CHAPTER 6
Other CEQA Considerations

Consistent with CEQA *Guidelines* Section 15126.2, this chapter discusses significant and unavoidable impacts, significant irreversible environmental changes, growth-inducing impacts, cumulative impacts, and impacts found to be less than significant.

6.1 Significant and Unavoidable Adverse Impacts

Potentially significant environmental impacts that would result from implementation of the proposed project, which includes the Housing Element Update (HEU) the Stanford Community Plan (SCP) update, and related rezonings, are evaluated in the various subsections of Chapter 4.0, *Environmental Setting, Impacts, and Mitigation Measures*, of this EIR. With implementation of standard conditions and requirements, and mitigation measures identified for each resource area significantly impacted, many of the potentially significant impacts resulting from implementation of the project would be reduced to a less than significant level. The impacts listed below would remain significant and unavoidable even after mitigation.

Impact AQ-3: Construction and operation of individual development projects following adoption of the project could result in a cumulatively considerable net increase in criteria pollutants for which the region is in nonattainment status under an applicable federal, state, or regional ambient air quality standard. (*Significant and Unavoidable Impact, with Mitigation*)

Impact CR-1: Implementation of the project could cause a substantial adverse change in the significance of an historical resource pursuant to CEQA Guidelines Section 15064.5. (*Significant and Unavoidable Impact, with Mitigation*)

Impact CR-4: Implementation of the project, in combination with other cumulative development, could cause a substantial adverse change in the significance of historical resources pursuant to CEQA Guidelines Section 15064.5. (*Significant and Unavoidable Impact, with Mitigation*)

Impact NOI-1: Construction activities associated with implementation of the proposed project would not result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (*Significant and Unavoidable Impact, with Mitigation*)

Impact TRA-2: Implementation of the project would exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

Impact TRA-6: Implementation of the project, in combination with cumulative development, would exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

6.2 Significant Irreversible Impacts

Pursuant to Section 15126.2(c) of the CEQA *Guidelines*, an EIR must consider any significant irreversible environmental changes that would be caused by a project should it be implemented. Section 15126.2(c) states:

> *"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

Resources that would be permanently and continually consumed by implementation of the project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources. Construction activities related to the various development projects that could result from implementation of the HEU and SCP, though analyzed in the applicable technical section of this EIR, would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline for automobiles and construction equipment. With respect to the operational activities associated with the project's implementation, compliance with all applicable building codes, as well as EIR mitigation measures, would ensure that all natural resources are conserved to the maximum extent practicable. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, and would further reduce reliance upon nonrenewable energy resources. Further, development of new housing under the project would generally occur in areas that are already urbanized and would not occupy undeveloped land where mineral or other resources might be available, or eliminate biological resources permanently, as most of the designated housing sites are already in use and any impacts to biological resources would be mitigated to less than significant levels.

The CEQA *Guidelines* also require a discussion of the potential for irreversible environmental damage caused by an accident associated with proposed projects. During the construction phase of the various development projects that could result from implementation of the project, construction equipment and materials would include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. Once constructed, the completed structures would use and store small quantities of chemicals typical in residences, such as household cleaning solutions, paints and thinners, and motor fuel (e.g., motor vehicles and lawn mowers). As stated in Section 4.8 of this EIR, *Hazards and Hazardous Materials*, these materials are regulated through a series of federal, state, and local laws and regulations. Compliance with these existing requirements would

ensure that the potential to cause significant irreversible environmental damage from an accident or upset of hazardous materials would be less than significant.

6.3 Growth-Inducing Impacts

The CEQA *Guidelines* require that an EIR evaluate the growth-inducing impacts of a proposed action (Section 15126.2[d]). A growth-inducing impact is defined by the CEQA *Guidelines* as:

> *[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth.... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement could result if a project involved construction of new housing. A project can have indirect growth-inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA *Guidelines* also require analysis of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The timing, magnitude, and location of land development and population growth is based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and non-residential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. Because general plans define the location, type, and intensity of growth within a given jurisdiction, they are the primary means of regulating development and growth in California. Since the Housing Element and the SCP are part of the County's General Plan, any updates to the Housing Element and the SCP would, by definition, provide a means to plan for and regulate development in the areas considered as part of the proposed project.

The growth inducing impacts analysis addresses the potential of the project's implementation for unplanned growth inducement in the County of Santa Clara and the broader area. Under CEQA, a project is generally considered to be growth-inducing if it results in any one of the following:

1. Extension of urban services or infrastructure into a previously unserved area;
2. Extension of a transportation corridor into an area that may be subsequently developed; or

3. Removal of obstacles to population growth (such as provision of major new public services to an area where those services are not currently available).

6.3.1 Extension of Urban Services or Infrastructure

The unincorporated areas of Santa Clara County that are the subject of the project, including the housing inventory sites identified in the HEU, are largely built out and highly urbanized. Urban services and infrastructure like roadways, utilities, and public services (police, fire protection, etc.,) are already established and have been in place for decades. Any development associated with the project would essentially be infill in nature. The absence of these types of services is not a constraint to development on the County's selected housing inventory sites. Nearly all of the housing inventory sites identified in the HEU are already developed with residential or commercial uses and are served by existing urban infrastructure and services. Those sites that are not already developed with some type of developed use are located immediately adjacent to or are surrounded by existing urban infrastructure and services. Therefore, implementation of the project would not induce unplanned growth in the County or broader area due to extension of urban services or infrastructure.

6.3.2 Extension of Transportation Corridors

As stated in the discussion above, the unincorporated areas of the County that are the subject of the project, including the housing inventory sites identified in the HEU, are largely built out and highly urbanized. These areas are already served by existing transportation facilities and roadways that lie immediately adjacent to the housing inventory sites identified in the HEU. Any development associated with the project would essentially be infill in nature. The established transportation network in the County and adjoining areas offers local and regional access to and from all of the project planning areas. Any onsite circulation that would be required on individual housing sites would be facilitated by construction of internal streets that would connect to existing and adjacent roadways. Consequently, implementation of the project would not induce unplanned growth in the County or broader area due to extension of transportation corridors.

6.3.3 Removal of Obstacles to Population Growth

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 site as well as an analysis of the infrastructure and planning changes that would be necessary to implement the project.

Projects that are characterized as having significant impacts associated with the inducement of growth are frequently those that would remove obstacles to additional growth, such as the expansion of sewer or water facilities that would permit construction of more development in the service area covered by the new facilities. The project's implementation would not remove

obstacles to additional growth in this manner, as it would be undertaken in an area that currently is served by all utilities and services. Any development associated with the project would essentially be infill in nature. Similarly, if a project would overburden existing infrastructure so as to require construction of new facilities that could result in significant impacts, then the project may be deemed to have a significant growth-inducing impact. Similarly, revising the General Plan and the County's Zoning Ordinance to allow intensified development would increase the County's population, which could trigger indirect commercial growth, or new public services or facilities, to serve the new residents. As discussed in Section 4.13, *Public Services and Recreation*, and Section 4.16, *Utilities and Service Systems*, the implementation of the project is not anticipated to require such additional public service facilities, and no such facilities are currently proposed. It is therefore not possible to speculate as to the location, type, size, and timing of construction for such facilities. However, in the event that a need for new or expanded facilities is identified at some point during the timeframe of the project, any such undertaking would require its own environmental review, mitigation, and compliance with applicable regulations in effect at the time of construction.

Section 4.12, *Population and Housing*, analyzes the project's overall effect on population and housing, including growth-inducing considerations. In terms of housing, development allowed under the proposed project (between 6,198 and 8,441 units) and pending projects (2,609 units) could result in a population increase of between 25,452 and 31,935 persons, based upon an average persons-per-household ratio of 2.89 persons per household.

This planned population growth in the County has been projected and directed by the Association of Bay Area Governments (ABAG) as part of the 6th Housing Element Cycle to meet the region's housing needs allocation. Implementation of the project would require an amendment to the County's General Plan and Zoning Code to accommodate the projected growth. Because general plans define the location, type, and intensity of growth within a given jurisdiction, they are the primary means of regulating development and growth in California. Since the Housing Element and SCP are part of the County's General Plan, any updates to those provisions would, by definition, provide a means to plan for and regulate development in those areas. Additional new residential development that could derive from the project's implementation would therefore be consistent with the growth projections in the County's General Plan as well as applicable regional plans adopted by ABAG and other relevant entities and would help the region meet its regional housing allocation requirements. Consequently, implementation of the project would not induce substantial unplanned population growth that was not previously anticipated.

6.3.4 Conclusions

Implementation of the project would facilitate increased development of residential uses on specific sites in the County and on the Stanford campus. However, it is important to note that while the law requires the HEU to include an inventory of housing sites and requires the County to zone those sites for multifamily housing, the County is not required to actually develop housing on these sites. Future development on the identified sites will be up to the property owners and will be largely dependent on market forces and (in the case of affordable housing) available subsidies.

Regardless, any increased development that could arise on these sites following the project's implementation would be developed in compliance with the General Plan land use and zoning designations. Although on-site infrastructure improvements would occur as part of this development, these improvements would connect to existing infrastructure. No extensions or expansions of infrastructure systems or roads would be required beyond what is needed to serve project-specific demand. Consequently, the project's implementation would not induce unplanned growth in the County or broader area due to extension of urban services or infrastructure. For the above-described reasons, implementation of the project would not cause a new impact related to a substantial increase in population growth and would be in line with the projected growth planned for the area as defined in the County's General Plan and applicable regional planning directives.

6.4 Cumulative Impacts

CEQA defines cumulative impacts as two or more individual impacts which, when considered together, are substantial or which compound or increase other environmental impacts. The cumulative analysis is intended to describe the "incremental impact of the project when added to other, closely related past, present, or reasonably foreseeable future projects" that can result from "individually minor but collectively significant projects taking place over a period of time." (CEQA Guidelines Section 15355). The analysis of cumulative impacts is a two-phase process that first involves the determination of whether a project, together with existing and reasonably foreseeable projects, would result in a significant impact. If there would be a significant cumulative impact of all such projects, the EIR must determine whether the project's incremental "contribution" is cumulatively considerable, in which case, the cumulative impact would be significant (CEQA Guidelines Section 15130).

The analysis of each environmental topic included in Chapter 4, *Environmental Setting, Impacts, and Mitigation Measures*, of this EIR considers possible cumulative impacts and identifies circumstances in which the project would contribute to significant cumulative impacts.

Cumulative significant and unavoidable impacts to air quality (Impact AQ-3), cultural resources (Impact CR-4), and transportation (Impacts TRA-2 and TRA-6) were identified in these cumulative impact analyses. These cumulative analyses assumed that the mitigation measures identified in this EIR would be implemented. Nonetheless, these identified impacts would be cumulatively considerable and not fully mitigable. No other cumulative impacts were determined to be significant after mitigation.