6 Other CEQA Considerations

As required by the California Environmental Quality Act (CEQA), this chapter discusses the following types of impacts that could result from implementation of the proposed project: growth-inducing impacts, significant irreversible changes, effects found not to be significant, and significant and unavoidable effects.

6.1 Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines states that an environmental impact report (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 the physical impacts on the environment that would result if a project induces population, employment, or housing growth in the areas surrounding a project, including an analysis of the infrastructure and planning changes that would be necessary to accommodate induced growth. According to the CEQA Guidelines, it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

This EIR discusses the manner in which the proposed project could affect growth in the city and the larger Bay Area. The growth-inducement discussion is provided for informational purposes so that the public and local decision-makers appreciate the potential long-term growth implications of the proposed project. Although CEQA requires a disclosure of growth-inducement effects, an EIR is not required to anticipate and mitigate the effects of a particular project related to 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 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.

6.1.1 Direct Impacts

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 3, Project Description, the project site includes 8.15 acres and is currently developed with five existing single-story office and light industrial buildings totaling 103,983 square feet of building space. The site also supports 47,859 square feet of landscaping and 307,326 square feet of impervious surfaces, including parking lots, streets, and walkways. Direct growth associated with the proposed project would include 411,931 gross square feet residential building space consisting of an apartment building with 316 dwelling units in approximately 224,863 gross square feet and 116 townhomes with a total of 187,068 gross square feet of residential space. Parking for the apartment building would be provided in a 151,626 square foot parking structure accommodating 552 parking spaces and private garages would be provided for the townhomes in a total of 50,893 square feet. In total, there would be 679,485 square feet of building space within the project site (including space not within the dwelling units, such as for lobby spaces, common areas, leasing office, and decks/balconies/patios, as well as the parking structure and individual townhome unit garages). The project would also include approximately 25,580 square feet of landscape zones, approximately 23,577 square feet of landscaped areas along street frontages, approximately 15,518 square feet of common green spaces between townhomes, an approximately 23,360 square-foot common landscape area in the apartment building courtyard, and 26,154 square feet of publicly accessible open space

within a paseo and park. The project would include approximately 61,454 square feet of vehicle circulation and parking facilities and approximately 87,579 square feet of paths and patios. There would be a total of approximately 300,587 square feet of impervious surfaces on site, representing a 6,739-square-foot decrease compared to existing impervious surfaces (Appendix B, Sheet C5.1, and Appendix G2).

The project is located in the Bayfront Area of the City of Menlo Park, an area that has been planned in the ConnectMenlo General Plan Update for increased development of residential uses. As identified in Chapter 3, Project Description, the project site is zoned as Residential Mixed-Use Bonus (R-MU-B), which is intended to provide high-density housing to complement nearby employment as well as associated retail/service and office uses. As discussed in Impact 4.12-1, the project would result in an increase of 432 new residential units within the City. Under the residential population rate identified in the ConnectMenlo EIR of 2.57 persons per household, these units could support a residential population of 1,110 people. The ConnectMenlo EIR evaluated a development potential of 4,500 new residential units, 11,570 residents, and 5,500 employees in the Bayfront Area.

The proposed project would directly influence population in the Bayfront Area through the construction of the proposed 432 dwelling units. As discussed in more detail in Impact 4.12-1, with a potential for 1,110 residents, the project would account for 9.6 percent of the new residents within the Bayfront Area identified in the ConnectMenlo EIR. As discussed in Chapter 4.12, Population and Housing, 17 percent of the residential units (74 units) would be Below Market Rate (BMR), providing affordable housing to low-income households. This growth is consistent with the goals outlined in the ConnectMenlo General Plan Update to meet the City's growing housing needs. The project is consistent with the land use and zoning designations applied to the property under ConnectMenlo and would not result in unplanned growth.

6.1.2 Indirect Impacts

Indirect growth occurs beyond a particular 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, during project construction, construction workers would spend money in the local area, and the expenditure of that money could result in additional job creation. Similarly, a project that constructs new residential and/or employment uses would bring additional residents and workers to the project area, and money spent by those residents and workers in the local area could result in additional job creation. The indirect jobs generated by a project (referred to as the "multiplier effect") tend to occur relatively close to places of employment but may occur at more distant locales as well. Construction of the proposed project would be relatively short-term with building occurring in phases over a five-year period. It would not create long-term employment opportunities that could result in an increased demand for local housing. As discussed in Impact 4.12-2, 44,000 residents within the San Francisco-Redwood City–South San Francisco region are employed in the construction industry Applying the most recent unemployment rate of 2.4 percent for San Francisco-Redwood City–South San Francisco area to the construction sector, approximately 1,056 construction employees could be available in the region to work on the proposed project. Therefore, the construction labor force is anticipated to come from the existing workforce in the Bay Area and employment opportunities associated with project construction would not lead to relocation of workers or contribute to the housing demand in the Bayfront Area (Appendix I1). As such, an increase in housing demand resulting from the project is not expected and the project would not indirectly induce substantial unplanned population growth. Finally, as discussed in Impact 4.12-3, demolition of the existing businesses currently at the project site would result in a net job loss, however, the housing units replacing those businesses would create a demand for on-site workers associated with construction as well as a limited number of on-site workers associated with property management and maintenance during project operation. In addition, the city has more jobs than housing resulting in many

employees needing to commute into the city. The proposed project would help balance available jobs to available housing within the Bayfront Area.

6.2 Significant Irreversible Changes

Section 15126.2(d) of the CEQA Guidelines requires an EIR to evaluate the significant irreversible environmental changes that could be caused by a proposed project should it be implemented. Irreversible environmental changes involve large commitments of nonrenewable resources or irreversible damage, such as damage that can result from environmental accidents. CEQA Guidelines Section 15126.2(d) discusses three categories of significant irreversible changes that should be considered. Each is addressed below.

6.2.1 Change in Land Use that Commits Future Generations to Similar Uses

The project site is within the Bayfront Area of the City and generally surrounded by commercial, light industrial, and office uses. The approximate 8.15-acre project site spans five existing adjacent parcels northwest of the intersection at Independence Drive and Chrysler Drive, with a portion of the site bounded on the north by Constitution Drive. The site currently supports five existing single-story office and light industrial buildings totaling 103,983 square feet of building space. The proposed project would demolish the existing structures and construct 316 residential apartment and 116 residential townhouses.

Construction of the proposed project would occur on land that is designated for Mixed-Use Residential uses. The proposed project would be consistent with existing zoning for the site; however, in the future, the site could be rezoned or redeveloped for a different use also allowed in the existing mixed-use zoning, in which case, at the end of the useful life of the proposed project, the use could change. Therefore, the proposed project would not commit future generations to a significant change in land use. This is in contrast to a large industrial use, where reuse for non-industrial uses likely would require extensive remediation, making such reuse difficult, or large infrastructure projects that are rarely moved or dismantled once constructed.

6.2.2 Irreversible Damage from Environmental Accidents

No significant environmental damage, such as damage from an accidental spill of a hazardous material, is anticipated to occur with development of the proposed project. As described in Chapter 4.8, Hazards and Hazardous Materials, a Phase I Environmental Site Assessment (ESA) was prepared for the project site.

It is anticipated that the proposed project would use hazardous materials that are typical in residential buildings (e.g., cleaning products, building maintenance products, fertilizers and pesticides for landscaping). It is possible that such materials could be released into the environment. As discussed in Section 4.8, Hazards and Hazardous Materials, The San Mateo County Environmental Health Department regulates household hazardous waste and the City and County provide residents with multiple options to properly dispose of such waste. Compliance with federal, state, and local regulations would ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to a hazardous materials release during project operation. No irreversible changes, such as those that might result from construction of a large-scale mining project, a hydroelectric dam project, or major institutional project, would result from development of the proposed project.

6.2.3 Large Commitment of Nonrenewable Resources

The proposed project would provide approximately 411,931 square feet of residential space spread between 316 apartment and 116 townhouses, 202,523 square feet of parking structure and garage space, and 26,154 square feet of publicly accessible open space. Project development would require the use of materials such as lumber, steel, copper, plastics, and aggregate materials, 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.

As discussed in Section 4.5, Energy, the proposed project would consume an estimated 571,767.39 gallons of diesel fuel and 41,928.52 gallons of gasoline during the construction period. Construction of the proposed project would not involve the consumption of natural gas. The project would, however, include the consumption of construction-related materials. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel, and stone), metals (e.g., steel and copper), petrochemical construction materials (e.g., plastics), and glass. Construction, design, and planning of the project would comply with CALGreen codes and policies outlined in the City of Menlo Park Municipal Code. Additionally, the project would be built in accordance with the current Building Energy Efficiency Standards (Title 24) at the time of construction, which include robust requirements for energy efficiency and the new buildings would be more energy efficient than the existing buildings. Further, the amount of energy used by each project resident would be less than residents in older homes or less dense developments, such as traditional single-family subdivisions.

During operation, the proposed project's energy demand is estimated to be as follows:

- Electricity: The proposed project would consume approximately 4,451,000 kWh of electricity per year, which would represent an increase in electricity demand by 3,551,513 kWh per year compared to the existing energy usage of 899,487 kWh per year at the project site. All of this electricity would come from renewable sources such as wind and solar, as required by the City's Municipal Code.
- Natural Gas: The proposed project would be built "all electric" and would not utilize natural gas other than emergency generators. Based on modeling estimates, existing buildings within the project site currently consume 1,803,488 kBTU per year (Appendix C). This consumption would be eliminated upon project implementation.
- Other Fuel: The proposed project would consume 138,020 gallons of petroleum per year from vehicle trips traveling to and from the project site. Based on modeling estimate, the existing buildings within the project site currently consume 74,311 gallons of petroleum per year (Appendix C). Therefore, implementation of the project would lead to an increase in petroleum consumption of 63,709 gallons of petroleum per year.

To the extent that electricity for the proposed project comes from carbon-free and renewable sources (e.g., hydropower, sun, wind, geothermal), the proposed project would not represent an irreversible use of resources. As discussed in Section 4.5, Peninsula Clean Energy (PCE) is the default energy provider throughout San Mateo County and PCE obtains all of its electric power from renewable resources (e.g., water, wind, and solar) and carbon-free sources (e.g., hydroelectric and geothermal). To the extent that electricity for the proposed project comes from non-renewable sources (e.g., natural gas, coal, nuclear), the proposed project would represent an irreversible use of those resources. The project's green building features would include compliance with Menlo Park Municipal Code Section 16.45.130 though installation of solar-power generation equipment and ensuring that 100 percent of the project's energy demand is met with renewable energy sources, attaining Leadership in Energy and Environmental Design Gold standard, enrolling in EPA Energy Star Building Portfolio Manager, attaining

indoor and outdoor water use efficiency standards, and implementing project-specific zero waste management plans. Additional green building measures incorporated in the proposed project include consistency with Municipal Code Chapter 12.16 to provide all electric buildings, providing electric vehicle charging stations and parking spaces that include infrastructure to accommodate future installation of electric vehicle charging stations and providing bicycle and pedestrian facilities. Construction and operation of the proposed project would be prohibited from using natrual gas, except in the case of emergancies when generators are nesesary.

6.3 Significant and Unavoidable Impacts

Section 21100(b)(2)(A) of CEQA requires a Draft EIR to identify any significant environmental effects that cannot be avoided. With implementation of the mitigation measures recommended in this EIR all impacts of the proposed project would be reduced to a less-than-significant level. The proposed project would not result in any significant and unavoidable impacts.

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