



City of Palo Alto

City Council Staff Report

(ID # 7331)

Report Type: Study Session

Meeting Date: 2/6/2017

Summary Title: Stanford University 2018 General Use Permit Application

Title: Update on Stanford University's General Use Permit (GUP) Application to Santa Clara County

From: City Manager

Lead Department: Planning and Community Environment

Recommendation

This is a study session to allow the City Council to receive and discuss a presentation regarding Stanford University's proposal for an updated General Use Permit (GUP) from Santa Clara County. No action is recommended. The City Council will have the opportunity to review and provide direction regarding a formal comment letter from the City to the County on March 6, 2017.

Executive Summary

On November 28, 2016, Stanford University submitted an application to Santa Clara County for a major modification of their current General Use Permit (GUP). If approved, the updated GUP would govern land use and development on the Stanford campus, which is located in unincorporated Santa Clara County, starting in 2018. At this evening's meeting, representatives of Stanford University have agreed to present their proposal to the City Council and answer questions from the Council.

An Environmental Impact Report (EIR) will be required prior to County approval of the University's proposal, and the County has issued a Notice of Preparation, which is included as Attachment A. The notice contains a brief description of the proposal and topics to be analyzed in the EIR. Stanford's application, which includes substantial additional information on a wide variety of topics, is available on line at

<https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/CurrentProjects.aspx>.

County staff has granted the City's request for additional time to comment on the scope of the EIR, and the City Council will discuss a draft comment letter at their meeting on March 6, 2017.

Background

Stanford University is located within unincorporated Santa Clara County and is governed by the County's general plan and zoning. Specifically, there is a "community plan" within the County's general plan which was adopted in 2000 and establishes land use policies and implementation measures specific to Stanford. The University's current GUP also dates to 2000, and is currently being used as the basis for development on campus.

The University is now proposing to update the GUP and submitted an application to the County in November 2016. Santa Clara County requires every applicant to hold a public outreach meeting following filing of an application and Stanford held their meeting on January 25, 2017 at the Mitchell Park Community Center.

The County has also taken the first step in the environmental review process for this proposal, which is issuance of a Notice of Preparation (NOP), indicating that the County will be complying with the California Environmental Quality Act (CEQA) by preparing an Environmental Impact Report (EIR). The City will submit written comments on the environmental document, and Council questions and comments at this evening's study session will help inform preparation of that letter. The Council will have an opportunity to review the draft letter at its March 6, 2017 meeting.

Next Steps

Written comments on the scope of the EIR are due to the County in early March. (The City requested and received an extension of time from the original due date of February 17, 2017.) On March 6th, the City Council will be considering a draft of the City's comment letter, which is expected to address issues of potential concern, including at a minimum:

- Traffic and transportation issues affecting the campus and its surroundings, including:
 - linkages to local and regional bicycle and pedestrian facilities,
 - opportunities for enhanced and consolidated transit (including shuttle) services,
 - additional peak hour traffic congestion/delays anticipated and the effectiveness of Stanford's "no net trips" policy
 - potential lengthening of the peak hours
 - spill over parking in Palo Alto neighborhoods
 - impacts on safe routes to schools
- Public service needs associated with the anticipated growth in housing, students, faculty, and staff including impacts on recreational facilities, fire services, and more
- Impacts on local schools from the addition of housing and school age population
- Storm water detention and potential for increasing or decreasing the risk of downstream flooding
- The ability to assess potential impacts on historic resources, the urban canopy, and aesthetics generally without specificity on building locations and other site changes
- The desire for the County to assume a share of the City's Regional Housing Needs Allocation (RHNA) for the next housing cycle if significant development (non-residential and residential) is approved adjacent to the City boundaries

County environmental staff anticipates that the preparation of the EIR for this project will take 10 months to a year.

Attachments:

- Attachment A: Notice of Preparation Stanford University 2018 General Use Permit



**NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT
FOR THE
STANFORD UNIVERSITY "2018 GENERAL USE PERMIT"**

Project Applicant: Stanford University
File Number: 7165-16P-16GP-16Z-16EIR
Application For: Major Modification to Stanford University's General Use Permit, Community Plan Amendment, Zoning Amendment

As the Lead Agency, the County of Santa Clara will prepare an Environmental Impact Report (EIR) for the proposed project and would like your views regarding the scope and content of the environmental information to be included in the EIR. On November 21, 2016, Stanford University submitted an application to the County to update its General Use Permit (hereafter collectively referred to as the "2018 General Use Permit"), amend the Stanford Community Plan, and amend zoning designations for some parcels to conform to existing conditions on the ground. A brief description of the proposed project, its site boundary, and a summary of the potential environmental effects are attached. The EIR may be used by your agency when considering approvals for the project. The County will make the ultimate determination regarding what level and type of development is approved under the project and what conditions of approval and mitigation measures and/or project alternatives may be imposed.

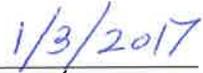
A Public Scoping/Community Meeting to solicit comments for the Notice of Preparation will be held at the Palo Alto Arts Center auditorium located at 1313 Newell Road, Palo Alto, on Wednesday, February 8th, 2017, from 6:00 p.m. and 8:00 p.m. The deadline for your response is February 17th. However, an earlier response, if possible, would be appreciated. Please send your response to:

County of Santa Clara Planning Office
Attention: David Rader
County Government Center
70 West Hedding, 7th Floor, East Wing, San Jose CA 95110
E-mail: david.rader@pln.sccgov.org

Prepared by:
David Rader, Senior Planner



Signature

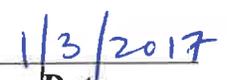


Date

Approved by:
Manira Sandhir,
Principal Planner, AICP



Signature



Date

Introduction

The purpose of an Environmental Impact Report (EIR) is to inform decision-makers and the general public of the environmental effects of a proposed project that an agency may implement or approve. The EIR process is intended to provide information sufficient to (a) evaluate a proposed project and its potential for significant impacts on the environment, (b) to examine methods of reducing adverse impacts; and (c) to consider alternatives to the project.

The EIR for the proposed project will be prepared and processed in accordance with the California Environmental Quality Act (CEQA) of 1970, as amended. In accordance with the requirements of CEQA, the EIR for the Stanford University 2018 General Use Permit and related approvals will include the following:

- A summary of the project;
- A project description;
- A description of the existing environmental setting, potential environmental impacts, and mitigation measures;
- A cumulative impact discussion;
- Alternatives to the proposed project; and
- CEQA required environmental consequences, including (a) any significant environmental effects which cannot be avoided if the project is implemented; (b) any significant irreversible and irretrievable commitment of resources; (c) the growth inducing impacts of the proposed project; and (d) effects found not to be significant.

Project Location

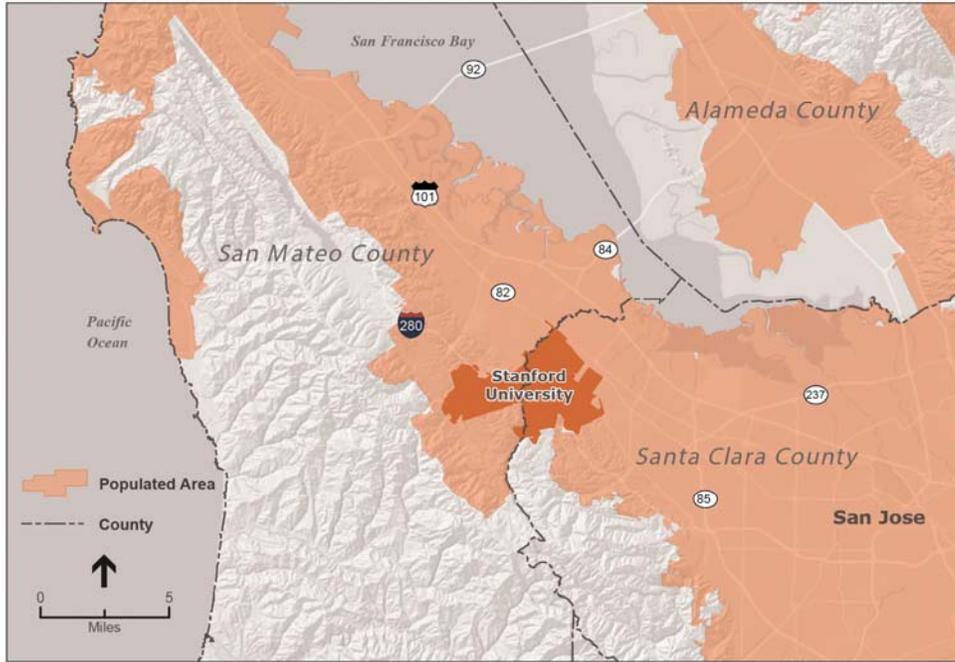
Stanford University (Stanford) is located on the San Francisco Peninsula, approximately 35 miles southeast of San Francisco, and 20 miles northwest of San Jose (see **Figure 1**). Stanford owns approximately 8,180 contiguous acres across six governmental jurisdictions, including unincorporated areas of Santa Clara County and San Mateo County, and the cities of Palo Alto, Menlo Park, Portola Valley and Woodside (see **Figure 2**).

The proposed 2018 General Use Permit would apply only to the 4,017 acres of Stanford lands that are located within unincorporated Santa Clara County, and thus, subject to the land use jurisdiction and regulatory authority of the County of Santa Clara (see **Figure 3**). As shown in Figure 3, the project area is generally located southeast of Sand Hill Road, southwest of El Camino Real, northwest of Stanford Avenue and Page Mill Road, north of Arastradero Road, and east of Alpine Road. Stanford's core campus area, including academic and academic support facilities and housing, is concentrated north of Junipero Serra Boulevard and located within Stanford's Academic Growth Boundary. The largely undeveloped Stanford lands within the foothills south of Junipero Serra Boulevard are located outside of Stanford's Academic Growth Boundary.

Project Description

Background

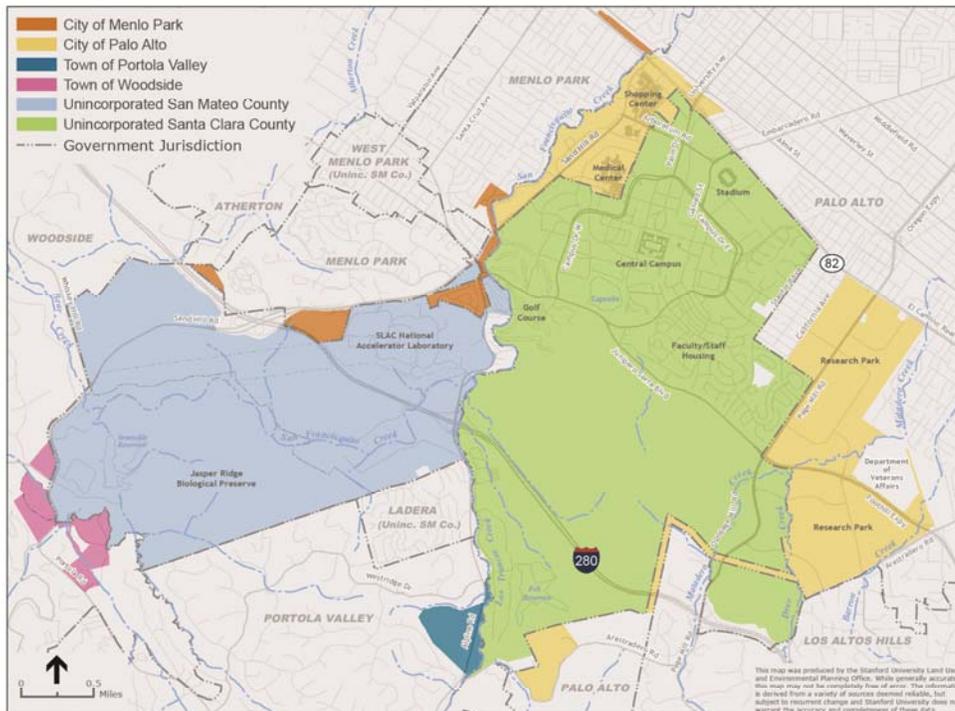
The County of Santa Clara regulates land uses on the Stanford lands within its jurisdiction through several mechanisms, including the General Use Permit adopted in 2000 (hereafter referred to as the 2000 General Use Permit), the Stanford Community Plan (adopted in 2000 as part of the Santa Clara County General Plan), the County Zoning Code, and the 1985 Land Use Policy Agreement between the County of Santa Clara, City of Palo Alto and Stanford University.



SOURCE: Stanford LBRE LUEP, ESA

Stanford 2018 General Use Permit . 160531

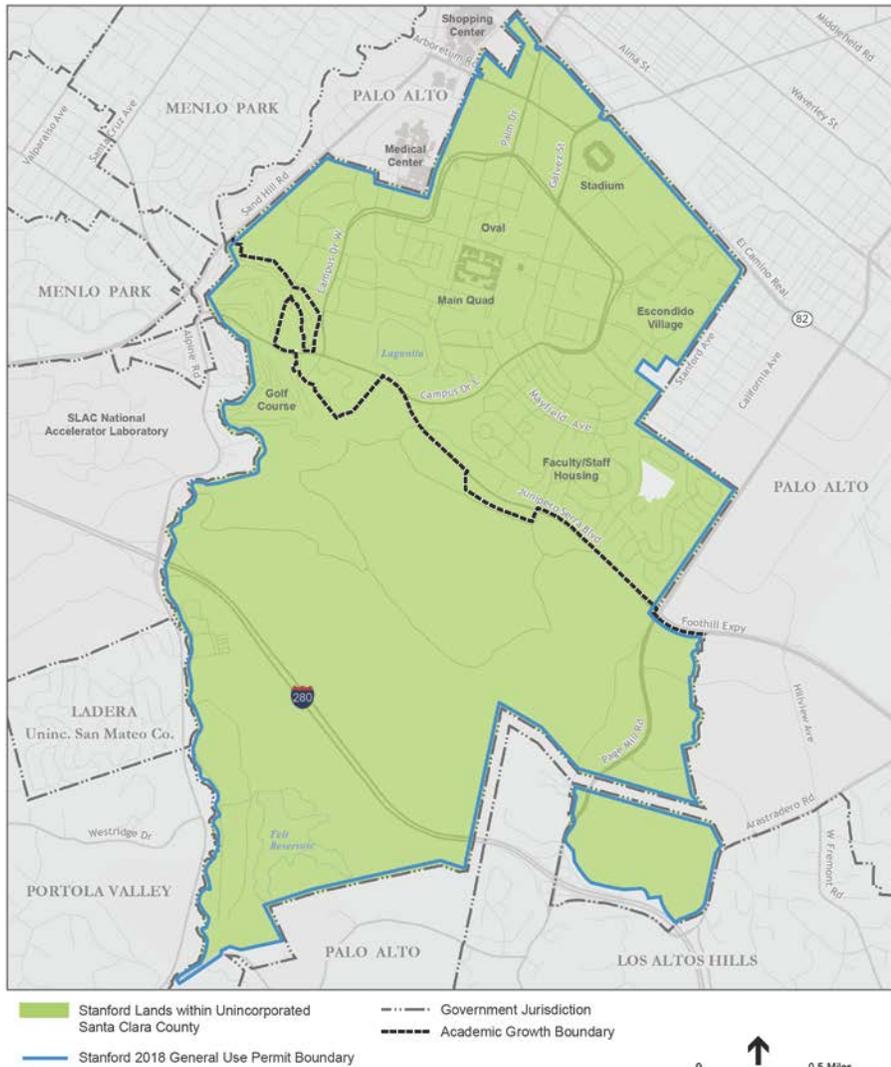
Figure 1
Regional Map



SOURCE: Stanford LBRE LUEP, ESA

Stanford 2018 General Use Permit . 160531

Figure 2
Stanford University Lands



SOURCE: Stanford LBRE LUEP, ESA
Stanford 2018 General Use Permit . 160531
Figure 3
Stanford University Land Subject to
Proposed 2018 General Use Permit

The Stanford Community Plan serves as the General Plan for the campus and maps the goals, strategies, and policies for Stanford lands in unincorporated Santa Clara County. It is guided by six core principles:

- compact urban development;
- academic growth boundary for minimum of 25 years;
- conservation of natural resources;
- housing concurrent with academic development;
- flexibility and accountability; and
- goal of no net new commute trips.

The General Use Permit is the implementation document that permits additional academic facilities and housing units, and establishes conditions of approval, consistent with the goals, strategies, and policies of the Community Plan.

The 2000 General Use Permit as amended allowed the construction of 2,035,000 net new square feet¹ of new academic and academic support uses, 3,018 net new housing units/beds for students, faculty and staff, 2,300 net new parking spaces, and associated infrastructure. In May 2016, the County authorized an additional 1,450 housing units to be constructed under the 2000 General Use Permit (for a total of 4,468 housing units/beds authorized under the 2000 General Use Permit). Stanford estimates that approximately 1.4 million net square feet of the academic and academic support uses, and all of the housing, allowed in the 2000 General Use Permit has been built or approved; and that all remaining authorized development under the 2000 General Use Permit will be exhausted between 2018 and 2020.

Proposed 2018 General Use Permit

On November 21, 2016, Stanford submitted an application to the County to update its General Use Permit (hereafter referred to as the 2018 General Use Permit). The 2018 General Use Permit application, as well as relevant plans, reports and other documents, are located on the County’s website at:

<https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Stanford.aspx>

The proposed 2018 General Use Permit would authorize an increment of campus growth and land use development, anticipated to take place over a period that would extend from approximately 2018 through 2035. The requested amount of growth corresponds to the 2035 Moderate Growth Scenario included in Stanford’s Sustainable Development Study, approved by the County in 2009. **Table 1** presents a summary of existing authorized development and parking at Stanford, and additional development and parking proposed under the 2018 General Use Permit.

TABLE 1: Summary of Existing Authorized Development and Parking at Stanford University, and Additional Development and Parking Proposed Under the 2018 General Use Permit

Development	Academic and Academic Support Space (Net Square Feet)	Housing (Units/beds)	Parking
Authorized Prior to 2000 General Use Permit	8,220,000	9,832	19,351
Authorized Under 2000 General Use Permit	2,035,000	4,468 ^a	2,300
Additional Proposed under 2018 General Use Permit	2,275,000	3,150	0 ^b
Total	12,530,000	17,450	21,651
^a Revised as of May 2016. ^b See, however, proposed 2000-space parking reserve discussed under Proposed Parking, below. Source: Stanford LRBE LUEP, 2016			

Proposed Development

Similar to the 2000 General Use Permit, the proposed 2018 General Use Permit would apply to all land uses within unincorporated Santa Clara County that would require a conditional use permit, Architecture and Site Approval (ASA), or Planning Commission approval under the County Zoning Code. The 2018 General Use Permit would not apply to uses on Stanford lands that are permitted by right under the County Zoning Code.

Under the 2018 General Use Permit, Stanford proposes new academic and academic support space, and housing subject to the following development limits:

- 2,275,000 net new square feet of net new academic and academic support facilities; and
- 3,150 net new housing units/beds, of which up to 550 units would be available for faculty, staff, postdoctoral scholars, and medical residents.

¹ Refers to gross square footage pursuant to Government Code Section 65995-65998.

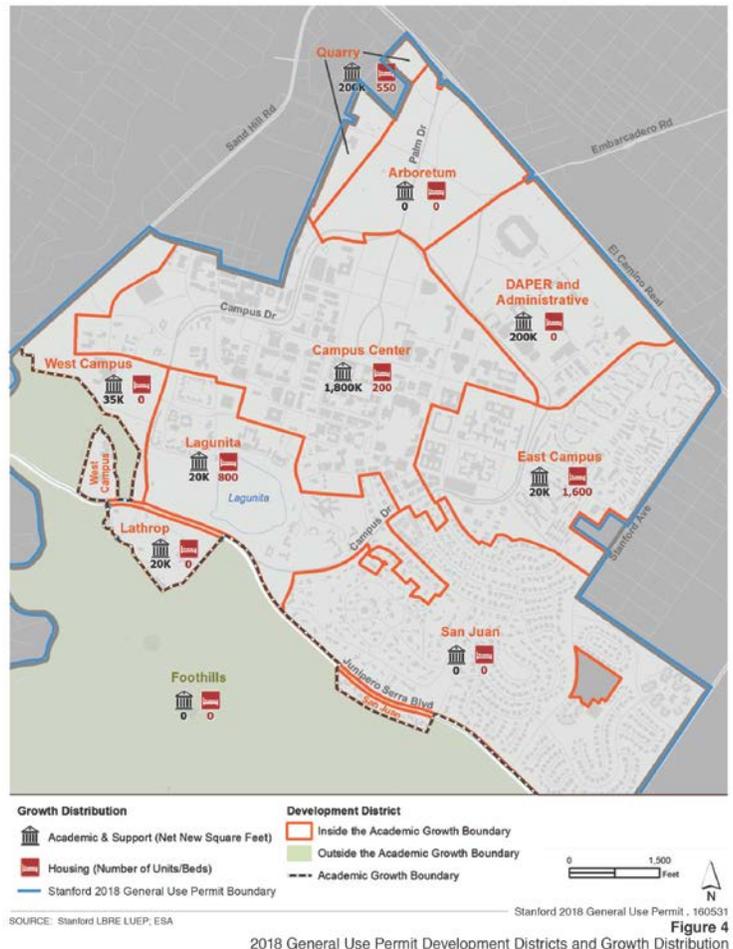
The proposed academic and academic support space and housing units would be constructed on vacant land, infill sites and redevelopment sites within the Academic Growth Boundary (see Figure 3). No site-specific projects and locations have been identified for development under the 2018 General Use Permit. Each individual building or project that would be developed under the 2018 General Use Permit would require submittal of an application to the County at the time proposed, and may be subject to additional review prior to consideration of approval by the County.

Stanford proposes that any remaining unbuilt academic and academic support space square footage that was authorized by the 2000 General Use Permit would be carried over to the 2018 General Use Permit in the event that Stanford does not receive approval for construction of all the remaining square footage by the time the 2018 General Use Permit takes effect.

In the 2000 General Use Permit Stanford identified development districts to estimate the distribution of development within the campus. **Figure 4** presents the proposed distribution of academic and academic support space and housing that is proposed to occur under the 2018 General Use Permit, by development district. Stanford proposes modifications to the district boundaries to better comport to existing zoning boundaries and conditions on the ground. In addition, Stanford proposes minor amendments to Community Plan and zoning designations on some parcels to conform to existing conditions on the ground.

Housing Linkage

As with the 2000 General Use Permit, under the proposed 2018 General Use Permit the development of academic and academic support space would be linked to the development of housing units. **Table 2** presents the proposed housing linkage under the 2018 General Use Permit, and proposed interim milestones for development.² Interim milestones would be required to be met for each increment of 500,000 square feet of academic and academic support space to ensure proposed housing keeps pace with academic and academic support facility growth. Similar to the 2000 General Use Permit Condition F.7, under the 2018 General Use Permit, Stanford seeks a condition that would allow it to build additional housing beyond the proposed development limit of 3,150 housing units/beds, subject to additional environmental review and approval by the Planning Commission.



² As shown in Table 2, under the proposed project, Stanford would use the same housing linkage ratio as was identified in Condition F.8 in the 2000 General Use Permit.

TABLE 2: 2018 General Use Permit Housing Linkage

Academic and Academic Support Space (Net New Square Feet)	Housing Units/Beds at 1/826 (Net New Square Feet)	Cumulative # of Housing Units/Beds
0 – 0.5 M	605	605
0.5 – 1.0 M	605	1,210
1.0 – 1.5 M	605	1,815
1.5 – 2.0 M	605	2,240
2.0 - 2.275 M	333	2,753
Note: This table represents the minimum housing required per the housing linkage ratio. However, the 2018 General Use Permit proposes a greater number of housing units/beds (3,150) than that required by the housing linkage ratio. Source: Stanford LRBE LUEP, 2016		

Stanford has proposed that certain specific types of development not be counted towards the proposed development limits. This exempted development would include 40,000 net new square feet of child care and community center space. Stanford also proposes to continue to be allowed to utilize up to 50,000 net new square feet of construction surge space that was authorized in the 2000 General Use Permit. Surge space is used to temporarily house uses that may be displaced during a construction project.

As proposed, the 2018 General Use Permit would also accommodate construction of campus infrastructure improvements to support development proposed under the 2018 General Use Permit, including, but not limited to, utilities and circulation improvements.

Proposed Parking

Under the 2018 General Use Permit the authorized amount of parking would be unchanged from the limits established by the 2000 General Use Permit. Stanford proposes to exempt certain types of parking at the campus from inclusion in its authorized parking limit, including parking associated with trip-reduction programs, electric vehicles, police and fire department use, and high-density faculty and staff housing. In addition, Stanford University proposes that the 2018 General Use Permit include an option to allow Stanford to construct a 2,000-space parking supply reserve, subject to Planning Commission review and approval, if any one of the following conditions apply: 1) Stanford is achieving its No Net New Commute Trip goal; 2) such parking would not result in a substantial increase in peak-hour commute trips; or 3) unforeseen circumstances occur due to changes in background conditions would require provision of additional parking.

County Approvals

Stanford seeks the following approvals from the County:

- Certification of the 2018 General Use Permit EIR;
- Adoption of a new 2018 General Use Permit;
- Approval of amendments to the County Zoning Map (zoning designation changes are proposed for specific parcels within the campus); and
- Approval of amendments to the Stanford Community Plan.

Potential Environmental Effects of the Project

The County will prepare a program level EIR for the proposed 2018 General Use Permit pursuant to CEQA Guidelines Section 15168. It should be noted that project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at

the time they are proposed to determine whether the environmental effects of the specific project were disclosed in the 2018 General Use Permit EIR.

The EIR will identify the significant environmental effects anticipated to result from implementation of the proposed 2018 General Use Permit. Specific environmental topics addressed will include:

- **Aesthetics** – The EIR will describe the existing visual and aesthetic conditions of the project site and the study area, and will evaluate the effect of the proposed changes envisioned by the proposed project on scenic views, visual character and quality, and light and glare. Mitigation measures will be identified to reduce any potential significant aesthetic impacts will be identified and analyzed, as appropriate.
- **Air Quality.** The air quality analysis presented in the EIR will discuss current air quality conditions and air-pollutant sensitive land uses or activities in the vicinity of the project area; describe the regulatory context for air pollution in the Bay Area; and assess the potential for the project to conflict with the Clean Air Plan, violate any air quality standards, result in cumulatively considerable increase in criteria pollutants, cause emissions of substantial pollutant concentrations, or create objectionable odors. Stanford University has submitted an Air Quality Technical Report for the proposed project, which will be peer-reviewed and, if appropriate, included in the Air Quality section. As needed, mitigation measures to reduce any potential significant air quality impacts will be identified and analyzed.
- **Biological Resources** – The EIR will present information on applicable biological resources in the project area, including special-status wildlife and plant species, natural communities, and wetlands; describe the regulatory framework for biological resources; and evaluate potential for implementation of the proposed project to impact biological resources and/or conflict with Stanford’s Habitat Conservation Plan. As needed, mitigation measures to reduce any potentially significant biological resource impacts will be identified and analyzed.
- **Cultural Resources** –The EIR will present relevant cultural resources information, including data from Stanford’s Archaeological Resources Map and other sources; and will assess the potential for the proposed project to cause a substantial adverse change in the significance of historical resources, archaeological and unique paleontological resources, tribal cultural resources, or potential disturbance of human remains. In addition, Stanford University has submitted an Historic Resources Survey for the proposed project, which will be peer-reviewed and, if appropriate, included in the Cultural Resources section. As needed, mitigation measures to reduce any potentially significant impacts to historic and archaeological resources will be identified and analyzed.
- **Energy Conservation** –Consistent with CEQA Guidelines Appendix F, the EIR will evaluate the potential energy impacts of operation, construction, and transportation associated with the proposed 2018 General Use Permit. Stanford has submitted an Energy Technical Analysis for the proposed project, which will be peer-reviewed and, if appropriate, included in the Energy Conservation section. If needed, mitigation measures that would avoid or reduce the wasteful, inefficient, and unnecessary consumption of energy will be identified and analyzed.
- **Geology and Soils** – The EIR will present relevant information on existing soils and geologic conditions at Stanford. The EIR will address the potential for implementation of the proposed 2018 General Use Permit to result in soil erosion or exacerbate conditions related to unstable soils or slopes. If needed, mitigation measures to reduce any potential significant impacts related to geology and soils will be analyzed and described.
- **Greenhouse Gas Emissions** – The EIR will report greenhouse gas (GHG) emissions associated with implementation of the proposed 2018 General Use Permit, and will assess any conflict with applicable policies or regulations adopted for the purpose of reducing emissions of GHGs. As needed, relevant

policies and features that may serve to minimize GHG emissions will be identified. Stanford University has submitted a GHG Emissions Technical Report for the proposed 2018 General Use Permit, which will be peer-reviewed and, if appropriate, included in the GHG Emissions section of the EIR. If needed, mitigation measures to reduce any potential significant impacts related to GHG emissions will be identified and analyzed.

- **Hazards and Hazardous Materials** – The EIR will discuss existing conditions as it relates to the potential past releases of hazardous materials within the General Use Permit area, describe existing hazardous materials and waste use, storage, and disposal operations at the campus, and discuss the regulatory requirements governing these operations. The EIR will assess whether implementation of the proposed project would have the potential to emit hazardous emissions, exacerbate hazard conditions through ground disturbance, or interfere with emergency evacuation plans. If needed, mitigation measures to reduce any potential significant impacts related to hazards and hazardous materials will be identified and analyzed.
- **Hydrology and Water Quality** – The EIR will generally describe the hydrology and water quality conditions in and around the General Use Permit area, and describe the applicable regulatory agencies and regulations governing water resources at the campus. The EIR will address the potential for implementation of the proposed project to substantially degrade water quality or violate water quality standards, deplete groundwater supplies or substantially interfere with groundwater recharge, substantially increase surface runoff or erosion, or exacerbate flooding hazards from new development. Stanford has prepared a draft Water Supply Assessment for the proposed 2018 General Use Permit, which will be peer-reviewed and, if appropriate, included in the Hydrology and Water Quality section of the EIR. If needed, mitigation measures to reduce any potential significant impacts related to hydrology and water quality will be identified and analyzed.
- **Land Use** – The EIR will describe existing land uses and development trends within the project area; discuss potential inconsistencies of the proposed 2018 General Use Permit with relevant County and other applicable planning documents; analyze potential programmatic land use changes that could occur, and evaluate the compatibility with neighboring land uses. If needed, mitigation measures to reduce any potential significant impacts related to land use will be identified and analyzed.
- **Noise and Vibration.** The EIR will describe the existing ambient noise environment in and around the General Use Permit area; identify applicable noise guidelines and regulations; assess the noise compatibility of the proposed project with existing land uses, and assess construction and operational noise and vibration impacts on existing and proposed future land uses. If needed, mitigation measures to reduce any potential significant impacts related to noise and vibration will be identified and analyzed.
- **Population and Housing** – The EIR will describe the magnitude of potential changes in population and housing associated with the proposed 2018 General Use Permit. The EIR will describe whether the housing demand associated with increased campus population under the proposed project would be met by the existing or future housing supply. The EIR will evaluate if implementation of the proposed project would displace housing and population, from both the Stanford campus and, indirectly, from nearby areas. If needed, mitigation measures to reduce any potential significant impacts related to population and housing will be identified and analyzed.
- **Public Services** – The EIR will describe local police and fire services, as well as primary and secondary schools in districts serving the General Use Permit area and surrounding communities; and assess whether implementation of the proposed 2018 General Use Permit would require the construction of new or expanded public facilities that would result in substantial adverse physical impacts. If needed,

mitigation measures to reduce any potential significant impacts related to public services will be described.

- **Recreation** –The EIR will describe the environmental setting for parks and recreation; discuss the potential for the anticipated population increases and proposed 2018 General Use Permit development to result in a corresponding increases in the use of non-Stanford recreational facilities such that substantial impacts could occur; and assess whether the construction of any proposed recreational facilities would have a significant effect on the environment. Stanford University has submitted a Parks and Recreation Facilities Analysis for the proposed project, which will be peer reviewed and, if appropriate, included in the EIR Recreation section. If needed, mitigation measures to reduce any potential significant impacts related to recreation will be identified and analyzed.
- **Transportation & Circulation** –The EIR will describe existing multi-modal transportation and circulation conditions at study intersections, on freeways, and transit facilities, as well as transit service and bicycle/pedestrian facilities; describe Stanford’s current and proposed transportation demand management programs; present forecasted future conditions using the VTA/CCAG travel demand model; estimate trip generation, trip distribution and vehicle miles traveled associated with the 2018 General Use Permit; and analyze near-term and cumulative transportation conditions with and without the proposed 2018 General Use Permit. Stanford University is submitting a Traffic Impact Study for the proposed 2018 General Use Permit, which will be peer reviewed and, if appropriate, included in the EIR Transportation & Circulation section of the EIR. If needed, mitigation measures to reduce any potential significant impacts related to transportation and circulation will be identified and analyzed.
- **Utilities and Services Systems** –The EIR will describe existing utilities and service systems, including water, wastewater and solid waste services that serve Stanford, calculate increased demand for water and generation of wastewater and solid waste under the proposed 2018 General Use Permit; and assess whether implementation the proposed project would require new or expanded public utilities, the construction or operation of which would have a substantial adverse impact on the environment. The EIR will also consider whether the proposed project would comply with applicable regulations related to solid waste. The evaluation of water demand will be based on a draft Water Supply Assessment prepared by Stanford for the proposed 2018 General Use Permit, and peer reviewed and ultimately approved by the County. The EIR will evaluate if there are sufficient water supplies available to serve the project from existing entitlements and resources. If needed, mitigation measures to reduce any potential significant impacts related to utilities and service systems will be identified and analyzed.
- **Cumulative Impacts.** The EIR will evaluate, issue by issue, the potential for the proposed project, when combined with other development identified in the cumulative setting, to either result in new, or contribute to existing, cumulatively considerable adverse effects on the environment.
- **Alternatives.** CEQA requires that an EIR describe a range of reasonable alternatives to a project (or project location) that feasibly attain most of the objectives, but could avoid or reduce at least one environmental impact (see CEQA Guidelines Section 15126.6).
- **Growth Inducement.** This section will qualitatively evaluate the project’s potential to induce growth and any subsequent environmental impacts that would occur (pursuant to CEQA Guidelines Section 15126[d]).