

CHAPTER 6

Growth Inducement and Other Topics Required by CEQA

Growth Inducement Potential and Secondary Effects of Growth

CEQA Guidelines (§15126.2(d)) require that an EIR evaluate the growth inducing impacts of a proposed action:

Discuss the way 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. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. 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 would result if a project involved construction of new housing. A project can have indirect growth inducement 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. A project would also have an indirect growth inducement effect if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service.

Based on the CEQA definition above, assessing the growth-inducement potential of the Emergency Water Supply and Storage Project involves answering the question: “Will implementation of the proposed project directly or indirectly support economic expansion, population growth, or residential construction?” Water supply is one of the chief, though not the only, public services needed to support urban development. A water service capacity deficiency could constrain future development, particularly if coupled with strong community policy. Adequate water supply, treatment, and conveyance would play a role in supporting additional growth in the City of Palo Alto, but it would not be the single impetus to such growth. Factors

such as the General Plans and policies of the cities and counties and/or the availability of wastewater disposal capacity, public schools, and transportation services also influence business and residential or population growth in the planning area. Economic factors, in particular, greatly affect development rates and locations.

Growth inducement may constitute an adverse impact if the growth is not consistent with the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service and solid waste service. A project that would induce “disorderly” growth that is in conflict with local land use plans could indirectly cause additional adverse environmental impacts and impacts to other public services. Thus, it is important to assess the degree to which the growth accommodated by a project would or would not be consistent with applicable land use plans.

The proposed project is intended to correct the deficiency in the City’s emergency water supply, when compared to the emergency water supply standards recommended by the California Department of Health Services. The proposed project would augment the City’s short-term emergency water supply by approximately 3,125 gpm to be used in the event that the City is cutoff from its SFPUC water supply for an extended period or during drought conditions. Upon notification that the SFPUC source water was again available, City staff would shut down each of the groundwater wells and associated chloramine systems. If the groundwater wells were to exceed limitations on the length of time or amount extracted as described in Section 2, Project Description, the City would need to work with Department of Health Services in accordance with CCR 64414(c) (Standby Sources) to exceed the maximum annual operation limit. As such, implementation of the proposed project as an emergency water supply would not directly foster population growth or result in the construction of additional housing.

The proposed groundwater system would also be used to a limited extent (approximately 1,500 acre-feet per year) for water supply during drought conditions when SFPUC supplies are reduced. The City experienced severe droughts during 1976–77 and 1987–93. The 1987–93 drought profoundly highlighted the deficit between SFPUC’s water supplies and the demands on the SFPUC system. Based on the 1987–93 drought experience, the SFPUC assumes its “firm” capability to be the amount the system can be expected to deliver during historically experienced drought periods. In estimating this firm capability, the SFPUC assumes the potential recurrence of a drought such as occurred during 1987–93, plus an additional 18 months of limited water availability. At current delivery levels, the SFPUC system can be expected to experience up to a 25% shortage 15 to 20% of the time, during multiple-year drought sequences (City of Palo Alto, 2005). Therefore, the City is proposing use of the groundwater system during drought conditions to provide water reliability. During non-drought years, City staff would shutdown each of the groundwater wells and associated chloramine systems. As such, implementation of the proposed project during drought conditions would not directly foster population growth or result in the construction of additional housing.

Planned Growth and Water Demand

The following discussion describes relevant population data, general land use characteristics, growth projections, management plans, and water demand projections established by the General Plans and other planning documents for the City of Palo Alto and Santa Clara County.

City of Palo Alto

According to the *City of Palo Alto Comprehensive Plan* (1998), Palo Alto is comprised of 16,627 acres, or about 26 square miles in 1998. Approximately 40 percent of that area was in parks and preserves and another 15 percent consisted of agriculture and other open space uses. The remaining area (45 percent) was nearly completely developed, with single family uses predominating. Less than one percent of the City's land area consisted of vacant, developable land. Therefore, the amount of urban land in Palo Alto in 2010 was projected to remain essentially the same as it is was in 1998, with growth occurring through infill and redevelopment.

As reported in the Housing Element of the *City of Palo Alto Comprehensive Plan*, Palo Alto's population had been stable during the 25 years prior to 1998. The number of residents was the same in 1995 as it was in 1970 (approximately 56,000) and the average number of people per household declined from 2.7 in 1970 to 2.24 in 1990. As of December 31, 1996, there were 25,588 housing units in Palo Alto. This was an increase of 400 units from 1990.

The City of Palo Alto limits future urban development to currently developed lands through establishment of an urban growth boundary. The City retains undeveloped land west of Foothill Expressway and Junipero Serra as open space, with allowances made for very low-intensity development consistent with the open space character of the area. The City also retains undeveloped Baylands northeast of Highway 101 as open space.

As stated in the *City of Palo Alto Utilities Draft 2005 Urban Water Management Plan*, total water consumption in the City will almost remain constant, increasing only a total of 2.0% from its 2004 level of 13,900 acre-feet per year (AFY) to 14,100 AFY by the end of 2030. This is despite the modest increase of 10.3% expected in total number of accounts, which suggests that, on a use per account basis, water consumption is expected to go down. This is due to conservation efforts expected to be taken by customers including the effects of the plumbing code and water agency induced activities. Examination of 2004 consumption levels reveals that the residential sector (single- and multiple-family dwellings) is responsible for 65% of total water consumption in the City. The business sectors (commercial and industrial combined) consume 27%, and the public facilities and the City facilities consume the remaining 8%.

Santa Clara County

According to the *Santa Clara County General Plan* (1994), growth in the County was projected to reach 1.8+ million persons by 2010. From 1990 to 2010, population was projected to increase by 315,000 persons, with annual growth rates ranging from 12,000 to 22,000 persons per year. Most of the growth in Santa Clara County's population was expected to occur in San Jose and to

a somewhat lesser extent, in the South County, while the North and West Valley cities were expected to experience relatively little population growth. The number of households in Santa Clara County was projected to increase from 520,180 in 1990 to approximately 629,600 in 2010.

In 1973, the Urban Development/Open Space Plan was adopted by the County and the cities, and subsequently incorporated within the guidelines and policies of the Santa Clara County Local Agency Formation Commission. The central concept of the policy framework established in this jointly adopted plan was that future urban expansion take place on a staged, orderly basis only under cities' jurisdiction, and that the County no longer allow urban development under its jurisdiction. The plan explicitly rejected the prospect of continued and indefinite expansion of urban development into hillsides and the remaining valley agricultural lands. The policies created do not foreclose the possibility of further urban expansion by cities; instead, they discourage haphazard and inefficient sprawl and protect from development in natural hazard and resource areas.

The SCVWD is responsible for countywide water management, including flood control, conservation, and wholesale water supplier for most of the county's water retailing services. In 1987, water use countywide approached 400,000 acre-feet, approximately half of which was imported. Latest projections by the SCVWD indicate that the water needed by 2020 may total 538,000 AFY (Santa Clara County, 1994).

Secondary Effects of Growth

Implementation of the proposed project would not result in a direct or indirect increase in population or employment. However, some potentially adverse secondary effects would result from development of planned land uses in the project area from implementation of the City of Palo Alto and Santa Clara County General Plans. Effects which have been identified as significant and unavoidable are impacts to traffic, circulation and parking; hydrology; and public services and utilities (City of Palo Alto General Plan – 1998) and traffic, geology, public services and cultural and historic resources (Santa Clara County General Plan – 2004). No additional impacts are anticipated beyond those identified in the City of Palo Alto General Plan EIR and Santa Clara County General Plan EIR. Local land use plans and specific development plans have been adopted and approved, with the local lead agency adopting a statement of overriding consideration for these significant unavoidable effects.

The City of Palo Alto and Santa Clara County have primary land use jurisdiction and responsibility to regulate growth through the land use planning and development approval process. Other agencies which have decision-making authority to implement mitigation measures related to secondary impacts of growth in the project area are shown in Table 6-1.

**TABLE 6-1
AGENCIES HAVING AUTHORITY TO IMPLEMENT MAJOR MITIGATION MEASURES FOR
GROWTH-RELATED IMPACTS**

Agency	Authority
Association of Bay Area Governments	Formed to provide more effective regional planning in the Bay Area. Charged with providing a framework for orderly regional growth and development; a clearing house for federal grant applications. Responsible for developing regional population and demographic projections.
Santa Clara County	Responsible for planning, land use, and environmental protection of unincorporated areas. Of particular importance are development of presently undeveloped lands, provision of regional solid waste management facilities, and regional transportation, air quality and flood control improvement programs.
The City of Palo Alto	Responsible for adoption of the <i>General Plan</i> and various planning elements and local land use regulations. Responsible for managing wastewater treatment facilities. Adopts and implement local ordinances for control of noise and other environmental concerns. Participates in regional air quality maintenance planning through adoption of local programs to control emissions via transportation improvements. Responsible for enforcing adopted energy efficiency standards in new construction.
Local Agency Formation Commission	Empowered to approve or disapprove all proposals to incorporate cities to form special districts or to annex territories to cities or special districts. Also empowered to guide growth of governmental service responsibilities.
Regional Water Quality Control Board, San Francisco Bay Region	Shares responsibility with SWRCB to coordinate and control water quality. Formulates and adopts water quality control plans. Implements portions of the CWA when USEPA and SWRCB delegate authority, as is the case with issuance of NPDES permits for waste discharge, reclamation, and storm water drainage.
State Department of Health	Responsible for the purity and potability of domestic water supplies for the state. Assists SWRCB and RWQCBs in setting quality standards.
California Air Resources Board	Responsible for adopting and enforcing standards, rules, and regulations for the control of air pollution from mobile sources throughout the state.
Bay Area Air Quality Management District	Adopts and enforces local regulations governing stationary sources of air pollutants. Issues Authority to Construct Permits and Permits to Operate. Provides compliance inspections of facilities and monitors regional air quality. Developed the Clean Air Plan in compliance with the Clean Air Act.
California Energy Commission	Requires energy needs forecasts from public utilities. Considers applications for new energy facilities and certifies as to their need and grants necessary approvals through rigorous regulatory process to assure compliance with environmental protection laws and regulations.
U.S. Fish and Wildlife Service	Requires consultation under Section 7/10 of the Endangered Species Act for projects which could potentially impact endangered or threatened species. Prepares biological opinions on the status of species in specific areas and potential effects of proposed projects. Approves mitigation measures to reduce impacts and establishes Habitat Conservation Plans.
U.S. Army Corps of Engineers	Issues permits to place fill in waterways pursuant to Section 404/408 of the CWA.
California Department of Fish and Game	Issues Stream Bed Alteration Agreements for projects potentially impacting waterways.

SOURCE: ESA, 2006.

Other Topics Required by CEQA

Population and Housing

Construction activities would occur on land designated for public parks, regional/community commercial, and neighborhood commercial that do not support housing units; and single family Residential and major university / major institution that do support housing units. Since the proposed project would not induce population growth, displace existing housing, or displace substantial numbers of people, create imbalance between employed residents and jobs, or cumulatively exceed regional or local population projections, the impact to population and housing would be less than significant.

Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines states the following:

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.

Construction of the project facilities would result in an irretrievable and irreversible commitment of natural resources through the direct consumption of fossil fuels and use of materials. That commitment of resources would end when construction is completed. Implementation of the project would not alter land uses, nor commit future generations to undesirable uses.

References – Growth Inducement and Other Topics Required by CEQA

City of Palo Alto, *Palo Alto 1998-2010 Comprehensive Plan*, July 1998.

City of Palo Alto, *Palo Alto Comprehensive Plan Environmental Impact Report*, 1998.

City of Palo Alto Utilities, *Draft 2005 Urban Water Management Plan*, October 2005.

Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), *Bay Area Census 2000 Data*, available online at <http://www.bayareacensus.ca.gov/>, April 2006.

Santa Clara County, *Santa Clara County General Plan 1995–2010*, December 1994.

Santa Clara County, *Santa Clara County General Plan Environmental Impact Report*, 1994.