

CHAPTER 6 CEQA CONSIDERATIONS

6.0 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 Environmental Impact Report (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, and (5) alternatives to the proposed project (evaluated in Chapter 5 Project Alternatives).

6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS

The Executive Summary, and Sections 4.1 through 4.10 of this Draft EIR provide a comprehensive identification of the proposed project's significant environmental effects, including the level of significance both before and after mitigation.

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL 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 the technical sections contained in Chapter 4, Environmental Analysis, of this Draft EIR. There are no project-specific or cumulative impacts that cannot be avoided if the project is approved. All of the impacts can be mitigated to a less-than-significant level through the adoption of recommended mitigation measures.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS

Section 15126.2 (c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental change that would be caused by the proposed project. Generally, a project would result in significant irreversible changes if:

- The primary and secondary impacts would generally commit future generations to similar uses (such as highway improvement that provides access to a previously inaccessible area);
- The project would involve a large commitment of nonrenewable resources (CEQA Guidelines Section 15126.2(c));

- 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).

Implementation of the proposed project would result in the long-term commitment of resources of the project site to urban land use. The development of the proposed project would likely result in or contribute to the following irreversible environmental changes:

- Conversion of undeveloped land. Approximately 48.75 acres of undeveloped land would be converted to urban uses, thus precluding other alternate land uses in the future.
- Irreversible consumption of energy and natural resources associated with the future use of the site.

Development of the proposed project would result in the commitment of the project site to urban development, thereby precluding other uses for the lifespan of the project. Restoration of the site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Resources that would be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels. Wood products, asphalt, and concrete would be used in construction along with gas and diesel fuel. With respect to operational activities, compliance with all applicable state and local building codes, as well as mitigation measures, planning policies, and standard conservation features, would ensure that resources are conserved to the maximum extent possible. The project would incorporate a number of sustainable practices that reduce the consumption of energy. Nonetheless, construction activities related to the proposed project would result in irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline and diesel for automobiles and construction equipment.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by environmental accidents associated with the project. While the project would result in the use, transport, storage, and disposal of minor amounts of hazardous materials during project construction and operation, as described Section 4.4, Hazards and Public Safety, all such activities would comply with applicable local, state and federal laws related to the use, storage and transport hazardous materials, which significantly reduces the likelihood and

severity of accidents that could result in irreversible environmental damage. The project itself does not include any uniquely hazardous uses that would require any special handling or storage. Further, the project does not contain any industrial uses that would use or store acutely hazardous materials.

Implementation of the proposed project would result in the long-term commitment of resources to urban development. The most notable significant irreversible impacts include the use of non-renewable and/or slowly renewable natural and energy resources, such as lumber and other forest products and water resources during construction activities. Operations associated with future uses would also consume natural gas and electricity. These irreversible impacts, which are unavoidable consequences of urban growth, are described in detail in the appropriate sections of this Draft EIR (see Chapter 4).

6.4 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, the stimulation of economic activity within the region, or the establishment of policies or other precedents that directly or indirectly encourage additional growth. Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth would be considered a significant impact if it can be demonstrated that the potential growth, directly or indirectly, significantly affects the environment.

In general, a project could 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, or 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). 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 such

effects as the “multiplier effect.” A “multiplier” is an economic term used to describe interrelationships 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.

Limitations on Analysis of Growth Inducement

Under the provisions of SB 375, an EIR prepared for a residential or mixed-use residential project that is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area a sustainable communities strategy (SCS) “is not required” to discuss growth inducing impacts, or any project specific or cumulative impacts from cars and light-duty truck trips on global warming, or on the regional transportation network (Pub. Res. Code, § 21159.28, subd. (a); Gov. Code, § 65080, subd. (b)(2)(I)).

The Sacramento Area Council of Governments (SACOG) has provided a letter (see Appendix N) stating that the proposed project is consistent with the assumptions for this site contained in the Metropolitan Transportation Plan (MTP)/SCS. An analysis of the proposed project’s growth inducing impacts is therefore not required. However, for the purposes of full public disclosure this EIR includes an evaluation of potential growth inducement.

Elimination of Obstacles to Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect, though not necessarily a significant one. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

Removal of Infrastructure Limitations or Provision of Capacity

The elimination of physical obstacles to growth is considered a growth-inducing effect, though not necessarily a significant one. Physical constraints to growth in the vicinity of the project site include Capital City Freeway to the north and the Union Pacific Railroad (UPRR) embankment to the south of the site.

The proposed project includes sizing of on-site infrastructure to serve development approved under the project. The project site is immediately adjacent to the Capital City Freeway to the

north, which would preclude development immediately north of the site; and the UPRR embankment borders the project site to the east, south, and west, which would preclude inducing growth (there is a residential neighborhood and the American River parkway also east of the site). Development of on-site infrastructure to accommodate the project would not be considered growth inducing because there are existing development limitations (or existing development) that essentially surrounds the site. Utility infrastructure is available to the site, but due to the UPRR embankment, utility lines need to be extended and road access constructed to provide access to the site. To the south and east are developed areas currently served by the City of Sacramento (City), so the connection to existing City infrastructure to serve the project site would not induce growth in this area. Due to the location of the project site, the proposed project would not eliminate any constraints that are currently obstacles to growth in this portion of the City that would hasten development of this area.

Economic Effects

The proposed project would affect the local economy by the construction of new residences that would encourage people to live in Sacramento and would help encourage people to stay in the City to take advantage of proximity to local shops, restaurants, and other amenities in nearby downtown and midtown.

Additional local employment can be generated through the multiplier effect, as discussed previously in this chapter. 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. Based on an Economic Study done for the project by EPS, project construction would generate a one-time economic output of \$207.3 million in Sacramento County, would support approximately 1,455 job years over the life of the project, and would generate total labor income of \$84.6 million (EPS 2013).

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. 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 beyond the expenditures of the residents within the project area to include jobs created by the stream of goods and services necessary to support residences within the proposed project. When a manufacturer buys or sells products, the employment associated with those inputs or outputs are considered *induced* employment.

For example, when an employee of the project goes out to lunch, the person who serves the employee lunch holds a job that is *indirectly* related to 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 and residents 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 the City, Sacramento County, and beyond.

Impacts of Induced Growth

The growth induced directly and indirectly by the proposed project could contribute to the environmental impacts, discussed in Chapter 4, in the City and the County, as well as the greater regional area. Any such environmental effects, however, are too diffuse and speculative to predict or describe with any particularity.

Indirect and induced population growth in the City would further contribute to the loss of open space because it would encourage the conversion of undeveloped land to urban uses for additional housing and infrastructure. However, it is assumed this new growth would occur within areas of the City designated and zoned for development. Again, however, the particular open space that might get converted cannot be predicted with any particularity.

In summary, although the proposed project can be said to induce growth, the consequences of such growth-inducement are too speculative to predict and thus cannot be said to contribute meaningfully to any significant environmental effect. Growth-inducing effects are **less than significant**.

6.5 CUMULATIVE IMPACTS

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed project. This assessment involves examining project-related effects on the environment in the context of similar effects that have been caused by past or existing projects, and the anticipated effects of future projects. As indicated in the CEQA Guidelines, the discussion of cumulative impacts need not provide the same level of detail as project-related impacts. The discussion should be guided by “standards of practicality and reasonableness” (CEQA Guidelines, Section 15130(b)). Although project-related impacts can 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 (14 CCR 15130(a)). Where a lead agency concludes that the cumulative effects of a project, taken together with the impacts of other closely related past, present, and reasonably foreseeable 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).

Cumulative Context

To ensure an adequate discussion of cumulative impacts is included in an EIR, CEQA allows the lead agency to use either a list of past, present, and probable future projects (including those projects outside of the control of the lead agency), or projections included in an adopted local, regional, or statewide plan like a general plan (CEQA Guidelines, Section 15130(b)(1)). The general cumulative impact context for evaluating cumulative impacts for the majority of the technical issue areas evaluated in Chapter 4 of this Draft EIR considers development projections identified in the City's 2030 General Plan, or evaluates the potential loss of resources on a much broader, regional scale. This cumulative impact analyses in this Draft EIR thus do not rely on any list of specific pending, reasonably foreseeable development proposals in the general vicinity of the proposed project.

It is important to note that the basis of the cumulative analysis varies by technical area. For example, traffic and traffic-related air emissions and noise analyses assume development that is planned and/or anticipated in the City, as well as the surrounding unincorporated area, because each contributes to traffic on local and regional roadways that is quantifiable. Operational air quality impacts are evaluated against conditions in the City and surrounding areas within the Sacramento Federal Nonattainment Area for ozone. The cumulative analysis in each of the technical sections evaluates the proposed project's contribution to the cumulative scenario. A description of the cumulative context for each issue area evaluated is included in the cumulative impacts at the end of each technical section of Chapter 4.

6.6 SOURCES

Economic & Planning Systems, memorandum to Megan Norris. August 19, 2013.

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