

7. CEQA-Mandated Sections

This section provides an overview of the impacts of the proposed Plan based on the analyses presented in Chapter 4, Environmental Analysis, and Chapter 6, Alternative to the Proposed Project, of this Draft EIR. The topics covered in this section include impacts found not to be significant, growth-inducing impacts, and significant irreversible changes to the environment. A more detailed analysis of the effects that the proposed Plan would have on the environment, and proposed mitigation measures to minimize significant impacts, are provided in Chapters 4.1 through 4.14.

7.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines states:

An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

An Initial Study was prepared for the proposed Project in September 2013 and circulated with the Notice of Preparation (NOP) to interested agencies and the public. A copy of the Initial Study has been included in Appendix A of this Draft EIR. Based on the analysis contained in the Initial Study, it was determined that implementation of the proposed Project would not result in significant environmental impacts to the environmental impact topics listed below and therefore, these topics are not discussed in detail in Chapters 4.1 through 4.14 of this Draft EIR.

As described in Section 4.0, the standards of significance used in this EIR take into consideration Appendix G of the CEQA Guidelines and the City of Palo Alto's *Environmental Criteria Used by the City of Palo Alto* (prepared in 2007 and contained in Appendix B of this EIR). As required by CEQA Guidelines Section 15128, the following possible significant effects have been determined not to be significant and are therefore not discussed further in this EIR for the reasons stated below.

Agriculture and Forestry Resources:

- *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.* In Palo Alto, there are approximately nine acres of Prime Farmland and 11 acres of Unique Farmland. None of the proposed Plan scenarios would involve changes to existing agricultural lands. Therefore, there would be no impact to Farmland of Statewide Importance and this threshold is not included in the analysis in this EIR.

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- *Conflict with existing zoning for agricultural use, or a Williamson Act contract.* The Williamson Act is intended to conserve agricultural open space lands through the use of property tax incentives and voluntary restrictive land use contracts. In Palo Alto, there are a total of 24 properties under Williamson Act Contracts. As described in Chapter 3, Project Description, the proposed Plan would continue to protect existing open space. None of the proposed Plan scenarios would involve changes to existing agricultural lands or alter the City's participation in the Williamson Act program. Therefore, there would be no impact to Williamson Act contracts and this threshold is not included in the analysis in this EIR.
- Woodlands in the EIR Study Area that could fall under California Public Resource Code Section 12220(g) are primarily located in the southern foothills, according to 2006 mapping data from the California Department of Forestry and Fire Protection (CAL FIRE). Mapping data also shows scattered, isolated woodlands within the urbanized areas of the city; these areas are contained within parks, creek corridors, and built-out residential neighborhoods. None of the woodland areas mapped within the EIR study area are proposed for redevelopment, rezoning, or land use changes by the proposed Plan. Therefore, there would be no impact to forestry resources and the following thresholds are not included in the analysis in this EIR:
 - *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).*
 - *Result in the loss of forest land or conversion of forest land to non-forest use.*
 - *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.*

Mineral Resources:

- The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources.¹ The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources as mandated by the Surface Mining and Reclamation Act (SMARA) of 1975. SMARA requires all cities and counties to incorporate in their general plans the mineral designations approved by the State Mining and Geology Board. The classification of these mineral resources is a joint effort of the state and the 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), Scientific Resource Zones (SZ), or Identified Resource Areas (IRAs), as follows: MRZ-1—adequate information indicates that no significant mineral deposits are present or

¹ 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. Development generally results in a demand for minerals, especially construction aggregate.

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likely to be present; MRZ-2—adequate information indicates that significant mineral deposits are present or a likelihood of their presence and development should be controlled; MRZ-3—the significance of mineral deposits cannot be determined from the available data; MRZ-4—there is insufficient data to assign any other MRZ designation; SZ areas—contain unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance; IRA areas—adequate production and information indicates that significant minerals are present. According to the United States Geological Survey (USGS), the majority of the EIR Study Area is classified as MRZ-1, MRZ-3, or MRZ-4, meaning that no significant mineral deposits are present or data does not exist to identify the significance of mineral deposits. A small area is classified as MRZ-2 in the southern portion of the city, adjacent to the San Mateo County/Santa Clara County border north of Foothills Park. The proposed Plan does not propose redevelopment, rezoning, or land use changes in this area. Therefore, there would be no impact to mineral resources and the following thresholds are not included in the analysis in this EIR:

- *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.*
- *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.*

7.2 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth-inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. This section evaluates the proposed Plan’s potential to create such growth inducements. As Section 15126.2(d) of the CEQA Guidelines requires, “. . .it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.” In other words, negative impacts associated with growth inducement occur only where the project would induce growth *and* the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts, consist of growth induced in the region by creating additional demands for housing, goods, and services associated with population or employment increases.

The proposed Project would update the City’s existing Comprehensive Plan and adopt implementing zoning regulations that would address critical issues such as housing affordability, traffic and parking, and the pace and character of development in Palo Alto. This EIR considers four planning scenarios that assume different policies, different amounts of growth, and different transportation investments. The four scenarios are not

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meant to be mutually exclusive; rather they are intended to illustrate several ways in which the City can address important issues that Palo Alto is facing.

Implementation of the proposed Plan would not directly induce growth because it would not extend services to an undeveloped area. Although the proposed Plan does allow additional growth and the planning scenarios do include transportation infrastructure investments, the scenarios do not induce growth in and of themselves. Some growth will occur in Palo Alto and in the region regardless of the final scenario that is identified as the basis for the updated Comprehensive Plan. The four scenarios reflect various perspectives on how Palo Alto might accommodate local and regional growth that is already projected based on current trends; none of the scenarios contemplate land use changes or infrastructure improvements that would induce or indirectly create additional growth beyond what is already expected to occur.

All four scenarios would direct growth to specific areas of the EIR Study Area that are already urbanized. Virtually all new development under the proposed Plan would be in the form of infill development in mixed-use and commercial or industrial areas of Palo Alto. All four scenarios would maintain the existing Comprehensive Plan land use map (with the exception of Scenario 4, which may include a designation change for the Fry's Electronics site), which provides a mixture of housing, shopping, public, and employment opportunities. The proposed Plan commits to only allow development where infrastructure is in place or is planned, and would discourage piecemeal development. The infrastructure itself would serve areas that are already urbanized, making mobility easier, but not making new areas within or outside of Palo Alto easier to develop.

Employment growth that occurs during the life of the proposed Plan could indirectly induce additional growth by contributing to an increased demand for housing, as discussed in detail in Chapter 4.11, Population and Housing, of this Draft EIR. .

The proposed Plan is expected to include policies to control the geographical extent of growth and encourage sustainable patterns of urban land uses, and these are reflected in different ways in the planning scenarios analyzed in Chapter 4. In addition, Chapters 4.1 through 4.14 identify mitigation measures that could be incorporated into the proposed Plan to ensure that it continues to guide future growth in a sustainable manner.

Growth under the proposed Plan would have beneficial effects as well. Implementation of the proposed Plan would provide additional housing for people working in Palo Alto and would also provide additional local job and shopping opportunities for existing and future residents, thereby increasing opportunities for current residents to work and shop locally. The jobs/housing balance that would be achieved varies slightly under the four scenarios. However, as described in Chapter 4.11, Population and Housing, all potential impacts associated with population and housing growth would be mitigated to less-than-significant levels. State law requires the City to promote the production of housing to meet its fair share of the regional housing needs distribution made by the Association of Bay Area Governments (ABAG), and implementation of the proposed Plan would allow the City to satisfy these requirements.

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Overall, while implementation of the proposed Plan would indirectly induce growth, the proposed Plan would accommodate this growth in previously urbanized areas of the city, and all four scenarios seek to pace growth so that this growth occurs incrementally over a period of 15 years.

7.3 SIGNIFICANT IRREVERSIBLE CHANGES

7.3.1 LAND USE CHANGES THAT COMMIT FUTURE GENERATIONS

The four scenarios test varying levels of development by assuming different paces of residential and commercial growth throughout the EIR Study Area. As stated in Section 3.4.1 of Chapter 3, Project Description, of this EIR, the current Comprehensive Plan land use map is likely to remain unchanged. Overall, under all four scenarios, the Comprehensive Plan would continue to emphasize the preservation of existing open space and residential neighborhoods, and the enhancement of neighborhood services. As described in Chapter 4.9, Land Use Planning, Palo Alto's open space lands, single-family residential neighborhoods, and public and institutional lands, which make up over 86 percent of existing land uses, would remain unchanged under all four scenarios. In the remainder of the EIR Study Area, allowed land uses would be largely consistent with current land uses and redevelopment would occur in the form of infill development in areas that are already urbanized. Thus, no irreversible land use changes are expected to occur from the adoption of the proposed Plan.

7.3.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Irreversible changes to the physical environment could occur from accidental release of hazardous materials associated with development activities. However, compliance with State and federal hazardous materials regulations and local emergency plans, as discussed in Chapter 4.7, Hazards and Hazardous Materials, would ensure that potential impacts associated with hazardous materials would be less than significant.

7.3.3 LARGE COMMITMENT OF NON-RENEWABLE RESOURCES

Implementation of the proposed Plan would result in the commitment of limited, renewable resources such as lumber and water. In addition, development allowed by the proposed Plan would irretrievably commit nonrenewable resources for the construction and maintenance of buildings, infrastructure, and roadways. These non-renewable resources include mined materials such as sand, gravel, steel, lead, copper, and other metals. Buildout of the proposed Plan also represents a long-term commitment to the consumption of fossil fuels, natural gas, and gasoline. Increased energy demands would be used for construction, lighting, heating, and cooling of residences, and transportation of people within, to, and from the EIR Study Area. However, all four scenarios would promote paid transit passes for employees in work places with more than 50 employees to offset the consumption of fossil fuels, and Scenarios 2, 3, and would provide employer incentives for carpooling and bicycling. In addition, Scenario 4 would allow concentrated residential

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development that would maximize conservation, energy efficiency, and solar energy generation. With mitigation, all scenarios would include adoption and implementation of an aggressive *Sustainability and Climate Action Plan*, and an aggressive program for eliminating net new vehicle trips from certain types of development.