

Chapter 3

Environmental Impact Analysis

Chapter 3 of the Draft Environmental Impact Report (Draft EIR) presents an analysis of the potential impacts that the Commonwealth Corporate Center Project (Project) could have on existing environmental conditions. The environmental analysis has been prepared in accordance with California Environmental Quality Act (CEQA), as amended (Public Resources Code Section 21000, et seq.), and the State CEQA Guidelines.

Organization of This Chapter

Each CEQA topic or environmental issue in this chapter is given its own section, each containing the following subsections.

- **Regulatory Setting**—describes the federal, state, and local regulations regarding the impact topic that would be applicable to the construction and operation of the Project.
- **Environmental Setting**—describes existing baseline conditions, including the environmental context and background. The environmental baseline for purposes of the analysis is discussed in detail below. As discussed in Chapter 2, *Project Description*, the existing Project site includes the Commonwealth Site at 151 Commonwealth Drive and the Jefferson Site at 164 Jefferson Drive. Currently, these two properties are not connected and include different land uses. Therefore, where appropriate, the properties are discussed separately under the environmental setting.
- **Environmental Impacts**—identifies standards of significance and evaluates how the Project would affect the baseline conditions. If the change to the baseline conditions would exceed the significance thresholds, this would constitute a significant impact and mitigation measures to reduce, eliminate, or avoid the significant impacts are suggested. Under the Project, the Commonwealth Site and the Jefferson Site would be merged to form one property. Therefore, the analysis of the Project discusses the two existing properties as one combined Project site. This section also analyzes cumulative impacts, as described in detail below.

CEQA Methodology

State CEQA Guidelines Section 15151 provides guidance for the preparation of an adequate EIR.

- An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.
- An evaluation of the environmental impacts of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

In practice, this guidance suggests that EIR preparers adopt a reasonable methodology upon which to estimate impacts and make reasonable assumptions using the best information reasonably available.

Classification of Impacts

In accordance with Section 15022(a) of the State CEQA Guidelines, the City of Menlo Park (City) uses the impact significance criteria designated by CEQA and the State CEQA Guidelines (Appendix G). These criteria, as well as City-adopted significance criteria for traffic impacts, are used to evaluate project impacts throughout this document. These criteria are listed at the beginning of the *Environmental Impacts* subsection under “Thresholds of Significance” throughout this chapter.

For each impact identified, a level of significance is determined using the following classifications.

- *Potentially significant (PS)* impacts are those cases in which it is not precisely clear whether a significant effect would occur. The analysis in these instances conservatively assesses the credible worst-case conditions, but the discussion acknowledges that there is some uncertainty regarding the credible extent of the impact.
- *Less-than-significant (LTS)* impacts are effects that are noticeable but do not exceed established or defined thresholds, or are mitigated below such thresholds.
- *No impact (NI)* denotes situations in which there is no adverse effect on the environment.

For each impact identified as being potentially significant (PS), the Draft EIR provides mitigation measures to reduce, eliminate, or avoid the adverse effect. If the mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the Draft EIR. However, if the mitigation measures would not diminish these effects to less-than-significant levels, then the Draft EIR classifies the impacts as “significant and unavoidable (SU).”

In Chapter 3, impacts are defined using an alphanumeric system that identifies the environmental topic of the impact. For example, NOI-1 denotes the presentation of the first impact in the Noise section. The abbreviated codes used to identify the environmental issues discussed in this chapter are listed below.

- LU—Land Use
- AES—Aesthetics
- TRA—Transportation
- AQ—Air Quality
- GHG—Greenhouse Gas Emissions
- NOI—Noise
- CUL—Cultural Resources
- GEO—Geology and Soils
- WQ—Hydrology and Water Quality
- HAZ—Hazardous Materials
- BIO—Biological Resources
- POP—Population and Housing
- PS—Public Services
- UT—Utilities and Service Systems

Mitigation Measures

Mitigation measures identified in this Draft EIR were developed during the analysis and are designed to reduce, minimize, or avoid potential environmental impacts associated with the Project. According to State CEQA Guidelines Section 15126.4:

The discussion of mitigation measures shall distinguish between measures that are proposed by the project proponents to be included in the project and other measures proposed by the lead, responsible, or trustee agency or other persons who are not included, but the agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.

In this Draft EIR, mitigation measures are provided immediately following each potentially significant impact. The mitigation measures are numbered to correspond to the impacts they address. For example, Mitigation Measure CUL-2.1 refers to the first mitigation measure for Impact CUL-2 in the Cultural Resources section.

If the Project is approved by City Council, then a Mitigation Monitoring and Reporting Program (MMRP) must be adopted. Pursuant to CEQA Guidelines Section 15097, an MMRP is a mechanism used for the monitoring and reporting of revisions to the Project or conditions of approval that the public agency has required as mitigation measures to lessen or avoid a significant environmental effect. The City can conduct the reporting or monitoring, or it can delegate the responsibilities to another public agency or private entity that accepts the delegation. The MMRP for the Project will identify: the specific monitoring actions that shall be done, the various City departments or other entities that shall oversee the completion of the mitigation, and a timeline for implementation of the measures. The responsible departments shall ensure that due diligence is carried out during implementation of the measures. Execution of the MMRP would reduce the severity or eliminate the significant impacts identified in this EIR.

Environmental Baseline

In determining whether impacts are significant, an EIR ordinarily compares the potential impacts of the project with preproject environmental conditions. Sections 15125(a) and 15126.2(a) of the State CEQA Guidelines specify that the baseline normally consists of the physical conditions that exist at the time the Notice of Publication (NOP) is published or the time the environmental analysis begins.

The approach to the analysis of the Project is consistent with the State CEQA Guidelines. As discussed above, the Project site is currently comprised of two separate properties: the Commonwealth Site and the Jefferson Site. At the time the NOP was released (August 6, 2012), the existing buildings at the Commonwealth Site were vacant and have been vacant since 2011. These buildings, which total 217,396 square feet (sf), are designed for a traditional industrial use and could not be reoccupied without significant modification. The Project Sponsor proposes to demolish the existing development and construct a new corporate campus. Therefore, the baseline, and the point from which all impacts are measured for the Commonwealth Site, is as an unoccupied site with vacant buildings.

The existing building at the Jefferson Site is occupied and operational, with approximately 30 employees, at the time of the NOP release. This is considered the baseline for the Jefferson Site. This 20,462-sf building continues to be used for offices, storage, and light industrial uses, which would be eliminated as part of the Project.

Approach to Cumulative Impacts

In addition to the evaluation of project-specific impacts, CEQA also requires an evaluation of cumulative impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. According to Section 15355 of the State CEQA Guidelines:

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects taking place over a period of time.

Throughout this Draft EIR, cumulative impacts are denoted by a “C” (i.e., Impact C-NOI-1). An analysis of cumulative impacts follows the Project-specific impact evaluation and recommendation of mitigation measures in each section. An introductory statement defining the cumulative context that is being analyzed for respective sections (e.g., the City, the San Francisco Bay Area Air Basin) is included at the beginning of each cumulative impacts section. In some instances, a Project-related impact may be considered less than significant but would be considered potentially significant in combination with development of the surrounding area. Similarly, a Project-specific potentially significant impact may not result in a cumulatively considerable impact.

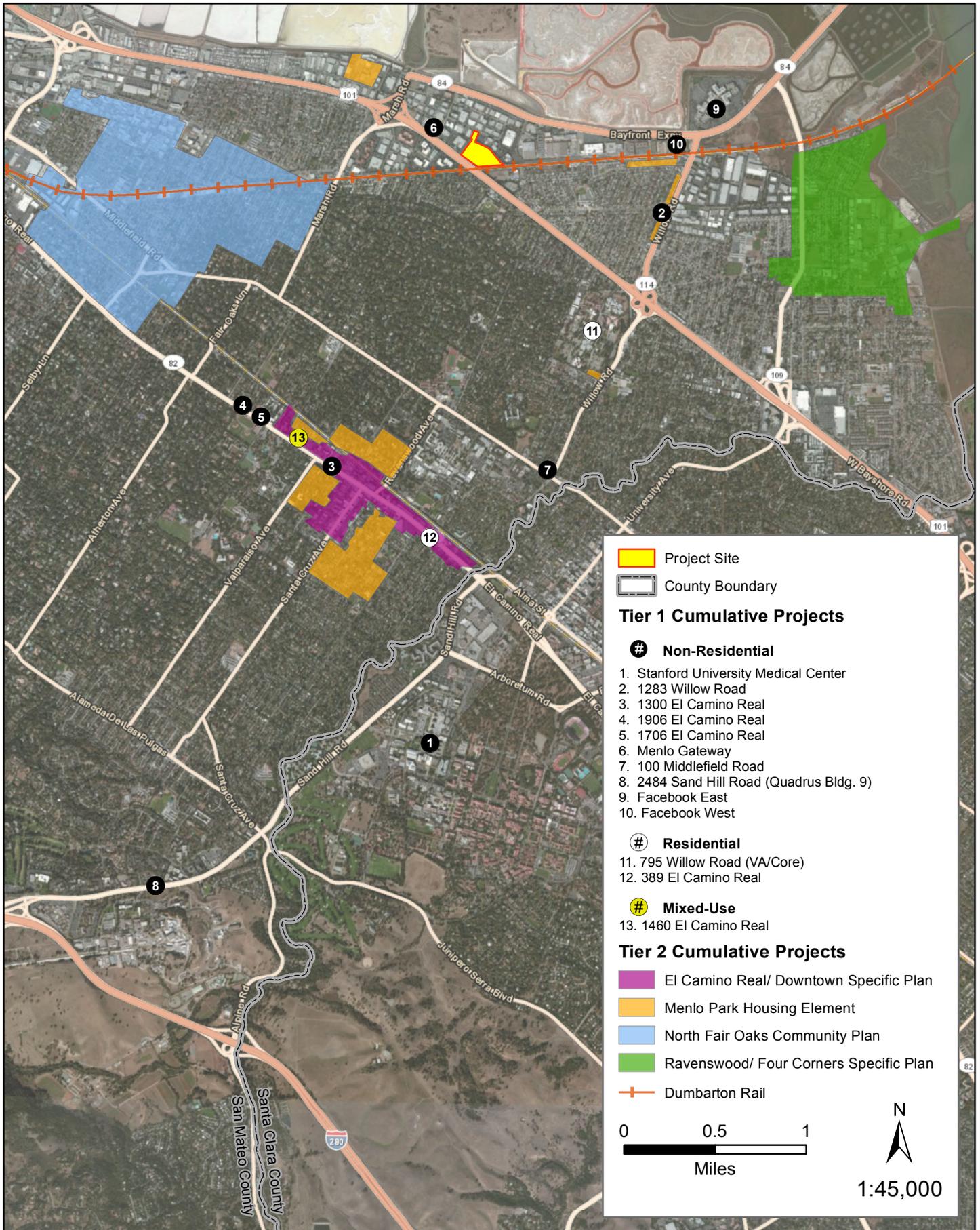
The closely related past, present, and reasonably foreseeable probable future projects considered in this Draft EIR consist of two categories, Tier 1 and Tier 2, as shown in Table 3.0-1 and Table 3.0-2, and depicted in Figure 3.0-1.

Tier 1 projects consist of reasonably foreseeable development projects identified by the City and generally within City limits (with the exception of the Stanford University Medical Center Project, which is located in the City of Palo Alto). Where appropriate, the cumulative effect of the Tier 1 projects is quantified and discussed in detail. For purposes of the quantitative cumulative analyses in the Transportation, Air Quality, and Noise sections, an ambient growth rate of 1 percent per year is applied in addition to the analysis of the Tier 1 cumulative projects. This percentage has been determined by City staff to reasonably represent regional growth in traffic.

Tier 2 encompasses a larger geographic area, not necessarily within the boundaries of the City, and includes projects that are in the early stages of planning or whose development could be considered somewhat speculative. The cumulative analysis in this Draft EIR qualitatively considers the Tier 2 projects to the extent feasible.

Impacts Requiring No Further Analysis

Section 15128 of the State CEQA Guidelines states, “An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.” Implementation of the Project would not result in significant



Source: Imagery, ESRI 2013; City of Menlo Park, ICF 2013



**Figure 3.0-1
Cumulative Projects**

environmental impacts on agricultural and forestry resources or mineral resources. Therefore, these issues are not discussed further in Chapter 3 of this Draft EIR and are briefly summarized below.

Agricultural and Forestry Resources

There are approximately 5,483 acres of farmland in San Mateo County. However, the Project site is not on or adjacent to any farmland and is considered “Urban and Built-Up Land.”¹ Therefore, the Project would not convert or have the potential to convert existing farmland to a nonagricultural use. In addition, the Project site is not currently protected under the Williamson Act or zoned for agricultural uses.² All properties to be directly or indirectly impacted by the Project are currently zoned for office, research and development, and industrial uses. Therefore, the Project would result in no impact on agricultural resources.

There are currently about 45 ornamental and/or landscaping trees at the Project site; however, these are not considered to be forestry resources per the definitions of Public Resources Code Section 12220(g), timberland as defined by Public Resources Code Section 4526, or timberland zoned Timberland Production per Government Code Section 51104(g). Based on a review of maps and aerial photographs of the Project site, as well as site visits, the Project site is not on or in the immediate vicinity of forest lands. The surrounding area is characterized by light industrial and office uses and, therefore, implementation of the Project would have **no impact** on forest resources.

Mineral Resources

The Surface Mining and Reclamation Act of 1975 is the state legislation that protects mineral resource zones. Part of the purpose of the act is to classify mineral resources in the state and to transmit the information to local governments which regulate land use in each region of the state. Local governments are responsible for designating lands that contain regionally significant mineral resources in local general plans to assure resource conservation in areas of intensive competing land uses. The law has resulted in the preparation of Mineral Land Classification Maps delineating Mineral Resource Zones (MRZ) 1 through 4 for aggregate resources (sand, gravel, and stone).

The Project site is not delineated as a locally important mineral resource by the California Geological Survey (CGS) or on any County or City land use plan. The *San Mateo County General Plan* Mineral Resources Map does not specify that the Project site contains any significant mineral resources. However, according to this map, the Project site is approximately 0.3 mile south of an area delineated as Salines, which are salt evaporation ponds.³ Nonetheless, construction and operational activities associated with the Project would have **no impact** on mineral resources.

¹ State Department of Conservation, Farmland Mapping and Monitoring Program. 2011. “San Mateo County Important Farmland 2010.” October. Available: <<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/smt10.pdf>> Accessed: March 12, 2013.

² State Department of Conservation, Division of Land Resource Protection. 2012. “San Mateo County Williamson Act FY 2006/2007.” Available: <ftp://ftp.consrv.ca.gov/pub/dlrp/wa/sanmateo_06_07_WA.pdf> Accessed: March 12, 2013.

³ San Mateo County Department of Environmental Management, Planning and Development Division. 1986. San Mateo County General Plan. Mineral Resources Map. Available: <<http://www.co.sanmateo.ca.us/planning/genplan/index.html>> Accessed: March 12, 2013.

Table 3.0-1. Cumulative Projects—Tier 1

ID	Address	Type of Use	Size (net)	Unit	Status
Office/Retail/Commercial/Etc.					
1	Stanford University Medical Center (300 Pasteur Drive, Palo Alto) ^a	Medical	1.3M	sf	Approved New Construction
2	1283 Willow Road (Police/City Service Center)	Office	3,800	sf	Approved New Construction
		Retail	5,096	sf	
3	1300 El Camino Real	Commercial	110,065	sf	Approved New Construction
4	1906 El Camino	Medical Office	9,825	sf	Complete, no tenant improvements
5	1706 El Camino	Medical Office	10,166	sf	Approved New Construction
6	100–155 Constitution Drive and 100– 190 Independence Drive (Menlo Gateway)	Office/Health Club/Restaurant/ Hotel (includes 230 Rooms)	941,354	sf	Approved New Construction
7	100 Middlefield	Office	8,936	sf	Complete, no tenant improvements
8	2484 Sand Hill Road (Quadrus Bldg. 9)	Office	8,774	sf	Approved New Construction
9	1 Hacker Way (Facebook East)	Office	n/a ^b		Approved
10	312–313 Constitution Drive (Facebook West)	Office	433,700	sf	Approved New Construction
		Subtotal Non-Residential Uses	2,831,716	sf	
Residential					
11	795 Willow Road (VA/Core)	Residential	60	du	Proposed Construction
12	389 El Camino	Residential	22	du	Approved New Construction
		Subtotal Residential Units	82	du	
Mixed-Use					
13	1460 El Camino Real	Office/Residential	26,800/16	sf/du	Approved New Construction
		Subtotal Mixed-Use	26,800/16	sf/du	
		TOTAL RESIDENTIAL	98	du	
		TOTAL NON-RESIDENTIAL	2,858,516	sf	

Notes: square feet (sf); dwelling unit (du).

a. This project is included due to its adjacency to Menlo Park and its large-scale nature.

b. The buildings at 1 Hacker Way (formerly 1601 Willow Road) are existing and no new construction would occur. However, employees at the site would increase from approximately 3,600 to approximately 6,600 with a new trip cap of 15,000 trips per day and 2,600 trips during the two-hour peak periods.

Table 3.0-2. Cumulative Projects—Tier 2

Project	Type of Use	Size	Unit	Status	Location
El Camino Real/Downtown Specific Plan	Retail	91,800	sf	Approved	West Menlo/Downtown/El Camino Real
	Office	240,820	sf		
	Hotel	380	rooms		
	Residential	680	du		
Ravenswood/Four Corners Specific Plan	Residential	835	du	Approved	City of East Palo Alto, University/Dumbarton/Ravenswood/Bay Road
	Office	1,268,500	sf		
	Retail	112,400	sf		
	R&D/Industrial	351,820	sf		
	Civic	61,000	sf		
	Parks/Trails	30	ac		
North Fair Oaks Community Plan	Residential (net new)	3,024	du	Approved	Redwood City to north, west, southwest, Atherton to the east, Menlo Park to the northeast
	Retail (net new)	180,000	sf		
	Office (net new)	155,000	sf		
	R&D/Industrial (net new)	210,000	sf		
	Institutional (net new)	110,000	sf		
	Parks/Trails (net new)	4	ac		
Menlo Park Housing Element	Residential	638 ^a	du	Proposed	The entire City of Menlo Park
Dumbarton Rail Corridor Project	Rail Corridor from East Bay to Peninsula	20.5	mi	Proposed	Rail corridor from the East Bay to the Peninsula. Potential stations on the Peninsula include: East Palo Alto/Menlo Park, Downtown Menlo Park, North Fair Oaks, and Redwood City.
	Total Residential	5,177	du		
	Total Nonresidential	2,781,340	sf		
	Total Hotel	380	rooms		
	Parks/Trails	34	ac		
	Rail Corridor	20.5	mi		

Notes: square feet (sf); dwelling unit (du); acre (ac); miles (mi).

^a As presented in the Housing Element, the total number of housing units projected by 2035 is 1,318. This table reflects a small number of units (638) since the units included in the El Camino Real/Downtown Specific Plan (680) are included in the Housing Element projections.

