

5.1 Significant and Unavoidable Environmental Impacts

Section 21100(b)(2)(A) of the California Environmental Quality Act (CEQA) requires that a Draft Environmental Impact Report (Draft EIR) identify any significant environmental effects that cannot be avoided if a project is implemented. Most impacts identified for the Commonwealth Corporate Center Project (Project) would either be less than significant or could be mitigated to a less-than-significant level. However, the Project would result in some significant impacts that cannot be mitigated to less-than-significant levels; these impacts are listed below.

Project-Level Impacts

- **Impacts on Intersections in Near Term 2015 Plus Project Conditions.** Increases in traffic generated by the Project under Near Term 2015 Plus Project Conditions would result in increased delays during AM and PM Peak Hours at the following intersections: Marsh Road/Bayfront Expressway, Marsh Road/US 101 Northbound Off-Ramp, Independence Drive/Constitution Drive, Chrysler Drive/Bayfront Expressway, Chrysler Drive/Jefferson Drive, Chrysler Drive/Independence Drive, Willow Road/Bayfront Expressway, Willow Road/Newbridge Street, and University Avenue/Bayfront Expressway. (Impact TRA-1)
- **Impacts on Roadway Segments in the Near Term 2015 Plus Project Conditions.** Increases in traffic associated with the Project under the Near Term 2015 Plus Project Conditions would result in increased ADT volumes on the following Project area roadway segments: Marsh Road between Bohannon Drive and Bay Road; Chrysler Drive between Bayfront Expressway and Constitution Drive; Chrysler Drive between Constitution Drive and Jefferson Drive; Chilco Street between Bayfront Expressway and Constitution Drive; Chilco Street between Hamilton Avenue and Ivy Drive; Constitution Drive between Independence Drive and Chrysler Drive; Constitution Drive between Jefferson Drive and Chilco Street; Jefferson Drive between Chrysler Drive and the Project driveway; Jefferson Drive between the Project driveway and Constitution Drive; Independence Drive between Constitution Drive and Chrysler Drive. (Impact TRA-2)
- **Impacts on Routes of Regional Significance in the Near Term Plus Project Conditions.** Increases in traffic associated with the Project under the Near Term 2015 Plus Project Conditions would result in potentially significant impacts on the following Routes of Regional Significance: SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and the County Line; US 101 between Marsh Road and Willow Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (Impact TRA-3)
- **Violation of Any Air Quality Standard During Construction.** The Project would result in the violation of a BAAQMD air quality standard or substantial contribution to an existing or projected air quality violation during Project construction. (Impact AQ-2)
- **Substantial Temporary or Periodic Increase in Vibration Levels.** The Project would generate ground-borne vibration levels in excess of 65 VdB at nearby office buildings but would

not exceed vibration levels in excess of 80 VdB and noise levels in excess of 43 dBA at nearby residences. (Impact NOI-4)

Cumulative Impacts

- **Impacts on Intersections in the Cumulative 2030 Plus Project Conditions.** Increases in traffic associated with the Project under the Cumulative 2030 Plus Project Conditions would result in increased delays at the following intersections during peak hours: Marsh Road/Bayfront Expressway, Marsh Road/US 101 Northbound Off-Ramp, Marsh Road/US 101 Southbound Off-Ramp, Marsh Road/Middlefield Road, Independence Drive/Constitution Drive, Chrysler Drive/Bayfront Expressway, Chrysler Drive/Jefferson Drive, Willow Road/Bayfront Expressway, Willow Road/Newbridge Street, and University Avenue/Bayfront Expressway. (Impact TRA-6)
- **Impacts on Roadway Segments in the Cumulative 2030 Plus Project Conditions.** Increases in traffic associated with the Project under the Cumulative 2030 Plus Project Conditions would result in increased average daily traffic at the following study roadway segments: Marsh Road between Bohannon Drive and Bay Road; Chrysler Drive between Bayfront Expressway and Constitution Drive; Chrysler Drive between Constitution Drive and Jefferson Drive; Chilco Street between Bayfront Expressway and Constitution Drive; Chilco Street between Hamilton Avenue and Ivy Drive; Constitution Drive between Independence Drive and Chrysler Drive; Constitution Drive between Jefferson Drive and Chilco Street; Jefferson Drive between Chrysler Drive and Project driveway; Jefferson Drive between Project driveway and Constitution Drive; and Independence Drive between Constitution Drive and Chrysler Drive. (Impact TRA-7)
- **Impacts on Routes of Regional Significance in the Cumulative 2030 Plus Project Conditions.** Increases in traffic associated with the Project under the Cumulative 2030 Plus Project Conditions would result in impacts on the following Routes of Regional Significance: SR 84 between Willow Road and University Avenue; SR 84 between US 101 and Bayfront Expressway; US 101 between Marsh Road and Willow Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (Impact TRA-8)
- **Violation of a BAAQMD Air Quality Standards or Substantial Contribution to an Existing or Projected Air Quality Violation during Project Construction.** Construction activities associated with the Project, in combination with other construction activities in the City, could generate substantial oxides of nitrogen (NO_x) emissions in excess of BAAQMD threshold. (Impact C-AQ-2)

Due to these significant and unavoidable environmental effects, approval of the Project would require the adoption of a Statement of Overriding Considerations, indicating that the City of Menlo Park (City) is aware of the significant environmental consequences and believes that the benefits of the Project outweigh the impacts.

5.2 Significant and Irreversible Environmental Changes

Section 21100(b)(2)(B) of CEQA requires that a Draft EIR identify any significant effect on the environment that would be irreversible if the Project were implemented. Section 15126.2(c) of the State

CEQA Guidelines identifies irreversible environmental changes as those involving a large commitment of nonrenewable resources or irreversible damage resulting from environmental accidents.

The Sobrato Organization (Project Sponsor) intends to develop the 13.27-acre Project site (comprised of the properties at 151 Commonwealth Drive and 164 Jefferson Drive) to accommodate approximately 1,300 workers. Existing development at the Project site includes three vacant buildings plus support space totaling approximately 217,396 square feet (sf) (Commonwealth Site) and one occupied building that totals approximately 20,462 sf (Jefferson Site). The existing buildings would be demolished and developed with two office buildings totaling approximately 259,920 sf. Due to the increase in usable floor space, it can be reasonably assumed that the postconstruction commitment of nonrenewable resources would increase from current levels, although the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. It is also possible that new technologies or systems would emerge or would become more cost-effective or user-friendly and further reduce the reliance upon nonrenewable natural resources during the lifetime of the Project.

Accidents, such as the release of hazardous materials, may trigger irreversible environmental damage. Potential hazardous materials that could be used at the Project site could include cleaning products used for facility maintenance, liquids with polychlorinated biphenyls, mixed oil, and other organic solids. Exposure of site occupants to hazardous materials could occur in the following manner: improper handling or use of hazardous materials or hazardous wastes during occupancy of the Project site, transportation accident, environmentally unsound disposal methods, and/or emergencies, such as fires and explosions. However, safety requirements and the goals and policies adopted by federal, state, and local governments would reduce the public health and safety risks to reasonably prudent levels so that significant irreversible changes from accidental releases would not be anticipated. These regulations are identified in Section 3.10, *Hazards and Hazardous Materials*.

5.3 Growth-Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines states that an 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, or through precedent-setting action. CEQA requires a discussion of how a project could increase population, employment, or housing in the areas surrounding the project as well as an analysis of the infrastructure and planning changes that would be necessary to implement the project. This Draft EIR discusses the manner in which the Project could affect growth in the City and the larger San Francisco Bay Area region (Bay Area).

In accordance with the State CEQA Guidelines, Section 15126.2, this discussion of growth inducement is not intended to characterize the Project as necessarily beneficial, detrimental, or of little significance to the environment. The growth inducement discussion is provided for informational purposes so that the public and local decision makers have an appreciation of the potential long-term growth implications of the Project.

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. *Indirect growth* occurs beyond a project site but is stimulated by the project’s direct growth. Indirect growth is tied to increased direct and indirect investment and spending associated with

the direct growth. When CEQA refers to induced growth, CEQA means all growth—direct, indirect, or otherwise defined.

Housing Growth. Section 3.11, *Population and Housing*, states that the total Project would not increase population by adding homes or displace housing or residents. However, the Project would indirectly induce housing growth by providing additional jobs. As discussed in Section 3.11, the total Project would result in approximately 1,300 new jobs. The increased employment would indirectly result in the need for additional housing in the City and other jurisdictions within commuting distance. The Project could result in a demand of up to 1,300 housing units by 2020 at full buildout and occupancy. However, this assumes that each new employee would form a household, which is an extremely conservative scenario.

As discussed in Section 3.11, the U. S. Census 2006–2008 American Community Survey (ACS) reports that 7.8 percent of those who work in the City of Menlo Park also live in the City. For this analysis, the existing 7.8 percent share derived from the ACS has been applied to estimate the number of new workers who would seek and find housing in City as a result of the 1,300 jobs generated by the Project. The estimated City share of total housing needs would result in a total of 102 new households. As shown in Table 3.11-3, the indirect housing demand from the Project would represent a small percentage of the Association of Bay Area Governments (ABAG) projected housing growth for most jurisdictions in the Bay Area. Therefore, the Project would not significantly impact the 2020 forecasted household growth within the City and other jurisdictions within the region, and the demand for housing as a result of the total Project would be less than significant.

Job Growth. Aside from direct increases in employment and indirect growth in housing demand, the Project would result in indirect job growth. During Project construction, the direct spending associated with construction materials and labor would stimulate the economy. However, this impact would not be substantial in terms of the local or Bay Area economy due to its temporary nature. Given the limited duration and standard nature of the construction anticipated, the demand for construction employment would likely be met within the existing and future labor market in the City, in San Mateo County, or within the Bay Area. Neither a substantial quantity of specialized labor nor construction workers from outside the region would be expected to relocate temporarily or to commute extraordinarily long distances.

Indirect growth could also be generated through the expenditure patterns of employees associated with the Project. For example, future workers would spend money in the local economy, and the expenditure of that money would result in additional jobs. To estimate this potential “multiplier effect” associated with the indirect and induced employment generated by the Project, ABAG has developed Type I and Type II economic multipliers for the Bay Area based on an input-output model. Type I multipliers measure the direct and indirect effects of a change in economic activity and capture the initial economic change and the effect of local industries buying from each other in response to that initial change. Type II multipliers capture all of the effects in the Type I multiplier plus the impact of the change in income and expenditures by households. The additional Type II effects are commonly referred to as induced effects.¹ The jobs that would be generated by the Project would be classified as Management and Administrative from ABAG’s list of industries, with a Type I multiplier of 1.15 and a Type II multiplier of 1.52. This means that for every 1 job created, there would be 0.15 indirect and induced jobs created locally and 0.52 jobs created regionally.

¹ ABAG, Center for Analysis and Information Services, *2001 Input-Output Model and Economic Multipliers for the San Francisco Bay Region*, Table 5, 1987 Bay Area Employment Multipliers, p. 20, March 2004.

As shown in Table 5-1, applying the local and regional economic multipliers to the 1,300 new jobs directly resulting from the Project would result in about 195 local and 676 regional indirect and induced jobs. Therefore, the combined total local employment growth (direct and indirect employment) with the Project would be about 1,495 new jobs, and the combined regional employment growth would be about 1,976 new jobs. This increase in regional employment represents less than 0.01 percent of the projected 4,040,690 total jobs within the Bay Area by 2020, which is insignificant compared to the rest of the region.²

Table 5-1. Direct, Indirect, and Induced Jobs Resulting from the Project

	Direct Jobs	Type I Multiplier ^a	Type II Multiplier ^b	Direct and Indirect Jobs	Direct, Indirect, and Induced Jobs
Project Site	1,300	1.15	1.52	195	676

Source: ABAG, 2004; ICF, 2013.

Notes:

^a The Type I multiplier measures the direct and indirect jobs created.

^b The Type II multiplier measures the direct, indirect, and induced jobs created.

Infrastructure Capacity and Land Use Changes. Growth in a geographic area may be induced by removing infrastructure barriers through the provision of new infrastructure (roads, sewers, water supply, storm drainage, energy) and/or improving transportation and circulation systems. Accordingly, the growth-inducing potential of the Project would be significant if the Project had a need for infrastructure improvements that would substantially exceed existing capacity.

Construction of the Project site for office use would augment and reinforce existing office and industrial land uses surrounding the Project site (see Section 3.1, *Land Use*, regarding land uses in the Project area). Redevelopment of the Project site for new office/research and development, and commercial support uses would not directly contribute to an increase in growth outside the City limits. Thus, the total Project would not induce growth by removing infrastructure barriers or by providing new infrastructure, nor would it create new transportation access to a previously inaccessible area.

Utilities and Public Services Demand. To the extent that the Project would increase the employee and resident population, there would be an increase in the demand for the provision of public services. This includes an increased demand for police protection, fire protection and emergency services, school facilities, library services, and recreational areas proportional to the increased intensity of the Project site. As discussed in the Section 3.12, *Public Services*, there would be no significant impacts on public services as a result of the Project. In this regard, the Project would not in and of itself indicate a substantial growth-inducing potential so as to inhibit the reasonable provision of public services. An increase in the demand for new public service facilities could lead to potential significant environmental impacts only if expanding or constructing new facilities were required that adversely affected the physical environment under the impact criteria established. Since the Project would not trigger the need for expanded or new public services facilities, there would be no significant impact.

Planning for the future expansion of utility, transportation, and public service facilities would take into account the proposed population levels. The increase in utility and public service personnel and

² ABAG, Projections 2009, December 2009.

equipment required to serve the Project would not be implemented beyond what is required to accommodate the Project, and no significant growth inducements would result.

The Project would be served by existing water entitlements as described in Section 3.13, *Utilities and Service Systems*. Existing electricity and natural gas infrastructure would continue to serve the Project site. Implementation of the Project would result in an increase in energy demand over existing conditions but would not require installation of additional electricity and natural gas infrastructure.

5.4 Cumulative Impacts

State CEQA Guidelines (Section 15355) define cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The combination of the Project with other foreseeable projects in the vicinity or region affected by the Project defines the cumulative scenario. The list of Tier 1 and Tier 2 cumulative projects are included in Chapter 3.0, *Environmental Impact Analysis*, and the cumulative impacts and the Project’s contribution to the cumulative impacts are addressed in Sections 3.1 through 3.14 of this Draft EIR. These resource sections identify feasible mitigation measures that would reduce the Project’s cumulatively considerable contributions to cumulative impacts to less-than-cumulatively-considerable levels. These sections also identify those cumulative impacts that would be significant and unavoidable even with the implementation of feasible mitigation measures.