Regs. 15384(a).

significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163(a) of the CEQA Guidelines provides for preparation of a supplement to an EIR, rather than a subsequent EIR, if: “[a]ny of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and [o]nly minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.”

Although both lead and responsible agencies are prohibited from preparing subsequent or supplemental EIRs unless the Section 15162 standards are met, the City of Menlo Park may prepare an addendum under certain circumstances:

(a) The . . . responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

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(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR . . . prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's report on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

14 Cal. Code Regs. § 15164(a), (c)-(e). As discussed in the Conclusions (Section 5), construction and operation of the Menlo Park Roadway Project as currently designed would not trigger the preparation of a subsequent or supplemental EIR. There would be no new significant impacts or substantial increases in the severity of any of the impacts described in the EIR.

### 3.0 CHANGES IN PROJECT DESCRIPTION

The Menlo Park Roadway Project is part of the "Sand Hill Road Extension and Related Roadway Improvements" Project described at Volume 2, pages 3-65 to 3-81 of the EIR. The stated objectives of that project are:

- Improve vehicular, bicycle and pedestrian circulation in the Sand Hill Road corridor, between El Camino Real and Santa Cruz Avenue;
- Improve access to and through the Stanford Shopping Center, Campus, and Medical Center employment districts.
- Reduce the level of regional/business traffic on residential streets;
- Encourage walking and bike use by increasing the safety and attractiveness of these routes in and along the roadway; and
- Improve access to and from the Stanford University Hospital Emergency Room.

(2 EIR at 3-69.) The "Project Characteristics" described in the EIR that pertain to the Menlo Park Roadway Project are:

- Widening of Sand Hill Road from two lanes to four lanes between Santa Cruz Avenue in Menlo Park and Arboretum Road in Palo Alto (see Figures 3-35 through 3-38). The widening of Sand Hill Road would remove up to 96 trees;
- Construction of a new frontage road with a cul-de-sac, parallel to Sand Hill Road between Oak Avenue and Santa Cruz Avenue in Menlo Park. The frontage road would be separated from Sand Hill Road by a landscaped berm. Leland Avenue and Stanford Avenue . . . . . to Sand Hill Road (see Figure 3-38);
- Widening of the existing two-lane bridge over San Francisquito Creek by approximately 31 feet to provide a total of four 11-foot lanes, two six-foot bicycle lanes and two five-foot sidewalks with a handrail.

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The bridge widening project would remove up to 13 trees.

- Six-foot wide, striped on-street bicycle lanes on both sides of (1) Sand Hill Road between Santa Cruz Avenue and El Camino Real. . . .
- Pedestrian sidewalks and paths are proposed along both sides of Sand Hill Road (except between Santa Cruz Avenue and Pasteur Drive, where the walkway would be restricted to the north side due to the presence of archaeological resources). . . .

From Sand Hill Road, pedestrian walkways would provide access to Searsville Road. . . .

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- Modification of the Stanford University Golf Course to accommodate the widening of Sand Hill Road between San Francisquito Creek and Santa Cruz Avenue. The modifications affect Holes #2, #3, and #4, and involve expansion of the Golf Course into a 3.6-acre parcel located east of Hole #2 and west of the Environmental Safety Facility; (see Figure 3-40); and
- Various related intersection, traffic signal, and entryway improvements and changes, including the following traffic signal improvements on Sand Hill Road:

....

- Santa Cruz Avenue (modification of existing signal)

. . . Landscape medians in the portion of the Sand Hill Road located in Menlo Park would be maintained by either the City of Menlo Park or Stanford University, at the discretion of the City of Menlo Park. In the event that the landscape medians are ultimately maintained by the City of Menlo Park, there would be a small increase in demand for maintenance services in the City. (2 EIR at 3-70, 3-76 & 3-78.)

Since the EIR was certified, the Menlo Park Roadway Project has been revised as described below.

### 3.1 Roadway Refinements

Discussions between the City of Menlo Park and Stanford University have resulted in the following refinements to the roadway improvements in Menlo Park:

1. Shortening the two eastbound left-turn lanes on Santa Cruz Avenue at Sand Hill Road from 190 feet to 120 feet;
2. Restricting westbound Sand Hill Road at Santa Cruz to no right turn on red (but allowing turns concurrent with the eastbound left-turn phase);
3. Adding a four-foot bicycle lane for bicycle through-movements on eastbound Santa Cruz Avenue;

4. Separating the traffic paths of opposing left turns to provide more space during concurrent opposing left-turns; and

5. Adding pedestrian ramps.

These changes would provide a designated lane for southbound through-bicyclists; provide better clearance between vehicles during concurrent left-turn phases; provide better access for pedestrians; allow maximum preservation of on-street parking on the east side of Santa Cruz Avenue; and allow better access to the roadway from the driveways along the east side of Santa Cruz Avenue. See Statements of David A. Richwood, P.E. and Gerald Walters, P.E. and Ellen M. Poling, P.E. (Sept. 24, 2002).

### **3.2 Addition of Multi-user Trail East of Sand Hill Road**

The Menlo Park Roadway Project would, by widening Sand Hill Road and making related improvements, eliminate an existing path on the southeast side of Santa Cruz Avenue between Alpine Road and Sand Hill Road. The EIR's Project Description did not provide for replacement of this path due to concern over archaeological resources.

Since the EIR was certified, the key prehistoric archaeological site south of Sand Hill Road has been excavated and Stanford has identified a trail route that would not significantly affect archaeological resources. Accordingly, the Menlo Park Roadway Project now includes a Multi-User Trail that would replace and extend the existing path.

The trail, shown in Exhibit A to this Addendum, would advance the project objectives of improving bicycle and pedestrian circulation and of encouraging walking and bike use by increasing the safety and attractiveness of these routes along Sand Hill Road. At its west end, the trail would connect to the existing trail on Alpine Road; at its east end, the trail would connect to the Stanford University trail at Searsville Road. Thus the trail would fill a gap between two existing trails in the Sand Hill Road vicinity plus provide a connection to Oak Avenue.

For most of its length, the trail would be set back from Sand Hill Road, and would be in addition to the bicycle lanes and sidewalks along the roadway itself.

### **3.3 New Golf Course Reconfiguration**

The Stanford University Golf Course reconfiguration necessitated by the widening of Sand Hill Road was described in the EIR. This reconfiguration has been changed because the County of Santa Clara, the City of Palo Alto, and Stanford University have agreed that the site identified in the EIR as the future home of Hole #2 should instead be set aside for future housing (and, in turn, that a site formerly designated for housing should instead remain Hole #1 of the Golf Course). Accordingly, Stanford, in consultation with its Golf Advisory Committee, has designed a new reconfiguration of the Golf Course that takes into account both the widening of Sand Hill Road, including the proposed bicycle and pedestrian trail, and the future housing site. The Golf Course reconfiguration shown in the EIR and the revised Golf Course reconfiguration site are shown in Exhibit B to this Addendum. The New Golf Course Reconfiguration consists of: 1) reversing the direction of play at Hole #3; 2) shortening and improving Hole #4; and 3) restoring Hole #5

by restoring the fifth tee and removing a bridge and a concrete spillway from San Francisquito Creek. The restoration of Hole #5, including the bridge and spillway removal, are not required by the widening of Sand Hill Road, but rather were suggested by the Golf Advisory Committee and agreed to by Stanford as an enhancement of the Golf Course.

#### **4.0 ENVIRONMENTAL ANALYSIS OF CHANGES**

The changes described in Section 3 above would not change the Menlo Park Roadway Project's impacts on Land Use; Air Quality; Noise; Geology, Soils and Seismicity; Hydrology and Water Quality; Public Health and Safety; Utilities, Energy and Infrastructure; Public Services and Schools; or Growth Inducing Impacts. Potential effects of the changes to the Menlo Park Roadway Project on Visual Quality/Light and Glare; Cultural Resources; Transportation; and Biological Resources are addressed below.

##### **4.1 Visual Quality/Light and Glare**

The EIR identified significant and unavoidable project-level and cumulative Visual Quality impacts. These consist of "major visual changes within the Sand Hill Road corridor for viewers traveling on Sand Hill Road" (Impacts 4.2-1 and 4.2-9). The EIR also identified a less-than-significant impact from automobile headlight glare (Impact 4.2-7) and a short-term, significant and unavoidable impact consisting of visual disturbance from construction of the Sand Hill Road Corridor Projects (Impact 4.2-8).

None of the changes to the Menlo Park Roadway Project would substantially increase the severity of any of the Visual Resources/Light and Glare impacts identified in the EIR or cause new significant impacts. Addition of the Multi-User Trail is a minor improvement in the Project with respect to Visual Resources Impacts 4.2-1 and 4.2-9 because the Trail would allow pedestrian and bicycle travelers along Sand Hill to use an off-road trail in addition to, or instead of, the bicycle lane and sidewalk along the roadway.

##### **4.2 Cultural Resources**

The EIR identified significant and mitigable project-level and cumulative Cultural Resource impacts consisting of damaging effects on important archaeological resources (Impacts 4.3-1, 4.3-6). The Menlo Park Roadway Project would contribute to these impacts.

The Roadway Refinements would neither substantially increase the severity of the Cultural Resources impacts identified in the EIR nor cause new significant impacts. The Roadway Refinements include widening of Sand Hill Road and Santa Cruz Avenue at and near their intersection. Stanford's Campus Archaeologist, the leading expert on archaeological resources in the vicinity, has stated that there are no prehistoric cultural resources in the area of this intersection and, therefore, no additional impact from the widening. See Statement of Laura Jones, Ph.D., Sept. 23, 2002. The Roadway Refinements would extend into the garden of the Meyer-Buck Estate. Because the garden lacks historical integrity (most of its specimen plantings having been lost to frost and drought), the removal of an edge of the garden is not a new significant impact. *Id.*

The Multi-User Trail would traverse the Level 1 Cultural Sensitivity Zone south of Sand Hill Road. Stanford's Campus Archaeologist has stated:

The Sand Hill Road EIR did not include a sidewalk along Sand Hill Road on its eastern (*southern*) side partly in order to avoid impact to cultural resources. However, the proposed pathway is in a new location: aligned well back from the roadway to avoid the most sensitive archaeological site area. The pathway crosses a portion of the archaeological site, but does so in an area that was so disturbed by construction of the Golf Course in the 1920s that it has no potential to . . .

Construction of paths on top of archaeological sites may have two kinds of impact: damage may occur to shallow cultural deposits from installation of the path, and from the point of view of access for future research, paths form a barrier. At Stanford we place a very high value on preserving access to archaeological sites for research, and paths create obstacles to research access. Thus we carefully site paths, tree planting and other "open space" improvements to maintain access to intact cultural deposits. In this case, the proposed pathway route avoids areas of the site that have scientific value and will cause only minor damage to already severely damaged site areas. The Sand Hill Road EIR identified mitigation measures listed in Measure 4.3-1(e) to insure that pathways are designed to reduce construction impact. While this treatment would be adequate under CEQA for a path anywhere in the Level 1 sensitivity area, it has been confirmed that in areas where the deposit has been severely damaged. The impact of the path, already less . . . will be further reduced by application of these measures. *Id. (language in italics added)*

The Golf Course Reconfiguration has also been examined by Stanford's Campus Archaeologist who has found no new significant impact or substantial increase in the archaeological resources impact that was previously identified. *Id.* With regard to restoration of Hole #5, the Campus Archaeologist has stated:

The proposed reuse of the Hole 5 tournament tee on the Menlo Park/San Mateo County side of the creek may involve minor subsurface work, primarily for irrigation and some shallow grading. There are no prehistoric archaeological deposits in this area. During installation of a french drain in the area this year, several horse skeletons were disturbed which are probably associated with the Palo Alto Stock Farm. The area has also yielded small amounts of historic household debris (broken china for example). Given the minor changes required to reopen the tee, the construction impact to a potential historic archaeological deposit is expected to be less than significant, and such impacts were studied in the Sand Hill EIR for the Golf Course Replacement Holes area closer to the central Stock Farm (Red Barn) area. Mitigation measures including archaeological monitoring and data recovery will be sufficient to protect potential finds from this minor construction impact.

Replacement of riparian vegetation lost as a result of changes in the design of the Golf Course should be carefully planned to avoid impacts to buried archaeological resources. Planting of trees can disturb shallow cultural deposits during installation and as the trees grow their root systems create further displacement. Tree removal can also impact



archaeological materials. A qualified archaeologist should review planned tree removals and proposed new trees to minimize impact to intact cultural resources. Some flexibility in the siting of revegetation areas will be helpful in meeting this goal.

It should also be noted that although the EIR did not discuss whether the Golf Course itself was a historical resource, the EIR certified by the County of Santa Clara for the Stanford University Draft Community Plan and General Use Permit (the "GUP EIR") did address that question. The GUP EIR concluded that the Golf Course was not a historical resource and that the then-proposed replacement of Hole #1 would not have a significant impact on historical resources. III GUP EIR at 11-42 to 11-44 (County of Santa Clara 2000). Thus the currently planned reconfiguration of the Golf Course would not impact historical resources.

#### 4.3 Transportation

The EIR stated that the Sand Hill Road Extension and Related Roadway Improvement Project would cause significant and mitigable impacts consisting of: 1) effects on bicycle and/or pedestrian access and safety (Impact 4.4-2); 2) degraded level of service at the Sand Hill Road/Santa Cruz Avenue intersection (Impact 4.4-7); and 3) construction-phase impacts (Impact 4.4-8). The Menlo Park Roadway Project is itself a mitigation measure for these and other traffic impacts and it includes mitigation for its own construction-phase impacts.

The Roadway Refinements would not cause any new significant Transportation impact or any substantial increase in the severity of previously identified significant effects. Instead, the Roadway Refinements would improve the operation of the Sand Hill Road/Santa Cruz Avenue intersection for bicycles, vehicles, and pedestrians. See Statement of Gerard Walters, P.E. and Ellen M. Poling, P.E., Sept. 24, 2002 (Exhibit B).

The Multi-User Trail would not cause any new significant Transportation impact or substantially increase the severity of previously identified significant impacts. Instead, the Multi-User Trail would ameliorate Impact 4.4-2 by providing a dedicated path for bicyclists and pedestrians that is separated from vehicular traffic.

The New Golf Course Reconfiguration would have no effect on Transportation.

It has been suggested that some new development, not proposed at the time the EIR was certified, has occurred or is occurring in the vicinity of the Menlo Park Roadway Project that would add traffic not contemplated by the EIR. The EIR's cumulative traffic projections were, however, conservatively high, so these relatively small projects would not be expected to lead to traffic exceeding the EIR's projections. More importantly, the Menlo Park Roadway Project is a traffic mitigation project that would improve, not degrade, traffic flow. This beneficial effect of the Menlo Park Roadway Project would remain beneficial and, therefore, not a "significant impact," regardless of whether other projects cause negative effects.

#### 4.4 Biological Resources

The EIR identified significant impacts from the Sand Hill Road Extension and Related Roadway Improvements Project consisting of: 1) loss of trees (Impact 4.7-1); 2) loss of trees that provide bird habitat (Impact 4.7-2); 3) loss of riparian habitat and encroachment of urban development

due to Sand Hill Road Bridge widening (Impact 4.7-4); 4) construction-phase impacts to aquatic life (Impacts 4.7-6 and 4.7-7); 5) water quality impacts to San Francisquito Creek during operations (Impact 4.7-8); and cumulative impacts (Impacts 4.7-10 through 4.7-15). The Menlo Park Roadway Project would contribute to these impacts.

The Roadway Refinements and Multi-User Trail would not cause any new significant Biological Resources impacts or cause a substantial increase in the severity of any previously identified significant impacts because if the project changes would not occur in sensitive locations or require significant additional tree removals.

The New Golf Course Reconfiguration, although requiring work near San Francisquito Creek, would not cause any new significant Biological Resources impacts or substantially increase the severity of previously identified significant impacts because the Golf Course currently crosses the Creek in many locations. In fact, if the proposed reconfiguration of Golf Course Hole #5 is implemented, the proposed removal of a bridge and a concrete spillway from San Francisquito Creek will constitute a significant improvement in existing conditions with respect to Biological Resources. The removal of the concrete spillway has long been favored by regulatory agencies as a means to improve flow in San Francisquito Creek and encourage migration of aquatic species, particularly steelhead salmonids. The New Golf Course Reconfiguration would require removal of more trees (up to 15) than the originally approved reconfiguration (up to nine). The trees removed by the New Golf Course Reconfiguration would, however, include seven landscape trees and up to eight native oaks, whereas the original reconfiguration would have removed up to nine native oaks (and the landscape trees would likely have been removed in any event as a matter of ongoing Golf Course maintenance). In addition, the New Golf Course Reconfiguration would eliminate the Menlo Park Roadway Project's contribution to a potentially significant cumulative impact, because the New Golf Course Reconfiguration would preserve 3.6 acres of non-native grassland that would have been removed under the original Golf Course reconfiguration. (See Impact 4.7-12 (cumulative loss of non-native grasslands).)

## 5.0 CONCLUSION

The discussion in Section 4 shows that the changes that have been incorporated into the Menlo Park Roadway Project since the EIR . . . . . supplemental EIR. The Project has not changed so as to cause new significant environmental effects or a substantial increase in the severity of previously identified environmental effects.

In addition, substantial evidence in light of the whole record does not support a determination that substantial changes have occurred in the circumstances under which the Menlo Park Roadway Project is undertaken that would require preparation of an SEIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Nor is there new information of substantial importance that shows that the Project will have new significant effects, that significant effects examined in the EIR will be substantially more severe, or that new mitigation measures or alternatives are now available to substantially reduce one or more significant effects of the Project.