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# 4 Environmental Analysis

The purpose of this draft environmental impact report (EIR) is to evaluate the potential environmental effects of the 123 Independence Drive Residential Project (project; proposed project). The City of Menlo Park (City) circulated a Notice of Preparation (NOP) beginning on January 8, 2021, with the public review period ending on February 8, 2021. A public scoping session based on the original project application was held as part of the Planning Commission meeting on January 25, 2021. The January NOP reflected the original project application, which proposed development of a mixture of residential and office uses. In July and August 2021, the project applicant submitted revised project plans that omit the office component and include additional residential units. The City circulated a revised NOP based on those revised plans, which was circulated for public review between September 11, 2021, and October 11, 2021. A second scoping session based on the revised project application was held as part of the Planning Commission meeting on September 27, 2021.

Both NOPs were transmitted to the State Clearinghouse, responsible agencies, other affected agencies, and other public and private potential stakeholders to solicit feedback regarding the scope of the environmental analysis to be addressed in the project's Draft EIR. The NOPs and comment letters received are contained in Appendix A of this Draft EIR.

Sections 4.1 through 4.15 of this Draft EIR contain the potential environmental impacts analysis associated with implementation of the project, and focus on the following issues:

- Section 4.1 – Aesthetics
- Section 4.2 – Air Quality
- Section 4.3 – Biological Resources
- Section 4.4 – Cultural and Tribal Cultural Resources
- Section 4.5 – Energy
- Section 4.6 – Geology, Soils, Seismicity, and Paleontological Resources
- Section 4.7 – Greenhouse Gas Emissions
- Section 4.8 – Hazards and Hazardous Materials
- Section 4.9 – Hydrology and Water Quality
- Section 4.10 – Land Use and Planning
- Section 4.11 – Noise
- Section 4.12 – Population and Housing
- Section 4.13 – Public Services and Recreation
- Section 4.14 – Transportation
- Section 4.15 – Tribal Cultural Resources
- Section 4.16 – Utilities and Service Systems

## Cumulative Scenario

Each of the environmental impact analysis sections includes consideration of the project's potential contribution to significant cumulative impacts to the environmental resources addressed in that section. Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase

other environmental impacts. The individual effects may be changes resulting from a single project or several separate projects. The cumulative impact from several projects is the change in the environment that 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 time.

The cumulative impacts analysis in each of the environmental impact analysis sections includes a definition of the geographic range in which cumulative impacts are considered, a summary of applicable cumulative impacts analysis and conclusions from the ConnectMenlo EIR and other prior environmental impact analyses documents, and a discussion of the project's contribution to cumulative impacts.

The geographic range for consideration of cumulative impacts varies by resource area. In many cases the consideration of cumulative impacts is limited to the City limits, or may be limited to just the Bayfront area of the City. In other cases, the geographic range may include other surrounding areas, such as the remainder of San Mateo County and nearby portions of Santa Clara County. The specific geographic range for consideration of cumulative impacts is stated in the cumulative impact analysis for each environmental resource topic.

### Citywide Buildout

Where the geographic range for cumulative impacts is defined as the City limits or the Bayfront Area, the cumulative development scenario is considered to be buildout of the City's General Plan, as described in the ConnectMenlo EIR and with consideration of specific projects within the City including those that are under construction, have been recently approved, and are currently undergoing environmental review. The ConnectMenlo EIR evaluated a General Plan buildout scenario that included development of potential new development that would only occur in the Bayfront Area as reflected in the ConnectMenlo General Plan Update in combination with the remaining and previously approved buildout potential in the prior General Plan that was reaffirmed and included in the cumulative development scenario under the ConnectMenlo General Plan Update. Specifically, the ConnectMenlo EIR defined the cumulative 2040 buildout horizon to include the following new development, as shown in Table 4-2 of the ConnectMenlo EIR:

- 5.6 million square feet of non-residential space
- 920 hotel rooms
- 6,780 residential units (within the Bayfront Area, this included 780 multi-family units that were already pending, approved, or under construction, 3,000 additional multi-family units anticipated under the ConnectMenlo General Plan Update, and 1,500 new units of corporate campus residential anticipated under the ConnectMenlo General Plan Update)
- 17,450 residents (based on an average of 2.57 persons per household, as reflected in the Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*); and
- 22,350 employees

### Project Consistency with ConnectMenlo EIR

While the proposed project is consistent with the land use designation for the project site and the proposed density is consistent with the zoning designation, including use of a density bonus, the project would result in more multi-family dwelling units in the Bayfront Area compared to the development projections evaluated in the ConnectMenlo EIR. Specifically, the Land Use Element identified the potential for 4,500 new residential units in the Bayfront Area

and recognized that there was a remaining potential under the prior General Plan for development of 150 multi-family units. The ConnectMenlo EIR assumed that 1,500 of the new residential units would be corporate campus units, which, on average, are smaller than average multi-family units, and thus may result in lower population and associated demands for public services and utilities, and that 3,150 units would be multi-family.

The City has received several applications for development in the Bayfront Area since adoption of the ConnectMenlo General Plan Update. At the time that the development applications for the proposed project were submitted, the City had received applications for development of 2,816 multi-family units within the Bayfront Area. The proposed project, in combination with those previously submitted applications, would result in 3,248 multi-family units, which is within the maximum number of units permitted under the General Plan but 98 units greater than the development projections for multi-family units evaluated in the ConnectMenlo EIR. The project-level cumulative impact analysis in this EIR includes consideration of these additional 98 multi-family units. Where relevant, the cumulative impact analysis also discusses whether the increased rate of buildout that has been occurring compared to the assumed rate in the ConnectMenlo EIR would affect the extent and level of significance of cumulative impacts. Refer to the individual cumulative impact evaluation in each of the environmental resource sections for further discussion of the cumulative development assumptions relevant to each topic.

### Buildout Horizon

In addition, the ConnectMenlo Final EIR assumed a buildout horizon of 2040. Given the development applications that the City has already received, it is likely that buildout of the residential uses anticipated under the General Plan will be reached prior to 2040. The environmental impact analysis presented in the ConnectMenlo Final EIR evaluated the maximum development potential that could occur and did not consider phased buildout of the development potential; therefore, no new or additional impacts are anticipated as a result of the expedited buildout. Other regional planning efforts undertaken after adoption of ConnectMenlo, such as Plan Bay Area 2050 and the Menlo Park Municipal Water Urban Water Management Plan 2020, have reflected both the current pace of development and full buildout of ConnectMenlo where relevant to each planning document.

### Specific Menlo Park Projects

In some cases, the cumulative impact analysis in this EIR also considers the following specific projects within the City that are under construction, have been recently approved, and are currently undergoing environmental review:

**Menlo Gateway** – office and hotel development on 15.9 acres on Independence Drive and Constitution Drive;

**Facebook campus expansion** – redevelopment of two parcels on Constitution Drive with two new office buildings and publicly-accessible open space;

**Menlo Park Community Campus** – redevelopment of the Onetta Harris Community Center, Menlo Park Senior Center, and Belle Haven Youth Center with a multi-generational community center and library;

**Middle Plaza at 500 El Camino Real** – mixed-use residential/office/retail on El Camino Real;

**Springline** – redevelopment of a 6.4-acre site on El Camino Real and Oak Grove Avenue with approximately 220,000 square feet of commercial uses and 183 dwelling units;

**O'Brien Drive projects** – two proposed five-story research and development buildings, each with approximately 120,000 square feet, on O'Brien Drive and Willow Road;

**1704 El Camino Real** – proposed replacement of a 28-room hotel with a 70-room hotel;

**1350 Adams Court** - proposed five-story research and development building with up to 260,400 square feet

**Commonwealth Building 3** – proposed 249,500 square-foot office building on Jefferson Drive;

**CSBio 3** – proposed seven-story office and research and development building;

**Hotel Moxy** – proposed demolition of a non-medical office building and construction of a 163-room hotel;

**Menlo Flats** – proposed redevelopment of three parcels totaling 1.38 acres with approximately 158 multi-family dwelling units, 13,400 square feet of office space, and 1,600 square feet of commercial space;

**Parkline** – proposed updates to SRI International’s research campus, including development of a mixed-use neighborhood with a range of housing units, located adjacent to the City’s Downtown Area and Caltrain Station;

**Willow Village** – proposed redevelopment of the former Menlo Science and Technology Park with up to 200,00 square feet of retail, 1,729 housing units, a 193-room hotel, 1,250,000 square feet of offices, and 350,000 square feet of accessory, meeting, and conference space.

#### City of East Palo Alto Projects

At the time that the ConnectMenlo EIR was prepared, there was a moratorium on new or expanded water service connections in the City of East Palo Alto due to water supply constraints. For that reason, the ConnectMenlo EIR did not consider East Palo Alto projects in the cumulative scenario. However, in 2018, the City of East Palo Alto secured a permanent additional water supply via an agreement with the City of Palo Alto, which allowed the City of East Palo Alto to lift the water connection moratorium and proceed with processing development applications. Thus, for environmental resource areas where the geographic range for cumulative impacts includes nearby portions of Santa Clara County, development projects that are under construction, approved, or pending in East Palo Alto are considered in the cumulative impact analysis. These projects include:

**KIPP School** – an approved elementary charter school located at 1039 and 1063 Garden Street;

**Woodland Park Euclid Improvements** – development of 444 residential units located at 1960 Tate Street;

**Glory Mobile Home Park Conversion** – an approved redevelopment project that will remove 30 residential units at this existing mobile home community;

**Small Residential Developments** – development of a total of 95 residential units across several project sites located at 807 E Bayshore Road, 717 Donohoe Street, 2340 Cooley Avenue, 547 Runnymede, 1062 Runnymede, 1201 Runnymede Street, 760 Weeks Street, 120-126 Maple Lane, and 990 Garden Street;

**University Corner** - a 47,594 square foot four-story mixed-use building with retail space and parking on the ground level and 33 residential units on upper floors;

**865 Weeks Street** - 136 units of multi-family housing for low-income households;

**East Palo Alto Waterfront Project** - a mixed-use development including 750,000 square feet of office space, 50,000 square feet of retail/commercial space, 550,000 square feet of research and development/light industrial space, 40,000 square feet of other non-residential uses, and 260 residential units, located on Tara and Demeter Streets;

**Four Corners** – a mixed-use development at 1675 Bay Road that would develop 40,000 square feet of retail/commercial space, 500,000 square feet of research and development/light industrial space, and 180 residential units;

**1804 Bay Road** – a mixed-use development that would construct 1,903 square feet of retail/commercial space, 5,936 square feet of research and development/light industrial space, and 75 residential units;

**2020 Bay Road** – a mixed-use development that would construct approximately 1.4 million square feet of office space, 3,500 square feet of retail/commercial space, and 18,000 square feet of other non-residential uses;

**The Landing at EPA – Harvest Properties** – a mixed-use development that would replace 15,000 square feet of industrial space located on Bay Road and Weeks Street with approximately 880,000 square feet of office space, 23,500 square feet of retail/commercial space, and 23,500 square feet of other non-residential uses;

**The Sobrato Office Project** - a project to construct 65,000 square feet of office space on Pulgas Avenue;

**JobTrain Office Project** – redevelopment to replace 4,500 square feet of research and development/light industrial space on Pulgas Avenue with approximately 102,500 square feet of office space; and

**University Circle Phase II** – a project to construction 18,000 square feet of office space on University Avenue.

## Technical Studies

Technical studies were prepared to analyze air quality and greenhouse gas emissions, health risks, biological resources, cultural resources, energy consumption, hazards and hazardous materials, noise, and traffic, and were used in the preparation of this Draft EIR. These documents are identified in the discussions for the individual environmental issues and are included as technical appendices on a flash drive attached to the Draft EIR and available at the City.

## Analysis Format

The Draft EIR assesses how the project would impact each of the above-listed resource areas. Each environmental issue addressed in this Draft EIR is presented in terms of the following subsections:

- **Environmental Setting:** Provides information describing the existing setting on and/or surrounding the project site that may be subject to change as a result of implementation of the project. This setting discussion describes the conditions that existed when the NOP was sent to responsible agencies and the State Clearinghouse.
- **Regulatory Framework:** Provides a discussion of federal, state, regional, and local regulations, plans, policies, and ordinances applicable to the project.
- **Thresholds of Significance:** Provides criteria for determining the significance of project impacts for each environmental issue.
- **Impacts and Mitigation Measures:** Provides a discussion of the characteristics of the project that may have an impact on the environment, analyzes the nature and extent to which the project is expected to change

the existing environment, analyzes the nature and extent to which the project may contribute to cumulative environmental effects, indicates whether the project's impacts would meet or exceed the levels of significance thresholds, identifies mitigation measures to reduce significant adverse impacts to the extent feasible, and identifies the level of impact significance after implementation of mitigation measures.

- **References Cited:** Lists the sources cited during preparation of the Draft EIR.