

Section 4

Other CEQA Considerations

4.1 SIGNIFICANT 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 the Project is implemented. Most impacts identified for the Project would either be less than significant or could be mitigated to a less than significant level. However, the Project would result in significant impacts that cannot be mitigated to less than significant levels; these impacts are listed below.

East Campus

- **Impacts to Intersections.** Increases in traffic associated with the Project under the Near Term 2015 East Campus Only Condition would result in increased delays at the following intersections: Marsh and Middlefield Road; Willow Road and Bayfront Expressway; University Avenue and Bayfront Expressway; Bayfront Expressway and Chrysler Drive; and Middlefield Road and Lytton Avenue. (TR-1)
- **Impacts on Roadway Segments.** Increases in traffic associated with the Project under the Near Term 2015 East Campus Only Condition would result in significantly increased ADT volumes on the following roadway segments: Marsh Road between Bay Road and the railroad tracks; Willow Road between Durham Street and Chester Street; Willow Road between Nash Avenue and Blackburn Avenue; and Middlefield Road between Linfield Drive and Survey Lane. (TR-2)
- **Impacts to Routes of Regional Significance.** Increases in traffic associated with the Project under Near Term 2015 East Campus Only Condition would result in significant impacts to the following Routes of Regional Significance: SR 84 between US 101 and Willow Road; SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and County Line; US 101 north of Marsh Road; US 101 between Marsh Road and Willow Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (TR-3)
- **Violation of any Air Quality Standard.** Operation of the East Campus would create NOx emissions that would exceed BAAQMD's significance thresholds. (AQ-2)
- **Substantial Permanent Increase in Noise Level.** Operation of the Project at the East Campus would result in a substantial permanent ambient noise level increase in the Project vicinity due to an increase in traffic. (NO-3)

West Campus

- **Violation of any Air Quality Standard.** Operation of the West Campus would create NOx emissions that would exceed BAAQMD's significance thresholds. (AQ-2)
- **Temporary Increases in Ambient Noise Level.** The West Campus would result in levels of vibration that would disrupt operations at nearby vibration-sensitive land uses. (NO-2)
- **Substantial Permanent Increase in Noise Level.** Operation of the Project at the West Campus would result in a substantial permanent ambient noise level increase in the Project vicinity due to an increase in traffic. (NO-3)

Total Project

- **Impacts to Intersections.** Increases in traffic associated with the Project under the Near Term 2018 East Campus and West Campus Condition would result in increased delays at the following intersections: Marsh Road and Bayfront Expressway; Marsh Road and US 101 NB Ramps; Willow Road and Bayfront Expressway; Willow Road and Newbridge Street; Willow Road and Middlefield Road; University and Bayfront Expressway; Bayfront Expressway and Chrysler Drive; and Middlefield Road and Lytton Avenue. (TR-6)
- **Impacts on Roadway Segments.** Increases in traffic associated with the Project under the Near Term 2018 East Campus and West Campus Condition would result in increased volumes on the following roadway segments: Marsh Road between Bay Road and the railroad tracks; Willow Road between Durham Street and Chester Street; and Willow Road between Nash Avenue and Blackburn Avenue. (TR-7)
- **Impacts to Routes of Regional Significance.** Increases in traffic associated with the Project under Near Term 2018 East Campus and West Campus Condition would result in significant impacts the following Routes of Regional Significance: SR 84 between US 101 and Willow Road; SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and County Line; US 101 north of Marsh Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (TR-8)
- **Violation of any Air Quality Standard.** Operation of the Project, at both the East Campus and West Campus, would create new area and mobile sources of air pollutants that would generate emissions of ROG, NOX, and PM10 and would exceed BAAQMD's significance thresholds. (AQ-2)
- **Exposure to Excessive Noise Levels.** The increase in vehicular traffic associated with implementation of the East Campus and West Campus, combined, would result in an increase in the exposure of off-site noise sensitive receptors to noise levels in excess of the standards established in the General Plan or Municipal Code. (NO-1)

Cumulative

- **Impacts to Intersections.** Increases in traffic associated with the Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East and West Campuses Condition would result in increased delays at the following intersections: Marsh Road and Bayfront Expressway; Marsh Road and US 101 NB Ramps; Willow Road and Middlefield Road; Willow Road and Bayfront Expressway; Willow Road and Newbridge Street; University and Bayfront Expressway; Bayfront Expressway and Chrysler Drive; and Middlefield Road and Lytton Avenue. (TR-11)
- **Impacts on Roadway Segments.** Increases in traffic associated with the Project under the Cumulative 2025 East Campus Only Condition and the Cumulative 2025 East and West Campuses Condition would result in increased volumes the following roadway segments: Marsh Road between Bay Road and the railroad tracks; Willow Road between Durham Street and Chester Street; Willow Road between Nash Avenue and Blackburn Avenue; and Middlefield Road between Linfield Drive and Survey Lane. (TR-12)
- **Impacts to Routes of Regional Significance.** Increases in traffic associated with the Project under Cumulative East Campus Only Condition and Cumulative East and West Campuses Condition would result in significant impacts to the following Routes of Regional Significance: SR 84 between US 101 and Willow Road; SR 84 between Willow Road and University Avenue; SR 84 between University Avenue and County Line; US 101 north of Marsh Road; US 101 between Willow Road and University Avenue; and US 101 south of University Avenue. (TR-13)
- **Violation of any Air Quality Standard.** The Project, in combination with other development within the City, would create new area and mobile sources of air pollutants that would generate emissions of ROG, NO_x, and PM₁₀ resulting in a violation of an Air Quality Standard. (C-AQ-2)
- **Cumulative Construction Criteria Air Pollutant Emissions.** Construction activities associated with the West Campus, in combination with other construction activities in the City, would generate dust or diesel emissions, thus exposing people to particulate matter. (C-AQ-3)
- **Cumulative Toxic Air Contaminants Emissions.** The Project, in combination with other foreseeable development in the Project vicinity, would expose sensitive receptors to substantial TACs. (C-AQ-5)
- **Cumulative Exposure to Excessive Noise.** The Project, in combination with other development within the City, would result in a substantial increase in exposure of persons to noise in excess of the standards established in the General Plan or Municipal Code. The Project's contribution would be cumulatively significant. (C-NO-1)
- **Cumulative Permanent Increase in Noise Levels.** Operation of the Project and other cumulative developments would result in a substantial permanent ambient noise level increase in the Project vicinity. The Project's contribution would be cumulatively significant. (C-NO-3)

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

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

East Campus

The Project at the 56.9-acre East Campus would convert the 3,600-employee cap included in the existing Conditional Development Permit (CDP) that applied to the former Sun Microsystems site to a Trip Cap that allows for approximately 6,600 workers to occupy the East Campus. As outlined in the Project Description, Table 2-1, the East Campus is currently developed with nine buildings, totaling more than one million square feet (sf). The Project Sponsor would repurpose the existing buildings with building modifications that will make the facilities functional for Facebook while improving its sustainability with energy and water-conserving features. Project Description, Figure 2-2, depicts the existing site layout of the East Campus, which would not change with implementation of the Project.

No construction would be necessary at the East Campus; therefore, this component of the Project would not involve a commitment of nonrenewable resources, such as building materials and fossil fuels. It can be reasonably foreseen that post-construction 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 due to the Project's energy-conserving features. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources.

Accidents, such as the release of hazardous materials, may trigger irreversible environmental damage. Potential hazardous materials to be used at the East Campus could include cleaning products used for facility maintenance, asbestos-containing waste, liquids with polychlorinated biphenyls, mixed oil, and other organic solids. As such, 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 East Campus, 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 3.13, Hazardous Materials.

West Campus

The Project Sponsor intends to develop the 22-acre (963,684 sf), unoccupied property at the West Campus to accommodate approximately 2,800 workers. The developed, western portion of the site consists of approximately 13.5 acres (587,930 sf), with 12 percent of the parcel occupied by development. Existing development at this site includes two office buildings totaling 127,246 sf. The existing buildings at the West Campus would be demolished and developed with office buildings and amenities structures totaling approximately 440,000 sf. Although the Project Sponsor does not intend to apply for entitlements for the West Campus at this time, this subsequent phase of development is evaluated as part of the Project in this EIR. Due to the increase in floor space at the West Campus, it can be reasonably foreseen that post-construction 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, to further reduce the reliance upon nonrenewable natural resources.

Accidents, such as the release of hazardous materials, may trigger irreversible environmental damage. Development at the West Campus would result in demolition and construction. Testing and removal of asbestos in West Campus buildings prior to their demolition would be performed. It is likely that potential hazardous materials to be used at the West Campus would include standard office and cleaning materials and result in hazardous materials exposure similar to the East Campus. 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 3.13, Hazardous Materials.

4.3 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the 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 section of the EIR discusses the manner in which the Project could affect growth in the City, and the larger Bay Area.

In accordance with the 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 new direct growth. When CEQA refers to induced growth, CEQA means all growth—direct, indirect, or otherwise defined. For clarity, the discussion below distinguishes between direct growth from the construction and use of project facilities, and all secondary growth, or indirect growth.

Direct and Indirect Housing Growth. Section 3.14, Population and Housing, states that the total Project would not directly increase population by adding homes or displace housing or residents. However, it would indirectly induce growth by providing additional jobs.

As discussed in Section 3.14, the total Project would result in approximately 5,800 net new jobs. The increased employment would indirectly result in the need for additional housing in the City and other jurisdictions within commuting distance. As discussed in the Housing Needs Analysis for the Project (see Appendix 3.14), a total demand for 3,257 new housing units would be induced by the Total Project at 2025 full build-out and occupancy. As discussed in Section 3.14, The U. S. Census 2006-2008 American Community Survey (ACS) reports that 7.8 percent of those who work in Menlo Park also live in Menlo Park. The existing 7.8 percent share derived from the ACS has been applied to estimate the number of new workers of the Project who would seek and find housing in Menlo Park. 7.8 percent of the housing needs are the estimated Menlo Park “share” of total housing needs, which would result in a total of 254 new households.¹ As shown in Section 3.14, Population and Housing, Table 3.14-9, 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 region. Therefore, the Project would not significantly impact the 2025 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.

Direct and Indirect Job Growth. Aside from direct increases in employment and indirect growth in housing demand, the Project would result in indirect job growth. The direct spending associated with re-purposing the East Campus and construction activities at the West Campus would stimulate production of associated products and services in the economy during the construction period. This impact would not be substantial in terms of the local or Bay Area economy, due to its temporary nature.

Improvements at the East Campus and construction of the West Campus would directly, but temporarily, increase construction employment. 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

¹ Keyser Marston Associates, Inc. *Housing Needs Analysis Menlo Park Facebook Campus Project*, September 2011, p. 21.

substantial quantity of specialized labor nor construction workers from outside the region would be expected to be induced 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. Indirect jobs tend to be in relatively close proximity to the places of employment.

To estimate this potential “multiplier effect” associated with Project-related jobs, ABAG has developed Type I and Type II economic multipliers for the San Francisco Bay Region 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.² 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.

As shown in Table 4-1, below, applying the local and regional economic multipliers to the 5,800 net new jobs directly resulting from the Total Project would result in about 870 local and 3,160 regional indirect and induced jobs. Therefore, the combined total local employment growth (direct and indirect employment) with the Project would be about 6,670 new jobs, and the combined regional employment growth would be about 8,906 new jobs. This increase in regional employment represents 0.20 percent of the projected 4,379,900 total jobs within the San Francisco Bay Region by 2025, which is insignificant compared to the rest of the region.³

Table 4-1
Direct, Indirect, and Induced Jobs

Job Sector	Direct Jobs	Type I Multiplier^a	Type II Multiplier^b	Direct and Indirect Jobs	Direct, Indirect, and Induced Jobs
East Campus	3,000	1.15	1.52	450	1,650
West Campus	2,800	1.15	1.52	420	1,456
Total Project	5,800	--	--	870	3,106

Source: ABAG, 2004; Atkins, 2011.

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.

² 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.

³ ABAG, *Projections 2009*, December 2009.

Infrastructure Capacity/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 West Campus for office use would augment and reinforce existing office and industrial land uses surrounding the Project area (see Section 3.2, Land Use, regarding land uses in the project area). As indicated above, only minimal improvements to the existing East Campus would be made. Redevelopment of the project area for new office/R&D, 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. 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 3.15 (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, no significant impact would occur.

Planning for the future expansion of utility, transportation, and public service facilities would take into account the Facebook Campus population levels. The increase in utility and public service personnel and equipment required to serve the Project would not be implemented beyond what is required to accommodate the Facebook Campus and there would be no significant growth inducements as a result.

The Project would be served by existing water entitlements as described in Section 3.16, Utilities. Existing electricity and natural gas infrastructure would continue to serve the Project site. Implementation of the East Campus would reduce electricity demand and the increase in natural gas demand would be negligible. The West Campus would result in an increase in energy demand over existing conditions, but would not require installation of additional electricity and natural gas infrastructure.

Summary. In conclusion, growth and the rate of growth shape both the physical and social structure of communities. As indicated above, the Project would not facilitate or contribute to direct population growth in Menlo Park and San Mateo County. The Project would, however, result in both direct and indirect employment growth, but not in excess of current ABAG projections. Similarly, this growth in the number of jobs in the Menlo Park and San Mateo County would not result in indirect population growth over ABAG population projections.

4.4 CUMULATIVE IMPACTS

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. Cumulative impacts and the Project’s contribution to the cumulative impacts are addressed in Sections 3.2 through 3.16 of this EIR. These 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. Please refer to those sections of the Draft EIR for a discussion of cumulative impacts.

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