

4.12 Population and Housing

4.12.1 Introduction

This section evaluates the potential for the proposed project, which includes the Housing Element Update (HEU), the Stanford Community Plan (SCP) update, and related rezonings (collectively, the “project”) to result in substantial adverse effects related to population and housing. Below, the Environmental Setting portion of this section includes descriptions of existing conditions relevant to population and housing. Further below, existing plans and policies relevant to population and housing associated with implementation of the project are provided in the Regulatory Setting section. Finally, the impact discussion evaluates potential impacts to population and housing that could result from implementation of the project in the context of existing conditions.

Notice of Preparation Comments

A Notice of Preparation (NOP) for the Draft EIR was circulated on August 8, 2022, and a scoping meeting was held on August 23, 2022. A revised NOP reflecting changes to the HEU’s list of opportunity sites was circulated on March 21, 2023. Both NOPs circulated for a period of 30 days, and the NOPs and the comments received during their respective comment periods can be found in **Appendix A** of this EIR. Comments relevant to population and housing included concerns that the proposed HEU housing opportunity sites might not be sufficient to meet the County’s current and future housing needs, and that the County should adopt a more aggressive HEU that would provide substantially more housing.

Information Sources

The primary sources of information referenced in this section included those listed below. Please note that a full list of references for this topic can be found at the end of this section.

- Santa Clara County General Plan (1994).
- Stanford University Community Plan (2000).
- U.S. Census Bureau: QuickFacts (2021).
- California Department of Finance (2021).

4.12.2 Environmental Setting

Population

Santa Clara County

In 2021, the County had an estimated population of 1,885,508 residents (U.S. Census Bureau, 2021a), with approximately 95.5 percent of residents living in incorporated cities and towns and about 4.5 percent living in unincorporated portions of the County.

Between 2010 and 2020, the population in Santa Clara County increased by 9.2 percent, which was greater than the Bay Area region, which experienced a population increase of 8.4 percent over the same period. **Table 4.12-1** below shows the population trends for 2010-2020 for the entire County and the Bay Area region.

**TABLE 4.12-1
 SANTA CLARA COUNTY POPULATION TRENDS, 2010-2020**

	2010	2020	% Change from 2010-2020
Santa Clara County	1,781,642	1,945,166	9.2%
Bay Area Region ^a	7,150,739	7,748,930	8.4%

NOTES:

a. The nine-county Bay Area Region includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties.

SOURCE: California Department of Finance, E-4 Series (CDOF 2021a).

Over the next 20 years, population growth in the County is projected to increase by 27.8 percent, which is greater than projected population growth in the Bay Area region, which is expected to experience a population increase of 21.9 percent over the same period. **Table 4.12-2** below shows the population projections for 2020-2040 for the County and the region.

**TABLE 4.12-2
 SANTA CLARA COUNTY POPULATION PROJECTIONS, 2020-2040**

	2020	2030	2040	% Change from 2020-2040
Santa Clara County	1,986,340	2,217,750	2,538,320	27.8%
Bay Area	7,920,225	8,689,440	9,652,945	21.9%

SOURCE: Association of Bay Area Governments, Projections 2040 by Jurisdiction (ABAG 2019)

City of San José

The City of San José encompasses approximately 180 square miles. In 2021, the City had an estimated population of 983,489 residents (U.S. Census Bureau, 2021c), which represented approximately half, or 52.2 percent, of Santa Clara County’s total population. Between 2010 and 2020, the population in the City increased by 10.1 percent, which is slightly greater than Santa Clara County, which experienced a population increase of 9.2 percent, and the Bay Area region, which experienced a population increase of 8.4 percent, over the same period. **Table 4.12-3** below shows the population trends for 2010-2020 for the City, County, and the region.

**TABLE 4.12-3
CITY OF SAN JOSÉ POPULATION TRENDS, 2010-2020**

	2010	2020	% Change from 2010-2020
City of San José	945,942	1,041,466	10.1%
Santa Clara County	1,781,642	1,945,166	9.2%
Bay Area Region ^a	7,150,739	7,748,930	8.4%

NOTES:

a. The nine-county Bay Area Region includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties.

SOURCE: California Department of Finance, E-4 Series (CDOF 2021a).

Over the next 20 years, population growth in the City is projected to increase by approximately a third, or 33.9 percent, which is greater than projected population growth in Santa Clara County, which is expected to experience a population increase of 27.8 percent, and the Bay Area region, which is expected to experience a population increase of 21.9 percent, over the same period.

Table 4.12-4 below shows the population projections for 2020-2040 for the City, County, and the region.

**TABLE 4.12-4
CITY OF SAN JOSÉ POPULATION PROJECTIONS, 2020–2040**

	2020	2030	2040	% Change from 2020-2040
City of San José	1,028,210	1,189,660	1,377,145	33.9%
Santa Clara County	1,986,340	2,217,750	2,538,320	27.8%
Bay Area	7,920,225	8,689,440	9,652,945	21.9%

SOURCE: Association of Bay Area Governments, Projections 2040 by Jurisdiction (ABAG 2019)

Housing

Santa Clara County

In 2021, an estimated 693,240 housing units were located in Santa Clara County. Between 2010 and 2020, the number of housing units in the County increased by 6.7 percent, which exceeded the Bay Area regional growth rate in housing units of 5.0 percent. **Table 4.12-5** below shows the housing trends for 2010-2020 for the County and the region.

**TABLE 4.12-5
 SANTA CLARA COUNTY HOUSING TRENDS, 2010-2020**

	2010	2020	% Change from 2010-2020
Housing Units^a			
Santa Clara County	631,920	674,558	6.7%
Bay Area Region ^b	2,783,991	2,924,264	5.0%

NOTES:

- a. "Housing units" are all housing (occupied and unoccupied housing units).
- b. The nine-county Bay Area Region includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties.

SOURCE: California Department of Finance, E-4 and E-5 Series (CDOF 2021a; 2021b).

Over the next 20 years, the growth in the number of housing units in Santa Clara County is projected to increase by 24.8 percent, which is greater than projected growth in housing units in the Bay Area region, which is expected to experience a 17.4 percent increase in housing units over the same period. **Table 4.12-6** below shows the housing projections for 2020-2040 for the County and the region.

**TABLE 4.12-6
 SANTA CLARA COUNTY HOUSING PROJECTIONS, 2020–2040**

	2020	2030	2040	% Change from 2010-2020
Santa Clara County	706,565	767,750	881,655	24.8%
Bay Area	2,971,440	3,158,760	3,488,970	17.4%

SOURCE: Association of Bay Area Governments, Projections 2040 by Jurisdiction (ABAG 2019)

City of San José

Between 2010 and 2020, the number of housing units in the City increased by 7.2 percent, which exceeded Santa Clara County’s growth rate in housing units of 6.7 percent and the region’s growth rate in housing units of 5.0 percent. **Table 4.12-7** below shows the housing trends for 2010-2020 for the City, County, and the region.

**TABLE 4.12-7
CITY OF SAN JOSÉ HOUSING TRENDS, 2010-2020**

	2010	2020	% Change from 2010-2020
Housing Units^a			
City of San José	314,038	336,507	7.2%
Santa Clara County	631,920	674,558	6.7%
Bay Area Region ^b	2,783,991	2,924,264	5.0%

NOTES:

a. "Housing units" are all housing (occupied and unoccupied housing units).

b. The nine-county Bay Area Region includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties.

SOURCE: California Department of Finance, E-4 and E-5 Series (CDOF 2021a; 2021b).

Over the next 20 years, the growth in the number of housing units in the City is projected to increase by a third, or 33 percent, which is greater than the projected growth in housing units in Santa Clara County and the Bay Area region, which are expected to experience increases in housing units of 24.8 percent and 17.4 percent, respectively, over the same period. **Table 4.12-8** below shows the housing projections for 2020-2040 for the City, County, and the region.

**TABLE 4.12-8
CITY OF SAN JOSÉ HOUSING PROJECTIONS, 2020–2040**

	2020	2030	2040	% Change from 2010-2020
City of San José	344,665	390,415	458,490	33.0%
Santa Clara County	706,565	767,750	881,655	24.8%
Bay Area	2,971,440	3,158,760	3,488,970	17.4%

SOURCE: Association of Bay Area Governments, Projections 2040 by Jurisdiction (ABAG 2019)

4.12.3 Regulatory Setting

Federal

Fair Housing Act

The federal Fair Housing Act (42 U.S.C. 3601 et seq.), enacted in 1968, prohibits discrimination by direct providers of housing, such as landlords and real estate companies, as well as other entities, such as municipalities, banks or other lending institutions and homeowner insurance companies whose discriminatory practices make housing unavailable to persons because of race or color, religion, sex, national origin, familial status, or disability.

State

California Housing Element Law

California law (Government Code Section 65580, et seq.) requires cities and counties to include a housing element as a part of their General Plans to address housing conditions and needs in the community. Housing elements are prepared approximately every eight years, following timetables set forth in the law. The housing element must identify and analyze existing and projected housing needs and “make adequate provision for the existing and projected needs of all economic segments of the community,” among other requirements. The County adopted its current housing element in 2014 and must adopt an updated housing element for the 6th cycle.

State law mandates that all cities and counties zone land appropriately to accommodate the increasing needs of regional population growth. Regional housing needs are determined by the California Department of Housing and Community Development (HCD).

There have been substantial changes to State laws regarding housing in the recent years, including changes to housing element requirements (for example requiring that housing elements affirmatively further fair housing), changes to facilitate production of Accessory Dwelling Units (ADUs) and other forms of housing, and changes that limit local agencies’ ability to condition or deny applications for affordable housing.

Regional

The Association of Bay Area Governments (ABAG) is the comprehensive regional planning agency and council of governments for the nine-county San Francisco Bay Area Region. Its members include the counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties and 101 cities and towns of the San Francisco Bay region.

ABAG determines the distribution of the regional housing need through its Regional Housing Needs Allocation (RHNA) process. For the period from 2023 to 2031, HCD has identified a need of more than 441,000 housing units in the Bay Area — more than double the amount from the last eight-year cycle (187,000 units between 2015 and 2023). ABAG distributes this regional housing need to local jurisdictions, including allocations for very low income, low income, moderate income, and above moderate households (ABAG, 2021).

As discussed in Chapter 3, *Project Description*, jurisdictions in the Bay Area are currently updating their housing elements for the 6th cycle, representing the eight-year planning period from 2023 to 2031. ABAG adopted the Final Regional Housing Needs (RHNA) Plan for the region in December 2021 (ABAG, 2021) and unincorporated Santa Clara County’s RHNA is 3,125 units, distributed among four income categories. The housing allocation for Santa Clara County by income category is enumerated in **Table 4.12-9**. The County’s HEU must plan for housing that meets this RHNA, plus an appropriate buffer.

**TABLE 4.12-9
 6TH CYCLE (2023-2031) ABAG HOUSING ALLOCATIONS FOR UNINCORPORATED SANTA CLARA COUNTY**

Income Category	Citywide Total Housing Units	Portion of Total Allocation
Very Low	828	26.5%
Low	477	15.3%
Moderate	508	16.3%
Above Moderate	1,312	42.6%
Total	3,125	100%

SOURCE: ABAG. 2021. Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031. Available at: https://abag.ca.gov/sites/default/files/documents/2021-12/proposed%20Final_RHNA_Allocation_Report_2023-2031.pdf. Accessed January 12, 2023.

Plan Bay Area 2040 and Plan Bay Area 2050

Plan Bay Area 2040 is a regional planning document prepared jointly by ABAG and the Metropolitan Transportation Commission (MTC) that utilizes a multipronged strategy to address housing affordability, transportation requirements, the region’s widening income disparities and economic hardships faced by low- and middle-income workers, and the Bay Area’s vulnerabilities to natural disasters such as earthquakes and floods. Three principal issues form the core of the Action Plan:

- **Housing:** Lower the share of income spent on housing and transportation costs, lessen displacement risk, and increase the availability of housing affordable to low- and moderate-income households.
- **Economic Development:** Improve transportation access to jobs, increase middle wage job creation, and maintain the region’s infrastructure.
- **Resilience:** Enhance climate protection and adaptation efforts, strengthen open space protections, create healthy and safe communities, and protect communities against natural hazards.

As discussed previously, based on the RHNA allocations for housing units from ABAG, each jurisdiction must update their housing element to show the proposed allocations of housing. While the RHNA focuses on the eight-year cycle, Plan Bay Area 2040 focuses also on the longer-term vision for growth through 2040.

In October 2021, ABAG and MTC adopted an updated plan; Plan Bay Area 2050 (ABAG & MTC, 2021). While the plan has been adopted, it will take up to three years for the plan’s growth forecast to be integrated into MTC’s transportation model, after which updates to each county’s transportation model will take place. For these reasons, and for purposes of this EIR, Plan Bay Area 2040 is referenced as the regional plan containing regional population, housing and employment projections.

Local

Santa Clara County General Plan

The Santa Clara County General Plan is a comprehensive long-range general plan for the physical development of unincorporated Santa Clara County (County of Santa Clara, 1994). The General Plan contains the current County of Santa Clara Housing Element, which was adopted in 2015. The various elements within the General Plan include goals and policies for the physical development of the County. General Plan strategies and policies related to population and housing and relevant to implementation of the proposed project are listed below.

Growth and Development

Strategy #1: Promote Compact Urban Development Patterns

Policy GD 1. Most of the future urban growth of Santa Clara County should be accommodated within the existing urban areas, through infill development, rather than through expansion of the urbanized area into hillsides and resource areas.

Policy GD 2. Urban development shall occur only within cities' urban service areas (USAs) and under city jurisdiction. The County shall not allow urban development on unincorporated lands outside cities' urban service areas.

Policy GD 3. Urban service areas should generally include only those areas suited for urban development. Development of such areas should be:

- a. reasonably serviceable with public facilities and services;
- b. relatively free from risks associated with natural hazards;
- c. without substantial adverse environmental impact;
- d. not likely to create severe off-site impacts on surrounding areas; and
- e. without cumulative adverse impacts on the county's water supply watersheds or any other natural resource.

Policy C-GD 29. Land use and development patterns that enhance the cost effectiveness of transportation and other urban infrastructure investments should be encouraged.

Policy C-GD 30. Cities should make maximum use of vacant or underutilized lands within the existing urban area for application of compact and mixed-use development principles. Wherever possible, expansion of the urbanized area should also incorporate such principles.

Policy C-GD 31. Mixed land use and compact developments should be encouraged in urban areas wherever appropriate and compatible with city plans and existing development for the purposes of enhancing community identity, creating more affordable housing, reduced auto dependency, trip reduction, and improved environmental quality.

Policy C-GD 32. Mixed land use and compact development should be encouraged which clusters employment, residential, and the types of land uses, goods, and services customarily needed on a daily basis around transit stations, along transit corridors, and in other appropriate urban locations.

Strategy #2: Achieve More Balanced Growth and Development

Policy C-GD 37. Within the urban areas of Santa Clara County, a balance should be achieved and maintained between employment levels, housing supply, infrastructure capacity, and environmental quality.

Policy C-GD 38. Increases in employment should be consistent with the following: a. the rate of housing supply increase; b. the ability of cities and districts to provide needed urban services and infrastructure without lessening levels of service to existing neighborhoods; and c. the attainment of environmental quality standards.

Policy C-GD 39. Geographic separation of housing and employment should be reduced to the maximum extent possible through a variety of means, including:

- a. increased housing opportunity in job-rich cities where feasible;
- b. mixed use and compact development patterns, including on-site housing for employment centers; and
- c. increased housing densities along transit corridors, or “transportation-efficient land use,” combined with mixed use “urban activity centers” at transit stations.

Policy C-GD 40. Improved balance between employment and housing opportunities should include the need for: a. increased overall supply and more varied types of housing; b. housing costs commensurate with household income distribution; and c. increased proximity of housing to employment centers.

Policy C-GD 41. Cities should take maximum advantage of the development potential of their vacant land supply and underutilized industrial/commercial lands to achieve more balanced growth and development.

Economic Well-Being

Strategy #4: Improve Quality of Life for All Segments of the Population

Policy C-EC 8. Local governments, as part of an overall economic development program, should work to maintain and improve the overall quality of life in Santa Clara County by:

- a. increasing the supply of affordable housing;
- b. improving our transportation network and facilitating alternative transportation modes;
- c. improving the quality of our schools;
- d. providing an adequate system of public parks and open space lands;
- e. maintaining a healthy environment;
- f. providing a diversity of cultural and recreational opportunities; g. providing adequate and efficient public services; and
- g. maintaining the beauty of our physical setting.

Housing

Strategy #1: Plan for a Balanced Housing Supply

Policy HG 1. The planning for the supply and diversity of housing in each part of the urbanized areas county shall provide for existing and expected employment and household needs and a diversity of affordability that matches the diversity of household

incomes, while respecting the capacity of constructed or planned public systems and services.

Strategy #2: Promote cooperation and collaboration on housing development

Policy HG 4. The County and the cities should work cooperatively to ensure that there is a balanced housing supply sufficient to achieve countywide economic, social, and environmental objectives. Further opportunities for inter-agency, intergovernmental, interregional, and public/private cooperation should be sought out and encouraged.

Policy HG 5. Intergovernmental and public and private cooperation shall be encouraged to achieve an adequate supply of affordable housing that meets changing demographic needs in Santa Clara County.

Stanford University Community Plan

The current Stanford University Community Plan was adopted in 2000 (County of Santa Clara, 2000). The primary purpose of the Community Plan is to guide future use and development of Stanford lands in a manner that incorporates key County General Plan principles of compact urban development, open space preservation, and resource conservation. The Community Plan was adopted as an amendment of the General Plan in the manner set forth by California Government Code Section 65350 et seq. Any revisions to the Community Plan must also be made according to the provisions of State law for adopting and amending general plans. Community strategies and policies related to population and housing and relevant to implementation of the proposed project are listed below.

Housing

Strategy #1: Increase the Supply and Affordability of Housing

Policy SCP-H 4. Develop housing at densities that make more efficient use of land and enhance the affordability of housing.

Policy SCP-H 8. Streamline the review and approval of housing projects to the extent possible consistent with County standards, land use policy, and State law.

Strategy #2: Balance Housing Needs with Neighborhood Conservation

Policy SCP-H 11. Promote location of housing near compatible and neighborhood-serving support uses and facilities, such as child care, shopping, and recreation, and promote inclusion of such neighborhood-serving facilities in housing areas, as appropriate.

Policy SCP-H 13. Recognize and enhance the character of existing residential areas for faculty/staff and students.

Policy SCP-H 14. Balance concerns about the compatibility of new housing development in existing neighborhoods with the need for increased housing supply and improved affordability.

Policy SCP-H 16. Balance concerns about the compatibility of new housing development on the campus periphery with existing off-campus neighborhoods with the need for increased housing supply and improved affordability.

4.12.4 Environmental Impacts and Mitigation Measures

Significance Thresholds

The thresholds used to determine the significance of impacts related to population and housing are based on Appendix G of the *CEQA Guidelines*. Implementation of the project would have a significant impact on the environment if it would:

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Methodology and Assumptions

The project would update the County’s Housing Element and the SCP and enact conforming rezonings to facilitate development of additional housing. Importantly, the first significance threshold above requires an evaluation of whether a project would induce “unplanned growth,” which it would not, since the Housing Element itself is a plan. Similarly, the Regional Housing Needs Allocation (RHNA) Plan and the housing requirements contained therein is also a plan, as is the Stanford Community Plan. It thus follows that the project’s conformance with those plans would avoid a significant environmental impact. Nonetheless, the analysis informs consideration of whether implementation of the project would induce substantial unplanned population growth and is supplemented with a consideration of whether the planned development of new housing would displace existing people or housing, necessitating construction of replacement housing.

Impacts and Mitigation Measures

Impacts

Impact PH-1: Implementation of the project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). (*Less than Significant Impact*)

Housing Element Update and Stanford Community Plan

Implementation of the project would provide for the development of additional housing units in selected unincorporated areas within the City of San José and on the Stanford campus. These housing units would meet population demand that ABAG has projected to occur during the eight-year period of the 6th cycle. While no specific development proposals are directly associated with the project, the HEU and SCP would plan for development of between 6,198 and 8,441 new

housing units in the unincorporated County, which is expected to enable the County to meet the 3,125 units assigned to the County through the RHNA process plus a substantial buffer. In doing so, the Housing Element and SCP would be updated to identify specific sites for multifamily housing in the two geographies mentioned above. In addition, the County would rezone those sites as necessary to meet the requirements of State law.

If all sites on the Stanford campus were developed at the planned densities to accommodate between 1,680 and 2,160 new housing units, the population on the campus would increase by approximately 4,855 to 6,242 persons, based on a factor of 2.89 persons-per-household, which is the average number of persons per household in the project area as defined by the Valley Transportation Authority (VTA) travel demand model.¹ Furthermore, if all of the identified sites in unincorporated San José were developed at the planned densities to accommodate between 4,518 and 6,281 new housing units, the unincorporated areas within the City could accommodate an additional approximately 13,057 to 18,152 persons. In total, the project would facilitate the development of housing units to accommodate an additional 17,912 to 24,394 persons.

The number of housing units and resultant population growth assumes that each parcel identified in the inventory of housing opportunity sites would be developed at somewhat less than its maximum potential under its proposed zoning, which reflects constraints that exist at each site. It is important to note that the identification of housing sites in the HEU does not mean that housing will necessarily be constructed on those sites at the planned unit count or desired level of affordability. Although the County must plan for housing development, it does not directly build, or require to be built, any housing. Instead, the identification of housing sites is intended to plan for and encourage housing, and future development on identified sites would be at the discretion of individual property owners and would be largely dependent on market forces, and in the case of affordable housing, on available funding and/or other incentives.

Combined, the proposed project could result in between 6,198 and 8,441 new housing units. By definition, these units would be “planned” rather than unplanned and would conform to the County’s Zoning Ordinance as amended, as well as the ABAG RHNA Plan.

Development of additional housing units on the Stanford campus and in unincorporated areas within the City of San José would be infill in nature and would not require extension of services to previously undeveloped areas. Any upsizing or improvement to existing infrastructure would be designed to serve only the planned housing and would not enable growth or facilitate unplanned growth beyond that housing.

Based upon these considerations, implementation of the proposed project would not directly or indirectly induce unplanned population growth to the area, and the impact would therefore be **less than significant**.

¹ The VTA model serves as the primary travel demand forecasting tool for the County. The model is a mathematical representation of travel within the nine Bay Area counties, as well as Santa Cruz, San Benito, Monterey, and San Joaquin counties. The base model structure was developed by the Metropolitan Transportation Commission (MTC) and further refined by the City/County Association of Governments and Santa Clara Valley Transportation Authority for use within San Mateo County and Santa Clara County.

Mitigation Measure: None required.

Impact PH-2: Implementation of the project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. (*Less than Significant Impact*)

Housing Element Update

A majority of the housing opportunity sites are already developed with some sort of use, be it residential or commercial uses; the remaining sites are vacant. Accordingly, in order to develop additional residential uses on those parcels at the densities greater than that which is currently present, it stands to reason that the existing structures on the sites would need to be removed and higher-intensity residential use developed in its place. For example, a collection of parcels with single-family uses could be combined and redeveloped into a multi-family residential project. Under such a scenario, the existing residents would vacate their properties, though such a circumstance would be voluntary through the sale of their properties to the prospective developer(s). Regardless, residential use on the sites would be perpetuated, though at a higher density, and there would be a *net increase* in available housing on the site. Therefore, the construction of replacement housing elsewhere would not be required. As such, the implementation of the project would not displace substantial numbers of existing people or housing, and construction of replacement housing elsewhere would not be required. The impact would be **less than significant**.

Mitigation Measure: None required.

Cumulative Impacts

This section presents an analysis of the cumulative effects of the project in combination with other past, present, and reasonably foreseeable future projects that could cause cumulatively considerable impacts. Significant cumulative impacts related to population and housing could occur if the incremental impacts of the project combined with the incremental impacts of one or more of the cumulative projects or cumulative development projections included in the project description and described in Section 4.0.3, *Cumulative Impacts*.

Impact PH-3: Implementation of the project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect related to population and housing. (*Less than Significant Impact*)

Unplanned Growth

As discussed under the analysis for Impacts PH-1 and PH-2, implementation of the project would have a less than significant impact with respect to unplanned population growth or residential displacement. As discussed above, the project represents a maximum-development scenario by which population and housing effects in the unincorporated County are evaluated. The potential

population and housing growth provided for by the project conforms to the ABAG RHNA Plan and ABAG’s predictions about population growth and housing demand that is expected to occur in the Bay Area region during 2023-2031. Under the project, if growth were to occur at the maximum densities specified, that growth would conform to the County’s zoning code, as amended, as well as the ABAG RHNA Plan, and would thus constitute “planned growth.”

Other jurisdictions in the Bay Area have or are in the process of updating their Housing Elements in response to RHNA allocations presented by ABAG. Updates to those Housing Elements would also conform to the housing unit and buffer requirements of the RHNA Plan, and those jurisdictions would also update and amend their General Plans and zoning codes to meet the requirements of the RHNA Plan. Similar to the County’s planned growth as described above, growth in these other jurisdictions would therefore be similarly “planned” and would not contribute to a cumulatively considerable effect as relates to unplanned growth.

Residential Displacement

As discussed above under Impact PH-2, the project would support existing County and regional policies concerning the provision of more housing to meet anticipated regional demand. The project would not redesignate or rezone an existing residential area to a nonresidential use. Other jurisdictions throughout the region are undergoing a similar transition as each responds to the substantial increase in each jurisdiction’s RHNA allocation and regional efforts to provide more housing, particularly at affordable price points. Ultimately, the number of housing units in the County and the region would increase and would help to address the region’s housing needs, particularly as the number of jobs in the region also increases.

Conclusion

Based upon each of the above considerations, implementation of the project would not be cumulatively considerable, and the impact would therefore be **less than significant**.

Mitigation Measure: None required.

4.12.5 References

- Association of Bay Area Governments (ABAG). 2019. Projections 2040 by Jurisdiction. Available online: <https://data.bayareametro.gov/Demography/Projections-2040-by-jurisdiction/grqz-amra>. Accessed January 12, 2023
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