

4.1 Significant and Unavoidable Environmental Impacts

Section 21100(b)(2)(A) of the California Environmental Quality Act (CEQA) requires that a Draft Environmental Impact Report (Draft EIR) identify any significant environmental effects that cannot be avoided should a project be implemented. Many impacts identified for a project would either be less than significant or mitigated to a less-than-significant level. However, some significant impacts cannot be mitigated to less-than-significant levels; these impacts are listed below.

Significant and Unavoidable Project-Level Impacts

- **Peak-Hour Motor Vehicle Traffic at Study Intersections.** Increases in traffic associated with the Project would result in increased delays during the a.m. and p.m. peak hours, causing significant and unavoidable impacts at study intersections. (Impact TRA-1)
- **Peak-Hour Motor Vehicle Traffic on Routes of Regional Significance.** Increases in peak-hour traffic associated with the Project would result in significant and unavoidable impacts on regionally significant segments of Bayfront Expressway/State Route 84 (Bayfront Expressway) and US 101. (Impact TRA-2)
- **Daily Motor Vehicle Traffic on Roadway Segments.** Increases in daily traffic associated with the Project would increase daily traffic volumes on study segments, resulting in significant and unavoidable impacts on roadway segments. (Impact TRA-3)
- **Increased Delay to Transit Vehicles.** Increases in peak-hour traffic associated with the Project would increase delay to AC Transit Dumbarton buses operating on Bayfront Expressway, resulting in a significant and unavoidable impact. (Impact TRA-8)
- **Conflicts with Applicable Plans and Policies.** The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs, especially EO S-3-05. (Impact GHG-2)

Significant and Unavoidable Cumulative Impacts

- **Cumulative Peak-Hour Traffic at Study Intersections.** Increases in traffic associated with the Project would contribute to increased delay during the a.m. and p.m. peak hours under 2040 conditions, contributing to significant and unavoidable cumulative impacts at study intersections. (Impact TRA-10)
- **Cumulative Peak-Hour Traffic on Routes of Regional Significance.** Increases in peak-hour traffic associated with the Project under 2040 conditions would contribute to significant and unavoidable cumulative impacts on regionally significant segments of Bayfront Expressway and US 101. (Impact TRA-11)
- **Cumulative Daily Traffic on Roadway Segments.** Increases in daily traffic associated with the Project would contribute to increased daily traffic volumes on study segments under 2040 conditions, contributing to significant and unavoidable cumulative impacts on roadway segments. (Impact TRA-12)

4.2 Significant Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines requires that a Draft EIR evaluate significant irreversible environmental changes that would be caused by a proposed project should it be implemented and that it identify irreversible environmental changes as those involving a large commitment of nonrenewable resources or irreversible damage resulting from environmental accidents.

The Project would involve approximately 962,400 gross square feet (gsf) of space within two new office buildings (Buildings 21 and 22) and a 200-room hotel with approximately 174,800 gsf. This development would require the use of materials such as steel and copper, as well as fossil fuels, during construction. The source metals used, unless they come from recycled materials, would represent an irreversible use of resources. Fossil fuels used during construction would represent an irreversible use of oil and natural gas.

As discussed in Section 3.14, *Utilities and Service Systems*, the Project would consume an estimated 759,000 gallons of fuel over the entire construction period and more than 300,000 kilowatt hours (kWh) of electricity annually during construction.

During operations, the Project's energy demand is estimated as follows:

- **Electricity:** The Project would consume approximately 16.6 million kWh of electricity per year, which would represent a decrease in electricity demand of 15.9 million kWh per year compared with existing electricity demand on the Project site (i.e., 32.5 million kWh per year).
- **Natural Gas:** The Project would consume approximately 361,010 therms of natural gas per year, which would represent a decrease in natural gas demand of 439,539 therms per year compared with existing natural gas demand on the Project site (i.e., 800,549 therms per year).
- **Other Fuel:** The Project would also consume more than 321,000 million British thermal units (BTUs) of fuel annually during normal operations. This Draft EIR assumes that no employees currently work at the Project site; therefore, no fuel is currently consumed at the Project site.

To the extent that electricity for the Project comes from renewable sources (e.g., hydropower, sun, wind, geothermal), it would not represent an irreversible use of resources. To the extent that electricity for the Project comes from non-renewable sources (e.g., natural gas, coal, nuclear), it would represent an irreversible use of those resources.

Permanent visual alterations would result from the Project with the construction of two office buildings and one hotel, each approximately 75 feet high. The proposed buildings would replace 10 existing buildings on the Project site, which range in height from one level to three partial levels. As discussed in Chapter 2, *Project Description*, three of the 10 existing buildings (Buildings 307–309) would be demolished regardless of Project implementation. Demolition of these buildings would occur prior to Project implementation under a separate ministerial permit. Development of the office buildings and hotel would result in a net increase of approximately 121,300 gsf at the Project site and increase overall building heights. The proposed multi-use bicycle/pedestrian bridge over Bayfront Expressway/State Route 84 would also be a new source of height, mass, and bulk. Under the existing site plans, all trees would be removed, and no heritage trees would remain. The Project Sponsor is proposing to replace the heritage trees that would be removed following Project implementation, in compliance with the proposed heritage tree replacement ratio. As documented in Section 3.2, *Aesthetics*, these physical changes would alter views of the Project site from various locations, but they would not substantially affect scenic vistas, nor would they substantially degrade the existing visual character or quality of the site and its surroundings.

Accidents, such as a release of hazardous materials, may trigger irreversible environmental damage. Hazardous materials that could be used at the Project site include cleaning products for facility maintenance, liquids with polychlorinated biphenyls, mixed oil, and organic solids. Exposure of site occupants to hazardous materials could occur under the following scenarios: improper handling or use of hazardous materials or hazardous wastes during occupancy of the Project site, a transportation accident, environmentally unsound disposal methods, and/or emergencies such as fires or explosions. However, numerous laws and regulations have been developed at the federal, state, and local levels to reduce public health and safety risks to reasonably prudent levels. These regulations are identified in Section 3.11, *Hazards and Hazardous Materials*. Significant irreversible changes from accidental releases are not anticipated.

4.3 Growth-Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines states that an EIR should discuss “...the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Growth can be induced in a number of ways, including through the elimination of obstacles to growth; through the stimulation of economic activity within the region, including the generation of significant employment opportunities; or through precedent-setting action. CEQA requires a discussion of how a project could increase population, employment, or housing in the areas surrounding a project as well as an analysis of the infrastructure and planning changes that would be necessary to implement the project.

The EIR discusses the manner in which the Project could affect growth in the city and the larger Bay Area. In accordance with the State CEQA Guidelines, Section 15126.2, this discussion of growth inducement is not intended to characterize the Project as necessarily beneficial, detrimental, or of little significance to the environment. This growth-inducement discussion is provided for informational purposes so that the public and local decision-makers have an appreciation of the potential long-term growth implications of the Project. Although CEQA requires disclosure of growth-inducement effects, an EIR is not required to anticipate and mitigate the effects of a particular project on growth in other areas. Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the affected area. Because the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in that community.

In discussing growth inducement, it is useful to distinguish between direct and indirect growth. Direct growth occurs on a project site as a result of new facilities (buildings) being constructed or an increase in developed space. As discussed in Chapter 2, *Project Description*, direct growth associated with the Project would amount to 1,137,200 gsf of development, which includes approximately 962,400 gsf of office uses and approximately 174,800 gsf of hotel uses.

Indirect growth occurs beyond a project site but is stimulated by a project’s direct growth. Indirect growth is tied to increased direct and indirect investment and spending associated with the new direct growth. For example, if a project were implemented, future workers would spend money in the local area, and the expenditure of that money would result in additional jobs. The indirect jobs generated by a project (referred to as the “multiplier effect”) tend to be relatively close to places of employment but may occur at more distant locales as well. When CEQA refers to induced growth, CEQA means all growth—direct, indirect, and otherwise defined.

A total of 6,550 employees would be generated by the Project; this, in turn, would generate substantial demands for new housing in the city and region. As discussed in Section 3.12, *Population and Housing*, between 2015 and 2020, the indirect housing demand generated by the Project would be 3.1 percent of the projected household growth in the Bay Area, 8.3 percent of household growth in San Mateo County, and 46 percent of housing growth in the city. Overall, on a regional basis, the Project's demand for housing would not be a significant share of the total housing growth projected by the Association of Bay Area Governments (ABAG). As such, the development associated with the Project would be generally consistent with what is projected in the City of Menlo Park's (City's) adopted general plan and what is included in the regional ABAG projections. Thus, the adopted general plan considered the direct job growth and the indirect induced housing demand that would result from implementation of the Project.

As discussed in Section 3.12, *Population and Housing*, the increase in employment at the Project site would result in an increase in housing demand and an influx of new residents within the city and other jurisdictions in the region as well as outside the Bay Area region in outlying areas.¹ Assuming the county's average of approximately 1.80 employees per worker household, the Project would generate a total housing demand of 3,638 units to support employment from the Project.² Given existing Facebook employment, it is estimated that 4.8 percent of the employees generated by the Project would seek and find housing in the city. Thus, approximately 314 of the projected number of employees at the Project site would be expected to live in the city.³ Given an average of 1.8 workers per household, the Project could generate a housing demand of 175 units in the city.⁴ In addition, the Project could, using these assumptions, create a demand for approximately 3,463 units outside the city.⁵

Approximately 7.6 percent of all city residents work in the city. As such, to provide a conservative analysis, a discussion that assumes that 7.6 percent of employees generated by the Project would seek and find housing in the city is provided for informational purposes only. Using this rate, approximately 498 of the projected number of employees at the Project site would be expected to live in the city.⁶ The Project would generate demand for 277 housing units in the city, assuming that each new employee who would live in the city would form a household.⁷ In addition, the Project could, using these assumptions, create demand for approximately 3,361 units outside the city.⁸

As discussed in Section 3.1, *Land Use and Planning*, the city's jobs/housing ratio is projected to worsen over the next 5 years. The Project's development of office and hotel uses, rather than housing, in the context of the city's already high jobs/housing ratio, does not further the balanced growth objectives

¹ Some of the employees in cities within Silicon Valley, such as Menlo Park, are long-distance commuters from areas outside the Bay Area, such as San Joaquin County, who take advantage of relatively lower housing prices in outlying areas and the relatively higher salaries and/or available jobs in Silicon Valley.

² A total of 3,638 new housing units required to support the Project = 6,550 employees/1.80 worker per housing ratio.

³ The 6,550 Project employees x 4.8 percent of Project employees who would live in the city = 314 Project employees who would live in the city.

⁴ The 314 Project employees in the city/1.8 workers per worker household = 175 units in the city's sphere of influence.

⁵ The 3,638 units to support employment from the Project minus 175 units demanded in the city's sphere of influence due to the Project = 3,463 units demanded outside of the city due to the Project.

⁶ The 6,550 Project employees x 7.6 percent of Project employees who would live in the city = 498 Project employees who would live in the city.

⁷ The 498 Project employees in the city/1.8 workers per worker household = ~277 units in the city's sphere of influence.

⁸ The 3,638 units to support employment from the Project minus 277 units demanded in the city's sphere of influence because of the Project = 3,361 units demanded outside of the city because of the Project.

of Plan Bay Area. Plan Bay Area represents a transportation and land use/housing strategy for how the Bay Area will address its transportation mobility and accessibility needs, land development, and greenhouse gas emissions reduction requirements through 2040. This manifests in upward pressure on housing demand because of low supply, which, in turn, results in workers seeking housing farther and farther away from the Project site. However, as discussed below, it is not possible to predict with certainty whether the percentage of employees both living and working in the city will be maintained into the future, nor it is possible to predict accurately exactly where employees from outside the city might live.

Employees of the Project could be housed throughout the region. As stated above, it is anticipated that 4.8 percent of the employees generated by the Project would live in the city. The remaining employees would very likely find housing throughout the region, with the majority living in San Mateo, Santa Clara, and San Francisco Counties and with a small percentage living outside the region in outlying areas. Alternatively, more local housing could be provided by cities within San Mateo County, thereby lessening the commute for those traveling to the Project site by providing local housing options. However, the future location of housing demand cannot be predicted with certainty because it is influenced by complex factors, including housing supply, demographics of new employees, traffic and transit conditions, salaries of new employees, and preferences of new employees.

Because of the lack of adequate housing throughout the Bay Area, residential demand could occur as far away as Monterey or San Joaquin Counties. Regardless of where it is located, future housing development would result in environmental impacts. Secondary environmental impacts in the potentially affected areas would depend on the location of the new development as well as the intensity of the development. CEQA does not require that a detailed analysis be conducted for these secondary impacts, but because of the magnitude of the housing demand created by the Project, this discussion considers, very broadly, the types of impacts that could occur for infill/redevelopment, suburban, and rural residential development.

Table 4-1 outlines the most likely ways for each type of development to affect resources.

Table 4-1. Most Likely Resources Affected by Induced Growth in Urban, Suburban, and Rural Areas

CEQA Topic	Urban	Suburban	Rural
Land Use		●	●
Aesthetics			
▪ Block scenic vista or damage scenic resource, introduce new sources of light and glare		●	●
▪ Degrade visual character	●	●	●
Transportation	●	●	●
Air Quality			
▪ Violate air quality standards, increase criteria pollutants	●	●	●
▪ Expose sensitive receptors to substantial pollutants	●		
Greenhouse Gas Emissions		●	●
Noise	●	●	●
Cultural Resources			
▪ Demolition of historic resources	●		
▪ Adverse change to archaeological resources or unique geologic feature		●	●

CEQA Topic	Urban	Suburban	Rural
Biological Resources		●	●
Geology and Soils	●	●	●
Hydrology and Water Quality		●	●
Hazards and Hazardous Materials	●	●	●
Population and Housing	●	●	●
Public Services		●	●
Recreation	●	●	●
Utilities		●	●
Mineral Resources		●	●
Agriculture and Forest Resources			●

Notes:
 ● = more likely to result in impacts
 No ● = less likely to result in impacts

It should not be concluded from the information in the table above that significant impacts would occur within each checked resource area or that no impacts would occur in resource areas that are not checked; the table is provided only to note that the areas of more likely impact tend to vary under different development settings. Resource topics are broken down by subtopic, as needed, to clarify differences between urban, suburban, and rural development. Note that any discretionary development that is subject to CEQA review, including projects that are exempt from CEQA, requires lead agencies to identify feasible mitigation measures prior to approval.

4.4 Cumulative Impacts

The State CEQA Guidelines (Section 15355) define cumulative impacts as “...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The combination of the Project with other foreseeable projects in the vicinity or region that would be affected by the Project defines the cumulative scenario. Cumulative impacts and the Project’s contribution to the cumulative impacts are addressed in Sections 3.1 through 3.14 of the Draft EIR. These sections identify feasible mitigation measures to reduce the Project’s cumulatively considerable contributions to significant cumulative impacts to less than cumulatively considerable. These sections also identify those cumulative impacts for which the Project’s contribution would remain cumulatively considerable, even with implementation of feasible mitigation measures. Please refer to those sections of the Draft EIR for a discussion of cumulative impacts.