

4.17 Environmental Topics Not Subjected to Detailed Analysis

Pursuant to CEQA Guidelines Section 15128, this subsection describes the reasons that various possible effects of the Housing Element Update (HEU), the Stanford Community Plan (SCP) update, and related rezonings (collectively, the “project”) were determined not to be significant, or to have no impact, and, therefore, were not discussed in detail in this EIR. These determinations were generally made because the identified environmental resources are not present within or around the project or because development of the project would clearly have no effect with respect to the topic issue area. Further, no comments related to these issues were submitted during the Notice of Preparation (NOP) comment periods. These issue areas are described in this section with an explanation of why they are not evaluated further in this EIR.

4.17.1 Agricultural and Forestry Resources

Appendix G of the CEQA *Guidelines* specifies that an impact to agricultural and forestry resources would occur if a project would: 1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; 2) conflict with existing zoning for agricultural use, or a Williamson Act contract; 3) conflict with existing zoning, or cause rezoning of, forest land or timberland; 4) result in loss of forest land or conversion of forest land to non-forest use; or; 5) involve other changes that could result in conversion or farmland of forest land to non-agricultural use.

With respect to agricultural resources as relates to the HEU’s housing opportunity sites and the Stanford University campus, all of the opportunity sites and the entirety of the Stanford campus are mapped as “Urban and Built-Up Land” or “Other Land” by the California Farmland Mapping and Monitoring Program (FMMP). This is a reflection of the fact that all of the HEU’s opportunity sites and the Stanford campus are located in areas that are already urbanized. According to the FMMP map for Santa Clara County, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance designated on any portion of the planning areas (California Department of Conservation, 2018).

No existing farming or forestry operations are present on any of the HEU’s housing opportunity sites or on the Stanford campus. The former Pleasant Hills golf course is zoned as “A – Agricultural” under the County’s zoning code, but that designation is a broad category that “is also intended to retain in open space uses those lands which may be suitable for future urbanization until such time as they are included within a city’s urban service area and public facilities and services can be economically provided, consistent with community plans and objectives” (County of Santa Clara, 2023) [Zoning ordinance, Chapter 2.20.010 (A)]. This foreseen future use is clearly applicable to this site, as it is fully surrounded by urban development, and no agricultural uses have taken place on the site for many decades.

With respect to forestry resources, no existing timber-harvest uses are located on or in the vicinity of the HEU’s housing opportunity sites or the Stanford campus. None of the aforementioned areas are designated or zoned for such use.

Based on these considerations, implementation of the project would result in no impacts to agricultural and forestry resources. Accordingly, this issue was not subjected to detailed analysis in the EIR.

4.17.2 Mineral Resources

For the purposes of this analysis, mineral resources are defined as any non-fuel mineral resource that is obtained from the ground, including sand and gravel, cement, boron, crushed stone, gold, limestone, and other important excavated resources. Appendix G of the CEQA *Guidelines* specifies that an impact to mineral resources would occur if a project would: 1) result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or 2) result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The California Geological Survey (CGS) provides information about California's nonfuel mineral resources and classifies lands throughout the State that contain regionally significant mineral resources as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975. Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt and dimension stone; and construction aggregate including sand, gravel, and crushed stone. The classification process involves the determination of Production-Consumption (P-C) Region boundaries, based on identification of active aggregate operations (Production) and the market area served (Consumption).

The classification of mineral resources is a joint effort of the State and local governments. It is based on geologic factors and requires that the State Geologist classify the mineral resources area as one of the four Mineral Resource Zones (MRZs), described below:

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or a where it is judged that a likelihood exists for their presence.
- MRZ-3: Areas containing mineral deposits the significance which cannot be evaluated from available data.
- MRZ-4: Areas where available information is inadequate for assignment to any other MRZ.

None of the HEU's housing opportunity sites or any area of the Stanford campus are located within in an established MRZ-2 (Kohler-Antablin, 1996). The County's General Plan, the City of San José's General Plan, and the SCP do not include any data that suggests any of the housing opportunity sites are within an established MRZ-2 or any type of extractive resources zone. Additionally, the project does not propose any activities that would result in the loss of availability of a known mineral resource. As such, there would be **no impact** in relation to the loss of availability of a known mineral resource.

4.17.3 Wildfire

Appendix G of the CEQA *Guidelines* specifies that an impact related to wildfire would occur if a project were located in or near a State Responsibility Area (SRA) or lands classified as a Very High Fire Hazard Severity Zone, and if it would: 1) substantially impair an adopted emergency response plan or emergency evacuation plan; 2) due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; 3) require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and 4) expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

As defined by the Public Resources Code (PRC) Section 4126, State Responsibility Areas (SRA) are State- and privately-owned forest, watershed, and rangeland for which primary financial responsibility for preventing and suppressing wildland fires rests with the State. Fire protection in SRAs is typically provided by the California Department of Forestry and Fire Protection (CalFire) and/or its designees. SRAs, by definition, do not include lands within areas where fire management responsibility is managed by local fire departments, such as the San José Fire Department (SJFD) or the Palo Alto Fire Department (PAFD). These areas are known as Local Responsibility Areas (LRAs). As defined by CalFire, none of the HEU housing opportunity sites or any portion of the Stanford campus are located within a SRA. The entirety of the project area considered in this EIR are served by either SJFD or PAFD and are therefore in an LRA. As such, the portion of the CEQA criteria set forth in Appendix G of the CEQA Guidelines related to SRAs is not applicable to the project.

Further, as part of its Fire and Resources Assessment Program (FRAP), CalFire has mapped areas of significant fire hazards throughout the state. The maps classify lands into fire hazard severity zones (FHSZs), based on a hazard scoring system that takes into account localized factors such as fuel loading, slope, fire weather, and other relevant considerations, including areas where winds have been identified as a major cause of wildfire spread. Within SRAs, areas with assigned risk classifications are classified as Moderate, High, or Very High Fire Hazard Severity Zones.

CalFire only provides recommendations for Very High FHSZs within LRAs. In its FHSZ maps for Santa Clara County and the City of San José, no such areas were designated (CalFire 2007, 2008a, 2008b).

CalFire is currently in the process of updating its FHSZ maps across the state, and draft maps were released in late 2022. On its FHSZ map released on November 21, 2022, no Very High FHSZs affecting any of the HEU's housing opportunity sites or any portion of the Stanford campus were designated.

Based upon this information, the portion of the CEQA criteria set forth in Appendix G of the CEQA Guidelines related to Very High FHSZs is not applicable to the project.

At the County level, Santa Clara County has identified areas of high wildfire risk as part of its Wildland-Urban Interface (WUI) planning efforts. Maps produced as part of that effort identify areas in the County that abut wildland areas that contain wildfire fuels (Santa Clara County, 2009). None of the HEU's housing opportunity sites are located within or adjacent to a WUI area.

Based on these considerations, implementation of the project would result in no impacts related to wildfire. Accordingly, this issue was not subjected to detailed analysis in the EIR.

4.17.4 References

- CalFire. 2007. *Very High Fire Hazard Severity Zones in SRA*. November 7, 2008. Available online: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed April 4, 2023.
- CalFire. 2008a. *Very High Fire Hazard Severity Zones in LRA*. October 6, 2008. Available online: <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed April 4, 2023.
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- California Department of Conservation. 2018. *Santa Clara County Important Farmland 2016*. Available: https://www.conservation.ca.gov/dlrp/fmmp/Documents/Farmland_of_Local_Importance_2018.pdf. Accessed April 4, 2023.
- County of Santa Clara. 2023. *Zoning Ordinance*. Available online: <https://stgenpln.blob.core.windows.net/document/ZonOrd.pdf>
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- County of Santa Clara. 2009. *Santa Clara County Wildland Urban Interface Fire Area*. Adopted February 24, 2009. Available online: https://stgenpln.blob.core.windows.net/document/WUIFA_Adopted_Map.pdf. Also available as a Google Earth overlay at: <https://plandev.sccgov.org/how/research-property/santa-clara-county-wildland-urban-interface>. Accessed April 4, 2023.
- Kohler-Antablin, Susan. 1996. *Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region*. California Division of Mines and Geology. Open File Report 95-13, Plate 1 of 23.