

6. CEQA-Mandated Assessment

This chapter provides an overview of the impacts of the proposed project based on the analyses presented in Chapters 4 through 5 of this Draft Environmental Impact Report (Draft EIR). The topics covered in this chapter include growth inducement, unavoidable significant impacts, and significant irreversible changes. A more detailed analysis of the effects the proposed project would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapters 4.1 through 4.14, of this Draft EIR.

6.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128 allows for no analysis of environmental issues for which there is no likelihood of significant impact. This section explains the reasoning by which it was determined that impacts to agriculture and forestry, and mineral resources, as a result of adoption and implementation of the proposed project would be less than significant.

6.1.1 AGRICULTURAL AND FORESTRY RESOURCES

The proposed project is located within the City of Menlo Park, which is an urbanized city. Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency categorize lands within Menlo Park as Urban and Built-Up Land.¹ There are no agricultural lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the City of Menlo Park. In addition, the California Land Conservation (Williamson) Act 2014 State Report does not identify lands in San Mateo County that are under Williamson Act contract.² Therefore, future development as a result of adoption and implementation of the proposed project would not conflict with lands under Williamson Act contract.

According to 2006 mapping data from the California Department of Forestry and Fire Protection, the City of Menlo Park does not contain any woodland or forestland cover;³ therefore, the City does not contain land zoned for Timberland Production nor does the Menlo Park Zoning Map identify any areas zoned for Timberland Production.⁴ Consequently, there would be no impacts with regard to agriculture and forestry resources.

¹ California Resources Agency, Farmland Mapping and Monitoring Program, San Mateo County Important Farmland 2012, <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/smt12.pdf>, accessed on November 18, 2015.

² California Department of Conservation, 2015, California Land Conservation (Williamson) Act 2014 Status Report, page 35.

³ California Department of Forestry and Fire Protection Fire and Resource Assessment Program, Land Cover Map, http://frap.fire.ca.gov/data/frapgismaps/pdfs/fvegwhr13b_map.pdf, accessed on November 18, 2015.

⁴ City of Menlo Park Website, General Plan Land Use & Zoning Map, April 2015, <http://www.menlopark.org/DocumentCenter/View/187>, accessed on November 18, 2015.

CEQA-MANDATED ASSESSMENT

6.1.2 MINERAL RESOURCES

Although the adoption and implementation of the proposed project would result in future development within the project area, buildout would not result in the loss of known mineral resources or substantially limit the availability of mineral resources over the long term. Industrial-scale solar salt production from sea water has occurred in the vicinity of Menlo Park since the 1800s. The nearest salt ponds are located directly adjacent to the west of the project area in Redwood City; however, ongoing salt production operations would not be affected by the proposed project given that it is outside of the project area. As a result, there would be no impact to mineral resources as a result of adoption and implementation of the proposed project.

6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As detailed in Chapters 4.3 through 4.12 of this Draft EIR, environmental impacts associated with the proposed project were found to be significant and unavoidable as shown in Table 6-1.

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

AIR QUALITY

Impact AQ-2a: Despite implementation of the proposed project policies identified in Table 4.2-8 in Chapter 4, Air Quality, of this Draft EIR, criteria air pollutant emissions associated with the proposed project would cause a substantial net increase in emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds.

Impact AQ-2b: Despite implementation of the proposed project policies, criteria air pollutant emissions associated with the proposed project construction activities would generate a substantial net increase in emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds.

Impact AQ-5: Despite implementation of the General Plan policies, criteria air pollutant emissions associated with the General Plan would generate a substantial net increase in emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds.

Greenhouse Gas Emissions

Impact GHG-1: The proposed project would result in a substantial increase in GHG emissions from existing conditions by the proposed General Plan horizon year 2040 and would not achieve the 2040 efficiency target, which is based on a trajectory to the 2050 goal of an 80 percent reduction from 1990 levels pursuant to Executive Order S-03-05. Additional state and federal actions are necessary to ensure that state and federally regulated sources (i.e., sources outside the City's jurisdictional control) take similar aggressive measures to ensure the deep cuts needed to achieve the 2050 target.

Impact GHG-2: While the proposed project supports progress toward the long term-goals identified in Executive Order B-30-15 and Executive Order S-03-05, it cannot yet be demonstrated that Menlo Park will achieve GHG emissions reductions that are consistent with a 40 percent reduction below 1990 levels by 2030 or an 80 percent reduction below 1990 levels by the year 2050 based on existing technologies and currently adopted policies and programs.

Population and Housing

Impact POP-4: Implementation of the proposed project, in combination with past, present, and reasonably foreseeable projects, would result in a significant cumulative impacts with respect to population and housing.

CEQA-MANDATED ASSESSMENT

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

Transportation and Circulation

Impact TRANS-1a: Implementation of the proposed project would exceed the City's current impact thresholds under the 2040 Plus Project conditions at some roadway segments in the study area.

Impact TRANS-1b: Implementation of the proposed project would result in increased delay to peak hour motor vehicle traffic exceeding the significance threshold at some of the study intersections.

Impact TRANS-2: Implementation of the proposed project would result in impacts to Routes of Regional Significance.

Impact TRANS-6a: Implementation of the proposed project would not provide adequate pedestrian or bicycle facilities to connect to the area-wide circulation system.

Impact TRANS-6b: The project would generate a substantial increase in transit riders that cannot be adequately serviced by existing public transit services, and the project would generate demand for transit services at sites more than one-quarter mile from existing public transit routes.

6.3 GROWTH INDUCEMENT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development.

This section evaluates the proposed project's potential to create such growth inducements. As Section 15126.2(d) requires, "[i]t must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." In other words, negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts consist of growth induced in the region by additional demands for housing, goods, and services associated with the population increase caused by, or attracted to, a new project.

Further, while implementation of the proposed project would induce growth, as discussed in detail in Chapter 4.11, Population and Housing, of this Draft EIR, the proposed project would be consistent with the regional planning objectives established for the Bay Area. While the project itself implements policies and programs to accommodate the project's projected growth, it would exceed the current regional planning as projected by the Association of Bay Area Governments (ABAG). However, ABAG prepares forecasts of the region's population and employment every two to four years. Amongst other sources, ABAG's projections take into account local planning documents for the nine-county region, such as the City of Menlo Park's General Plan. As such, while the proposed project exceeds the regional projections, both the General Plan and regional forecasts are long-range planning tools that assist local governments to identify policies that address changing environments. Accordingly, following adoption of the proposed project, the regional forecasts would take into account the new growth potential for Menlo Park; thus,

CEQA-MANDATED ASSESSMENT

bringing the two long-range planning tools into better alignment. Additionally, this additional growth would come incrementally over a period of approximately 24 years and a policy framework is in place to ensure adequate planning occurs to accommodate it. The proposed project results in mixed-used development near transportation facilities and employment centers, and implements energy and water conservation requirements related to existing and new development, thereby, minimizing commitment and consumption of non-renewable resources, to the extent practicable.

6.3.1 DIRECT IMPACTS

The proposed project is a plan-level document and does not propose any specific development; however, implementation of the proposed project would induce growth by increasing the development potential in the study area as shown in Table 3-2 in Chapter 3, Project Description, of this Draft EIR.

As shown in Table 3-2, the remaining and approved buildout potential is 1.8 million square feet of non-residential space, 0 hotel rooms and 1,000 residential units, and up to 2,580 new residents and 4,400 new employees. The proposed net new growth for the Bayfront Area is 2.3 million square feet of non-residential space, 400 hotel rooms and 4,500 residential units, and up to 11,570 new residents and 5,500. When combined, the proposed net new development potential of the Bayfront Area plus the current General Plan development potential (but not including Facebook Campus Expansion or other cumulative projects) for the 2040 horizon year is 4.1 million square feet of non-residential space, 400 hotel rooms and 5,500 residential units, and up to 14,150 new residents and 9,900.

State law requires the City to promote the production of housing to meet its fair share of the regional housing needs distribution made by ABAG. While the City currently meets its fair-share housing obligations, the housing under the proposed project would support any needed housing related to the proposed commercial/industrial.

In addition, the type of growth envisioned by the proposed project would be concentrated in the previously developed Bayfront Area in a highly urbanized part of Menlo Park. In addition, the study area includes the El Camino Real and Downtown PDA Transit Station Area Priority Development Area (PDA) as identified under the *Plan Bay Area* and designated sites previously identified as Housing Sites in the Housing Element. The growth envisioned under the proposed project would result in regional benefits by promoting growth that encourages less automobile dependence and supports regional transit systems, which could have associated air quality and noise effects. Encouraging infill growth in designated areas would help to reduce development pressures on lands outside the city boundary.

6.3.2 INDIRECT IMPACTS

The proposed project is considered growth inducing because it encourages new growth in the urbanized areas of Menlo Park. Development in these areas would consist of infill development on underutilized sites, sites that have been previously developed, and that are vacant and have been determined to be suitable for development. However, infrastructure is largely in place and commercial or office growth would be required to comply with the City's General Plan, Zoning regulations and standards for public services and utilities; secondary effects associated with this growth do not represent a new significant

CEQA-MANDATED ASSESSMENT

environmental impact which has not already been addressed in the individual resource chapters of this EIR.

Additional population and employment growth would occur incrementally over a period of approximately 24 years and would be consistent with the regional planning objectives established for the Bay Area. The new potential growth that would occur under the proposed project is planned for

6.4 SIGNIFICANT AND IRREVERSIBLE CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which the proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed below.

6.4.1 CHANGES IN LAND USE THAT COMMIT FUTURE GENERATIONS

As described in detail in Chapter 3, Project Description, of this Draft EIR, the proposed project generally maintains the land use pattern of the existing General Plan and introduces new land uses in the Bayfront Area. The current General Plan provided development allocations for buildout of the city through the year 2023. The proposed project includes increased density and heights at some locations, but future development under the proposed project would be located on land that is generally urbanized or on infill sites and sites in developed areas that are underutilized. Once future development under the proposed project occurs, it would not be feasible to return the developed land to its existing (pre-project) condition. Therefore, at least some of the development allowed under the proposed project would most likely lead to irreversible changes in land use.

6.4.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities; however, compliance with the applicable regulations and General Plan goals, policies, and programs and implementation of Mitigation Measures HAZ-4a and HAZ-4b, as discussed in Chapter 4.7, Hazards and Hazardous Materials, would reduce this potential impact to a less-than-significant level. Therefore, irreversible damage is not expected to result from the adoption and implementation of the proposed project.

6.4.3 LARGE COMMITMENT OF NONRENEWABLE RESOURCES

Implementation of development allowed under the proposed project would result in the commitment of limited, renewable resources such as lumber and water. In addition, development allowed by the proposed project would irretrievably commit nonrenewable resources for the construction of buildings, infrastructure, and roadway improvements. These nonrenewable resources include mined minerals such

CEQA-MANDATED ASSESSMENT

as sand, gravel, steel, lead, copper, and other metals. Future buildout under implementation of the proposed Project also represents a long-term commitment to the consumption of fossil fuels, natural gas, and gasoline. Increased energy demands would be used for construction, lighting, heating, and cooling of residences, and transportation of people within, to, and from Menlo Park. However, as shown in Section 4.14.1, Water; Section 4.14.3, Solid Waste; and Section 4.14.4, Energy Conservation, of Chapter 4.14, Utilities and Service Systems, of this Draft EIR, several regulatory measures and General Plan policies and strategies encourage energy and water conservation, alternative energy use, waste reduction, alternatives to automotive transportation, and green building.

Future development, as a result of increased development allocation under the project, would be required to comply with all applicable building and design requirements, the proposed Zoning Ordinance, including those set forth in Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, future development would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from land-fills, and install low pollutant-emitting materials.

Therefore, while the construction and operation of future development, as a result of increased development allocations under the proposed project, would involve the use of nonrenewable resources, compliance with applicable standards and regulations and implementation of General Plan policies would reduce the use of nonrenewable resources to the maximum extent practicable; therefore, the proposed project would not represent a large commitment of nonrenewable resources in comparison to a business as usual situation.