
**NATIONAL ENVIRONMENTAL POLICY ACT
ENVIRONMENTAL ASSESSMENT
FINAL**

**Enhanced-Use Lease Veteran Housing
Department of Veterans Affairs
Palo Alto Health Care System
Menlo Park Division
Menlo Park, California**

Department of Veterans Affairs
Office of Asset Enterprise Management



August 2022

EXECUTIVE SUMMARY

In this Environmental Assessment (EA), the U.S. Department of Veterans Affairs (VA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the development of supportive housing for homeless and at-risk of homeless Veterans, and their families at the VA Palo Alto Health Care System (VAPAHCS), Menlo Park Division (MPD) Campus located in the City of Menlo Park, California (Proposed Action). The Proposed Action requires the VA to enter into an Enhanced Use Lease (EUL) agreement with a private entity, MidPen Housing Corporation (MidPen; Lessee), and grant MidPen the rights to finance, design, construct, operate and maintain the proposed veteran housing development at the MPD Campus.

The proposed EUL property for the Proposed Action (herein referred to as the “project site”) is a previously developed and disturbed parcel located within the southeast quadrant of the MPD Campus along Willow Road (State Route 114), just south of the main entrance (Figure 1 - MPD Campus Location). The approximate 2.1-acre parcel is comprised of a paved parking lot for 100 vehicles, a grass covered auxiliary parking area that is south of the main lot, managed lawns and landscaping with irrigation, sidewalks, fencing, and below-ground utilities (Figure 2 - Project Site Locus).

The Proposed Action is comprised of a 3-story supportive housing development with 61 residential units (Exhibit I - Conceptual Site Plan). Key components of the conceptual design include:

- 54 one-bedroom units, 5 two-bedroom units, and 2 three-bedroom units;
- A new vehicular entrance/exit and access drive to the EUL site from Hospital Plaza, with a new bypass access road to Building 324 that is currently accessed through the EUL parcel;
- 76 dedicated parking spaces, with additional general parking;
- Laundry facilities on all floors;
- Lobby with community rooms; and
- Garden/Courtyard and greenspaces.

National Environmental Policy Act

The Proposed Action is subject to the procedural requirements of the *National Environmental Policy Act of 1969* (NEPA) (42 U.S. Code 4321 et seq.). NEPA requires federal agencies to consider environmental consequences in their decision-making process. The Council on Environmental Quality (CEQ) issued regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) to implement NEPA that include provisions for both the content and procedural aspects of the required environmental analysis. The VA complies with NEPA and CEQ implementing regulations in accordance with 38 CFR Part 26 (51 FR 37182, Oct. 20, 1986) (*Environmental Effects of VA Actions*).

Environmental Assessment

This document has been prepared by the VA, acting as lead agency, in accordance with NEPA and VA Implementing Regulations. This EA provides a description of the Proposed Action; Purpose and Need for the action; developed Alternatives, including No-Action that serves as a baseline assessment for the action; Affected Environments; Environmental Consequences, and Consultations conducted with federal, state and local agencies in the development of the findings and conclusions.

In this EA, the VA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action. For the purposes of this study, it is assumed

that the operation of the Proposed Action will be consistent with all relevant laws and regulations; accordingly, this EA does not provide an analysis of the implications of these other compliance requirements. However, to the extent that these other laws, regulations and guidelines impose a specific environmental standard which may impact or influence the outcome of the Proposed Action, these requirements are considered in this analysis.

Purpose and Need for the Proposed Action

The purpose of the Proposed Action is to construct, operate and maintain supportive housing for homeless and at-risk of homeless Veterans, and their families. The Proposed Action is needed to best reuse underutilized land at the MPD Campus to create, safe, affordable, supportive housing for Veterans and their families. The Proposed Action also helps to avoid ongoing operating costs to the VA and taxpayers, associated with the upkeep of underutilized assets, while providing aid to select Veterans.

This EA also analyzes the No Action alternative that serves as a benchmark against which the effects of the Proposed Action can be evaluated.

Proposed Action Evaluation

Resource areas examined in this EA include aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, biological resources, noise, land use, floodplains and wetlands, socioeconomics, environmental justice, community services, solid and hazardous waste materials, traffic and transportation, and utilities.

The following table summarizes the potential impacts of the Proposed Action in comparison to the No Action Alternative on the resources and attributes of the human environment at the project site and within the local community.

Resource/Attribute	Proposed Action Impacts	No Action Impacts
Meets Purpose of and Need for Action	Yes	No
Aesthetics	Negligible, short-term impact from heavy equipment during construction. Negligible impact during operation. The Proposed Action will not alter any aesthetically sensitive locations within the MPD Campus, or produce any related impacts for the local neighborhood.	None
Air Quality	Negligible, short-term impact from construction equipment emissions, which are below the <i>De Minimis</i> threshold level. Negligible impact during operation due to new emissions sources, and increase vehicle traffic associated with operation of the Proposed Action.	None
Cultural Resources	Contributing resources of the National Historic Preservation Act (NHPA) eligible " <i>Personnel Quarters Historic District</i> " are located immediately north and south of the proposed EUL parcel. These sites are considered moderately sensitive for both historic and pre-historic cultural remains. As required per Section 106 of the NHPA, effects to historic resources were considered in consultation with the State Historic Preservation Officer.	None

Resource/Attribute	Proposed Action Impacts	No Action Impacts
Geology and Soils	Negligible short-term impact during Construction. Impacts would be minimized through Best Management Practices (BMPs) and conformance with construction-related permit requirements from the National Pollutant Discharge Elimination System (NPDES) and the local requirements of the City of Menlo Park Building Division, including Menlo Park Stormwater Management program and the Bay Area Stormwater Management Agency Association.	None
Hydrology and Surface Water Quality	Negligible short-term impact during construction and operation. Construction impacts would be minimized through BMPs and conformance with construction-related permit requirements from NPDES and the local requirements of the Menlo Park Stormwater Management program and the Bay Area Stormwater Management Agencies Association (BASMAA).	None
Wildlife and Habitat	Negligible short-term impact to vegetation and local wildlife resources during construction, but the Proposed Action would not impact listed T&E species per VA's Effect Determination prepared in accordance with Section 7 of the Endangered Species Act.	None
Noise	Negligible short-term impact from construction and operation. Bordering vegetation between EUL site and potential receptors would be maintained to further attenuate potential noise impacts.	None
Land Use	Minimal short-term impacts are expected from the construction of the proposed Veteran Housing complex. Proposed Action is consistent and compatible with prior, current, and anticipated future land use at the site and surrounding area.	None
Floodplains and Wetlands	The Proposed Action is not located within or near any floodplains, wetlands or coastal zone management areas. There is no impact expected from the Proposed Action.	None
Socioeconomics	Negligible short-term benefit during construction due to hiring local construction workers, and long-term benefit from facility operations due to hiring of needed staff.	No benefit from local hiring for facility construction and/or operations.
Community Services	The Proposed Action will have no net increased demand for community services (e.g., emergency, fire, and police services; schools; libraries; churches etc.). Long-term, beneficial impact on health care services and increase in affordable permanent housing stock.	Long-term adverse impact, no increase in affordable permanent housing.

Resource/Attribute	Proposed Action Impacts	No Action Impacts
Solid Waste and Hazardous Materials	Negligible, short-term impact during construction. Identified regulated building materials would be handled and disposed of in accordance with local, state, and federal regulations. Negligible impact during operation from minor increase in solid wastes.	None
Transportation and Parking	The existing facility is vehicle accessible with adequate extended roadways, parking lots, and walkways to support the added vehicle and pedestrian traffic from facility operations. Negligible, short-term impact during construction due to construction equipment entering and leaving site and construction of the new parking lot and access. Long-term benefit on local traffic with the new access road to Building 324 that bypasses Lot 2.	No long-term improvements associated with improved traffic flow.
Utilities	Negligible short-term impact during construction and operation. New connections and overall utilization will not interrupt or reduce utility services to current or future utility suppliers or users.	None
Environmental Justice	No impact during construction. Long-term beneficial impact on low-income populations through the provision of affordable permanent housing.	Long-term impact due to absence of permanent affordable housing.
Potential for Generating Substantial Controversy	No controversy currently expressed and no future opposition anticipated. The VA received no related comments during the public review process.	Controversy could arise if Veteran Housing is not implemented.

Cumulative Impacts

The Federal Council on Environmental Quality regulations for implementing NEPA define cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.

Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7). Based on available information, no cumulative significant adverse effects to any resources are anticipated from the Proposed Action.

Public Involvement

As part of the NEPA process, VA made the Draft EA available for a 30-day public review and comment period. A Notice of Availability (NOA) announcing the availability of the Draft EA was published in San Mateo County Times on 22-24 April 2022 and 11-12 June 2022. Electronic copies of the Draft EA were posted to VA VAPAHCS Construction Website (<https://www.va.gov/palo-alto-health-care/programs/va->

palo-alto-construction-updates/). There were no comments received from Federal, state, or local agencies or interested members of the public. Proof of publication of the NOA is provided in Appendix D.

Conclusion

The purpose of the Proposed Action is to provide housing to the increasing number of homeless Veterans, reduce the inventory of underutilized real estate on the MPD Campus, and transfer the operation and maintenance costs to a Lessee or Developer (MidPen).

The VA has selected Alternate No. 1 (Proposed Action). The environmental assessment of all project attributes considered did not result in “Significant impact” during construction and/or operation of the Proposed Action. Also, the environmental assessment of all project attributes considered did not result in “significant-if-not-mitigated impacts” during construction and operations.

The construction and operation under the Proposed Action will not result in any adverse impacts on the natural or human environments that would require mitigation to reduce impacts to less than significant, nor preclude the issuance of a Finding of No Significant Impact (FONSI).

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Acronyms and Abbreviations

ABAG	Association of Bay Area Governments
ALTA	American Land Title Association
APCD	Air Pollution Control District
APE	Area of Potential Effects
BAAQMD	San Francisco Bay Area Air Quality
BCDC	San Francisco Bay Conservation and Development Commission
BMP	Best Management Practice
CAA	Federal Clean Air Act
CAAQ	California Ambient Air Quality Standards
CADFG	California Department of Fish and Game
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CCR	California Code of Regulations
CESA	California Endangered Species Act
CEQ	Council on Environmental Quality
CHRIS	California Historical Reserve Information System
CFR	Code of Federal Regulation
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EP	Environmental Professional
EUL	Enhanced Use Lease
FEMA	Federal Emergency Management Agency
ESA	Endangered Species
FONSI	Finding of No Significant Impact
GIS	Geographic Information
GSHE	Ground-Source Heat Exchange
HVAC	Heating, Ventilation and Air Conditioning
MPD	Menlo Park Division
N/A	Not applicable
NAAQS	National Ambient Air Quality Standard
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OAEM	(VA) Office of Asset Enterprise Management

PG&E	Pacific Gas and Electric
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SHPO	State Historic Preservation
SMCWPP	San Mateo Countywide Water Pollution Prevention Program
State	State of California
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	U.S. Department of Veterans Affairs
VAMC	Veterans Affairs Medical Center
VAPAHCS	Veterans Affairs Palo Alto Health Care System
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network
VOC	Volatile organic compound

1.0 INTRODUCTION

In this Environmental Assessment (EA), the U.S. Department of Veterans Affairs (VA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the development of supportive housing for homeless and at-risk of homeless Veterans, and their families at the VA Palo Alto Health Care System (VAPAHCS), Menlo Park Division (MPD) Campus (Proposed Action) located in the City of Menlo Park, California. The Proposed Action requires the VA to enter into an Enhanced Use Lease (EUL) agreement with a private entity, MidPen Housing Corporation (MidPen), and grant MidPen the rights to finance, design, construct, operate and maintain the proposed veteran housing development at the MPD Campus.

The Proposed Action is subject to the procedural requirements of the *National Environmental Policy Act of 1969* (NEPA) (42 U.S. Code 4321 et seq.). NEPA requires federal agencies to consider environmental consequences in their decision-making process. The Council on Environmental Quality (CEQ) issued regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) to implement NEPA that include provisions for both the content and procedural aspects of the required environmental analysis. The VA complies with NEPA and CEQ implementing regulations in accordance with 38 CFR Part 26 (51 FR 37182, Oct. 20, 1986) (*Environmental Effects of VA Actions*).

This EA provides the necessary information for the VA to make an informed decision regarding the Proposed Action. This study was performed to analyze potential direct, indirect, and cumulative environmental impacts associated with the Proposed Action. For purposes of comparison, this EA also evaluates the impacts associated with alternatives to the Proposed Action, including a No Action Alternative whereby the proposed Veteran housing complex is not developed at the MPD Campus.

1.1 Background

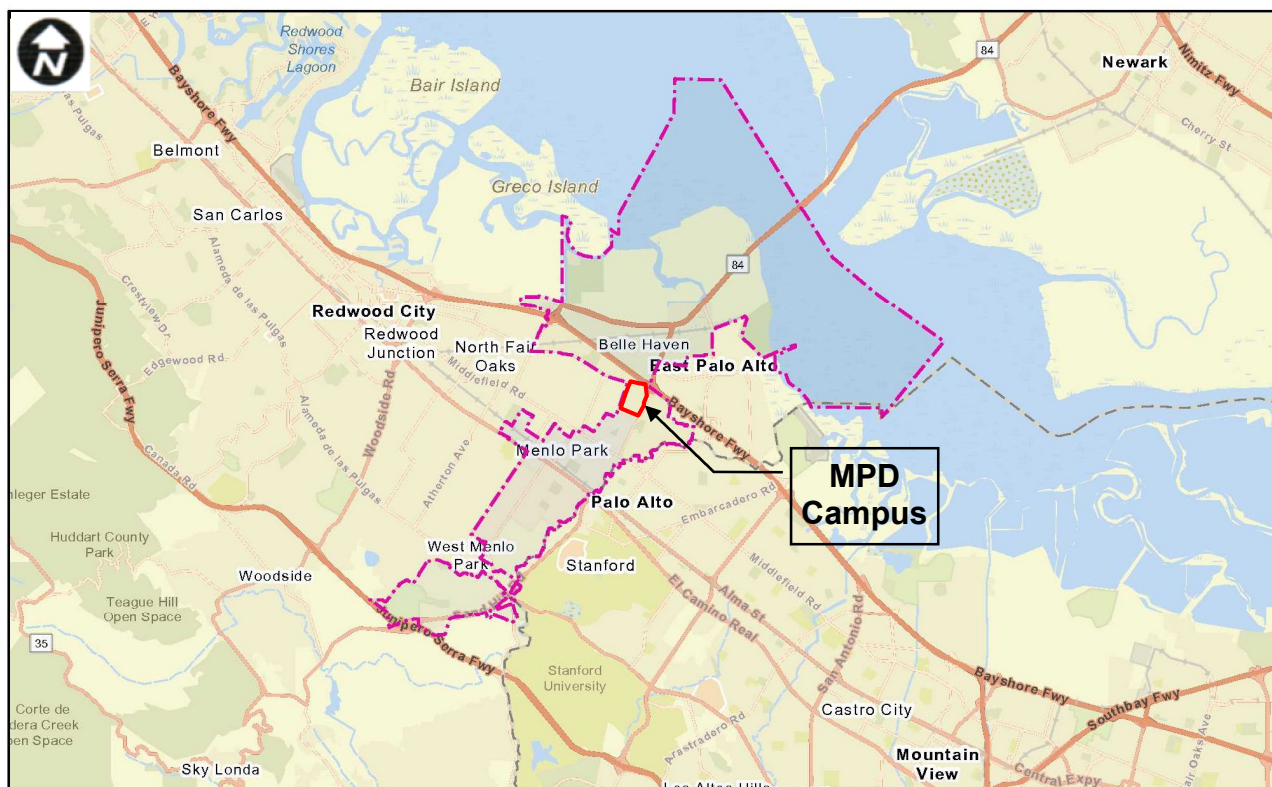
This EA has been prepared to evaluate the potential human and environmental impacts related to the Proposed Action, which is to construct and operate a supportive housing development for homeless and at-risk of homeless Veterans, and their families at the MPD Campus (Figure 1 – MPD Campus Location). The Proposed Action will consist of a 3-story development with 61 residential units (77 total occupants estimated at full capacity), laundry facilities on all floors, a main lobby with community rooms, central courtyard, multiple greenspaces, a new vehicular entrance/exit and access drive to the housing complex, and dedicated facility parking. A summary of the apartment units is provided in Table 1, and a detailed conceptual site plan for the development is provided in Exhibit I.

Table 1: Composition of the EUL Housing Development

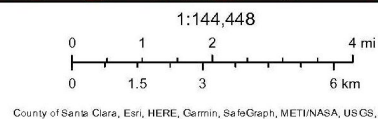
Type of Units	Quantity
One-Bedroom Apartments	54
Two-Bedroom Apartments	5
Three-Bedroom Apartments	2
Total	61

The VA will use its EUL Authority to ground-lease a portion of the MPD Campus property to allow MidPen to develop, construct, operate, and maintain the proposed veteran housing development. The EUL Authority, Title 38 United States Code Sections 8161-8169, allows the VA to enter into leases of available VA land, buildings, and other resources to improve services, provide facilities, and/or generate revenue.

Figure 1: Location of VAPAHCS MPD Campus, Menlo Park, CA



December 3, 2020



The VA's EUL authority provides for long-term leases (up to 75 years) to the public or private sector. The underlying ownership of the property is not proposed to change under the EUL program. The VA would be responsible for the lease of federal property and the Lessee (MidPen) would be responsible for site preparation activities and the construction and operation of the proposed facilities. In addition, the Lessee would be responsible for implementation of mitigation measures identified in this EA, and compliance with all applicable Federal, state and local laws and regulations.

Location of Proposed Action

The EUL parcel for the Proposed Action (herein referred to as the “project site”) is a previously developed and disturbed parcel located along Willow Road (State Route 114) within the southeast quadrant of the MPD Campus, just south of the main entrance (Figure 2, Project Site Locus). The MPD Campus is located at 795 Willow Road in the City of Menlo Park (San Mateo County), on Federal lands owned by VA.

Current land use surrounding the MPD Campus is a mixture of commercial properties and single-family and multi-family housing and apartments, schools and parks. The MPD Campus is bordered by Route 101 to the north, Willow Road to the east, South Perimeter Road to the south, and West Perimeter Road to the west. The area immediately west of the MPD Campus is an unincorporated portion of San Mateo County referred to as Menlo Oaks. Other jurisdictions in the vicinity of the MPD Campus include the Town of Atherton to the west, the City of East Palo Alto to the east, and the City of Palo Alto to the south (Figure 1).

Figure 2: Location of Project Site at the MPD Campus



The MPD Campus operates as a typical medical facility providing a variety of healthcare services for Veterans, as well as office buildings, facilities/maintenance buildings, and storage buildings. Operations at the MPD Campus include primary medical care, mental health service, extended rehabilitation care, social work services, and domiciliary care.

National Historic Properties

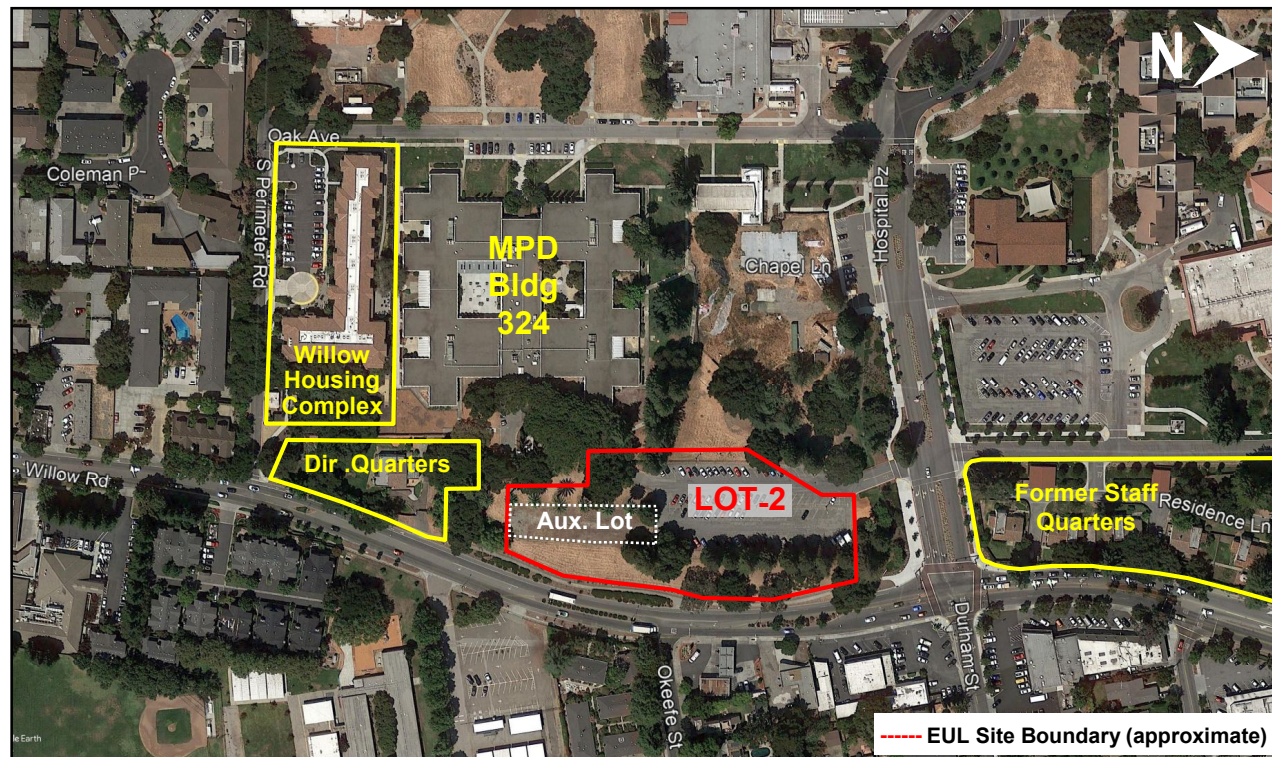
Based on a review of available records, there are no historic properties listed on the National Register of Historic Places (NRHP) located within the project site. However, a recently prepared Survey Report for the MPD Campus identified a discontinuous historic district on Campus that is eligible for inclusion in the National Register (VA BESR 2019). Referenced as the *Personnel Quarters Historic District*, it consists of 17 contributing buildings in four separate areas located along the perimeter of the MPD Campus. Two of these areas are near the project site, as detailed in Figure 2 and summarized as follows:

- Director's Quarters and Associated Garage (Buildings 222 and 222-G). Located directly south of the project site, the Proposed Action includes a 50-foot buffer along the boundary with this area (Exhibit II, EUL ALTA Survey).
- Staff Quarters Buildings 116 through 123. Located along Willow Road, the closest structure (Building 116) is approximately 200 feet north of the project site, and this area is further separated from the proposed property by Hospital Plaza and the MPD Campus main entrance.

Site Description

The approximate 2.1-acre project site is currently comprised of a paved parking lot for 100 vehicles (identified as Lot 2), a grass covered auxiliary parking area south of the main lot, managed lawns and landscaping with irrigation, sidewalks, fencing, and below-ground utilities (Figure 3 - Project Site Features).

Figure 3: Project Site Features



The project site is bound to the north by Hospital Plaza Road and the hospital main entrance off Willow Road, to the west and southwest by Building 324 (Psychiatry), to the east by Willow Road, and to the south by the Former Director's Quarters (MPD Buildings 222 and 222-G). There is an access road for shipping/receiving to Building 324 that traverses the west side of Lot 2 at the project site that will require rerouting to maintain this critical access.

The recently constructed Willow Housing complex is located at the southern limit of the MPD Campus along South Perimeter Road, approximately 325 feet southwest of the project site (Figure 3). The purpose and intent of the Proposed Action is similar to that of the current Willow Housing complex (i.e., apartments serving formerly homeless veterans and veterans at risk of imminent homelessness).

1.2 Purpose and Need for Proposed Action

The purpose of the Proposed Action is to utilize the VA's EUL authority to facilitate the construction, operation and maintenance of a supportive housing facility for homeless and at-risk of homeless Veterans, and their families. The Proposed Action is needed to best reuse underutilized land and infrastructure at the MPD Campus to create safe, affordable, permanent housing that addresses the needs of local Veterans who may be homeless or at risk of becoming homeless. The Proposed Action also helps to avoid ongoing operating costs to the VA and taxpayers, associated with the upkeep of underutilized Federal assets.

1.3 NEPA Process Overview

This EA has been prepared in accordance with NEPA and implementing regulations to evaluate the potential human and environmental impacts related to the Proposed Action. It is assumed for the purposes of this study that the operation of the Proposed Action will be consistent with all relevant laws and regulations; accordingly, this EA does not provide an analysis of the implications of these other compliance requirements. However, to the extent that these other laws, regulations and guidelines impose a specific environmental standard which may impact or influence the outcome of the Proposed Action, these requirements are considered in this analysis.

If the EA finds that the project would not significantly impact the human environment, a Finding of No Significant Impact (FONSI) will be prepared, and the VA will proceed with the project. The CEQ regulations consider the human environment to include the natural and physical environment and the relationship of people with that environment. If the evaluation contained within this EA finds that the proposed action would significantly affect the human environment, NEPA requires the preparation of an Environmental Impact Statement (EIS). Economic or social effects, however, are not intended by themselves to require the preparation of an EIS (40 CFR 1508.14).

EA Methodology

The terms Effects and Impacts are used interchangeably in this document. Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental outcomes, even if on balance the agency believes that the effect will be beneficial (40 CFR 1508.8).

Potential environmental impacts are identified, where applicable, according to their significance. According to the CEQ, the significance of an impact is determined by examining both its context and intensity (40 CFR 1508.27). Context is related to the affected region, the affected interests, and the locality; while intensity refers to the severity of the impact.

The EA methodology uses the following terms in assessing environmental impacts:

- **Short-term Impact:** Short-term impacts are those that would occur only with respect to a particular activity, for a finite period, or only during the time required for construction or installation activities.
- **Long-term Impact:** Long-term impacts are those that are more likely to be persistent and chronic.
- **Direct Impact:** A direct impact is caused by an action and occurs around the same time at or near the location of the action.
- **Indirect Impact:** An indirect impact is caused by an action and might occur later in time or be farther removed in distance but still be a reasonably foreseeable outcome of the action.
- **Beneficial-and-not-significant:** This impact represents an improvement in existing conditions and an Environmental Impact Statement (EIS) is not required.
- **None-to-negligible:** A potential impact of this severity would be barely detectable and an EIS is not required for this impact.
- **Minimal-to-moderate:** A potential impact that is less-than-significant and would not require specific mitigation measures, other than those dictated by regulatory and permitting requirements and an EIS is not required for this impact.

- **Significant-but-mitigated:** A potential impact of this severity would require specific mitigation measures beyond those associated with permit requirements but an EIS is not required for this effect.
- **Significant:** A potential impact of this severity would have to be evaluated in an EIS.

Environmental Impact Significance

If the EA finds that the proposed action would significantly affect the human environment, an EIS is required. Environmental consequences may be either significant or not significant impacts. The following are not significant environmental impacts because an EIS is not required for these findings:

- ✓ Beneficial-and-not-significant
- ✓ None-to-negligible
- ✓ Minimal-to-moderate
- ✓ Significant-but-mitigated

2.0 ALTERNATIVES

Provided in this section is information on the Proposed Action and its alternatives, including those that VA considered, but eliminated, and the reasons for elimination. The intent of this section is to provide the rationale for the selected Alternative which meets the purpose and need for the Proposed Action.

Screening Criteria for Objectives

The VA will consider the following screening criteria for alternatives:

- ✓ Meet purpose and needs;
- ✓ No cost for land acquisition;
- ✓ Facility must be structurally sound;
- ✓ Cost effective;
- ✓ Protect human health;
- ✓ Protect environment, for example minimal impacts; and
- ✓ Proximity to a mass transit system sufficient to service the facility.

2.1 Description of Alternatives

The following two project alternatives are evaluated in this EA: 1) The Proposed Action, which is also the preferred alternative, to construct and operate a 61-unit supportive housing complex for Veterans and their families at the MPD Campus; and 2) No Action: do not implement the Proposed Action and continue to underserve Veterans and others in need of safe, affordable, permanent housing.

2.2 Proposed Action (Preferred Alternative)

Under the Proposed Action, VA would enter into a EUL agreement with MidPen Housing, an affordable housing and real estate development company for the purpose of developing, financing, operating, and maintaining supportive housing for homeless and at-risk of homeless Veterans, and their families at the project site. VA would be responsible for the lease of federal property and the Lessee (MidPen) would be responsible for site preparation activities and the construction and operation of the proposed facilities. The Lessee would also be responsible for compliance with all Federal, state and local regulations in the construction and operation of the proposed facility, as applicable.

The Proposed Action would consist of the following facility features (Exhibit I, Conceptual Site Plan):

- 3-story supportive housing development with on-site case management services and other supportive/medical services offered at the adjacent VA hospital;
- 61 unit residential complex, comprised of 54 one-bedroom units, 5 two-bedroom units, and 2 three-bedroom units;
- New vehicle entrances/exits from Hospital Plaza near the facility main entrance from Willow Road;
- 81 dedicated parking spaces, with additional general parking;
- New access road to Building 324 that is rerouted around the proposed housing development;
- Laundry facilities on all floors;
- Lobby with community and function rooms; and
- Garden/Courtyard and greenspaces.

The design for the facility minimizes the removal of native trees, includes dedicated parking for the future residences, utilizes existing nearby infrastructure and utilities, and the proposed architecture will align with the adjacent MPD Campus.

Construction would be completed in a single phase, and once completed, the housing complex will be operated and managed on a day-to-day basis by MidPen, who has a successful history of operating similar projects.

The Proposed Action intends to provide expanded economical and efficient supportive housing to a growing veteran population in San Mateo County.

2.3 No Action Alternative

As required under CEQ Regulations (40 CFR 1502.14), the No-Action Alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated. Under the No Action Alternative, the Proposed Action would not be implemented. The VA would not enter into a EUL agreement with MidPen Housing and the proposed supportive housing complex for Veterans and their families would not be developed. This would result in reduced available housing for Veterans. The No Action Alternative would not satisfy the purpose and need for the Proposed Action.

2.4 Alternatives Eliminated From Further Consideration

The National Environmental Policy Act (NEPA), Council of Environmental Quality (CEQ) U.S. Department of Veterans Affairs June 2018 regulations, and the Code of Federal Regulations (CFR) 38 CFR 26 require that all reasonable alternatives be rigorously explored and objectively evaluated. The following alternatives was eliminated after applying the screening criteria:

- Leasing at another location at the MPD Campus – No other suitable areas or buildings were identified at the MPD Campus. Vacant land near the project site is earmarked for other VA projects.
- Leasing property at another VA facility - No other properties were identified in the area that would be suitable in support of the Veteran population in San Mateo County.

Based on the above considerations, other EUL alternatives were eliminated from further consideration.

3.0 AFFECTED ENVIRONMENT

This section presents the potential environmental, cultural and socioeconomic concerns for the implementation of the Proposed Action, as it relates to the construction and operation of the related housing development. The existing conditions associated with the No-Action Alternative will serve as a baseline from which to identify and evaluate potential changes or impacts to the affected environment that are attributable to the Proposed Action. Baseline environmental conditions were identified during a site visit performed in August 2020, and from review of aerial photos, topographical maps, VA historic documents, data from planning and resources agencies, and from communications with VA personnel.

The potential impact area for the Proposed Action includes the project site, and where appropriate, areas of the MPD Campus, adjacent roadways, and adjacent properties. The proposed EUL of the subject property, as an administrative action, will not have a direct adverse impact on the human and natural environment. Therefore, this EA is focused on the potential impacts resulting from the subsequent construction and operation of the proposed housing development. VA would be responsible for the lease of federal property and MidPen would be responsible for the construction and operation of the proposed facility. Furthermore, MidPen, as the developer, would be responsible for implementation of any mitigation and avoidance measures identified in this EA.

3.1 Aesthetics

The project site consists of an irregular shaped and elongated parcel comprised of a paved parking lot with a grass-covered auxiliary parking area bordering Willow Road (State Route 114) near the hospital main entrance. The parking lot, identified as Lot 2, is located near the center of the parcel and comprises over half of the total site. The remainder of the site is greenspace that is comprised mostly of managed lawns and landscaping with mature growth trees (i.e., deciduous and conifer varieties) and shrubs. The project site has perimeter sidewalks to/from the parking lot, but no recreational walking paths or seating areas.

The project site is located along the northern boundary with MPD Buildings 222 and 222G (former Directors Quarters), and just south of Buildings 116 through 123 (former Staff Quarters), which are contributing elements of a NRHP eligible *Personnel Quarters Historic District* (Figure 3). The closest contributing element from the Staff Quarters area is Building 116, which is located 200 feet north of the project site, and is further separated by Hospital Plaza Road and the MPD Campus main entrance.

Proposed Action (Preferred Alternative)

The Proposed Action would consist of constructing a three-story, 61 unit residential facility with dedicated vehicle parking, landscaped courtyard, and multiple greenspaces that would occupy nearly all the project site. The Proposed Action will not alter any aesthetically sensitive locations within the MPD Campus, or produce any related impacts for the local neighborhood. The design would preserve most of the native trees to maintain existing physical/visual buffer to the surrounding area, utilize existing nearby infrastructure and utilities, and would provide an architecture that would align with the adjacent properties.

The Proposed Action includes a 50-foot buffer at the boundary with Buildings 222 and 222G (Exhibits I and II) that includes an existing wooded area with tall trees and lower shrubs that provide a significant amount of visual screening from the Proposed Action.

Construction

During construction of the Proposed Action, aesthetic impacts would be limited to those associated with typical “residential apartment” type construction activities. This includes construction vehicles delivering

building materials, as well as on-site construction equipment associated with vertical construction (e.g. backhoe, lift-truck, cement truck). Existing mature trees and open spaces that are integral to a campus-like setting would be maintained to the greatest extent possible.

Operations

The Proposed Action would be professionally landscaped and maintained to provide an aesthetically pleasing environment. Using careful site design, mature trees will be retained and new plantings incorporated into the project, increasing the overall visual aesthetics. The design would be consistent with the architecture of the VAMC Campus and surrounding area, and will include landscaped courtyards and greenspaces (Exhibit I).

Outside lighting on the project site would include low mounted and downward casting lighting to reduce trespass light onto adjacent properties, and the brightness of the lighting would be comparable to the ambient lighting in the adjacent neighborhood.

No Action Alternative

As no action would occur under this alternative, no effect to aesthetics would be anticipated. The proposed property would continue to be used as a parking lot.

3.2 Air Quality

The Clean Air Act (CAA), as amended, requires the United States Environmental Protection Agency (USEPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The CAA established two types of NAAQS, primary and secondary. Primary standards protect against adverse health effects; secondary standards protect against welfare effects, such as damage to farm crops and vegetation and damage to buildings.

Located within San Mateo County, the project site is in the San Francisco Bay Area Air Basin (SFBAAB) and is subject to the rules and regulations imposed by the Bay Area Air Quality Management District (BAAQMD), as well as the California Ambient Air Quality Standards (CAAQS) adopted by the California Air Resources Board (CARB; <https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>). Although the CAAQS predate the NAAQS set by the USEPA, and are more restrictive than the NAAQS, attainment of the NAAQS has precedence over the CAAQS due to federal penalties for failure to meet federal attainment deadlines. Conversely, California law does not require that CAAQS be met by specified dates, only incremental progress toward attainment.

Both California and the USEPA have established health-based air quality standards for select air pollutants, referred to as "criteria" pollutants. CARB has area designations for ten criteria pollutants: ozone, carbon monoxide, nitrogen dioxide, suspended particulate matter (PM₁₀), fine suspended particulate matter (PM_{2.5}), sulfur dioxide, sulfates, lead, hydrogen sulfide, and visibility reducing particles (<https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>). In contrast, the USEPA makes national area designations for six criteria pollutants: ozone, particulate matter (PM₁₀ and PM_{2.5}), sulfur dioxide, lead, carbon monoxide and nitrogen dioxide (<https://www.epa.gov/criteria-air-pollutants>).

San Mateo County is currently designated by CARB as a CAAQS attainment area for carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfates, and lead; a nonattainment area for ozone, PM_{2.5}, and PM₁₀; and unclassified for hydrogen sulfide and visibility reducing particles (<https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>). The County is currently designated by the USEPA

as a NAAQS nonattainment area for PM_{2.5}, carbon monoxide, lead, nitrogen dioxide, sulfur dioxide; marginal nonattainment for 8-hour ozone; and unclassified for PM₁₀ (<https://www.epa.gov/green-book>).

Proposed Action (Preferred Alternative)

Based on the estimated *de minimis* amounts of emissions anticipated from construction and operation of the Proposed Action, the need for a conformity determination under the CAA General Conformity Rule is not warranted and has not been performed. However, as described below, construction Best Management Practicess (BMPs) will be utilized to minimize potential air quality impacts.

Construction

Heavy construction activities can result in fugitive dust (particulate matter) emissions from earth moving activities and the release of nitrogen oxides from diesel-powered construction vehicles and equipment. Vehicle and equipment emissions would unavoidably lead to a slight increase in local pollutant levels. To reduce these emissions, vehicle and equipment running times would be minimized, idling times for vehicles would be kept to a minimum and engines would be properly maintained.

Fugitive dust and soil from machinery activity may be a temporary negative impact during construction. To minimize fugitive soil impacts during construction, reasonable measures should be implemented to prevent particulate matter from becoming airborne resulting in unnecessary amounts of emissions generation. Such precautions would include:

- Spray exposed soils with water or other suppressant to reduce dust emissions;
- Cover trucks transporting materials to reduce dust emissions;
- Provide wheel washers to reduce dust emissions;
- Cover dirt, gravel, and debris piles as needed to reduce wind-blown particles; and
- Minimize on-site diesel engine idling to reduce construction vehicle and equipment emissions.

The proposed EUL development and related construction activities are not anticipated to result in air emissions in excess of the NAAQS or CAAQS, and it is expected that the Lessee will comply with all applicable air pollution control regulations. Therefore, construction would result in negligible, short-term impacts on air quality.

Operations

Mobile emissions would primarily be associated with vehicular traffic traveling to and from the development. However, the anticipated increase in resident, visitor and staff vehicle traffic is not expected to have a significant impact on local air quality. As discussed in the analysis of traffic in Section 3.13, approximately 81 parking spaces will be provided for the proposed EUL development.

For the evaluation of stationary sources, it is assumed that the proposed facility would be equipped with a natural gas boiler for heating. The source of air emissions could be potentially subject to Federal and State air permitting regulations, including the BAAQMD Regulation 9-7 that limits the air pollution emissions of nitrogen oxides and carbon monoxide from both existing and new industrial, institutional, and commercial boilers, steam generators and process heaters, all of which are collectively known as “boilers” (https://www.baaqmd.gov/~media/files/compliance-and-enforcement/advisories/combustion-equipment/9-7_amended_faq_070711.pdf). Based on the estimated square footage of the proposed building, the heat rating is expected to meet the exemption parameters of the rule. Therefore, operations would result in negligible, short-term impacts on air quality.

No Action Alternative

Under the No Action Alternative, no adverse impacts to air quality would occur. The proposed property would continue to be used as a vehicle parking lot.

3.3 Cultural Resources

Section 101(b)(4) of the National Historic Preservation Act (NHPA) establishes a federal policy of conserving the historic, cultural, and natural aspects of our national heritage. Regulations implementing NEPA stipulate that federal agencies consider the consequences of their undertakings on historic and cultural resources [40 CFR Part 1502.16(g)]. Numerous other laws, regulations, and executive orders define other requirements for protecting cultural resources, but the primary requirements are those of Section 106 of the NHPA. NHPA mandates that as federal projects, or federally-funded or approved projects, are planned and implemented, the responsible federal agencies give due consideration to historic properties, which are defined as districts, sites, buildings, structures, and objects included in, or eligible for listing in the NRHP. Regulations for Protection of Historic Properties (36 CFR Part 800) implement NHPA by defining a process for demonstrating such consideration through consultation with State Historic Preservation Offices (SHPOs), the federal Advisory Council on Historic Preservation (ACHP), and other organizations and individuals, such as related Native American Tribes through their Tribal Historic Preservation Officer (THPO).

NHPA Section 106 Process

The Section 106 review is an integral component of the NHPA process that requires each federal agency to identify and assess the effects its actions may have on historic resources. In accordance with NHPA requirements, the VA initiated consultation with the SHPO, THPO and the City of Menlo Park (Appendix C). These parties were provided opportunity to review and comment on the Proposed Action and related documents, to include the VA's tentative finding of "no adverse effect". SHPO concurrence was provided in a letter dated December 10, 2021 (Appendix C). Responses from the Amah Mutsun Tribal Band of Mission San Juan Bautista THPO and the City of Menlo Park were not received.

Property Setting

The property currently occupied by the MPD Campus was first developed in 1917 as the Base hospital for the former Camp Fremont during World War I. Prior to Base development, the area was reportedly dairy lands. Camp Fremont closed in September 1919 following the end of World War I. Since that time, the former Base hospital has seen continued service to veterans through the U.S. Public Health Service (1919-1922), the Veterans Bureau (1922-1930), the Veterans Administration (1930-1989), and the U.S. Department of Veterans Affairs (1989-present).

Based on a review of the MPD Campus history, a building was located on the project site from circa 1923 to 1980. This 3-story building with basement was identified as Building 109 and used as the Nurses Residence (Exhibit III - Nurses Residence, Building 109 Photograph). Prior to 1923, the project site was greenspace within the hospital property and the former Camp Fremont.

Expansion of Building 109 was performed in circa 1926 with the addition of a north and south wing to the original building footprint. Following the demolition of the Building 109 complex in circa 1980, the space was used to expand Lot #2 to its current size. Other than the use of the grassy area to the south for auxiliary parking, all available records show the remaining area of the project site as greenspace.

Previous Studies and Documentation

Two previous VA studies have assessed the archaeological resources and built environment within the larger MPD Campus, including the project site for the EUL development:

1. Extended Phase I Archaeological Investigation, U.S. Department of Veterans Affairs, Menlo Park Division Medical Campus, Menlo Park, California, June 2010. A Phase I archaeological survey is the first step in the archaeological process. The goal of this survey was to determine the presence or absence of archaeological resources within a project area. This investigation concluded that the MPD Campus has undergone extensive subsurface disturbance, and that the entire Campus is moderately sensitive for both historic-era and prehistoric cultural resources (VA 2010).
2. Veterans Affairs Palo Alto Health Care System, Menlo Park Division, Built Environment Survey Report (BESR), April 2019 (updated). This survey identified a discontinuous historic district on Campus that is eligible for inclusion in the National Register. Referenced as the *Personnel Quarters Historic District*, it consists of 17 contributing buildings in four separate areas located along the perimeter of the MPD Campus (VA BESR 2019). Two of these areas are near the project site, as detailed in Figure 3 and summarized as follows:
 - Director's Quarters and Associated Garage (Buildings 222 and 222-G). Located directly south of the project site, this historic resources abuts the proposed EUL housing development.
 - Staff Quarters Buildings 116 through 123. Located along Willow Road, the closest structure (Building 116) is approximately 200 feet north of the project site, and this area is further separated from the proposed EUL housing development by the MPD Campus main entrance.

This survey further identified two periods of significance from 1917-1919 (operation of the former Camp Fremont) and 1922-1951 (period of most significant Campus development).

Proposed Action (Preferred Alternative)

Historic Resources

No known historic resources would be directly affected by the Proposed Action, because no such resources are known to occur within the boundary of the project site. However, indirect impacts on the adjacent NRHP eligible Director's Quarters, with associated Buildings 222 and 222G, are possible. Indirect impacts on the this location have the potential to occur if changes to the visual setting, atmospheric intrusions, or other features of the Proposed Action outside the eligible historic district's boundaries would diminish the ability for it to convey its significance.

The proposed development includes the construction of a residential housing facility, surface parking lot, associated infrastructure, open space, and new landscaping within the project site, all of which would introduce subtle new visual elements to the larger setting to the north of Buildings 222 and 222G. The Proposed Action incorporates a 50-foot buffer at the boundary with Buildings 222 and 222G that includes an existing wooded area with tall trees and lower shrubs that provide a significant amount of visual screening from the Proposed Action.

In addition, because the project site and surrounding area has been previously developed, current views from the Personnel Quarters Historic District, specifically the Director's Quarters and Staff Quarter's Buildings, would remain similar to existing conditions. The Proposed Action would not detract from location, design, character, setting, materials, workmanship, and feeling of this historic resource. Therefore, no indirect impact on these historic resources would occur as a result of the Proposed Action.

Construction-related activities for the Proposed Action would introduce ground-borne vibration, and would result in noise effects on the surrounding area. Any construction-related vibration and noise would be temporary and would dissipate with distance to produce minimal impact on the Director's Quarter's buildings, and to a lesser extent, the Staff Quarter's buildings.

Archaeological Resources

No known archaeological resources would be affected by the Proposed Action, given that no such resources are known to occur at the project site. However, based on the previous Phase I Archaeological Investigation completed at the MPD Campus, the entire Campus was determined to be moderately sensitive for both historic-era and prehistoric cultural resources (VA 2010). In accordance with this general finding, a qualified archaeological monitor and Native American observer will be present during all construction-related ground disturbing activities for the Proposed Action. This action is consistent with past consultation with the SHPO/THPO on recent projects, including the Willow Housing development that is similarly adjacent to the western boundary of the Director's Quarters.

In the unlikely event of an inadvertent discovery of previously undocumented archaeological resources or human remains, consultation with the SHPO and/or THPO (as applicable), in accordance with 36 CFR 800.13, will occur and the following management measure will be followed:

If an inadvertent discovery of cultural materials (e.g., unusual amounts of shell, animal bone, bottle glass, ceramics, and structural/building remains) or human remains is made during construction activities associated with the Proposed Action, ground disturbances in the area of the find will be halted and a qualified professional archaeologist will assess the discovery. The archaeologist will determine whether the resource is potentially significant per the evaluation criteria of the NHPA and will develop appropriate mitigation. If human remains are encountered, the San Mateo County Coroner will be notified immediately upon discovery. If the coroner determines that the remains are Native American origin, the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) will apply.

Implementation of the management measures would reduce potentially adverse impacts resulting from inadvertent damage or destruction of presently unknown archaeological resources during construction. Therefore, no significant adverse impacts of archaeological resources would occur.

No Action Alternative

No effects on cultural resources would be expected from implementing the No Action Alternative. No new housing would be constructed and no impacts to either architectural or archaeological resources would result. The proposed project site would continue to be used for vehicle parking.

3.4 Geology and Soils

Geology

Based on a review of the United States Geological Survey (USGS) 7.5-Minute Topographic Series Quadrangle Maps (<https://www.usgs.gov/core-science-systems/ngp/tnm-delivery/topographic-maps>), the site is located within the central region of the Coast Ranges Geomorphic Province, within the relatively flat-lying, alleviated San Francisco Bay Plain I Santa Clara Valley. The eastern flank of the uplifted Santa Cruz Mountains is to the southwest. The general topography is characterized by subparallel, northwest trending mountain ranges and intervening valleys. The region has undergone a complex geologic history of sedimentation, volcanic activity, folding, faulting, uplift and erosion.

Geological resources typically consist of surface and subsurface materials and their inherent properties. Regional geological information was obtained from the Geologic Map of the San Francisco Bay Region (<https://pubs.usgs.gov/sim/2006/2918/>) which shows that the area of the project site is underlain by Holocene-aged Alluvium that consists of unconsolidated mixtures of gravel, sand, clay, and silt that is typical of stream deposition.

Soils

Soil structure, elasticity, strength, shrink-swell potential, and erodibility all determine the suitability of the ground to support buildings and structures. With respect to construction, soils are typically described in terms of their type, slope, physical characteristics, and relative compatibility or limitations with regard to particular construction activities and types of land uses.

According to the San Mateo County Soils Survey prepared by the USDA Natural Resources Conservation Service (NRCS) (Figure 4), the MPD Campus is underlain by the Botella-Urban Land soil complex and Urban Land (<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>). The Botella series consists of deep, well drained soils on alluvial fans, old flood plains and stream terraces. The plasticity index of the Botella soil complex ranges from 10-20, which is not considered expansive. Urban Land is defined as areas where more than 85 percent of the surface is covered by buildings, pavements or other structures.

Figure 4: NRCS Soil Map for the MPD Project Site

Soil Groupings

- 108 – Botella-Urban Land
- 131 - Urban Land



Regional Seismicity

The MPD Campus is located within the seismically active San Francisco Bay region (Figure 5). The area is vulnerable to seismic activity due to the presence of several active faults in the region. The closest and most prominent active fault near the MPD Campus is in the San Andreas Fault System, located approximately 3.5 miles to the southwest, and the Hayward fault located approximately 7.6 miles to the northeast. When an earthquake occurs, waves of energy are transmitted through the earth, resulting in a variety of variety of seismic effects, including surface rupture, ground shaking, and ground failure such as liquefaction.

Proposed Action (Preferred Alternative)

Construction

Construction activities would result in the disturbance of soils at the site as the existing parking area is removed and excavating/grading for the new development would take place. The development would implement BMPs to reduce any potential adverse effects (e.g. sediment runoff from the site, dust, etc.) to include the conservation of top soil. These practices would include setting work area limits, reducing exposure of unprotected soils, protecting disturbed areas, installing erosion and sediment control devices, and managing soil piles to reduce erosion.

In addition, construction projects that disturb greater than one acre of soil are required to comply with the National Pollutant Discharge Elimination General Permit (NPDES) for Storm Water Discharges Associated with Construction and Land Disturbance Activities. Based on anticipated implementation of the required storm water and erosion controls and related BMPs, it is expect that construction activities would not result in substantial soil erosion. Therefore, construction of the Proposed Action would result in none-to-negligible, short-term impacts on geology.

Operation

The Proposed Action would consist of constructing a three-story residential facility with dedicated vehicle parking, landscaped courtyard, and multiple greenspaces that would occupy nearly the entire project site. Design and construction of the structure would be required to comply with all Federal, state and local building codes, as applicable. While complying with the California building code does guarantee that a building would not suffer significant structural damage in the event of a major earthquake, it is reasonable to expect that a well-designed and well-constructed building would not collapse or cause loss of life in such an event. The operation of the Proposed Action is not anticipated to expose people or structures to substantial adverse effects related to seismic activity.

Expansive soils are typically composed of clays and can undergo a volume change with changes in moisture content. They have tendencies to expand and soften when wet and to harden when dry, which could damage foundations and other building components. As previously described, the proposed site is underlain by the Botella-Urban Land soil complex and Urban Land. Generally, a soil plasticity index of greater than 20 is considered expansive, and greater than 40 can generally be considered highly expansive

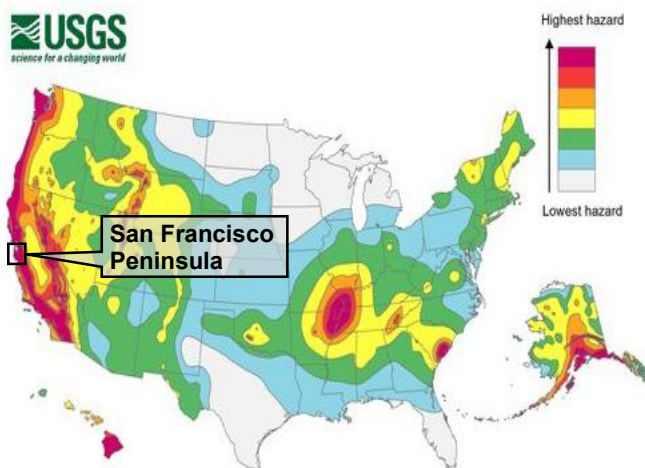


Figure 5: USGS 2018 Long-Term National Seismic Hazard Map. Project Area – San Francisco Peninsula

(ASTM D4318). Because the plasticity index of the Botella soil complex ranges from 10-20, it is not anticipated to be expansive. Therefore, the Proposed Action would not be located on expansive soil creating substantial risk to life or property.

No Action Alternative

Under the No Action alternative, the Proposed Action would not be constructed and no physical changes would occur to the project site.

3.5 Hydrology and Surface Water Quality

There are no wetlands or open waters regulated under Federal or state law within the project site or on the MPD Campus (Appendix A – NEPAAssist Report). Storm water runoff from the MPD Campus is currently routed through on-site storm drains that outlet to a 40-inch storm drain pipe located at the northwest corner of the Campus. Runoff then flows off-site through a series of channels and underground storm drains that eventually outfall to the Lower San Francisco Bay approximately 1 mile north of the project site.

Water quality in the area is regulated under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB). The SFBRWQCB allows the City of Menlo Park to discharge stormwater to local creeks and the Bay as long as it prevents, to the maximum extent practicable, pollution and sediment from entering its storm drain system (<https://www.menlopark.org/215/Stormwater-management>).

In accordance with the Menlo Park Stormwater Management program, sites with over one acre of new or improved impervious surface, or significant redevelopment projects affecting more than 50 % of the site, are required to file a “Notice of Intent” with the SFBRWQCB, prepare a Stormwater Pollution Prevention Plan (SWPPP) and provide stormwater control measures. The goals of this program are to manage possible sources of water pollution, ensure that site drainage does not affect neighboring properties, and remove contaminants from on-site stormwater before discharge to the municipal storm drain system (<https://www.menlopark.org/DocumentCenter/View/10104/Commercial-Drainage-Guidelines>).

Construction

The proposed construction of the residential facility, parking lot and associated roadways would result in a potential short-term temporary effect to water quality. Construction would include earthmoving activities that would temporarily disturb soils at the project site, including the removal of top soil and vegetation, removal of existing parking areas, grading, excavating, and soil stockpiling. Deposits of soil and debris from construction equipment onto adjoining roadways could also cause increased release of sediment from the project site. In addition, construction activities can be the source of chemical contamination from the use of alkaline construction materials (concrete, mortar, hydrated lime) and asphalt binder/sealer, and hazardous or toxic materials, such as fuels, solvents and paints. If not properly managed, construction of the proposed facility could increase sediment and chemical loads in runoff to the stormwater system which drains to receiving waters that outfall to the Lower San Francisco Bay.

The proposed construction will comply with the NPDES Permit and Implementation of a Stormwater Pollution Prevention Plan (SWPPP) that require the incorporation of Best Management Practices (BMPs) to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. With the implementation of BMPs and Low Impact Stormwater Design Standards, the construction of the Proposed Action would have a less than significant, short-term impact on water quality.

Operations

Operation of the Proposed Action will not impact groundwater or surface water quality. The application of any landscaping chemicals shall be made according to label instructions and minimized to the extent practicable. All future stormwater management systems would be inspected and maintained on a routine basis to ensure they are operating as designed.

Therefore, operation would result in negligible, short-term impacts on hydrology and surface water quality.

No Action Alternative

Under the No Action alternative, no changes to hydrology or surface water quality would occur. Overland storm water flow would continue to drain into the existing on-site stormwater system.

3.6 Wildlife and Habitat

The wildlife and habitat present at the project site and the larger MPD Campus is directly influenced by the development history of the Campus and its location in a suburban area of Menlo Park, CA. The property currently occupied by the MPD Campus was first developed in 1917 as the Base hospital for the former Camp Fremont during World War I. The area surrounding the MPD Campus generally consists of residential and light industrial/commercial properties, and there are no wetlands, creeks or other water features located on-site or within a 1-mile radius of the project site or adjacent areas (<https://www.fws.gov/wetlands/data/Mapper.html>).

Given the level of development, there is minimal suitable habitat to support wildlife within the extended area of the project site. Wildlife throughout the MPD Campus consists of species that are very adaptable to human-influenced environments. The habitat primarily consists of sparse clusters of individual trees, planted shrubbery, and grass-covered lawns that are landscaped and routinely maintained by the VA.

Federal Endangered Species Act

The Endangered Species Act (ESA) was enacted in 1973 (7 U.S.C. 136, 16 U.S.C. 1531 *et seq.*). Under the ESA, the Secretary of the Interior and the Secretary of Commerce have the authority to list a species as threatened or endangered (16 U.S.C. 1533[c]). The ESA is administered by both National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (USFWS). NMFS is accountable for animals that spend most of their lives in marine waters, including marine fish, most marine mammals, and anadromous fish. USFWS is accountable for all other federally listed plants and animals.

Pursuant to the requirements of the ESA, a federal agency authorizing, funding or carrying out a project within its jurisdiction must determine whether any federally-listed threatened or endangered species may be present in the project site and determine whether the agency's action could affect any federally listed species (16 U.S.C. 1536(a)(2), (3)). If the action would likely affect a listed species, the agency must consult with authorities under Section 7 of the ESA to determine whether the action is likely to jeopardize the continued existence of the species or result in the destruction or adverse modification of designated critical habitat (16 U.S.C. 1536(a)(2)).

USFWS Listed Species and Critical Habitat

The USFWS Information for Planning and Consultation (IPaC) website was reviewed for Critical Habitats and associated threatened and/or endangered species in the vicinity of the proposed property (<https://ecos.fws.gov/ipac/?state=7TjIouOstlM66jPVcXyanrtllwWwyp>). There is a total of 17 threatened, endangered, or candidate species that may be located in the vicinity of the proposed property. The USFWS IPaC report is provided in Appendix B, and the findings are summarized in Table 2.

Table 2: Federally Listed Species in the Region of the Proposed Action

	Species	Federal Status	Habitat	Potential for Occurrence
Plant Species	San Mateo Thornmint (<i>Acanthomintha duttonii</i>)	E	Chaparral, valley and foothill grassland in serpentinite soil	None - No suitable habitat present
	Fountain thistle (<i>Cirsium fontinale</i> var. <i>fontinale</i>)	E	Openings in chaparral, cismontane woodland, valley and foothill grasslands in serpentinite seeps	
	San Mateo woolly sunflower (<i>Eriophyllum latilobum</i>)	E	Cismontane woodland often in serpentinite soil on road cuts	
	Marin Dwarf flax (<i>Hesperolinon congestum</i>)	T	Chaparral, valley and foothill grassland in serpentinite soil	
	White-rayed pentachaeta (<i>Pentachaeta bellidiflora</i>)	E	Cismontane woodland, valley and foothill grassland often in serpentinite soil	
	California seablite (<i>Suaeda californica</i>)	E	Coastal salt marshes and swamps	
	Showy Indian Clover (<i>Trifolium amoenum</i>)	E	Coastal bluff scrub, valley and foothill grasslands sometimes in serpentinite soils	
Animal Species	California tiger salamander (<i>Ambystoma californiense</i>)	T	Need underground refuge such as rodent burrows. Need vernal pools or other seasonal water sources for breeding	None - No suitable habitat present
	Western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	T	Sandy beaches, slat pond levees and shores or large alkali lakes	
	Bay Checkerspot butterfly (<i>Euphydryas editha bayensis</i>)	T	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay	
	Steelhead – Central California Coast DPS (<i>Oncorhynchus mykiss irideus</i>)	T	Require loose well oxygenated gravel for spawning. Cool water temperatures	
	California clapper rail (<i>Rallus longirostris obsoletus</i>)	E	Salt-water and brackish marshes traversed by tidal sloughs in the vicinity of San Francisco Bay	
	California red-legged frog (<i>Rana draytonii</i>)	T	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation	
	Salt-marsh harvest mouse (<i>Reithrodontomys raviventris</i>)	E	Saline emergent wetlands	

Table 2 (Cont.): Federally-listed Species that Occur in the Region of the Proposed Action

Species		Federal Status	Habitat	Potential for Occurrence
Animal Species (Cont.)	Myrtle's silverspot (<i>Speyeria zerene myrtleae</i>)	E	The foggy, coastal dunes/hills of the Pt. Reyes Peninsula.	None - No suitable habitat present
	California least tern (<i>Sternula antillarum browni</i>)	E	Colonial breeder on bare or sparsely vegetated, flat substrates	
	San Francisco garter snake (<i>Thamnophis sirtalis tetrataenia</i>)	E	Freshwater marshes, ponds and slow moving streams in San Mateo County and extreme northern Santa Cruz County	
	Delta Smelt (<i>Hypomesus transpacificus</i>)	T	Freshwater-saltwater mixing zone of the estuary, but migrates upstream to fresh water during spawning season	
	Marbled Murrelet (<i>Brachyramphus marmoratus</i>)	T	Costal North Pacific in old-growth forests	
	San Bruno Elfin Butterfly (<i>Callophrys mossii bayensis</i>)	E	Inhabits rocky outcrops and cliffs in coastal scrub on the San Francisco Peninsula	
	Yellow-billed Cuckoo (<i>Coccyzus americanus</i>)	T	Riparian forest habitats in the lowlands of California	

Legend: E - Endangered; T – Threatened; DPS - distinct population segment

As concluded by USFWS in Appendix B, and as summarized in the previous table, the critical habitats for the threatened and endangered species identified in the above table do not exist on, or near the proposed property.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC 703-711) protects migratory birds and is enforced by the USFWS. The MBTA makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to Federal regulations (USFWS 2012).

The USFWS IPaC online project planning tool did not identify any migratory bird species that may be found on, or near the proposed property.

California Endangered Species Act

The California Endangered Species Act (CESA) is administered by California Department of Fish and Wildlife (CDFW). CESA provides state-level protections for state-listed plant and animal species. The California Natural Diversity Database (CNDDDB) was reviewed for threatened and/or endangered species in the vicinity of the proposed property (<https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>). The database search identified a total of 22 State-listed animal species and six plant species recorded as occurring within the extended area of project site. Table 3 summarizes the State-listed animal species that occur in the larger region and their potential to occur within the project site.

Table 3: State Listed Species near the Project Site

	Species	State Status	Habitat	Potential for Occurrence at the Project Site
Plant Species	San Francisco Thornmint (<i>Acanthomintha duttonii</i>)	E	Chaparral, valley, and foothill grassland in serpentinite soil	None - No suitable habitat present
	Fountain thistle (<i>Cirsium fontinale</i> var. <i>fontinale</i>)	E	Openings in chaparral, cismontane woodland, valley and foothill grasslands	
	San Mateo woolly sunflower (<i>Eriophyllum latilobum</i>)	E	Cismontane woodland often in serpentinite soil on road cuts	
	Marin western flax (<i>Hesperolinon congestum</i>)	T	Chaparral, valley, and foothill grasslands in serpentinite soil	
	Dudley's lousewort (<i>Pedicularis dudleyi</i>)	R	Maritime chaparral, cismontane woodland, coastal coniferous forest	
	White-rayed pentachaeta (<i>Pentachaeta bellidiflora</i>)	E	Cismontane woodland, valley and foothill grassland often in serpentinite soil	
Animal Species	Pallid bat (<i>Antrozous pallidus</i>)	SC	Day/hibernation roost sites include caves, rock or bridge crevices, buildings, and hollow trees. At night they roost usually in the open near foliage or in open buildings	Potential to occur in trees and old buildings.
	White-tailed kite (<i>Elanus leucurus</i>)	FP	Nests in a variety of habitats including urban areas, open grasslands, meadows, marshes, and deciduous woodlands	Suitable nesting habitat present in mature vegetation in study area.
	California tiger salamander (<i>Ambystoma californiense</i>)	T	Need underground refuge such as rodent burrows. Need vernal pools or other seasonal water sources for breeding	None - No suitable habitat present
	Townsend's big-eared bat (<i>Corynorhinus townsendii townsendii</i>)	SC/E	Open roosts in walls and ceilings of buildings	
	Short-eared owl (<i>Asio flammeus</i>)	SC	Nests in fresh and salt swamp lands, low-land meadows and irrigated alfalfa fields	
	Long-eared owl (<i>Asio otus</i>)	SC	Nests in riparian corridors in tall willows and cottonwoods and belts of live oak paralleling stream course	
	Western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	SC	Sandy beaches, salt pond levees and shores or large alkali lakes	
	Northern harrier (<i>Circus cyaneus</i>)	SC	Nests in grasslands at coast salt and freshwater marshes	

Table 3 (Cont.): State-Listed Species near the Project Site

Species		State Status	Habitat	Potential for Occurrence at the Project Site
Animal Species (Cont.)	Burrowing owl (<i>Athene cucularia</i>)	SC	Nests in rodent burrows in open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation	None - No suitable habitat present
	Western pond turtle (<i>Emys marmorata</i>)	SC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation	
	Saltmarsh common yellowthroat (<i>Geothlypis trichas sinuosa</i>)	SC	Nests along fresh and saltwater marshes of the San Francisco Bay region	
	California black rail (<i>Laterallus jamaicensis coturniculus</i>)	T	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays	
	Alameda song sparrow (<i>Melospiza melodia pusillula</i>)	SC	Nests along saltwater marshes bordering south arm of San Francisco Bay.	
	San Francisco dusky-footed woodrat (<i>Neotoma fuscipes annectens</i>)	SC	Constructs nests in riparian and woodland habitats.	
	California clapper rail (<i>Rallus longirostris obsoletus</i>)	E	Salt-water and brackish marshes traversed by tidal sloughs in the vicinity of San Francisco Bay.	
	Foothill yellow-legged frog (<i>Rana boylei</i>)	SC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats.	
	California red-legged frog (<i>Rana draytonii</i>)	SC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation.	
	Salt-marsh harvest mouse (<i>Reithrodontomys raviventris</i>)	E	Saline emergent wetlands of San Francisco Bay and its tributaries.	
	Salt-marsh wandering shrew (<i>Sorex vagrans halicoetes</i>)	SC	Salt marshes of the south arm of the San Francisco Bay.	
	California least tern (<i>Sternula antillarum browni</i>)	E	Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, land-fills, or paved areas.	
	American badger (<i>Taxidea taxus</i>)	SC	Dry open stages of shrub, forest and herbaceous habitats with friable soils.	
	San Francisco garter snake (<i>Thamnophis sirtalis tetrataenia</i>)	E	Vicinity of freshwater marshes, ponds and slow moving streams in San Mateo County and extreme northern Santa Cruz	

Legend: E – Endangered; T – Threatened; SC - Special Concern; FP - Fully Protected

According to the CNDDDB database, no State-listed animal species have been previously recorded at the MPD Campus. However, as summarized in Table 3, habitat requirements for two State-listed special-status species are present on the MPD Campus: Pallid Bat and White-Tailed Kite. Information on these two species, and their habitat, is provided as follows:

Pallid Bat (*Antrozous pallidus*). This bat is a State-listed species of special concern. The nearest recorded occurrence for the Pallid Bat is from 1951 at Stanford University, approximately 2.6 miles southwest of the MPD Campus. The Pallid Bat occurs in small numbers throughout most of California in a wide variety of lower elevation habitats including grasslands, shrub lands, woodlands, and forests. Day roost and hibernation roost sites include buildings, hollow trees, caves, and rock or bridge crevices. At night they usually roost in the open near foliage or in open buildings. They hibernate in the winter near the summer day roost.



The Pallid Bat has not been previously recorded at the MPD Campus.

White-Tailed Kite (*Elanus leucurus*). This small raptor is a State-listed fully protected special-status avian species. The nearest known nesting pair of was located approximately 1.75 miles northeast of the MPD Campus. In California, the White-Tailed Kite ranges from the coastline west to the Sierra's and is patchily distributed from Eureka to the southern border. They are mostly year round residents but move in response to prey abundance. They take cover and build nests in trees and tall shrubs with dense canopies. Their nests are situated near open foraging areas and are constructed of loosely piled sticks and twigs in the fork near the top of a tree or bush.



The white-tailed kite has not been previously recorded at the MPD Campus.

Proposed Action (Preferred Alternative)

Construction

No listed plant species have been previously recorded within the project site, and none are anticipated to occur at the MPD Campus due to absence of appropriate habitat and because of the developed and landscaped environment of the Campus and its surroundings. Therefore, construction of the Proposed Action would not result in adverse effects on listed plant species.

The site contains potentially suitable roosting and foraging habitat for the Pallid Bat and the White-Tailed Kite. To ensure potential impacts are minimized during construction, the design of the Proposed Action limits clearing of existing vegetation to include only those individual trees and shrubbery within the footprint of the proposed new building, driveways and parking areas. The removal of this vegetation and general construction activity may temporarily displace urban wildlife. However, all other vegetation within the EUL site will be preserved, increasing the overall site aesthetic and benefiting urban wildlife by retaining potential habitat. Additionally, new non-invasive native vegetation will be planted around the new buildings and parking areas.

Construction would involve tree removals that could potentially disturb the Pallid Bat and White-Tailed Kite, if present. To avoid potential disturbance of these species during construction, VA will ensure that a qualified biologist conducts a pre-construction surveys of trees to be removed to identify if the Pallid Bat or

White-Tailed Kite is present. If present, VA will take appropriate measures to protect these species. With implementation of these minimization measures, construction of projects under the Proposed Action would not result in substantial adverse effects to protected wildlife, if present. Therefore, construction of the Proposed Action would result in negligible, short-term impacts on wildlife and their habitats.

Operation

Operation of the Proposed Action will include ongoing professional landscaping services, including maintenance of existing and newly planted vegetation. If warranted, pesticides/herbicides may be applied to control nuisance species; applications would be made according to the lowest quantities possible per label instructions, and applied by licensed or qualified staff, further reducing potential impacts to the project site and surrounding area. Therefore, operation would result in negligible, short-term impacts on potential urban wildlife and habitat.

No Action Alternative

Under the No Action Alternative, the Proposed Action would occur. No effects on biological resources would be expected from implementing the No Action Alternative.

3.7 Noise

Noise, or unwanted or disturbing sound, was originally managed at the federal level by the Noise Control Act (NCA) of 1972, which was administered by the EPA. Since 1982, the responsibility of noise abatement and control has been delegated to state and local governments, but the noise levels and exposure recommendations developed by EPA under the NCA are still relevant. The EPA describes sound in terms of its amplitude (loudness), frequency (pitch), and time pattern (continuous, fluctuating, intermittent, impulsiveness). A decibel (dBA) is a unit of sound amplitude, whereas a hertz (Hz) is a unit of sound frequency.

Noise effects are discussed in terms of public hazards, where the focus is on the effects to community citizens and adjacent land uses, and in terms of occupational hazards, which focuses on effects on laborers [as mandated in 29 CFR Part 1910.5, Occupational Noise Exposure, administered by the Occupational Safety and Health Administration (OSHA)].

The EUL site is in an urbanized area. Sensitive noise receptors include hospitals, schools, churches and cemeteries, libraries, and public parks. The closest offsite noise sensitive receptor is a school approximately 800 feet southeast of the project site. Other potential receptors impacted by noise are the residential areas surrounding the Campus. The principal sources of noise in the area include traffic on the adjacent Willow Road (State Route 114), and Highway 101 (Bayshore Freeway) located to the north. Noise is also generated at the commercial and distribution services in the area. The overall noise conditions are typical of a developed area.

Proposed Action (Preferred Alternative)

The MPD Campus provides medical services to Veterans and maintaining a serene environment for patients is important. Under the Proposed Action, no significant adverse impacts associated with noise are anticipated.

Construction

Short-term increases in noise levels are expected during construction. Sources of construction-related noise would include construction equipment (including building contractor vehicles, road construction and paving equipment) and other contractor vehicles traveling to and from the project site. Construction

activities would be conducted only during normal business hours to minimize noise impacts during other times. Construction-related noise would be temporary and would cease once construction is completed. Existing vegetation around the boundary of the project site would be retained; this vegetation would further attenuate construction noises from reaching potential receptors. The temporary construction noises are not anticipated to be louder than existing noises generated by traffic along Willow Road.

Accordingly, the temporary construction noise generated at the project site would not cause an adverse impact on potential receptors due to the distance from the EUL site to these receptors, the presence of vegetation over this distance, and the prevalence of existing noise-generating activities from typical traffic on Willow Road and operations of commercial properties in the area.

Therefore, construction noise would result in a negligible, short-term impact on potential receptors.

Operation

The Proposed Action has no mechanical equipment that would generate loud operational noises. Operational noises would be associated with vehicles traveling to and from the EUL site, as well as grounds keeping activities (mowing), which would be similar to the existing conditions at the proposed project site.

Accordingly, operation of the Proposed Action would have a negligible, short-term impact on potential receptors due to the minimal operational noises associated with the operation of a typical housing complex, the distance to potential receptors, and the continued prevalence of other, louder noise-generating activities, including traffic on the adjacent Willow Road and operations at commercial properties in the area.

No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented and there would be no new noise sources at the site. Current noise associated with traffic along Willow Road, vehicle operations at parking Lot 2, and routine grounds keeping in the area would continue to be generated.

3.8 Land Use

The proposed project site is located within the southeast quadrant of the MPD Campus along Willow Road. The existing MPD Campus is federally-owned land which includes administrative, research and maintenance facilities, medical and other patient treatment, dormitories and other residential buildings, parking lots, open space, and roadways.

The surrounding land uses include residential single-family and multi-family housing to the southwest, south, and east, as well as small commercial properties along Willow Road. In addition, there are at least four schools within 0.25 mile, and two parks within 0.5 mile of the Campus. There is bus service available along Willow Road.

Proposed Action (Preferred Alternative)

Construction

The Proposed Action is consistent and compatible with current and anticipated future land uses at the project site and the surrounding area. The Proposed Action would occur entirely within the site boundary of the MPD Campus. As the project site is the prior location of the former Nurses Residence (refer to Section 3.3, Cultural Resources, Property Setting), the Proposed Action is consistent with this original land use. Furthermore, since the Proposed Action includes general use parking on the north side of the development, the proposed use is also consistent with the current use of the property.

Construction of the proposed housing development would not substantially conflict with existing land uses or result in adverse change to land use patterns, and is consistent with existing zoning and land use ordinances. Therefore, construction and operation of the Proposed Action would result in no impacts on land use.

Operation

The project site, as part of the MPD Campus, is zoned as Public Facilities (San Mateo County Property Map Portal, APN 062470060; <https://gis.smcgov.org/Html5Viewer/?viewer=raster>). The operation of the Proposed Action would represent a continuation of existing land uses already in place on the Campus (providing services to Veterans). Implementation of the proposed action would not require the sale of the property. The property would be leased to MidPen Housing Corporation under the proposed EUL; therefore there would be no changes in ownership, boundaries, or right-of ways. The proposed action would not encroach or conflict with existing land uses or result in the physical development incompatible to adjacent uses.

No Action Alternative

Under the No Action alternative, there will be no change to current land uses or conditions at the proposed EUL site.

3.9 Floodplains and Wetlands

Floodplains

According to Executive Order 11988: Floodplain Management Act, VA is responsible for reducing the risk of flood loss, minimizing the impact of floods on human safety, health, and welfare, and preserving the natural and beneficial values served by floodplains in all transactions and VA supported construction activities.

Floodplains generally refer to 100-year floodplains established by the Federal Emergency Management Agency (FEMA) and are shown on Flood Insurance Rate Maps (FIRM) or Flood Hazard Boundary Maps (FHBM) for all communities that are members of the National Flood Insurance Program (NFIP). The 100-year floodplain designates the area inundated during a storm having a 1.0% chance of occurring in any given year. FEMA also identifies the 500-year floodplain, the area inundated during a storm having a 0.2% chance of occurring in any given year.

The most recent Flood Insurance Study for Menlo Park became effective on October 16, 2012, and the existence of flood hazards near the Proposed Action location is shown on FEMA panel number 06081C0308E (<https://msc.fema.gov/portal/search>). According to this panel, no special flood hazard areas are located on the MPD Campus.

Wetlands

Executive Order (EO) 11990 (Protection of Wetlands) requires federal agencies to minimize the loss of wetlands and consider direct and indirect impacts on wetlands that may result from federally funded actions. VA has evaluated the MPD Campus and determined that no wetlands or open waters regulated by Federal or state laws exist on the Campus. According to the USFWS National Wetland Inventory Maps (<https://www.fws.gov/wetlands/data/mapper.html>), the nearest mapped wetlands is located along the San Francisquito Creek, approximately 0.5 miles southeast of the project site. The closest point along the San Francisco Bay is located approximately 1 mile north of the MPD Campus. (Appendix A)

Coastal Zones

California's Coastal Management Program, designates two coastal zone management agencies to implement the Federal consistency provisions: (1) California Coastal Commission for all coastal areas outside of the San Francisco Bay; and (2) the San Francisco Bay Conservation and Development Commission (BCDC) for the coastal areas along the San Francisco Bay. The MPD Campus, and therefore the Proposed Action location, is not located within a California Coastal Zone or on land that is within the BCDC's jurisdiction.

Proposed Action (Preferred Alternative)

Construction and Operation

The project site is not situated within a FEMA designated floodplain. In addition, there are no wetlands or open waters that occur in the vicinity of the Proposed Action area. Therefore, construction and operations would not be subject to flooding impacts or result in adverse effects on wetlands.

No Action Alternative

Under the No Action Alternative, there would be no construction or operation of a residential facility. Therefore, the No Action Alternative would result in no effects to floodplains or wetlands.

3.10 Socioeconomics

Socioeconomics is an umbrella term used to describe aspects of a project that are either social or economic in nature, or a combination of the two. A socioeconomic analysis evaluates how elements of the human environment such as population, employment, housing, and public services might be affected by the Proposed Action and alternative(s).

Current Statistics

With a 2020 population of 34,138, Menlo Park has shown a short-term population decline of -1.61% annually, but its population has increased by 6.59% since the 2010 census (<https://www.census.gov/quickfacts/menloparkcitycalifornia>). The median rental cost in recent years is approximately \$2,340 per month, and the median house value is \$2M. The average household income in Menlo Park is \$241,222 with a poverty rate of 7.60%.

Overall, the economic indicators posted with the U.S. Census Bureau suggest that the City of Menlo Park is economically stronger in key areas such as household income and lower unemployment than the surrounding County of San Mateo, and the overall State of California (<https://www.census.gov/programs-surveys/acs>).

Proposed Action (Preferred Alternative)

Construction and Operation

Under the Proposed Action, no significant adverse impacts to local employment or the economy are anticipated. Construction of the MPD housing development would not displace or limit access to any existing housing, business, or recreational areas. The proposed development will benefit the community by providing both temporary construction jobs and long-term part-time employment at the completed residential facility, including case management, maintenance, and grounds keeping employment opportunities.

Therefore, the Proposed Action would have minor beneficial short-term and long-term impacts on socioeconomics in the immediate community.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented, and none of the minor beneficial impacts associated with the Proposed Action would occur.

3.11 Community Services

Community services in vicinity of the project site are provided by the City of Menlo Park and/or San Mateo County and include police and fire protection, ambulatory services, schools, health care (outside of the VA), and parks and recreation.

The MPD Campus provides healthcare, case management and support services to Veterans from the Menlo Park area and beyond. The VA is acutely aware of the need in the area for permanent, affordable housing to meet the needs of Veterans and their families who are homeless or at risk of becoming homeless. By helping to provide housing at the MPD Campus, the VA is partially addressing the existing shortage of quality affordable housing in Menlo Park and the surrounding communities, and will help to relieve some of the immediate pressure on community organizations that currently assist in providing these housing services.

Proposed Action (Preferred Alternative)

Construction

Construction activities would be short-term in duration, and would not be expected to adversely impact community services. The possibility of the need for fire and law enforcement services could occur during construction, but the temporary nature and the limited size of the construction project would not exceed the capacity of these services. Incidents resulting from construction activities (e.g., construction related safety incidents or fires) at the project site are believed to be negligible and could be accommodated by existing service providers. Therefore, the construction of the Proposed Action would not impose additional demands on community services.

Operation

Although the EUL project site will remain federally-owned property, the housing development will be enclosed by a fence, have its own separate entrance and exit driveway, its own utilities, and be operated and managed independently of the VA through the duration of the lease term. Operations of the proposed housing development would not result in an increased demand for schools or public recreational facilities. There is the potential for families with school-aged children to reside at this housing development, but this would be a limited number that is not expected to exceed the capacity of the local school system.

The operation of the Proposed Action could have a net beneficial impact on community services in the context of providing supportive housing for Veterans with on-site case management and counseling services that would benefit the broader community. Therefore, operation of the Proposed Action could result in beneficial, long-term impacts on the community and related services.

No Action Alternative

Under the No Action alternative, the Proposed Action would not be implemented, and Veterans and their families in need of safe, affordable and permanent housing in this region would be underserved. Therefore, the No Action alternative would present a long-term, minimal-to-moderate adverse impact on affordable housing in this area. The No Action alternative would have no impact on other community services.

3.12 Solid Waste and Hazardous Materials

Hazardous materials and waste are subject to Federal, state, and local laws and regulations. The USEPA (under the Resource Conservation and Recovery Act; RCRA), CalEPA, California Department of Toxic Substances Control (DTSC), the local RWQCB, and BAAQMD are the primary agencies that enforce these regulations in California. Generators of hazardous waste must file with authorities to obtain a hazardous waste identification number for waste management, disposal and reporting. USEPA ID numbers are issued to Generators that produce more than 100 kg of RCRA hazardous waste and/or more than 1 kg of acutely hazardous waste per month (<https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/>). State EPA ID numbers are issued to Generators that produce less than this amount of a RCRA hazardous waste, or any amount of a non-RCRA hazardous waste (i.e., State-regulated wastes).

Other than landscaping and standard use of lawn-care chemicals (e.g., fertilizers, herbicides, pesticides, etc.), there are no routine activities at the project site that generate wastes. Hazardous waste generated at the MPD Campus is predominately medical waste from hospital operations, with smaller quantities of Universal Waste (e.g., florescent lamps, batteries, etc.) and used/spent solvents, detergents and oils/greases from maintenance activities.

The MPD Campus is listed as a Large Quantity Generator (LQG) of hazardous waste under USEPA ID Number CA1360010317 (<https://enviro.epa.gov/>), and has an existing agreement with a licensed hazardous waste disposal company to perform related disposal services. Furthermore, the VA uses local companies for disposal and/or recycling of municipal solid waste, including plastics, glass, metal, mixed paper and cardboard.

Environmental Site Assessment

A Phase I Environmental Site Assessment (ESA) was completed for the EUL site in December 2020 (Alares 2020). Although the ESA did not identify any Recognized Environmental Conditions (RECs) that have the potential to impact the EUL site, a review of historical records did identify a former 3-story building with basement that occupied the project site from circa 1923 to 1980 (Exhibit III). Identified as Building 109 (Nurses Residence), this building was demolished to develop additional Campus parking.

There were no available records to assess the completed demolition of Building 109, but the existing topography at the Subject Property does not suggest that construction and demolition (C&D) materials may be buried on-site (i.e., no visible surface mounding or changes in topography compared to earlier photographs). Although there is no visible evidence of this prior structure, the current paved parking lot may cover remnants of the old foundation and/or demolition debris used as fill material. Given the age of this former structure, if such debris is present, it could contain hazardous building materials (e.g., Asbestos Containing Materials, ACM; lead-based paint, LBP; etc.).

Proposed Action (Preferred Alternative)

Construction

The Proposed Action location currently consists of an approximate 2.1 acre project site that is comprised of a paved parking (identified as Lot 2), a grass covered auxiliary parking area located south of the main lot, managed lawns and landscaping with irrigation, sidewalks, fencing, and below-ground utilities (Figure 3). The paved parking lot makes up approximately half of the total project area. Based on the findings from the recently completed Phase I ESA for the Proposed Action, there are no Recognized Environmental Conditions (RECs) at the project site (Alares 2020).

Solid waste generation from construction activities is anticipated to be a minor contributor to overall solid waste generation in the region and would not result in adverse impacts. Construction of the Proposed Action would generate non-hazardous construction debris. Debris could include brick, masonry, wood, plaster, roofing shingles, electrical wiring and components and excess piping materials. Construction waste would be properly managed and disposed of at licensed landfill or recycling facility.

Staging and operation of construction equipment carries an increased potential for accidental releases of vehicle fluids. Proper construction vehicle maintenance and inspection will reduce this potential, and adverse impacts are not expected.

At a minimum, solid waste, including construction, demolition and any land clearing debris generated during construction will be properly disposed at a permitted solid waste disposal or recycling facility. Removal of the asphalt associated with the existing parking lot would not result in the release of hazardous materials. It is expected that asphalt debris would be transported off-site to a licensed facility for recycling.

Any hazardous materials encountered during construction would be handled and disposed of in accordance with applicable local, state, and federal regulations. If building debris or foundation items associated with former structures are discovered below the paved parking lot, mitigative measures will be implemented to segregate, analyze and assess the debris for hazardous building materials, and as needed, determine potential environmental impacts to soil and groundwater at the project site.

Therefore, construction would result in minor, short-term impacts on solid waste and hazardous materials.

Operation

During operation of the Proposed Action, limited quantities of solid wastes would be generated, with future solid waste generation a minor contributor to overall solid waste generation in the area. When the Proposed Action is occupied, the primary wastes generated will be typical of a residential development. Operational wastes will be properly stored, transported and disposed of off-site by a licensed waste hauler at a permitted facility. Other than typical household hazardous materials, no hazardous materials or wastes are anticipated to be stored or generated during operation of the Proposed Action. There will be no medical facilities associated with the residential housing project, therefore there would be no medical waste generated.

Overall, the operation would result in negligible, short-term impacts on solid waste and hazardous materials.

No Action Alternative

The No Action Alternative would result in no changes to the Proposed Action area and therefore would not result in any additional generation or management of solid waste or hazardous material/waste.

3.13 Transportation and Parking

Vehicular Access

The area has good regional access via Highway 101 (Bayshore Freeway), which includes an interchange with State Route 114 (Willow Road) located approximately 0.25 miles north of the project site. Highway 101 is a major regional freeway on the San Francisco Peninsula that connects Menlo Park with the other cities from San Jose to San Francisco.

Willow Road (State Route 114) is a primary arterial that borders the project site. Primary arterials serve major centers of activity and high volume traffic corridors within urbanized areas, and are designed to accommodate a high proportion of through trips.

There are three vehicle entrances to the MPD Campus. Two of the entrances are located off of Willow Road, which borders the Campus to the east. The main Campus entry is located at the intersection of Willow Road and Hospital Plaza and provides direct access to the main Campus for staff, visitors, and public transportation. The second entrance off of Willow Road is located at South Perimeter Road at the southeast corner of the Campus. The third entrance is located off of Bay Road, which borders the site to the north and is used primarily by staff.

The EUL site is currently accessible to vehicular traffic from Hospital Plaza at the existing main entrance from Willow Road (Figure 6). No modifications to Willow Road will be required to accommodate the Proposed Action. Furthermore, since the project site is located near the MPD Campus entrance, future residents of the Proposed Action would not need to travel through the main Campus to get to the proposed housing complex.



Figure 6: MPD Campus Main Entrance. Viewed from the south bound lane of Willow Road; note the SamTrans Route 296 outbound bus and the Project Site in background.

Existing Transit Services

The San Mateo County Transit District (SamTrans) provides local and regional bus service in San Mateo County. There are 54 routes in the County that can be categorized as community, express, Bay Area Rapid Transit (BART), and California commuter rail line (CalTrain) connection routes. SamTrans Route 296 has an existing stop at the MPD Campus on Hospital Plaza near the Proposed Action site. This route includes direct service to the Menlo Park CalTrain Commuter Rail Station, as well as other SamTrans bus connections from Redwood City to Palo Alto (<https://www.samtrans.com/296>).

CalTrain operates the commuter rail line along the San Francisco Peninsula from San Jose to San Francisco (<https://www.caltrain.com/main.html>). CalTrain is operated under contract with Amtrak, and managed under contract with SamTrans. The closest station to the MPD Campus is located in downtown Menlo Park, with existing SamTrans regional bus service from the Campus (i.e., Route 296).

Pedestrian and Bicycle Facilities

Sidewalks and walkways are provided within the MPD Campus and connect to sidewalks along Willow Road. No sidewalks or walking paths are currently present within the project site. Limited bike lanes exist around the MPD Campus and extended area (<https://www.menlopark.org/1081/Bicycling>). A Class II bike lane is located along Willow Road starting at the project site, with connection to downtown Menlo Park, including the CalTrain station.

Proposed Action (Preferred Alternative)

Construction

The Proposed Action would result in a short-term increase in construction-related vehicle trips on U.S. 101 and Willow Road. Construction would result in vehicle trips by construction workers and material and equipment deliveries to the project site. The number of construction-related vehicles traveling to and from

the project site would vary over the duration of the project, with upwards of 40 workers on-site during peak construction activities.

Access to the site during construction would be from the existing entrance to Lot 2 from Hospital Plaza. There will be no Campus parking allowed in Lot 2 during construction of the Proposed Action, so reduced availability of parking spaces on Campus would result. Traffic at the intersection of Willow Road and Hospital Plaza, and at the entrance to Lot 2 (i.e., project site), may be congested during peak-period construction activities, but no road closures are anticipated.

There is a critical access road for shipping/receiving to Building 324 (Psychiatry) that traverses the west side of Lot 2 at the project site. During construction of the Proposed Action, this utility access road to Building 324 will be impeded. Critical deliveries will need to be scheduled in advance and coordinated with the site contractor to minimize service disruptions.

The project site is located at the southeast perimeter of the MPD Campus, which is distant from the main hospital. Other than impeded access to Building 324 for shipping/receiving, and the temporary loss of parking Lot 2, there is no other Campus infrastructure that would be directly impacted by the construction of the Proposed Action. These impacts, while adverse, would be localized and temporary.

Operation

Potential impacts to traffic and parking associated with the operation of the Proposed Action are based on a lower-income residential development scenario, with a lower than average rate for vehicle ownership, and anticipated greater demand for municipal transit services. SamTrans provides local and regional bus service throughout San Mateo County, with connections to CalTrain that provides community rail service throughout the San Francisco Peninsula. SamTrans Route 296 has an existing stop at the MPD Campus on Hospital Plaza near the Proposed Action site. This route includes direct service to the Menlo Park CalTrain Station, as well as other SamTrans regional bus connections ([https:// www.samtrans.com/296](https://www.samtrans.com/296)).

The signalized main entrance at Willow Road is currently designed to handle peak-period traffic to/from the MPD Campus, and Willow Road (State Route 114) is a primary arterial designed to serve as a high volume traffic corridor within this urbanized area of Menlo Park. It is expected that operation of the Proposed Action would only cause a minor increase in trips at the local intersections during peak hours. Therefore, significant impact to local traffic is not anticipated.

Under the Proposed Action, 81 parking spots would be constructed for residents, visitors and operations staff. This represents fewer parking spaces than the original 100 spaces provided by Lot 2, but current demand for Campus parking at Lot 2 has been lessened over the years, as reported by VA, and as further witnessed during site inspections performed in advance of the Proposed Action.

A gated pedestrian entrance to the housing complex from the sidewalk along Willow Road would be provided for the future residents to allow for easier pedestrian and bike access to and from the housing complex. The current design also includes a secured and covered bike storage facility at ground level.

The Proposed Action includes a new access road for shipping/receiving to Building 324 (Psychiatry) that bypasses the proposed housing development. This element of the Proposed Action would be a direct long-term benefit to the operations of Building 324.

Overall, significant impacts to traffic and parking are not anticipated.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be constructed and no project associated traffic would be created. There would be no impacts to traffic and parking at the existing facility.

3.14 Utilities

Utility infrastructure currently available at the Proposed Action site includes the following:

- Water - Menlo Park Municipal Water District (MPMWD)
- Sanitary Sewer - West Bay Sanitary District (WBSD) and South Bayside Systems Authority (SBSA)
- Electricity & Natural Gas - Pacific Gas and Electric Company (PG&E)
- Stormwater – City of Menlo Park

Utilities for the proposed housing development project would be separate from the MPD Campus. New service connections from along Willow Road would be prepared for the above described utilities.

Proposed Action (Preferred Alternative)

Construction

The existing utilities would be terminated in a manner conforming to the local building codes. New utilities would be constructed in a manner conforming to national and local construction standards. Installation and/or termination of below ground utilities would be performed using standard open-trench excavation by means of cut-and-cover.

The existing utility mains are located along Willow Road, which would require excavations through the adjacent sidewalk and a portion of the street for access and connection. Pedestrian, bike and vehicular traffic lane closures and detours would be required to accommodate the service connections, resulting in temporary short-term disruptions in the normal traffic patterns along Willow Road.

Excavations may require dewatering activities to work in the dry. To mitigate the potential effects, the site contractor would ensure that a project specific dewatering and discharge plan is developed, as necessary, and implemented in compliance with the NPDES for Storm Water Discharges Associated with Construction and Land Disturbance Activities. The site contractor would maintain compliance under the required SWPPP for the project, to include established BMPs to ensure that sediments are not released into the stormwater system. There will be no discharge of water from dewatering to the sanitary sewer unless prior approval has been given by the WBSD and SBSA. Prior to any discharge of water to the storm water system or the sanitary system, the site contractor will ensure that all appropriate permits have been obtained.

Overall, construction for utilities would result in minor, short-term impacts.

Operation

According to the USEPA, the average family uses approximately 300-gallons of water per day (estimated at 100-gallons per person), with 70 percent being for indoor use (e.g., bathrooms, kitchens, washing machines) (<https://www.epa.gov/watersense/how-we-use-water>). Based on actual usage recorded by the Bay Area Water Supply and Conservation Agency (BAWSCA), the residential demand for water in Menlo Park is approximately 61 gallon-per-capita-day (<https://bawasca.org/members/profiles/menlo-park>). The operation of the Proposed Action would increase the use of water in the area by approximately 4,700 gallons per day, based on full occupancy and BAWSCA estimated residential usage. This proposed increase falls within the moderate increase identified in the City of Menlo Park, Water System Master Plan (<https://www.menlopark.org/1564/Water-System-Master-Plan>).

In an effort to reduce the overall consumption of water, the proposed housing development would use-low flow and low-usage water saving devices throughout the facility. The landscaping would include drought tolerant, non-invasive plants, where feasible, and have areas designed to use a high-efficiency irrigation

system with zone controlled drip irrigation and digital moisture sensors to conserve water. Permeable surfaces, such as rain gardens and bioswales would be utilized to provide on-site infiltration of stormwater. The operation of the proposed facility would not require the construction or expansion of any water supply facilities, water treatment facilities or stormwater control facilities.

No Action Alternative

Under the No Action Alternative no construction or operation of the proposed housing complex would occur. The No Action Alternative would have no impact on utilities in the City of Menlo Park.

3.15 Environmental Justice

Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires a determination whether the proposed action disproportionately impacts minority and low-income populations. EO 12898 also tasks federal agencies with ensuring that public notifications regarding environmental issues are concise, understandable, and readily accessible. Socioeconomic and demographic data were studied to determine if a disproportionate number (greater than 50 percent) of minority or low-income persons have the potential to be adversely affected by the alternatives.

Additionally, EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, states that each Federal agency “(a) shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and (b) shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.” Children (youths) are defined as populations 16 years of age or younger.

The current population and minority demographics for Menlo Park (i.e., Proposed Action area), San Mateo County and the State of California are provided in Table 4. As summarized in this table, the minority composition of Menlo Park is lower than that of San Mateo County and the State. The average income of the population within the project area is higher than the surrounding County, and that of the State. There is a slightly higher rate of poverty in Menlo Park compared to the surrounding County, but the poverty level in both San Mateo County and Menlo Park are much lower than the State average. Further note that the income for all categories has significantly increased since the 2010 census.

Table 4 - Population Demographics

Demographic	Menlo Park	San Mateo County	California
White - Non-Hispanic (%)	58.2	38.7	36.5
Black or African American (%)	4.5	2.8	6.5
American Indian / Alaska Native (%)	0.7	0.9	1.6
Asian (%)	15.0	30.6	15.5
Native Hawaiian / Other Pacific Islander (%)	2.0	1.5	0.5
Persons reporting two or more races (%)	5.0	4.8	4.0
Hispanic or Latino (%)	15.5	24.0	39.4
Per Capita Income	\$85,710	\$61,545	\$36,995
Median Household Income	\$160,784	\$122,641	\$75,235
Persons Below Poverty Level (%)	7.6	6.1	11.8

Source: <https://www.census.gov/quickfacts/CA>

Proposed Action (Preferred Alternative)

Construction and Operation

Under the Proposed Action, no disproportionately high or adverse impact on minority or low-income populations is anticipated. This project would benefit Veterans and their families in need of affordable, permanent housing. The project would also not pose any additional environmental risk to the health and safety of children.

Accordingly, the Proposed Action would have a minor beneficial, long-term impact on minority or low-income populations considered under Environmental Justice topics.

No Action Alternative

Under the No Action alternative there would be no increase in the ability of the VA to serve Veterans in need of quality, affordable, permanent housing, and who may also belong to minority and/or low-income populations. Therefore, the No Action alternative would result in a long-term, minor adverse impact on Environmental Justice due to the absence of affordable housing for this defined population.

3.16 Potential for Generating Substantial Controversy

Various federal, state, and local government agencies, as well as the general public, were provided an opportunity to comment on the Draft EA, with their input (if any) incorporated into the Final EA. The VA has not received any government or public opposition or controversy regarding the Proposed Action. There are no known or anticipated issues likely to generate substantial controversy among VA stakeholders, regulatory agencies, or the general public from the Proposed Action.

3.17 Cumulative Impacts

The CEQ regulations for implementing NEPA define cumulative effects as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.

Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7). This EA considers past, present, and reasonable foreseeable short-term and long-term future effects from implementing the Proposed Action and other projects that coincide with the location and timetable of the Proposed Action. Based on available information and the absence of any comments during the public review period, no cumulative significant adverse effects to any resources are anticipated from the Proposed Action.

4.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT

4.1 Agency Coordination

NEPA requirements help ensure that environmental information is made available to the public during the decision-making process and prior to actions being taken. The premise of NEPA is that the quality of Federal decisions will be enhanced if proponents provide information to the public and involve the public in the planning process. The Intergovernmental Coordination Act and EO 12372, Intergovernmental Review of Federal Programs, require Federal agencies to cooperate with and consider state and local views in implementing a Federal proposal.

Through the coordination process, the VA has notified relevant and necessary Federal, state, and local agencies of the Proposed Action and provided them sufficient time to make known their environmental concerns. Where received, agency responses have been incorporated into this EA. The VA's coordination, which included available agency database searches as an initial screening tool, included the following: USEPA, USFWS, CalEPA, BAAQMD, CNDDDB, and the California SHPO.

4.2 Public Involvement

As part of the NEPA process, VA made the Draft EA available for a 30-day public review and comment period. A Notice of Availability (NOA) announcing the availability of the Draft EA was published in San Mateo County Times on 22-24 April 2022 and 11-12 June 2022. Electronic copies of the Draft EA were posted to VA VAPAHCS Construction Website (<https://www.va.gov/palo-alto-health-care/programs/va-palo-alto-construction-updates/>). There were no comments received from interested members of the public. Proof of publication of the NOA is provided in Appendix D.

5.0 MANAGEMENT AND MITIGATION MEASURES

As documented in this EA, the Proposed Action would have no significant adverse impacts on the quality of human health or the environment. Accordingly, no “mitigation measures” are required for construction or operation of the Proposed Action. Mitigation measures are defined as project-specific requirements not routinely implemented as part of development projects and which are necessary to reduce potentially significant adverse impacts to less-than-significant levels.

Management measures are defined as routine best management practices (BMPs), environmental protection measures, and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, in California. In general, implementation of BMPs and environmental protection measures will ensure that any minimal adverse impacts identified in this EA do not become significant adverse impacts on the quality of human health or the environment.

Accordingly, per established protocols, procedures, and requirements, the following management measures and applicable regulatory requirements associated with the design, construction, and operation of the Proposed Action will be implemented.

5.1 Mitigation Measures

Mitigation Measures are defined as project-specific requirements not routinely implemented as part of development projects and which are necessary to reduce potentially significant adverse impacts to less-than-significant levels. As documented in this EA, the Proposed Action would have no significant adverse impacts on the quality of human health or the environment. Accordingly, no “mitigation measures” are required for the Proposed Action.

5.2 Management Measures

Management Measures are defined as routine BMPs, environmental protection measures and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across the State. In general, implementation of BMPs and environmental protection measures will ensure that any minimal adverse impacts identified in this EA do not become significant adverse impacts. Accordingly, per established protocols, procedures, and requirements, the following management measures and applicable regulatory requirements associated with the Proposed Action are recommended.

Air Quality

The following minimization measures have been recommended for short-term construction related air quality impacts. The Lessee will be responsible for complying with all applicable air pollution control regulations. During construction, reasonable measures will be implemented to prevent particulate matter from becoming airborne and unnecessary amounts of emissions generation. Such precautions would include:

- ✓ Spray exposed soils with water or other suppressant to reduce dust emissions;
- ✓ Cover trucks transporting materials to reduce dust emissions;
- ✓ Provide wheel washers to reduce dust emissions and off-site tracking of sediment;
- ✓ Cover soil and debris piles as needed to reduce wind-borne dust; and
- ✓ Minimize on-site diesel engine idling to reduce construction vehicle and equipment emissions.

Cultural Resources

In consultation with the SHPO, the developer would do the following to minimize impacts to historic properties:

- ✓ Building would be constructed with elements of the Spanish Eclectic style in order to blend in with the architectural character of the Personnel Quarters Historic District.
- ✓ Archeological investigations would be conducted on site consisting of multiple backhoe trench excavations under the supervision of a qualified archeologist and a representative of the Amah Mutsun Tribal Band in the project area prior to the commencement of work at the site. All activities would be in conformance with the Secretary of the Interior Standards and Guidance for Archaeology and Historic Preservation.
- ✓ Comply with all conditions associated with the SHPO.
- ✓ Comply with the NHPA, Archaeological Resources Protection Act (ARPA), NAGPRA, American Indian Religious Freedom Act (AIRFA), 36 CFR Part 79 (Curation of Federally-Owned and Administered Archaeological Collections), and Executive Order 13007 Indian Sacred Sites (1996), as needed during the proposed site development.

Hydrology/Water Quality

Implementation of a SWPPP and associated sediment, erosion, and pollution prevention control measures required under the Construction Stormwater General Permit would minimize adverse impacts to surface water resources during construction. The use of sediment and erosion control BMPs during construction (e.g., silt fences, wattles, hay bales, etc.) would be used to minimize the transport of sediments off-site during construction of the Proposed Action.

Incorporation of Low Impact Design features into the proposed landscape enhancements (e.g., drought resistant non-invasive plants, rain-gardens and bioswales for stormwater infiltration, and grassy parking islands,) to offset the effects of increased impervious surface area resultant from the development.

Wildlife and Habitat/Biological Resources

To avoid potential disturbance of the white-tailed kite and the pallid bat, if present, during construction, VA will ensure that a qualified biologist conducts a pre-construction surveys of trees to be removed to identify if either the pallid bat or white-tailed kite is present. If the species is present, VA will take the appropriate mitigation measures to protect the white-tailed kite and/or the pallid bat.

Noise

Limiting construction activities that generate noise to the hours of operations from 7:00 a.m. to 5:00 p.m. Monday through Friday, and properly maintaining construction equipment mufflers will reduce the potential for adverse effects to nearby sensitive noise receptors.

Utilities

The site contractor will ensure that a project specific dewatering and discharge plan is developed, as necessary when conducting any utility trenching and excavating. In addition, the VA would insist on the use of Best Management Practices to ensure the silt and sediments are not released into the stormwater system or sanitary sewer system. There will be no discharge of water from dewatering to the sanitary sewer unless prior approval has been given by the WBSD and the SBSA. Prior to any discharge of water

to the storm water system or the sanitary system, the site contractor will ensure that all appropriate permits have been obtained.

The landscaping would include drought tolerant, non-invasive plants, where feasible, and have areas designed to use a high-efficiency irrigation system with zone controlled drip irrigation and digital moisture sensors to conserve water. Permeable surfaces and bioswales will be utilized to provide on-site infiltration of stormwater.

6.0 LIST OF PREPARERS

This EA was prepared, under the direction of VA, by Alares Architects and Engineers, LLC (Alares). Individuals who contributed to the preparation, production and review of this document are listed below.

U.S. Department of Veterans Affairs

Alares Architects and Engineers

Don Maggioli, PE, LEED-AP - Alares Principal Engineer

Mike Bundy, CHMM - Alares Senior Environmental Scientist

7.0 REFERENCES

Alares Architects and Engineers, LLC. 2020. National Environmental Policy Act, Phase I Environmental Site Assessment Report, Enhanced-Use Lease Veteran Housing, Department of Veterans Affairs, Palo Alto Health Care System, Menlo Park Division, Menlo Park, California.

ASTM D4318, American Society of Testing Materials, Standard Test Methods for Liquid Limit, Plastic Limit, and Plasticity Index of Soils, version 17e1.

Bay Area Air Quality Management District (BAAQMD), Boilers and the Air District, Regulation 9, Rule 7 (https://www.baaqmd.gov/~media/files/compliance-and-enforcement/advisories/combustion-equipment/9-7_amended_faq_070711.pdf)

Bay Area Water Supply and Conservation Agency (BAWSCA), Member Profiles, Menlo Park (<https://bawasca.org/members/profiles/menlo-park>)

California Air Resources Board, Ambient Air Quality Standards (<https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards>)

California Air Resources Board, Maps of Current State and Federal Area Designations (<https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>)

California Building Standards Commission, California Building Standards Code, Cal. Code Regs., Title 24, January 1, 2020 (<https://www.dgs.ca.gov/BSC/Codes>).

California Commuter Rail (CalTrain), (<https://www.caltrain.com/main.html>)

California Department of Toxic Substances Control's (DTSC) Data Management System (<https://www.envirostor.dtsc.ca.gov/public/map/>)

California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDDB) (<https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>)

California Department of Toxic Substances Control's (DTSC), Managing Hazardous Waste (<https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/>)

California Environmental Protection Agency (CalEPA) Databases (<https://calepa.ca.gov/database-and-directories/>)

City of Menlo Park, Public Works, Transportation Division, Bicycling (<https://www.menlopark.org/1081/Bicycling>)

City of Menlo Park Municipal Water System Master Plan, Final Report April 2018 (<https://www.menlopark.org/1564/Water-System-Master-Plan>)

Federal Emergency Management Agency (FEMA), Flood Map Service Center, Database Search, FEMA Panel Number 06081C0308E, eff. October 16, 2012 (<https://msc.fema.gov/portal/search>)

NEPAssist (USEPA) Environmental Review Database (<https://www.epa.gov/nepa/nepassist>)

San Mateo County Assessor's Office Database (<https://gis.smcgov.org/Html5Viewer/?viewer=raster>)

San Mateo County, Property Maps Portal (<https://gis.smcgov.org/Html5Viewer/?viewer=raster>)

San Mateo County Transit District (SamTrans), Bus Route 296 (<https://www.samtrans.com/296>)

U.S. Census Bureau, Menlo Park, CA, Quick Facts
(<https://www.census.gov/quickfacts/menloparkcitycalifornia>)

U.S. Census Bureau, California Quick Facts (<https://www.census.gov/quickfacts/CA>)

U.S. Census Bureau. The American Community Survey (ACS) (<https://www.census.gov/programs-surveys/acs>)

U.S. Department of Agriculture (USDA), Natural Resource Conservation Service (NRCS), San Mateo County Soils Survey (<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>)

U.S. Department of Veterans Affairs. 2010. Extended Phase I Archaeological Investigation United States Department of Veterans Affairs Menlo Park Division Medical Campus, Menlo Park, California, June 2010.

U.S. Department of Veterans Affairs, 2019 (Updated). Veterans Affairs Palo Alto Health Care System, Menlo Park Division, Built Environment Survey Report (BESR), Original Report dated March 2013.

U.S. Department of Veterans Affairs, Extended Phase I Archaeological Investigation, Menlo Park Division Medical Campus, Menlo Park, California, June 2010.

U.S. Department of Veterans Affairs. 2013. Veterans Affairs Palo Alto Health Care System, Menlo Park Division, Built Environment Survey Report, March 2013.

U.S. Department of Veterans Affairs, Environmental Assessment for the Limited Build-Out of Facility Master Plan, Menlo Park Division, Palo Alto Health Care System, Menlo Park, California, November 2013.

U.S. Department of Veterans Affairs, Environmental Assessment for the Enhanced-Use Lease of Certain Real Property and Facilities at the VA Palo Alto Health Care System, Menlo Park Division, Menlo Park, CA. 2014

U.S. Environmental Protection Agency (USEPA), EnviroFacts Data Search (<https://enviro.epa.gov/>)

U.S. Environmental Protection Agency (USEPA), Enforcement and Compliance Online (ECHO) (<https://echo.epa.gov/detailed-facility-report>)

U.S. Environmental Protection Agency (USEPA), EnviroMapper
(<https://www.epa.gov/emefdata/em4ef.home>)

U.S. Environmental Protection Agency. The Green Book Nonattainment Areas for Criteria Pollutants.
http://www.epa.gov/oar/oaqps/greenbk/anay_ca.html (Accessed on January 4, 2021)

U.S. Environmental Protection Agency, National Ambient Air Quality Standards, Criteria Air Pollutants (<https://www.epa.gov/criteria-air-pollutants>)

U.S. Environmental Protection Agency, Water Sense, How We Use Water
<https://www.epa.gov/watersense/how-we-use-water>

U.S. Fish and Wildlife Service (USFWS), Information, Planning and Consultation (IPaC) System, Menlo Park, CA (<https://ecos.fws.gov/ipac/?state=7TjIouOstIM66jPVcXyanrtllwWwyp>)

U.S. Fish and Wildlife Service (USFWS), National Wetlands Inventory, Wetlands Mapper
(<https://www.fws.gov/wetlands/data/Mapper.html>)

U.S. Geological Survey (USGS), Geologic Map of the San Francisco Bay Region, Scientific Investigation Map 2918, 2006 (<https://pubs.usgs.gov/sim/2006/2918/>)

U.S. Geological Survey (USGS), Long-term National Seismic Hazard Map, 2018
(<https://www.usgs.gov/media/images/2018-long-term-national-seismic-hazard-map>)

U.S. Geological Survey (USGS), 7.5-Minute Topographic Series Quadrangle Maps
(<https://www.usgs.gov/core-science-systems/ngp/tnm-delivery/topographic-maps>),

VA Palo Alto Health Care System, Menlo Park Division, Tree Inventory and Management Plan. October 2012.

VA Palo Alto Health Care System, Our History, <https://www.paloalto.va.gov/about/history.asp>

Additional references are presented within text.

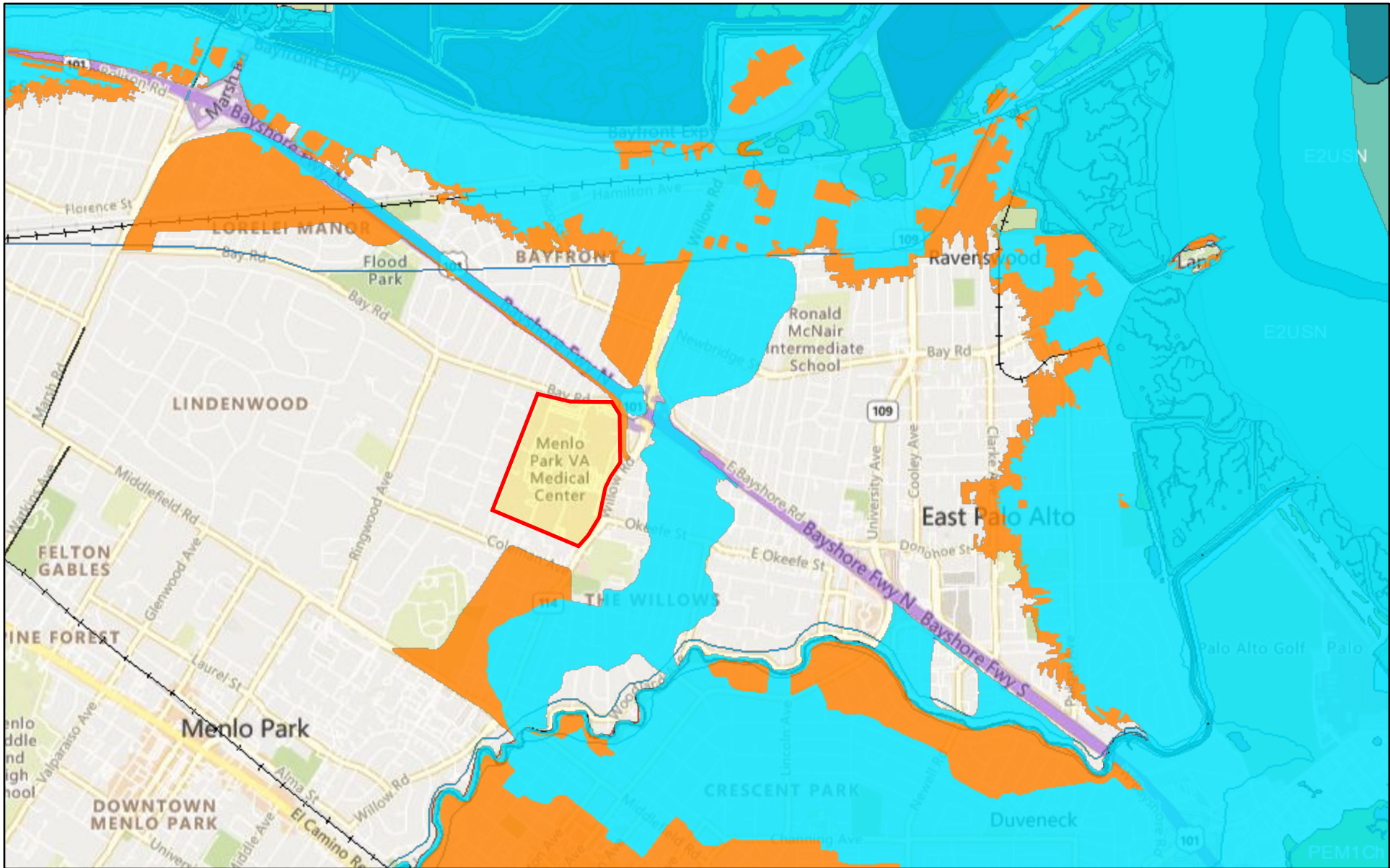
8.0 APPLICABLE LAWS/REGULATIONS

- 1) Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 and the Water Quality Act of 1987 (33 U.S.C. 1251 et seq.).
 - a. National Pollutant Discharge Elimination System (NPDES) NPDES Permit for Storm Water Discharges from Construction Site Activities
- 2) Clean Air Act, as amended by the Clean Air Act of 1977, and the Clean Air Act of 1990 (42 U.S.C. 7401 et seq.).
- 3) Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984 (42 U.S.C. 6901 et seq.).
- 4) National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347).
- 5) National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 et seq.).
- 6) Archaeological and Historic Preservation Act of 1974 (16 U.S.C. 469).
- 7) Archaeological Resources Protection Act of 1979 (16 U.S.C. 470aa-470ll).
- 8) Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001 et seq.).
- 9) Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661-666c).
- 10) Fish and Wildlife Conservation Act of 1980 (16 U.S.C. 2901-2911).
- 11) Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.).
- 12) Migratory Bird Treaty Act of 1918 (16 U.S.C. 703 et seq.).
- 13) Pollution Prevention Act of 1990 (42 U.S.C. 13101 et seq.).
- 14) Oil Pollution Act of 1990 (33 U.S.C. 2701).
- 15) Federal Facility Compliance Act of 1992 (Public Law 102-386).
- 16) Executive Order 11514 of March 1970, Protection and Enhancement of Environmental Quality, as amended by E.O. 11541 (7/1/1970) and E.O. 11991 (5/24/1977).
- 17) Executive Order 11912 of April 13, 1976, Delegation of Authorities Relating to Energy Policy and Conservation, amended by: E.O. 12003 (7/20/77), E.O. 12038 (2/3/78), E.O. 12148 (7/20/79), and E.O. 12375 (8/4/82). Superseded or revoked, in part, by E.O. 12919 (6/3/94).
- 18) Executive Order 11988 of May 24, 1977, Floodplain Management, amended by E.O. 12148 of July 20, 1979.
- 19) Executive Order 11990 of May 24, 1977, Protection of Wetlands, amended by E.O. 12608 of September 9, 1987.
- 20) Executive Order 12088 of October 13, 1978, Federal Compliance with Pollution Control Standards, amended by Executive Order 12580 of January 23, 1987, and revoked, in part, by Executive Order 13148 of April 21, 2000. E.O. 13148 revoked by E.O. 13423 of January 24, 2007.
- 21) Executive Order 12898 of February 11, 1994, Federal Actions to Address Justice in minority Populations and Low-Income Populations.

- 22) Executive Memorandum of April 26, 1994, Environmentally and Economically Beneficial Practices on Federal Landscaped Grounds. State and local laws and regulations related to pollution abatement, prevention, and control, as may be applicable to the Federal Government.
- 23) Executive Order 12969 of August 8, 1995, Federal Acquisition and Community Right-to-Know.
- 24) Executive Order 13045 of April 21, 1997, Protection of Children from Environmental Health Risks and Safety Risks.
- 25) Executive Order 13112 of February 3, 1999, Invasive Species.
- 26) Executive Order 13175 of November 6, 2000, Consultation and Coordination with Indian Tribal Governments.
- 27) Executive Order 13186 of January 10, 2001, Responsibilities of Federal Agencies to Protect Migratory Birds.
- 28) Executive Order 13211 of May 18, 2001, Actions concerning Regulations that Significantly Affect Energy Supply, Distribution, or Use.
- 29) Executive Order 13352 of August 26, 2004, Executive Order Facilitation of Cooperative Conservation.
- 30) Executive Order 13514 of October 5, 2009, Federal Leadership in Environmental, Energy, and Economic Performance.
- 31) California Endangered Species Act (CESA), as overseen by The California Department of Fish and Wildlife (CDFW)
- 32) California Fish and Game Code (currently, the Department of Fish and Wildlife, CDFW)
- 33) Porter-Cologne Water Quality Control Act of 1969
- 34) State Water Resources Control Board Construction General Permit (99-08-DWQ), July 2010. The Construction General Permit Order 2009-0009-DWQ, has been administratively extended until a new order is adopted and becomes effective.
- 35) Water Conservation Act of 2009 (Senate Bill X7 7(2009))
- 36) The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), 1990
- 37) City of Menlo Park General Plan for Development and Land Use, November 29, 2016
- 38) City of Menlo Park Municipal Code Title 7 Health and Sanitation; Chapter 7.38, Water Conservation
- 39) City of Menlo Park Municipal Code Title 7 Health and Sanitation; Chapter 7.42 Stormwater Management Program
- 40) City of Menlo Park Municipal Code Title 12 Building and Construction; Chapter 12.42 Flood Damage Prevention.
- 41) City of Menlo Park Municipal Code Title 12 Building and Construction; Chapter 12.44, Water Efficient Landscaping
- 42) City of Menlo Park Municipal Code Title 13 Streets, Sidewalks and Utilities; Chapter 13.24, Heritage Trees

APPENDIX A

NEPAssist Database Report for Project Site



December 6, 2020

Flood Hazard Zones

1% Annual Chance Flood Hazard

Regulatory Floodway



Special Floodway

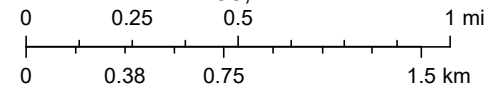


Area of Undetermined Flood Hazard

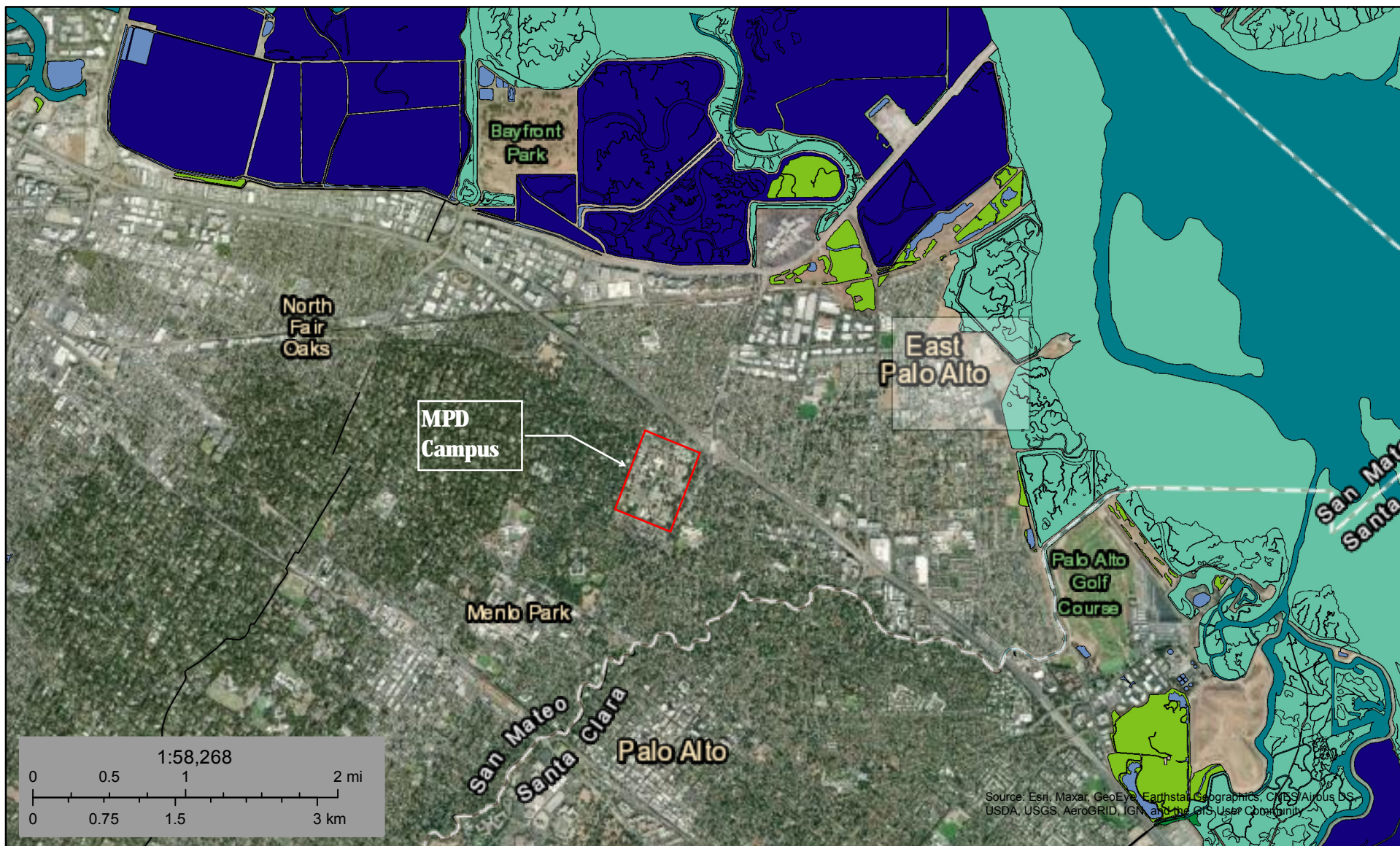


0.2% Annual Chance Flood Hazard

1:36,112










U.S. Fish and Wildlife Service, National Standards and Support Team, wetlands_team@fws.gov, © 2020 Microsoft Corporation © 2020 HERE, EPA



January 25, 2021

Wetlands

- | | | |
|--|---|--|
|  Estuarine and Marine Deepwater |  Freshwater Emergent Wetland |  Lake |
|  Estuarine and Marine Wetland |  Freshwater Forested/Shrub Wetland |  Other |
| |  Freshwater Pond |  Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

APPENDIX B

U.S. Fish and Wildlife Service OnLine Consultation Report



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To:

January 24, 2021

Consultation Code: 08ESMF00-2021-SLI-0784

Event Code: 08ESMF00-2021-E-02273

Project Name: VA Menlo Park District EUL Veteran Housing Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Please follow the link below to see if your proposed project has the potential to affect other species or their habitats under the jurisdiction of the National Marine Fisheries Service:

http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to

utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>;

<http://www.towerkill.com>; and

www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

<http://>

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

Project Summary

Consultation Code: 08ESMF00-2021-SLI-0784

Event Code: 08ESMF00-2021-E-02273

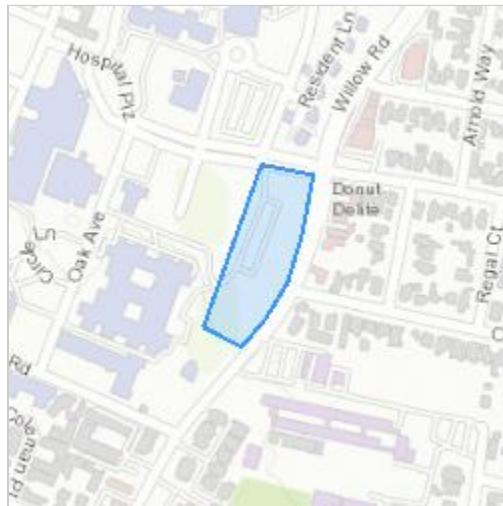
Project Name: VA Menlo Park District EUL Veteran Housing Project

Project Type: DEVELOPMENT

Project Description: Enhanced Use Lease of federal property at the MPD Campus for the development of residential housing for homeless or at-risk of homeless Veterans and their families.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@37.46422255,-122.15817719994931,14z>



Counties: San Mateo County, California

Endangered Species Act Species

There is a total of 17 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Salt Marsh Harvest Mouse <i>Reithrodontomys raviventris</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/613	Endangered

Birds

NAME	STATUS
California Clapper Rail <i>Rallus longirostris obsoletus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4240	Endangered
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104	Endangered
Marbled Murrelet <i>Brachyramphus marmoratus</i> Population: U.S.A. (CA, OR, WA) There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/4467	Threatened
Western Snowy Plover <i>Charadrius nivosus nivosus</i> Population: Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast) There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/8035	Threatened
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is proposed critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

Reptiles

NAME	STATUS
Green Sea Turtle <i>Chelonia mydas</i> Population: East Pacific DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6199	Threatened
San Francisco Garter Snake <i>Thamnophis sirtalis tetrataenia</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5956	Endangered

Amphibians

NAME	STATUS
California Red-legged Frog <i>Rana draytonii</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/2891	Threatened
California Tiger Salamander <i>Ambystoma californiense</i> Population: U.S.A. (Central CA DPS) There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/2076	Threatened

Fishes

NAME	STATUS
Delta Smelt <i>Hypomesus transpacificus</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/321	Threatened

Insects

NAME	STATUS
Bay Checkerspot Butterfly <i>Euphydryas editha bayensis</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/2320	Threatened
San Bruno Elfin Butterfly <i>Callophrys mossii bayensis</i> There is proposed critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/3394	Endangered

Flowering Plants

NAME	STATUS
Fountain Thistle <i>Cirsium fontinale</i> var. <i>fontinale</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7939	Endangered
Marin Dwarf-flax <i>Hesperolinon congestum</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5363	Threatened
San Mateo Thornmint <i>Acanthomintha obovata</i> ssp. <i>duttonii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2038	Endangered
Showy Indian Clover <i>Trifolium amoenum</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6459	Endangered

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

APPENDIX C

Section 106 Review and SHPO Consultation

DEPARTMENT OF VETERANS AFFAIRS
Palo Alto Health Care System
3801 Miranda Ave.
Palo Alto, CA 94304



NOV 09 2021

In reply refer to: 640/720

Ms. Julianne Polanco
California State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Dear Ms. Polanco:

The U.S. Department of Veterans Affairs (VA) is initiating National Historic Preservation Act (NHPA) Section 106 consultation with the State Historic Preservation Officer (SHPO) regarding plans to develop additional Veteran housing at the VA Palo Alto Health Care System (VAPAHCS), Menlo Park Division (MPD), 795 Willow Creek Road, Menlo Park, California. MPD is located on a 96-acre campus in north Menlo Park and provides comprehensive, integrated healthcare services to Veterans.

In our continued effort to end homelessness among Veterans, VA has identified underutilized land at the MPD Campus for a second enhanced-use ground lease (EUL) to construct and operate supportive housing for Veterans and their families who are homeless or at-risk of homelessness¹. The proposed undertaking is development of a Veteran housing project with approximately 61 residential units located in a single 3-story building (approximately 40 feet high) totally approximately 59,000 square feet on approximately 2.14 acres of land. The proposed site for this development is currently comprised of MPD Parking Lot 2 and surrounding greenspace located along Willow Road, just south of the main entrance to the Campus (Figure 1). The undertaking includes construction of the building and associated site work. A conceptual plan for the housing development is provided in Figure 2.

The proposed project site is bound to the north by Hospital Plaza Road at the Campus main entrance; to the west and southwest by non-historic Building 324 (Psychiatry, 1967), to the east by Willow Road, and to the south by the historic Director's Quarters and Garage (MPD Buildings 222, 1926; and 222-G, 1926-34) (Figure 1).

The Area of Potential Effect (APE) for above-ground historic resources has been defined as 500 feet beyond the limits of work for the project (Figure 3). The APE was determined based upon site distances, screening created by modern construction, and the nature of the proposed project. The APE for archaeological resources has been defined as the limits of ground disturbance.

¹ The first EUL at MPD providing 60 units of Veterans Housing was Willow Housing which opened in 2015; SHPO # VA_2014_0505_001, no adverse effect.

Identification of Historic Properties

One historic property is partially within the APE, the discontinuous MPD *Personnel Quarters Historic District*². The district is eligible for the National Register (NR) under criteria A and C, with a period of significance of 1920 through 1951. It consists of 17 total contributing resources in four separate areas located around the campus perimeter; these include houses of key hospital officials, multi-unit staff quarters, and garages that exhibit many characteristics of the Spanish Eclectic style that once characterized the facility. Buildings 222 and 222G (Director's Quarters and Garage) are contributing resources to the district and closest to the project.

Multiple archeological investigations have occurred at the MPD campus, indicating extensive subsurface disturbance and no eligible resources have been identified³. No sacred lands are known to be on or near the site according to information from the California State Native American Heritage Commission (NAHC). The Northwest Information Center (NWIC) of the California Historical Resource Information System (CHRIS) identified no archeological sites at MPD or within a quarter mile of the campus.

Menlo Park lies within an area once occupied by the Costanoan, or Ohlone, and NAHC has identified members of the Amah Mutsun Tribal Band of Mission San Juan Bautista (Amah Mutsun Tribal Band) as the most likely descendants of the Ohlone.

Assessment of Adverse Effects

The proposed EUL buildings will be approximately 100 feet north of Buildings 222 and 222G (Director's Quarters and garage) and visually screened by mature shrubs and trees (Figure 4). The new buildings will feature elements of the Spanish Eclectic Style to be compatible with the architectural character of the historic district. This will help minimize any visual impacts that might otherwise be caused by new construction.

Due to the physical separation, vegetation screening and the sympathetic architectural styling of the proposed new construction, there will be no negative alteration to the characteristics of the identified historic property qualifying it for the NR. Therefore, VA finds that the proposed undertaking will have No Adverse Effect.

VA requests your comments on the APE and historic property identification and seeks your agreement with its finding of No Adverse Effect for the undertaking.

By copy of this letter, VA is inviting the Amah Mutsun Tribal Band and City of Menlo Park to consult on this undertaking. Should either party provide comments, VA will share them with your office.

If you have questions or comments about this project, please contact Mr. James Crowe, Chief Engineer, via email James.Crowe2@va.gov or phone 650-493-5000, extension 62217, or Ms. Joanna Fong, Facility Planner, via email Joanna.Fong@va.gov or phone 650-493-5000, extension 69898.

² SHPO letter 5/3/2013; # VA_2013_0411_001

³ ARM, 1992; Martinez and Jurich, 2010; Atkins, 2011; King, 2012; Hoffman, 2014

Sincerely,



Lisa M. Howard
Director, VA Palo Alto Health Care System

Enclosures

cc: Valentin Lopez, Chairperson, Amah Mutsun Tribal Band (by email:
lcarrier@amahmutsun.org)
Deanna Chow, Asst. Community Development Dir., City of Menlo Park, CA (by email:
dmchow@menlopark.org)

FIGURE 1
Veteran Housing
Project Locus and
Site Detail, MPD
Campus, Menlo Park,
California

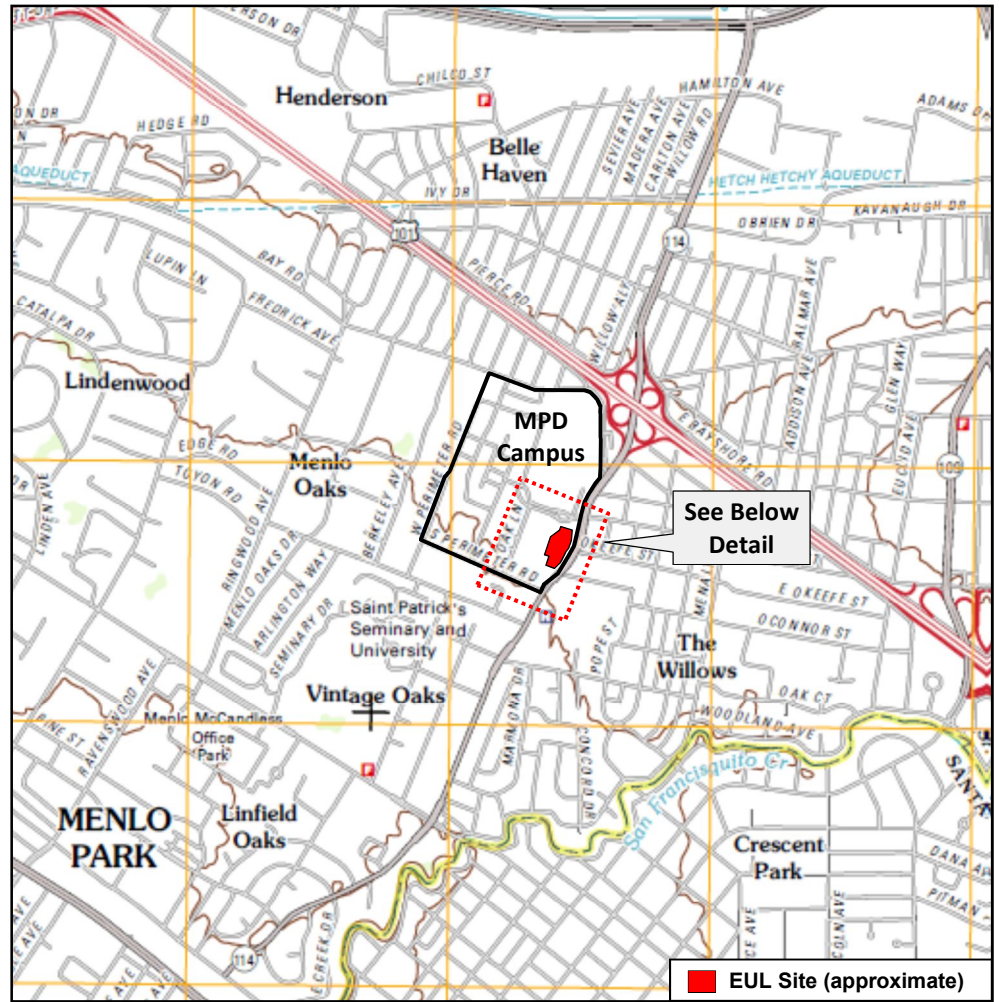


FIGURE 2
Veteran Housing Complex
Conceptual Site Plan

STATISTICS: PHASE I				
UNIT TYPE	1- BR	2- BR	3- BR	Sub-totals
1st Floor	16	1	0	17
2nd Floor	20	2	1	23
3rd Floor	18	2	1	21
TOTAL	54	5	2	61



FENCE LEGEND

- FULL EUL SITE FENCE, 8' DESIRED
- PROPOSED BUILDING FENCE, 4' DESIRED
- FENCE ALONG WILLOW, 8' DESIRED

LEGEND

- 1-BR
- 2-BR
- 3-BR
- COMMON AREA
- UTILITY
- CIRCULATION
- PROPERTY LINE
- 10' SETBACK LINE



MENLO PARK VETERANS HOUSING | SITE CONCEPT: LEVEL I - ALT PARKING

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING



STATISTICS: PHASE I				
UNIT TYPE	1-BR	2-BR	3-BR	Sub-totals
1st Floor	16	1	0	17
2nd Floor	20	2	1	23
3rd Floor	18	2	1	21
TOTAL	54	5	2	61



LEGEND

- 1-BR
- UTILITY
- 2-BR
- CIRCULATION
- 3-BR
- - - - PROPERTY LINE
- COMMON AREA
- · - · - 10' SETBACK LINE



MENLO PARK VETERANS HOUSING | SITE CONCEPT: LEVEL 2 - ALT PARKING

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING



STATISTICS: PHASE I				
UNIT TYPE	1- BR	2- BR	3- BR	Sub-totals
1st Floor	16	1	0	17
2nd Floor	20	2	1	23
3rd Floor	18	2	1	21
TOTAL	54	5	2	61



LEGEND

- 1-BR
- 2-BR
- 3-BR
- COMMON AREA
- UTILITY
- CIRCULATION
- PROPERTY LINE
- 10' SETBACK LINE



MENLO PARK VETERANS HOUSING | SITE CONCEPT: LEVEL 3 ALT PARKING

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING





MENLO PARK VETERANS HOUSING | 3D VIEWS: AERIAL FROM WILLOW ROAD - ALT2

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING



MENLO PARK VETERANS HOUSING | 3D VIEWS: AERIAL FROM WILLOW (SOUTH)- ALT2

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING



MENLO PARK VETERANS HOUSING | 3D VIEWS: STREET VIEW FROM WILLOW - ALT2

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING



MENLO PARK VETERANS HOUSING | 3D VIEWS: BUILDING ELEVATION (EAST) - ALT2

795 WILLOW ROAD, MENLO PARK, CA | APRIL 21, 2021 | MIDPEN HOUSING

SCALE: 1/16" = 1'-0"

MENLO PARK VETERANS' HOUSING BUILDING STATISTICS

Date: August 13, 2020

	Gross Area	Residential	Mgmt & Common	Laundry	Circulation	Utility & Storage
Ground Floor	17,680	9,210	3,260	225	3,185	1800
2nd Floor	16,955	13,100	-	225	2,960	670
3rd Floor	15,420	12,055	-	225	2,470	670
TOTAL	50,055	34,365	3,260	675	8,615	3,140

MANAGEMENT & COMMON AREA BREAKDOWN

PROGRAM	Gross Area	Lobby (includes Mail + Stairs)	Manager's Office	VA Office	Copy + Office St.	Mid Pen Services	Community Room	Bike Room	Laundry	Common bathrooms
Area (sq. ft.)	3,945	570	240	325	165	250	1,070	520	675	130

FIGURE 3
MPD Veteran Housing
Area of Potential Effect (APE)



FIGURE 4
Views of Historic Buildings from the Proposed Building Site



Photograph A – Director’s Quarters viewed from the north across the proposed build site. Area screened by trees, brush and privacy fence.



Photograph B – Officer’s Cottages viewed from the south across the proposed build site. Area screened by trees, brush and privacy fence. Building 116 viewed in background.



**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

Armando Quintero, Director

Julianne Polanco, State Historic Preservation Officer

1725 23rd Street, Suite 100, Sacramento, CA 95816-7100

Telephone: (916) 445-7000 FAX: (916) 445-7053

calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

December 10, 2021

Reply in Reference to: VA_2021_1116_001

Lisa Howard, Director
VA Palo Alto Health Care System
Department of Veterans Affairs
3801 Miranda Ave.
Palo Alto, CA 94304

VIA ELECTRONIC MAIL

Re: Section 106 Consultation for Supportive Hosing Construction, VA Palo Alto Health Care System, Menlo Park Division, 795 Willow Creek Road, Menlo Park

Dear Ms. Howard:

The Department of Veterans Affairs (VA) is initiating consultation with the State Historic Preservation Officer (SHPO) in compliance with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. §306108), as amended, and its implementing regulation found at 36 CFR Part 800.

The VA is proposing to construct 61 residential units located in a single 3-story, approximately 59,000 square feet building on approximately 2.14 acres at the Menlo Park Division campus.

A survey and records search revealed that a segment of the MPD Personnel Quarters Historic District, a resource formally determined eligible for National Register of Historic Places (NRHP) inclusion under criteria A and C, with a period of significance of 1920 through 1951, is within the undertaking's area of potential effects (APE). No listed or eligible NRHP archeological resources have been identified within the APE. The VA's letter indicates that it has concurrently initiated consultation with the Amah Mutsun Tribal Band of Mission San Juan Bautista and the City of Menlo Park.

The VA are requesting comments and concurrence with its delineation of the project's area of potential effects (APE) and finding of no adverse effect. Upon review of the information provided, the SHPO offers the following comments:

December 10, 2021
Lisa Howard
Page 2

VA_2021_1116_001

- 1) Pursuant to 36 CFR Part 800.4(a)(1), the SHPO does not object to the VA's APE definition.
- 2) The SHPO concurs that a finding of no adverse effect is appropriate.

This letter is being sent in electronic format only. Please confirm receipt of this letter and notify Ed Carroll, Historian II, at (916) 445-7006 or Ed.Carroll@parks.ca.gov if there are any questions or to request a hard copy of this letter.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

APPENDIX D

Notice of Availability – Proof of Publication

**AFFIDAVIT OF PUBLICATION
SAN MATEO DAILY JOURNAL**

**STATE OF CALIFORNIA
County of San Mateo**

The undersigned declares: That at all times hereinafter mentioned, affiant was a permanent resident of the United States, over the age of eighteen years old, and was at and during all said times. The Office Manager of the San Mateo Daily Journal, a newspaper published daily in the County of San Mateo, State of California. The notice mentioned was set in type no smaller than nonpareil and was preceded with words printed in black face type not smaller than size 6, describing and expressing in general terms, the purpose and character of the notice intended to be given; that the

NOTICE OF AVAILABILITY

Of which the annexed is a printed copy was published and printed in said newspaper on the 22nd and 23rd and 24th Day of April 2022

I declare under penalty of perjury that the foregoing is true and correct.

JP Uganiza

Dated at San Mateo, California,
This 11th day of Aug 2022.

**NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
U. S. Department of Veterans Affairs
Enhanced-Use Lease Veteran Housing
Palo Alto Health Care System
Menlo Park District
Menlo Park, California**

Background
The U.S. Department of Veterans Affairs (VA) is proposing the development of supportive housing for homeless and at-risk of homeless Veterans, and their families at the VA Palo Alto Health Care System (VAPAHCS), Menlo Park Division (MPD) Campus located in the City of Menlo Park, California (Proposed Action). The Proposed Action requires the VA to enter into an Enhanced Use Lease (EUL) agreement with a private entity, MidPen Housing Corporation (MidPen) to finance, design, construct, operate and maintain the proposed veteran housing development at the MPD Campus.

Proposed Action
The Proposed Action is comprised of a new 3-story supportive housing development with 61 residential units. The proposed EUL parcel for the Proposed Action is previously developed and disturbed land located within the southeast quadrant of the MPD Campus along Willow Road. The approximate 2.1-acre parcel is comprised of a paved parking lot for 100 vehicles, a grass covered auxiliary parking area, managed lawns and landscaping with irrigation, sidewalks, fencing, and below-ground utilities.

Actions Completed
Pursuant to Section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969 as implemented by the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), the VA gives notice that a Draft Environmental Assessment (EA) has been prepared. Concisely, the Draft EA identifies, analyzes and documents the potential physical, environmental, cultural, and economic impacts associated with the VA's Proposed Action. The Draft EA also evaluates the potential direct, indirect and cumulative impacts resulting from the Proposed Action. The proposed action and the no action alternative are considered.

Draft Environmental Assessment Location
The public is advised that it has 30 days to respond from the date of this publication with comments. The public comment period runs from April 24, 2022 to May 23, 2022. Hard copies of the Draft EA are available for public review at the Menlo Park Library (800 Alma Street, Menlo Park, CA 94025) and at the VAPAHCS construction updates website:
<https://www.va.gov/palo-alto-health-care/programs/va-palo-alto-construction-updates/>
For further information please contact the Public Affairs Office, VA Palo Alto Health Care System (VAPAHCS), 3801 Miranda Ave (Mail Code 00K), Palo Alto, CA 94304, at 650-658-3925 or by email VPHAPAL.EUL@DVAGOV.microsoft.com

Comments on the Draft EA shall be submitted to De Carol Smith, VA Office of Asset Enterprise Management, by email at DeCarol.Smith@va.gov.

Published in the San Mateo Daily Journal, April 22, 23, and 25, 2022.

**AFFIDAVIT OF PUBLICATION
SAN MATEO DAILY JOURNAL**

**STATE OF CALIFORNIA
County of San Mateo**

The undersigned declares: That at all times hereinafter mentioned, affiant was a permanent resident of the United States, over the age of eighteen years old, and was at and during all said times. The Office Manager of the San Mateo Daily Journal, a newspaper published daily in the County of San Mateo, State of California. The notice mentioned was set in type no smaller than nonpareil and was preceded with words printed in black face type not smaller than size 6, describing and expressing in general terms, the purpose and character of the notice intended to be given; that the

NOTICE OF AVAILABILITY

Of which the annexed is a printed copy was published and printed in said newspaper on the 11th and 12th day of June 2022

I declare under penalty of perjury that the foregoing is true and correct.

JP Uganiza



Dated at San Mateo, California,
This 12th day of August 2022.

NOTICE OF AVAILABILITY
Draft Environmental Assessment
U.S. Department of Veterans Affairs
Enhanced-Use Lease Veteran Housing
Palo Alto Health Care System
Menlo Park District, Menlo Park, California

Background

The U.S. Department of Veteran Affairs (VA) is proposing the development of supportive housing for homeless and at-risk of homeless Veterans, and their families at the VA Palo Alto Health Care System (VAPAHCS), Menlo Park Division (MPD) Campus located in the City of Menlo Park, California (Proposed Action). The Proposed Action requires the VA to enter into an Enhanced Use Lease (EUL) agreement with a private entity, MidPen Housing Corporation (MidPen) to finance, design, construct, operate and maintain the proposed veteran housing development at the MPD Campus.

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Pursuant to Section 102(2) (c) of the National Environmental Policy Act (NEPA) of 1969 as implemented by the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), the VA gives notice that a Draft Environmental Assessment (EA) has been prepared.

Conclusions

The Draft EA identifies, analyzes and documents the potential physical, environmental, cultural, and economic impacts associated with the VA's Proposed Action. The Draft EA also evaluates the potential direct, indirect and cumulative impacts resulting from the Proposed Action. The proposed action and the no action alternative are considered.

Draft Environmental Assessment Location

The public is advised that it has 30 days to respond from the date of this publication with comments. The public comment period runs from June 13, 2022 to July 13, 2022. Hard copies of the Draft EA are available for public review at the Menlo Park Library (500 Alma Street, Menlo Park, CA 94025) and at the VAPAHCS construction updates website:

<https://www.va.gov/palo-alto-health-care/programs/va-palo-alto-construction-updates/>

For further information please contact the Public Affairs Office, VA Palo Alto Health Care System (VAPAHCS), 3801 Miranda Ave (Mail Code 00K), Palo Alto, CA 94304, at 650-858-3925 or by email VPHAPAL.EUL (VHAPALEUL@DVAGOV.omicrosoft.com)

Comments on the Draft EA shall be submitted to De Carol Smith, VA Office of Asset Enterprise Management, by email at DeCarol.Smith@va.gov.

Published in the San Mateo Daily Journal, June 11-12, 2022.

EXHIBIT I
Conceptual Site Plan

STATISTICS: PHASE I				
UNIT TYPE	1- BR	2- BR	3- BR	Sub-totals
1st Floor	16	1	0	17
2nd Floor	20	2	1	23
3rd Floor	18	2	1	21
TOTAL	54	5	2	61



MENLO PARK VETERANS HOUSING | SITE CONCEPT PHASE I: LEVEL I

795 WILLOW ROAD, MENLO PARK, CA | OCTOBER 16, 2020 | MIDPEN HOUSING

STATISTICS: PHASE I				
UNIT TYPE	1-BR	2-BR	3-BR	Sub-totals
1st Floor	16	1	0	17
2nd Floor	20	2	1	23
3rd Floor	18	2	1	21
TOTAL	54	5	2	61



MENLO PARK VETERANS HOUSING | SITE CONCEPT PHASE I: LEVEL 2

795 WILLOW ROAD, MENLO PARK, CA | OCTOBER 16, 2020 | MIDPEN HOUSING



STATISTICS: PHASE I				
UNIT TYPE	1- BR	2- BR	3- BR	Sub-totals
1st Floor	16	1	0	17
2nd Floor	20	2	1	23
3rd Floor	18	2	1	21
TOTAL	54	5	2	61

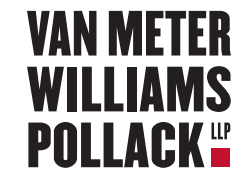


LEGEND	
 1-BR	 UTILITY
 2-BR	 PROPERTY LINE
 3-BR	 10' SETBACK
 COMMON AREA	 POTENTIAL ALTERNATE ACCESS
 CIRCULATION	



MENLO PARK VETERANS HOUSING | SITE CONCEPT PHASE I: LEVEL 3

795 WILLOW ROAD, MENLO PARK, CA | OCTOBER 16, 2020 | MIDPEN HOUSING

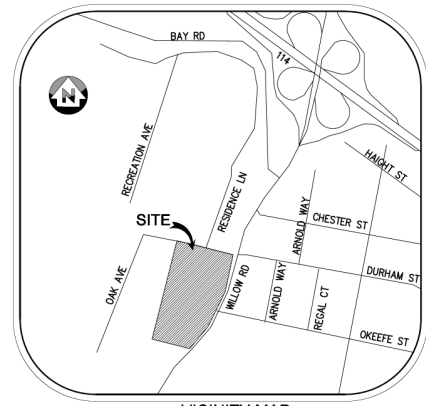


MENLO PARK VETERANS' HOUSING BUILDING STATISTICS						
	Gross Area	Residential	Mgmt/Common	Laundry	Circulation	Utility & Storage
Level 1	17,708	9,135	3,252	300	3,538	1,483
Level 2	17,134	13,051	0	300	3,354	429
Level 3	15,921	12,155	0	300	3,036	429
TOTAL	50,763	34,342	3,252	900	9,929	2,340

50762.73

MANAGEMENT & COMMON AREA BREAKDOWN								
PROGRAM	Gross Area	Lobby (Mail, seating, stairs)	Manager's Office	VA Services	MidPen Services	Community Room	Bike Room	Laundry
Area (sq ft)	4,152	700	184	268	250	1,325	525	900

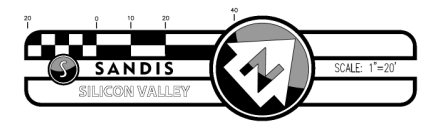
EXHIBIT II
EUL ALTA Survey



VICINITY MAP
N.T.S.

SYMBOLS & ABBREVIATIONS

- | | | | |
|------|----------------------------|-------|--------------------------|
| AD | AREA DRAIN | OV | GAS VALVE |
| BFP | BACK FLOW PREVENTER | OY | IRRIGATION CONTROL VALVE |
| BM | BUILDING CORNER | BR | LIP OF GUTTER |
| BOL | BENCHMARK | LP | PAVEMENT |
| BOW | WALL BOTTOM OF | OK | PAVEMENT |
| BW | BACK OF WALK | P | PEDESTAL |
| CB | CATCH BASIN | RED | STORM DRAIN MANHOLE |
| CLF | FENCE CHAINLINK | SSOO | SANITARY CLEANOUT |
| CONC | CONCRETE | SSMH | SANITARY MANHOLE |
| DI | EDGE OF PAVEMENT | S/S | STREET LIGHT LAMP NO ARM |
| EP | ELECTRIC PULLBOX | S/SB | STREET LIGHT PULLBOX |
| FDC | FIRE DEPARTMENT CONNECTION | STRIP | STRIP |
| FF | FIRE FINISHED FLOOR | SW | SIDEWALK |
| FOOR | FLOOR | TC | TOP OF CURB |
| FN | FIRE HOSE RANT | TR | TREE SYMBOL |
| FNC | FENCE | WM | WATER METER |
| | | WV | WATER VALVE |



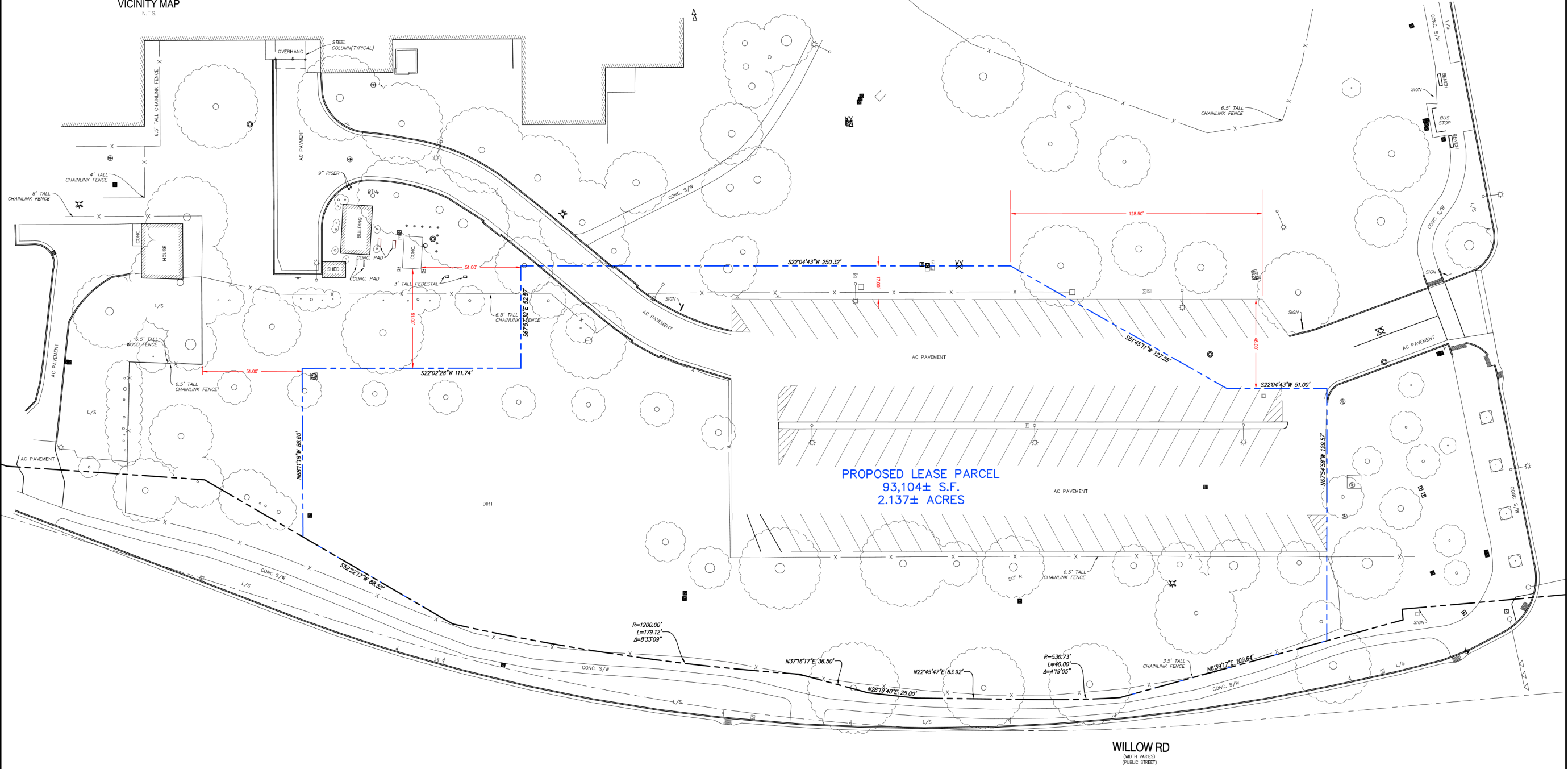
LEGEND

- BUILDING LINE
- BUILDING OVERHANG
- CURB LINE
- RIGHT OF WAY LINE
- CENTERLINE
- FENCE LINE
- PROPOSED LEASE LINE

BOUNDARY NOTE

THE RIGHT OF WAY LINE SHOWN HEREON IS BASED UPON RECORD INFORMATION AS SHOWN ON THAT CERTAIN RECORD OF SURVEY FILED IN BOOK 18 OF L.L.S., PAGE 68, SAN MATEO COUNTY RECORDS, UNRECORDED SURVEY OF A PORTION OF THE LANDS OF THE VETERANS ADMINISTRATION MEMO DIVISION BY STANLEY KANGAS OF RPT ENGINEERS IN 1975 (JOB NUMBER 14157) RESOLUTION NUMBER 3058 BY THE CITY COUNCIL OF MENLO PARK FILED AS DOCUMENT NUMBER 1984-021978, SAN MATEO COUNTY RECORDS, PARCEL ONE OF PRELIMINARY TITLE REPORT BY NORTH AMERICAN TITLE COMPANY ORDER NUMBER 54606-138492-15, DATED OCTOBER 9, 2015 AND PARCEL TWO OF PRELIMINARY TITLE REPORT BY NORTH AMERICAN TITLE COMPANY ORDER NUMBER 54606-138492-15, DATED OCTOBER 9, 2015.

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SANDIS CIVIL ENGINEERS SURVEYORS PLANNERS
1700 Winchester Boulevard, Campbell, CA 95008 | P. 408.636.0900 | F. 408.636.0999 | www.sandis.net

DATE: 11/18/2020
SCALE: 1"=20'
DRAWN BY: E.V.
CHECKED BY: C.C.
PROJECT NO.: 720054

No.	REVISION/ISSUE	DATE	BY

PROPOSED LEASE PARCEL
VAMC - 795 WILLOW ROAD
MENLO PARK CALIFORNIA

SHEET **1** OF 1 SHEETS
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EXHIBIT III

Nurses Residence Building 109 Photograph

**Building 109 - Nurses Residence
Veterans Bureau Hospital, Menlo Park, CA
circa 1923-25 (Prior to Building Expansion)
(Source: VAPAHCS)**

