

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15162.2, this chapter discusses significant environmental effects that cannot be avoided as identified in this draft environmental impact report (EIR); significant irreversible environmental changes, including those related to energy and the consumption of nonrenewable resources; and growth-inducing impacts. For a complete summary of the potential environmental impacts that could occur from implementation of the Willow Village Master Plan Project (Proposed Project), refer to the *Executive Summary* chapter. For an evaluation of alternatives that could reduce or avoid significant environmental effects of the Proposed Project, refer to Chapter 6, *Alternatives*.

4.1 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(c) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the Proposed Project is implemented. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce the Project's impacts to a less-than-significant level. Additional details about these impacts are provided in the respective sections of Chapter 3, *Environmental Impact Analysis*, of this Draft EIR.

- **Impact AQ-1:** Project operations would disrupt or hinder implementation of the Bay Area Air Quality Management District's (BAAQMD's) 2017 Clean Air Plan. Prior to adoption of the 2017 Clean Air Plan, the General Plan and M-2 Area Zoning Update (ConnectMenlo) EIR determined that emissions of criteria air pollutants and precursors associated with the operation of new development under ConnectMenlo would generate a substantial net increase in emissions that would exceed the BAAQMD regional significance thresholds and that operational impacts would be significant and unavoidable. Similarly, Project operations would exceed BAAQMD's operational reactive organic gasses (ROG) threshold (see Impact AQ-2 below). The Proposed Project would not result in a substantial change in the ConnectMenlo project and would not cause new or substantially more severe significant impacts than those analyzed in the ConnectMenlo EIR. However, as discussed under Impact AQ-2, below, implementation of Mitigation Measure AQ-1.2 would decrease the Proposed Project's full build-out operational ROG emissions, but there is no feasible mitigation available to reduce the Proposed Project's operational ROG emissions to a level below the BAAQMD threshold. The Proposed Project's ROG emissions would remain above the BAAQMD ROG threshold after implementation of all feasible mitigation measures.
- **Impact AQ-2:** Operation of the Proposed Project would generate levels of net ROG that would exceed BAAQMD's ROG threshold. As discussed above, the ConnectMenlo EIR determined that emissions of criteria air pollutants and precursors associated with operation of new development under ConnectMenlo would result in significant and unavoidable impacts. The Proposed Project would implement Mitigation Measure AQ-1.2, which would require use of super-compliant architectural coatings during operations at all buildings. However, ROG emissions from consumer products constitute most of the operational ROG emissions associated with the Proposed Project. The City of Menlo Park (City) and Project Sponsor would have minimal control over what

consumer products Project users would purchase. There are no additional mitigation measures to reduce ROG from consumer products. Thus, although the Proposed Project would not result in a substantial change in the ConnectMenlo project and would not cause new or substantially more severe significant impacts than those analyzed in the ConnectMenlo EIR, net mitigated operational ROG emissions would still exceed BAAQMD's ROG threshold after implementation of all feasible mitigation measures.

- **Impact C-AQ-1:** Cumulative development in the San Francisco Bay Area Air Basin (SFBAAB) would result in a significant unavoidable cumulative impact with respect to air quality as a result of an exceedance of BAAQMD criteria pollutant thresholds, even with implementation of all feasible mitigation. The ConnectMenlo EIR determined that criteria air pollutant emissions generated by cumulative development would exceed BAAQMD's project-level significance thresholds and that cumulative impacts related to criteria air pollutants under ConnectMenlo would be significant and unavoidable. The Proposed Project would not result in a substantial change in the ConnectMenlo project and would not cause new or substantially more severe significant impacts than those analyzed in the ConnectMenlo EIR. As a result of its operational ROG emissions, in excess of the BAAQMD ROG threshold, even after implementation of all feasible mitigation (see Impact AQ-2 above), the Proposed Project would be a cumulatively considerable contributor to a significant and unavoidable cumulative impact on air quality with respect to criteria pollutants.
- **Impact NOI-1:** Impacts related to construction during the day, construction during non-exempt daytime hours, construction during the night, potential intersection improvements, and construction of offsite improvements would be significant. The ConnectMenlo EIR determined that future projects in Menlo Park could result in construction-related noise levels that would exceed noise limits; however, with implementation of mitigation measures and compliance with the City Noise Ordinance, impacts would be less than significant. With respect to the Proposed Project, noise impacts on offsite uses from construction, including the construction of certain offsite improvements, would remain significant, even after implementation of feasible mitigation measures. In addition, construction noise impacts on onsite land uses during early morning and evening hours would be significant, even after implementation of feasible mitigation measures. Thus, the Proposed Project would cause a new or substantially more severe significant impact than that analyzed in the ConnectMenlo EIR.
- **Impact NOI-2:** Offsite vibration levels may exceed applicable vibration-related annoyance thresholds at nearby sensitive uses during daytime and nighttime construction on the site. The impacts would be significant, even after implementation of feasible mitigation. Likewise, construction vibration from offsite improvements would exceed annoyance thresholds. The impacts would be significant, even after mitigation. The ConnectMenlo EIR determined that future projects in Menlo Park could expose people to or generate excessive ground-borne vibration or ground-borne noise levels, but that with implementation of mitigation measures, impacts would be less than significant. Thus, the Proposed Project could cause a new or substantially more severe significant impact than that analyzed in the ConnectMenlo EIR.

4.2 Significant and Irreversible Environmental Changes

CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, Section 15126.2(d) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

On the main Project Site, the Proposed Project would construct approximately 1.8 million square feet (sf) of nonresidential uses (excluding the proposed hotel), including up to 1.6 million sf of office and accessory uses,¹ and up to approximately 200,000 sf of commercial/retail space. The Proposed Project would also include up to approximately 1,730 multi-family residential units, an up to 193-room hotel, and approximately 20 acres of open spaces, which include up to approximately 8 acres of publicly accessible parks, bike paths, and trails.

To support realignment of the Hamilton Avenue right-of-way and provide access to the new Elevated Park, the Proposed Project would demolish and reconstruct an existing Chevron gas station (with a potential increase in approximately 1,000 sf) at Hamilton Avenue Parcel South and enable the potential addition of up to 6,700 sf of retail uses on Hamilton Avenue Parcel North.

Offsite transportation and utility improvements would be constructed to serve the Proposed Project. These include various intersection improvements, which may be required per the City's transportation impact analysis guidelines; expansion of the Pacific Gas and Electric (PG&E) Ravenswood substation; installation of a new conduit to connect the Ravenswood substation to the main Project Site; construction of a sanitary sewer force main and recycled water line in the same trench in Hamilton Avenue; and an extension of the sanitary sewer line in Willow Road from O'Brien Drive to the proposed southwest sanitary sewer pump station.

As discussed in Section 3.5, *Energy*, during construction, the Proposed Project would consume an estimated 283 million British thermal units (BTUs) of electricity, 345,274 million BTUs of diesel, and 111,204 million BTUs of gasoline. In total, Project construction would consume 456,761 million BTUs of energy.

During operation, the Proposed Project's energy demand (using 2026 with-Project conditions) is estimated as follows:

- **Electricity:** The Project would consume 277,518 million BTUs of electricity per year, which represents an increase in electricity demand of 231,509 million BTUs per year compared to existing conditions (i.e., 46,009 million BTUs per year).

¹ Accessory uses could include the following types of spaces: meeting/collaboration space, orientation space, training space, event space, incubator space, a business partner center, an event building (including pre-function space, collaboration areas, and meeting/event rooms), a visitors center, product demonstration areas, a film studio, gathering terraces and private gardens, and space for other Meta accessory uses. Accessory uses could occur in spaces located anywhere throughout the Campus District.

- **Natural Gas:** The Project would consume 3,806 million BTUs of natural gas per year, which represents a decrease in natural gas demand of 26,468 million BTUs per year compared to existing conditions (i.e., 30,274 million BTUs per year).
- **Other Fuel:** In total, the Project would consume 454,476 million BTUs of gasoline and diesel fuel per year. This represents an increase in demand of 235,273 million BTUs per year compared to existing conditions (i.e., 144, 546 million BTUs per year of gasoline and 74,657 million BTUs per year of diesel).

Buildout of the Proposed Project would increase operational energy consumption on the Project Site by approximately 440,316 million BTUs compared with existing conditions. However, energy use per sf would decrease to 0.20 million BTU per sf compared with the existing condition, which is 0.29 million BTU per sf, despite the increase in building area.

To the extent that electricity for the Proposed Project would come from sources that can be renewed, such as hydropower, sun, wind, and geothermal, it would not represent an irreversible use of resources. To the extent that electricity for the Proposed Project comes from non-renewable sources, such as natural gas, coal, and nuclear, it would represent an irreversible use of those resources.

As discussed in Section 3.2, *Aesthetics*, construction of the Proposed Project would increase the total building area on the main Project Site by more than 2.6 million sf compared to existing conditions. Therefore, building massing and height would increase, resulting in greater visibility of the onsite buildings compared with existing conditions. However, the physical changes would not substantially affect surrounding views. Scenic views would continue to be available from publicly accessible vantage points, between buildings, and over lower-intensity areas. Of the 925 trees on the Project Site, inclusive of Hamilton Avenue Parcels North and South, 821 are proposed for removal, 269 of which qualify as heritage trees. Consistent with Chapter 13.24 of the Menlo Park Municipal Code, the Proposed Project would obtain a permit to remove protected heritage size trees and pay applicable fees. Furthermore, the proposed landscape plan for the main Project Site includes approximately 822 new trees, which is more than the number of trees proposed for removal on the main Project Site. Additional new trees would be planted on Hamilton Avenue Parcels North and South; however, conceptual landscape plans have not been identified at this time. Heritage tree replacements for both the main Project Site and Hamilton Avenue Parcels North and South would meet the City's replacement value requirements, based on the valuation of the existing heritage trees proposed to be removed.

As discussed in Section 3.12, *Hazards and Hazardous Materials*, accidents such as release of hazardous materials, may trigger irreversible environmental damage. Hazardous materials that would be used at the Project Site include materials that are typical in residential and commercial applications, such as solvents, cleaning agents, paints, petroleum fuels, propane, and batteries. These would be used in small, localized amounts. Site occupants could be exposed to hazardous materials under the following scenarios: site cleanup, 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, federal, state, and local regulations applicable to the Project, would reduce public health and safety risks. The Project is not expected to create a significant hazard to public health or the environment.

4.3 Growth-Inducing Impacts

CEQA Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(e) of the CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant, for example, could allow more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- Substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; and/or
- Substantial new permanent employment opportunities (e.g., commercial, industrial, or government enterprises); and/or
- Removal of an obstacle to additional growth and development, such as remove a constraint on a required utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may lead to foreseeable environmental effects. If substantial growth inducement occurs, it could result in secondary environmental effects, such as increased demand for housing, the construction of which could cause environmental effects; demand for other community and public facilities; demand for infrastructure, the construction of which could cause environmental effects; increased traffic and noise; degradation of air or water quality; degradation or loss of plant or animal habitats; conversion of agricultural and open-space land to urban uses; and other effects.

Growth Inducing Impacts of the Proposed Project

Short-term Employment Opportunities

As discussed in Section 3.13, *Population and Housing*, the size of the construction workforce would vary during the different phases of construction, but it is anticipated that the maximum number of construction workers onsite would be between 1,125 and 1,837 in 2024 and 2025. It is anticipated that construction workers would be hired from Bay Area sources. Although some would commute from outside the Bay Area, because of the temporary nature of construction, these workers would not be expected to relocate permanently. Therefore, the Proposed Project would not induce population growth by bringing substantial numbers of construction jobs to the area or result in associated increases in demand for housing.

Permanent Employment Opportunities

Operation of the Proposed Project would generate up to 4,332 net new jobs onsite at full buildout. In addition, the Proposed Project would induce approximately 523 offsite jobs that would serve residents of the proposed housing. Job creation, which is driven by increased demand for products and services, was projected for each industry that would serve the new households. Spending by residents is estimated to generate 642 jobs. Of that total, 119 are estimated to be captured as part of the onsite employment totals for grocery, retail, and dining uses. Although residents are anticipated to meet a significant share of the need within the onsite uses, not all retail categories would be available onsite. Services such as medical care and others would be located offsite. Furthermore, onsite retail and dining would also serve a wider customer base that would include local residents, workers, and hotel guests, in addition to new residents of the Proposed Project.² Using the assumption that 5.9 percent of people who live in Menlo Park also work in the city, this would equate to approximately 31 new offsite jobs in Menlo Park.

ABAG estimates that the number of jobs in the city's sphere of influence will grow by approximately 6,065 between 2020 and 2040. Therefore, the number of direct and indirect employees generated by the Proposed Project in Menlo Park would equal approximately 72 percent³ of the anticipated employment growth in the city from 2020 to 2040, which is within the anticipated employment growth forecasts. Therefore, the number of employees generated by the Proposed Project would not exceed ABAG projections, and the Proposed Project would not result in an increase in city population or demand for housing that would exceed ABAG projections.

Removal of an Obstacle to Additional Growth

Development of infrastructure could remove obstacles to population growth if it would allow for development in an area that was not previously considered feasible for development because of infrastructure limitations. As discussed in Section 3.15, *Utilities and Service Systems*, the Proposed Project would result in the construction of water system infrastructure, sewer infrastructure, and upgrades to the PG&E Ravenswood substation. The Proposed Project is an infill development within an already-developed area of the city. The infrastructure improvements are intended to serve Project-related demand. These improvements would not extend infrastructure into unserved or underserved areas or provide excess infrastructure capacity. Therefore, no indirect impacts related to population growth as a result of expansion of infrastructure would occur.

The Project would also realign Hamilton Avenue to provide an improved onsite circulation pattern. However, existing roadway connections along Hamilton Avenue would be maintained. Therefore, the Proposed Project would not result in roadway improvements that would provide access to a previously inaccessible area, as such, no indirect impacts related to population growth would occur.

² Keyser Marston Associates. 2021. *Willow Village Master Plan Project Housing Needs Assessment*. July.

³ The 4,332 net jobs at the Project Site + 31 new jobs in the city induced by the onsite residents/6,065 new jobs in the city between 2020 and 2040 $\times 100 = 72$ percent of anticipated employment growth in the city's sphere of influence.