4 ENVIRONMENTAL EVALUATION

The Environmental Assessment (EA) is comprised of 14 chapters that evaluate the direct, indirect, and cumulative environmental impacts of future development that would occur by adopting and implementing the proposed Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinances amendments, together referred to as "the Plan Components." The EA includes an examination of the following environmental issues listed by associated chapter number:

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

The topics of agricultural and forestry resources and mineral resources are not analyzed in this EA because it was determined through the Initial Study (see Appendix A) that the potential future development would not have any impacts to these resources due to existing conditions in the EA Study Area.

A. Chapter Organization

Each section in this chapter is organized into the following subsections:

- The *Regulatory Framework* section provides an overview of federal, State, regional, and local laws and regulations relevant to each environmental issue.
- The *Existing Conditions* section describes current conditions with regard to the environmental issue. Consistent with CEQA Guidelines Section 15125(a), the section describes the baseline, which is the time and physical conditions that are used as the point of comparison for determining the significance of a proposed project's environmental effects. For the purposes of this EA, the baseline is the existing

conditions as of May 22, 2012, which is the time the City Council approved the work program for the Plan Components.

- The *Standards of Significance* section describes how an impact is judged to be significant in this EA. Consistent with Section 15022(a) of the CEQA Guidelines, the City of Menlo Park (City) uses the significance criteria designated by CEQA and the State CEQA Guidelines (Appendix G), which are used to evaluate project impacts throughout this document, as well as the City-adopted Transportation Impact Analysis Guidelines and other applicable agencies with jurisdiction over signalized intersections. The level of significance determinations are described below.
- The *Impact Discussion* section describes potential Plan Components impacts (direct and indirect) and cumulative impacts and why each impact is found to be significant or less than significant.
- The *Impacts and Mitigation Measures* section numbers and lists identified impacts, and presents measures that would mitigate each impact. Consistent with CEQA Guidelines Section 15126(a)(1)(A), mitigation measures may consist of measures included in the Plan Components (i.e. goals, policies, and programs) and measures as conditions of approval. Where the Plan Components goals, policies, and programs serve to avoid impacts, they are listed in the "Impacts Discussion" section described above. Where additional mitigation measures are beyond the scope of the Plan Components, the measures are listed under this "Impact and Mitigation Measure" section. In each case, the significance following mitigation is also explained.

B. Levels of Significance

As noted above, the significance criteria are identified before the impact discussion subsection, under the subsection, "Standards of Significance." For each impact identified, a level of significance is determined using the following classifications:

- *Significant* impacts include a description of the circumstances where an established or defined threshold would be exceeded.
- *Less-than-significant* impacts include effects that are noticeable, but do not exceed established or defined thresholds, or are mitigated below such thresholds.
- *No impact* describes the circumstances where there is no adverse effect on the environment.

For each impact identified as being significant, the EA 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 EA. However, *Significant and Unavoidable* impacts are described where mitigation measures would not diminish these effects to less-than-significant levels.

C. Cumulative Impact Analysis

Consistent with Section 15130 of the CEQA Guidelines this EA includes a discussion of cumulative impacts when a project's incremental effect is "cumulatively considerable." A cumulative impact consists of an impact created as a result of the combination of the future development evaluated in the EA, together with other reasonably foreseeable projects causing related impacts.

In the case of an area-wide planning document, cumulative effects occur from development under the approved General Plan within the city combined with effects of development on lands around the city and in the region. Because all development in EA Study Area would be approved under the proposed General Plan, no development within the EA Study Area would be considered part of the cumulative impacts; instead, development inside the EA Study Area is part of the Plan Components itself.

Where the incremental effect of a project is not "cumulatively considerable," a Lead Agency need not consider that effect significant, but must briefly describe its basis for concluding that the effect is not cumulatively considerable.

The cumulative discussions in Chapters 4.1 through 4.14 explain the geographic scope of the area affected by each cumulative effect (e.g. immediate project vicinity, city, county, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing aesthetic impacts, only development within the vicinity of t the areas covered under the Plan Components would contribute to a cumulative visual effect because development is only visible within the vicinity of the sites. In assessing macro-scale air quality impacts, on the other hand, all development within the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions is the best tool for determining the cumulative effect.

Section 15130 of the CEQA Guidelines permits two different methodologies for completion of the cumulative impact analysis:

- The 'list' approach permits the use of a list of past, present, and probable future projects producing related or cumulative impacts, including projects both within and outside the City; and
- The 'projections' approach allows the use of a summary of projections contained in an adopted plan or related planning document, such as a regional transportation plan, or in an Environmental Impact Report prepared for such a plan. The projections may be supplemented with additional information such as regional modeling.

Depending on the impact area, this EA has used a combination of the list and projections methods as a conservative approach that tends to increase projected cumulative impacts. The following provides a summary of the cumulative impact approach for each impact area:

- Aesthetics: The cumulative setting for visual impacts includes the development under the General Pan within the City combined with effects of development on lands adjacent to the City and within the county.
- Air Quality: Cumulative air quality impacts could occur from a combination of the Plan Components combined with regional growth within the San Francisco Bay Area Air Basin.
- Biological Resources: The geographic scope of the cumulative analysis for biological resources considers the surrounding incorporated and unincorporated lands, and the region.
- Cultural Resources: Cumulative impacts to cultural resources could occur from development planned for under the Plan Components in conjunction with buildout of the City and the region.
- Geology and Soils: Potential cumulative geological impacts could arise from a combination of the development of the Plan Components together with the regional growth in the immediate vicinity of the EA Study Area.
- Greenhouse Gas Emissions: The cumulative impact analyses for GHG emissions is related to the ongoing activities in the EA Study Area and the Plan Components, and are not confined to a particular air basin but rather are dispersed worldwide.
- Hazards and Hazardous Materials: This chapter analyzes potential cumulative hazardous impacts that could arise from a combination of the development of the Plan Components together with the regional growth in the immediate vicinity of the EA Study Area.
- Hydrology and Water Quality: The geographic context used for the cumulative assessment of water quality and hydrology impacts is the San Francisquito Creek Watershed, which encompasses the entire EA Study Area.

- Land Use and Planning: The geographic context for the cumulative land use and planning effects occur from development under the Plan Components within the City combined with effects of development on lands adjacent to the City and within the region.
- Noise: The traffic noise levels are based on cumulative traffic conditions that take into account cumulative development in the region.
- Population and Housing: Impacts from cumulative growth are considered in the context of their consistency with regional planning efforts.
- Public Services and Recreation: Cumulative impacts are considered in the context of the growth from development under the Plan Components within the City combined with the estimated growth in the service provider's service area.
- Transportation and Traffic: The cumulative analysis scenario adds traffic generated by the future development to the one percent compound growth per year assumed for the increase in traffic volume within 23 years plus traffic generated by the pending/approved projects within Menlo Park and the El Camino Real/Downtown Specific Plan project, plus the Stanford University Medical Center (SUMC), a City of Palo Alto project, which consists of a net increase of 854,970 square feet of hospital space and 24,330 square feet of medical office. For the SUMC project, it is only the trips that go through Menlo Park that were considered under this scenario.
- Utilities and Service Systems: Cumulative impacts are considered in the context of the growth from development under the Plan Components within the City combined with the estimated growth in the service provider's service area.