

6 CEQA-REQUIRED ASSESSMENT CONCLUSIONS

This chapter provides an overview of the impacts of the proposed project based on the technical analyses presented in Chapters 4 and 5. The topics covered in this chapter include growth inducement, unavoidable significant impacts and significant irreversible changes. A more detailed analysis of the effects the Plan would have on the environment and proposed mitigation measures to minimize significant impacts is provided in Chapter 4.

A. Growth Inducement

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 project's potential to create such growth inducements. Not all aspects of growth inducement are negative; rather, negative impacts associated with growth inducement occur only where the project growth would cause adverse environmental impacts.

The Plan would involve direct growth inducement through the construction of up to 591 new housing units by 2035. However, as described in Chapter 4.10, Population and Housing, population and job growth that could occur under the Plan is in line with ABAG projections.

The Plan is not expected to result in indirect growth inducement because all development and infrastructure under the Plan would occur within already developed areas of East Palo Alto. The infrastructure extensions would serve the Plan Area, and no additional areas.

Longer-term employment would be provided through the various industrial, office and retail uses that would be developed under the Plan. These businesses and proposed residential uses would have the potential to create demand for other businesses that may choose to locate near the Plan Area. To

the extent that additional jobs would be created outside of the Plan Area, the Plan could have a growth-inducing effect in other areas of the city or nearby cities. However, since the Plan calls for infill, mixed-use development, and encompasses all of the Ravenswood Business District and 4 Corners area, it is expected that the Plan Area could absorb any demand for additional employment opportunities, and this effect is not expected to be significant.

B. Unavoidable Significant Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. This section lists the impacts for the proposed project that were found to be significant and unavoidable. More information on these impacts is found in Chapter 4 of this Draft EIR.

Impact AQ-1: Conflict with Clean Air Plan Projections and Control Measures. The proposed Plan would increase the rate of vehicle use at a greater rate than population growth. This would lead to greater regional emissions of nonattainment air pollutants (or their precursors) than assumed in the latest Air Quality Plan.

Impact AQ-CUM-1: Conflict with Clean Air Plan Projections and Control Measures. The proposed Plan would contribute to a regional impact by increasing the rate of vehicle use at a greater rate than population growth. This would lead to greater regional emissions of nonattainment air pollutants (or their precursors) than assumed in the latest Air Quality Plan.

Impact TRA-1 (Willow Road and Bayfront Expressway): During the PM peak hour, the intersection currently operates at an unacceptable level of service (LOS E). The addition of project-generated traffic is expected to cause the critical-movement delay on the southbound approach to increase by three seconds. This constitutes a *significant adverse impact* according to the thresholds established by the City of Menlo Park.

Impact TRA-2 (University Avenue and Bayfront Expressway): During the PM peak hour, the intersection currently operates at an unacceptable level of service (LOS E). The addition of project-generated traffic is expected to cause the average control delay at the intersection to increase by 31.6 seconds. This constitutes a *significant adverse impact* according to the thresholds established by the City of Menlo Park.

Impact TRA-9 (Freeway): All of the freeway segments evaluated would be significantly impacted by the implementation of the Specific Plan. Project impacts on freeway segments would diminish as the distance from the Plan Area increases until eventually the project's impact on freeway segments would be below the threshold established for significant impacts. This would be considered a *significant adverse impact* to freeway segments close to the Plan Area.

Impact TRA-CUM-1 (Willow Road and Bayfront Expressway): During the PM peak hour, the intersection is expected to operate at an unacceptable level of service (LOS F) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the critical-movement delay on the southbound approach to increase by 3.0 seconds. This constitutes a *significant adverse impact* according to the thresholds established by the City of Menlo Park.

Impact TRA-CUM-2 (University Avenue and Bayfront Expressway): During the AM and PM peak hours, the intersection is expected to operate at an unacceptable level of service (LOS F) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the average control delay at the intersection to increase by 17 to 28 seconds. This constitutes a *significant adverse impact* according to the thresholds established by the City of Menlo Park.

Impact TRA-CUM-4 (University Avenue and Bay Road): This intersection is expected to operate at an unacceptable level (LOS F) during the AM and PM peak hours under cumulative no project conditions. The addition of pro-

ject-generated traffic is expected to cause the intersection critical-movement delay to increase by at least 143 seconds and the V/C ratio to increase by at least 0.3 during the AM and PM peak hours. The average delay would be 265.1 seconds during the AM peak hour and 346.9 seconds during the PM peak hour. This constitutes a *significant adverse impact* according to the thresholds established by the City of East Palo Alto.

Impact TRA-CUM-6 (University Avenue and Highway 101 SB Off-Ramp): This intersection is expected to operate at an unacceptable level (LOS F) during the PM peak hour under cumulative no project conditions. The addition of Specific Plan-generated traffic is expected to cause the intersection critical-movement delay to increase by 45.9 seconds and the V/C ratio to increase by 0.14 during the PM peak hour. The resulting average delay would be 155.2 seconds. This constitutes a *significant adverse impact* according to the thresholds established by the City of East Palo Alto.

Impact TRA-CUM-7 (University Avenue and Woodland Avenue): This intersection is expected to operate at an unacceptable level (LOS F) during the PM peak hour under cumulative no project conditions. The addition of project-generated traffic is expected to cause the intersection critical-movement delay to increase by 8.5 seconds and the V/C ratio to increase by 0.02 during the PM peak hour. The resulting average delay would be 144.4 seconds. This constitutes a *significant adverse impact* according to the thresholds established by the City of East Palo Alto.

Impact TRA-CUM-11 (Pulgas Avenue and Bayshore Road): This intersection is expected to operate at an acceptable level (LOS D) during the PM peak hour under cumulative no project conditions. The addition of project-generated traffic is expected to cause the intersection to degrade to LOS E with 74.5 seconds of delay during the PM peak hour. This constitutes a *significant adverse impact* according to the thresholds established by the City of East Palo Alto.

Impact TRA-CUM-12 (Embarcadero Road and Bayshore Road): This intersection is expected to operate at an unacceptable level (LOS E) during the AM peak hour under cumulative no project conditions. During the AM peak hour, the addition of project-generated traffic is expected to cause the intersection critical-movement delay to increase by 21.4 seconds and the V/C ratio to increase by 0.056. The intersection would degrade to LOS F with an average delay of 97.4 seconds. During the PM peak hour, the intersection is expected to operate at an acceptable level (LOS D) under cumulative no project conditions. The addition of project-generated traffic is expected to cause the intersection to degrade to LOS E with 67.3 seconds of delay. This constitutes a *significant adverse impact* according to the thresholds established by the City of Palo Alto.

Impact TRA-CUM-13 (University Avenue and Loop Road (new intersection): This intersection would be constructed as part of the Specific Plan. The projected traffic volumes and assumed lane geometry under cumulative plus project conditions is expected to result in LOS F with 98.6 seconds of delay during the PM peak hour. This constitutes a *significant adverse impact* according to the thresholds established by the City of East Palo Alto.

Impact TRA-CUM-14 (Freeway): The project trips on study area freeways are expected to be the same under the cumulative plus project scenario as under the existing plus project scenario. Thus, as previously concluded, the Specific Plan is expected to result in *significant adverse impacts* to segments of Highway 101 and State Route 84 in the vicinity of the project.

C. Significant Irreversible Changes

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which a proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed below.

1. Changes in Land Use that Commit Future Generations

The Plan is intended to guide future development in the Ravenswood/4 Corners area. Although there are some vacant sites in the Plan Area for which development would be stimulated by the Plan, new development under the Plan would largely occur on sites either already developed or in close proximity to existing development. Therefore, the Plan is not expected to result in any land use changes that would commit future generations to uses that are not already prevalent in the Plan Area.

2. Irreversible Damage from Environmental Accidents

Potential environmental accidents of concern include those that would have adverse effects on the environment or public health due to the nature or quantity of material released during an accident and the receptors exposed to that release.

Demolition and construction activities associated with development under the Plan would involve some risk for environmental accidents. However, these activities would be monitored by City, State and federal agencies, and would follow professional industry standards for safety and construction. The land uses proposed by the Plan are similar to existing uses. As a result, the Plan would not pose a substantial additional risk of environmental accidents.

3. Large Commitment of Nonrenewable Resources

Consumption of nonrenewable resources includes issues related to increased energy consumption, conservation of agricultural lands, and lost access to mining reserves. The Plan would require additional electric and gas service, and it would require resources for construction. The City of East Palo Alto has adopted a Climate Action Plan with policies for energy conservation and promotion of renewable energy. These will help to reduce energy consumption and greenhouse gases produced by implementation of the Specific Plan. In addition, the new structures would generally be more energy efficient than the older structures that they replace since new development will need to comply with State regulations such as Title 24, which requires new develop-

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ment to incorporate energy conserving features, as well as city regulations and policies that promote the use of renewable energy sources.

The Plan Area does not contain any agricultural land, nor does it provide access to a mining reserve, so it would not affect those natural resources.

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