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## 7.0 OTHER CEQA REQUIRED CONSIDERATIONS

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### INTRODUCTION

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must also identify (1) significant environmental effects of the proposed project, (2) significant environmental effects that cannot be avoided if the proposed project is implemented, (3) significant irreversible environmental changes that would result from implementation of the proposed project, (4) growth-inducing impacts of the proposed project. It should be noted that although growth inducement itself is not considered an environmental effect, it could potentially lead to foreseeable physical environmental effects, which are discussed under Growth Inducing Impacts below.

### SIGNIFICANT ENVIRONMENTAL EFFECTS

Chapter 2 of this EIR, Summary of Environmental Effects, and sections 6.1 through 6.14 provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation.

### SIGNIFICANT AND UNAVOIDABLE 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. The environmental effects of the proposed project on various aspects of the environment are discussed in detail in Chapter 6. Project-specific and cumulative impacts that cannot be avoided if the 2030 General Plan is approved as proposed include:

#### **Project-Specific Significant and Unavoidable Impacts**

- 6.3-1 Implementation of the proposed General Plan would convert Important Farmland to nonagricultural uses.
- 6.3-4 Implementation of the proposed General Plan, in combination with other development in the region could convert Important Farmland to nonagricultural uses.
- 6.4-1 Implementation of the proposed General Plan could conflict with or obstruct implementation of an applicable air quality management plan.

- 6.4-2 Implementation of the proposed General Plan would result in operational emissions that would contribute substantially to an existing or projected air quality violation.
- 6.4-3 Implementation of the proposed General Plan would result in construction emissions that would contribute substantially to an existing or projected air quality violation.
- 6.7-1 Implementation of the proposed General Plan could cause a substantial adverse change in the significance of a historical resource.
- 6.11-1 Implementation of the proposed General Plan would result in an increase in exterior noise levels.
- 6.11-2 Implementation of the proposed General Plan would result in increases to exterior noise levels associated with traffic noise, per FTA standards.
- 6.11-3 Implementation of the proposed General Plan would result in an increase in interior noise levels.
- 6.11-5 Implementation of the proposed General Plan would result in substantial vibration impacts from construction activity in the policy area.
- 6.14-2 Implementation of the proposed General Plan could result in a deterioration in LOS on roadway segments located in adjacent jurisdictions.
- 6.14-3 Implementation of the proposed General Plan could increase traffic volumes on Caltrans facilities that serve the unincorporated county.

### **Cumulative Significant and Unavoidable Impacts**

- 6.4-7 Cumulative growth within the SVAB, in conjunction with the proposed General Plan, would not be consistent with current growth projections and would result in inconsistencies with local air quality management plans.
- 6.4-8 Implementation of the proposed General Plan, in conjunction with other development within the SVAB, would increase cumulative operational emissions above FRAQMD-established thresholds.
- 6.4-9 Implementation of the proposed General Plan, in conjunction with other construction activities in the SVAB, would increase cumulative construction-generated emissions above FRAQMD-established thresholds.
- 6.11-7 Implementation of the proposed General Plan would increase the noise and vibration levels in the policy area, which, along with the local influences of noise and

vibration sources from other development in the region, could result in an increase in cumulative interior and exterior noise levels.

## **SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS**

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. 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.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project;
- The project would involve a large commitment of nonrenewable resources; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development of the Policy Area would result in the continued commitment of the area to urban development, thereby precluding non-urban uses for the lifespan of the General Plan. Restoration of the policy area to a less developed condition would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While implementation of the proposed General Plan would result in the use, transport, storage, and disposal of hazardous wastes, as described in Section 6.9 Hazards and Hazardous Materials, all activities would comply with applicable state and federal laws related to hazardous materials transport, use and storage, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage.

Implementation of the proposed General Plan would result in the long-term commitment of resources to urban development. The most notable significant irreversible impacts are urbanization of vacant or rural areas and the change in visual character of the county,

increased generation of pollutants, including greenhouse gas emissions and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as water resources during future construction activities. Operations associated with future uses would also consume fossil fuels, water, and natural gas and electrical energy and contribute to climate change. These unavoidable consequences of urban growth are described in the appropriate sections in Chapter 6 of this EIR.

Resources that would be permanently and continually consumed by implementation of the proposed General Plan include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result the inefficient or wasteful use of resources. With respect to future development activities, compliance with all applicable building codes, as well as general plan policies, standard conservation features, and current (and proposed) County programs would ensure that natural resources are conserved to the maximum extent possible. It is possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. Nonetheless, future construction and operation activities related to implementation of the proposed General Plan would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline/diesel for automobiles and construction equipment.

## **GROWTH INDUCING IMPACTS**

As required by section 15126.2(d) of the CEQA Guidelines, an EIR must discuss 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. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental effect, it could potentially lead to environmental effects.

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of new access to an area; a change in zoning or general plan amendment approval); or economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc). These circumstances are further described below:

**Elimination of Obstacles to Growth:** This refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval.

**Economic Effects:** This refers to the extent to which a proposed project could cause increased activity in the local or regional economy. Economic effects can include effects such as the “multiplier effect.” A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect acknowledges that the on-site employment and population growth of each project is not the complete picture of growth caused by the project.

### **Elimination of Obstacles to Growth**

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or general plan designations.

The General Plan would develop land uses within the existing county boundaries which contain established land uses and supporting infrastructure (roads, water distribution, wastewater and drainage collection, and energy distribution). Growth areas within the unincorporated county have been created to identify those areas most logical to support new growth.

The General Plan includes areas of growth within the county which could intensify the uses over what currently exists in some areas. The existing infrastructure capacity could be an obstacle to this growth. The development of roads and other utilities infrastructure would be required to develop land uses in many of the growth areas identified, but specifically in the areas designated Rural Planned Communities in the community of Sutter, and the other overlapping the communities of East Nicolaus and Trowbridge. These areas would require a full level of public services.

An established transportation network exists in the county that offers local and regional access within and around the county. Major highways include State Route (SR) 20, SR 70, SR 99 and SR 113. The county also contains numerous arterial, collector, and neighborhood streets. Circulation within the county would be enhanced by the addition of new roads in vacant or underdeveloped areas, road widenings, bike lanes, new sidewalks and/or repairs, and road repairs associated with future development. Improvements to streets and

roadways are anticipated to occur in order to serve the increased population generated by the General Plan. Although these roadway improvements would be intended to facilitate improved circulation in and around the county, they would also improve the circulation system in the vicinity and could remove an obstacle for further development outside the county limits to the north, south, east and west.

Water and sanitary sewer service is currently only provided in the incorporated cities and in small areas of development within the unincorporated county. A majority of water and sewer services are provided by on-site wells and septic tanks. It is anticipated that new water and sewer pipelines would only be constructed to serve growth expected to occur within the county. However, while these improvements would be designed to accommodate uses proposed in the General Plan and would not be sized or designed to support development outside of the existing county boundaries.

Electricity and natural gas transmission infrastructure presently exists within the county boundaries. Development of growth areas within the proposed General Plan could necessitate the construction of additional distribution systems to convey energy to uses that are not currently served by public energy utilities. It is anticipated that any new electricity or natural gas infrastructure would be designed to accommodate new development and would not be designed to support development outside of the existing county boundaries.

Within the county boundaries and the surrounding area land is primarily undeveloped or used for agricultural activities. Because the growth proposed in the county is focused in areas near existing urbanization (i.e., cities of Yuba City and Live Oak) it is not anticipated that future development within the county would be considered a factor in eliminating an obstacle to further development and growth outside of the county boundaries.

### **Economic Effects**

In addition to the employment generated by the proposed project, additional local employment can be generated through the multiplier effect. The multiplier effect tends to be greater in regions with larger diverse economies due to a decrease in the requirement to import goods and services from outside the region.

Two different types of additional employment are tracked through the multiplier effect. Indirect employment includes those additional jobs that are generated through the expenditure patterns of direct employment associated with the project. For example, workers in the office and retail portions of the proposed project would spend money in the local economy, and the expenditure of that money would result in additional jobs. Indirect jobs tend to be in relatively close proximity to the places of employment and residence.

The multiplier effect also calculates induced employment. Induced employment follows the economic effect of employment beyond the expenditures of the employees within the proposed project area to include jobs created by the stream of goods and services necessary to support businesses within the proposed project. For example, when a manufacturer buys or sells products, the employment associated with those inputs or outputs are considered induced employment.

When an employee from the project goes out to lunch, the person who serves the project employee lunch holds a job that was indirectly caused by the proposed project. When the server then goes out and spends money in the economy, the jobs generated by this third-tier effect are considered induced employment.

The multiplier effect also considers the secondary effect of employee expenditures. Thus, it includes the economic effect of the dollars spent by those employees who support the employees of the project.

Increased future employment generated by employee spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this physical space and its specific location that will determine the type and magnitude of environmental impacts of this additional economic activity. Although the economic effect can be predicted, the actual environmental implications of this type of economic growth are too speculative to predict or evaluate, since they can be spread throughout Sutter County and beyond.

### **Impacts of Induced Growth**

Planning documents such as general plans and the regional SACOG Blueprint try to plan for future growth and plan for potential impacts due to this growth. While these documents attempt to incorporate the most current population projections, new development projects are often not included in the plans.

As discussed earlier in this EIR, the proposed General Plan would increase the population within the county by approximately 18,000 new residents under the adjusted buildout scenario. While growth in the county is an intended consequence of the General Plan, growth induced directly and indirectly by the proposed project could adversely affect the greater region. For example, potential impacts associated with induced growth in the area could include: traffic congestion; air quality deterioration, including an increase in greenhouse gas; loss of habitat and wildlife; increase in impervious area and stormwater runoff; impacts on utilities and services, such as fire and police protection, water, recycled water, wastewater, solid waste, energy, and natural gas; and increased demand for housing.

Specifically, an increase in population-growth-induced housing demand in the region could cause significant environmental effects as new residential development would require governmental services, such as new schools, libraries, and parks. Indirect and induced employment and population growth would further contribute to the loss of open space because it would encourage conversion from undeveloped land to urban uses for housing and infrastructure.

While the proposed General Plan would contribute to direct, indirect, and induced growth in the area, it would also provide residential and employment opportunities for existing and future residents of the county. It would also help prevent suburban sprawl by providing increased density in those areas where existing development already exists or where the infrastructure is available to support additional growth.

### **Cumulative Impacts**

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed project. As defined in CEQA Guidelines section 15355, "Cumulative impacts refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Although project-related impacts may be individually minor, the cumulative effects of these impacts, in combination with the impacts of other projects, could be significant under CEQA and must be addressed (CEQA Guidelines section 15130(a)). Through the evaluation of cumulative impacts, CEQA attempts to ensure that large-scale environmental impacts will not be ignored.

CEQA Guidelines section 15130(b) identifies the following elements as necessary for an adequate discussion of cumulative effects:

- Cumulative context in the form of a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.
- The geographic scope of the area affected by the cumulative effect and a reasonable explanation for the geographic limitation used.
- A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.
- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

The analysis of cumulative effects “need not provide as great detail as is provided for the effects attributable to the project alone,” but the discussion “shall reflect the severity of the impacts and their likelihood of occurrence.” (CEQA Guidelines section 15130(a)(b)) Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of past, present, and probable future projects, are significant, the lead agency then must determine whether the project’s incremental contribution to such significant cumulative impact is “cumulatively considerable” (and thus significant in and of itself). (CEQA Guidelines section 15130(a)) CEQA Guidelines section 15130(a)(2) states “[w]hen the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant.”

Section 15130, subdivision (b)(1)(B)(2), states an EIR must analyze probable future projects which include “projects requiring an agency approval for an application which has been received at the time the notice of preparation is released, unless abandoned by the applicant; projects included in an adopted capital improvements program, general plan, regional transportation plan, or other similar plan; projects included in a summary of projections of projects (or development areas designated) in a general plan or a similar plan; projects anticipated as a later phase of a previously approved project (e.g. a subdivision); or those public agency projects for which money has been budgeted.”

Cumulative impacts for each impact area are identified in each of the technical sections in Chapter 6. A summary of the project-specific and cumulative impacts for the project is included in Chapter 2, Summary of Impacts and Mitigation Measures. The basis of the cumulative analysis varies by technical area. In general, the cumulative context for the technical analyses is full buildout of the policy area assuming the theoretical maximum level of development or holding capacity of the various land use designations. This differs from the Adjusted Buildout assumptions used to evaluate the project-related impacts associated with implementation of the plan itself. Under the full buildout and adjusted buildout scenarios, the same amount of land disturbance would occur, the only difference being the holding capacity of the land. The full buildout assumes over 32,000 new residential units, 87,000 new jobs, and a population of approximately 91,000 people. In addition, over 74 million square feet in industrial and commercial development and 2.5 million in mixed use.

For the specific cumulative context certain technical areas require a different context based upon the area potentially affected by project or the area from which other projects could contribute to the impact. For instance, air quality impacts are evaluated against conditions in the entire Sacramento Valley Air Basin; thus, the analysis takes into consideration emissions beyond the boundaries of the policy area. Similarly, the cumulative

context for traffic assumes regional development that would contribute to traffic on local and regional roadways. Other cumulative analyses, such as cultural or biological resources, consider the potential loss of resources in a broader, more regional context, depending on the extent of the resource in question.

As discussed throughout this EIR, it is unlikely that the County will realize development of the theoretical holding capacity of the land. Yet, because the proposed General Plan includes land that could be developed to its maximum capacity this analysis is included as part of the cumulative discussion. Within the County there are no current projects slated for development with the exception of the Sutter Pointe Specific Plan (SPSP) that was recently adopted by the County Board of Supervisors to ultimately include up to a maximum of 17,500 residential units and up to 49.706 million square feet of commercial/industrial space, as well as parks, schools, and all required public services. Full buildout of the SPSP is anticipated to occur in the next 20 to 30 years. However, with the recent downturn in the economy construction on the project, which was slated to already have begun, is delayed which may further delay full buildout of the specific plan. Buildout of a portion of the SPSP is factored into the growth assumptions for the adjusted buildout scenario while buildout of the full SPSP is factored into the full buildout cumulative scenario for the General Plan.